

## Privacy Notice for the Extraordinary Meeting of Shareholders No. 1/2024

Right Tunnelling Public Company Limited (hereinafter referred to as the “Company”) prioritizes the protection of your personal data in accordance with the Personal Data Protection Act B.E. 2562 and relevant subordinate legislations, as well as any amendments to the Personal Data Protection Act to be made in the future (“**Personal Data Protection Act**”). Therefore, the Company has prepared the Privacy Notice for the shareholders (hereinafter referred to as the “**Notice**”) to inform personal data owners of the details of the collection, use, and/or disclosure of such personal data as follows:

### 1. Collection of Personal Data

The Company will collect the personal data only necessary for its operations, in accordance with the purposes specified in this Notice, and within the legal scope and by lawful means. This includes the following information:

Types of Personal Data	Details
Basic Personal Data	<ol style="list-style-type: none"> <li>1. <b>Personal Information</b> such as name, surname, age, date of birth, gender, nationality, identification number, passport number, or other government-issued identification information.</li> <li>2. <b>Contact Information</b> such as current address, registered address, telephone number, and email address.</li> <li>3. <b>Occupation Information</b> such as work experience, employment history, and management or executive positions in other companies or organizations.</li> <li>4. <b>Financial Information</b> such as bank account numbers and banking details, tax withholding information, and tax identification numbers.</li> <li>5. <b>Shareholding Details</b> such as shareholder registration number, number of shares/bonds held, stock/bond subscriptions, stock/bond purchases, stock sales, rights to dividends, voting rights, proxy appointments, offer to purchase or sell, conditions of rights usage and exercise dates, copies of shareholder inquiries and complaints, and other communications between the personal data owner and the Company as a shareholder, as well as terms and conditions of contracts between the shareholder and the Company.</li> <li>6. <b>Family Information</b> such as marital status, family member information, and dependents, including their shareholding,</li> </ol>

Types of Personal Data	Details
	employment history, and management or executive positions in other companies or organizations.
Sensitive Personal Data	<b>Religion, Blood Type, Criminal Record, and Legal History</b> such as information regarding past legal actions, lawsuits filed, or being subject to legal proceedings, etc.

On the event that the Company is required to collect shareholders' personal data to comply with the law, fulfill a contract, or enter into any agreement or transaction between shareholders and the Company, and should shareholders choose not to provide owners' personal data to the Company, the Company may decline to proceed such operations.

## 2. Purpose of Collecting, Using, or Disclosing Personal Data

The Company will collect, use, or disclose owners' personal data for the purposes and on the legal bases for personal data processing as follows:

Objectives	Legal Bases for Personal Data Processing
<p>1. To comply with legal requirements and for the Company's operational purposes, it is composed of the issuance of share certificates and the maintenance of the shareholder register, preparation of company reports and registration documents, conducting the Company's various transactions, and registering changes with the Ministry of Commerce. Also, the distribution of documents or letters, the disclosure, and reporting of personal data to legally mandated authorities such as the Securities and Exchange Commission, the Stock Exchange of Thailand, and the Thailand Securities Depository are included, in complying with court orders or directives from government agencies with legal authority.</p>	<ul style="list-style-type: none"> <li>• Compliance</li> <li>• Legitimate Interests</li> </ul>
<p>2. To purpose of convening and organizing Shareholders' Meetings, it is composed of verification the identity of personal data owners to participate in the meeting or to perform other actions related to the shareholders' meeting.</p>	<ul style="list-style-type: none"> <li>• Compliance</li> <li>• Legitimate Interests</li> <li>• Consent</li> </ul>

Objectives	Legal Baes for Personal Data Processing
It also involves exercising any rights as a shareholder, voting, appointing proxies, as well as preparing the minutes of the Company's Annual General Meeting of Shareholders and any other documents related to the shareholders' meeting.	
3. To communicate with shareholders on shareholder-Related matters, it is composed of notification of shareholders of their rights, sending meeting invitations, announcements, distributing dividend payments, or providing meeting reports.	<ul style="list-style-type: none"> <li>• Compliance</li> </ul>
4. For any other purposes as previously notified to the personal data owner	<ul style="list-style-type: none"> <li>• Consent</li> </ul>

On the event that the Company collects, uses, or discloses personal data for other purposes than those previously notified, the Company will inform personal data owners of the new purposes and seek their consents in writing or through electronic means.

**3. Methods of Collection and Receive of Personal Data**

The Company will collect and receive the personal data through the following channels:

**3.1 Directly from the Personal Data Owner:** Personal data is collected when data owners carry out transactions with the Company, such as subscribing to stock or registering as a shareholder, or when providing identity verification documents. It also includes interactions during shareholder meetings, participation in Company activities, or data collected from using the Company’s website through the personal data owner's browser.

**3.2 From Third Parties:** This includes data received from references or guarantors, government agencies, or external service providers that collect and store data for the Company.

**4. Personal Data Retention Period**

The Company will retain the personal data for the necessary duration to fulfill the purposes that were previously notified and for which the consent was obtained. This period will last 10 years from the date on which shareholders transfer or dispose of all shares in the Company and cease to be a shareholder.

However, the Company reserves the rights to retain personal data for a longer period if required to comply with the Personal Data Protection Act or any other applicable laws.

*(Translation)***5. Disclosure of Personal Data**

- 5.1 The Company will use or disclose your personal data only for the purposes that were previously notified to you and for which your consent has been obtained, or as required or exempted by law.
- 5.2 The Company has the right to disclose personal data to the following individuals or entities:
- 5.2.1 Employees, staff, directors, managers, and personnel of the Company or its affiliates, including but not limited to individuals whose roles are directly relevant and necessary for processing the personal data of the data owner in line with the specified purposes.
  - 5.2.2 **Partners, business affiliates, service providers, agents, contractors, subcontractors, brokers, or individuals working for or providing services to the Company**, including but not limited to personal data processors that the Company assigns to handle, provide, or manage personal data-related services, such as providers who develop, improve, or maintain the security standards of IT systems, financial institutions, payment service providers, securities companies, consultants, or professional service providers.
  - 5.2.3 **Law enforcement agencies or authorities that request data disclosure by legal authority**, including but not limited to requests for information to support legal proceedings or related processes, such as the Ministry of Commerce, the Securities and Exchange Commission, the Stock Exchange of Thailand, Thailand Securities Depository Co., Ltd., the Anti-Money Laundering Office, the National Anti-Corruption Commission, the Royal Thai Police, the Department of Special Investigation, the Office of the Attorney General, courts, and dispute resolution agencies.
- 5.3 If necessary, the Company may send or transfer personal data to individuals outside the country. The Company will make sure that the recipient meets the required personal data protection standards, in accordance with the guidelines set by the Personal Data Protection Committee and/or as required by Thai law.
- 5.4 The Company may disclose personal data when required by law, legal orders, regulations, court decisions, or when needed to fulfill contracts. This also includes sharing data during corporate restructuring, mergers, or business sales.

**6. Rights of the Personal Data Owner Regarding the Management of Personal Data**

The personal data owner has the following rights regarding the management of their personal data:

- 6.1 Personal data owners have the right to be informed about how their personal data is collected, stored, used, disclosed, or processed.
- 6.2 Personal data owners can withdraw consent for the Company to process their personal data at any time. This does not affect data processing that occurred before the withdrawal.
- 6.3 Personal data owners have the right to access and request a copy of their personal data. They can also request information on the source of any data collected without consent.
- 6.4 Personal data owners can request that their personal data be corrected to ensure it is accurate and complete.
- 6.5 Personal data owners can request that their personal data be erased, destroyed, or anonymized.

*(Translation)*

- 6.6 Personal data owners can request to limit the use, disclosure, or processing of their data, for example, when the data is no longer needed but should be retained for legal claims.
- 6.7 Personal data owners can request that their data be transferred to another data controller through automated means.
- 6.8 Personal data owners can object to the collection, use, disclosure, or processing of their data.
- 6.9 Personal data owners can file a complaint with the relevant authorities if the Company violates the law.
- 6.10 These rights can be exercised by submitting a request through the contact details in Section 10. The Company may refuse such requests if allowed by law.

### **7. Effects of Consent Withdrawal**

The personal data owner understands that they have the right to withdraw their consent for the collection, use, or sharing of personal data previously given to the Company. However, the personal data owner also understands that withdrawing consent will not affect any collection, use, or sharing of personal data that happened before the withdrawal.

### **8. Protection and Security of Personal Data**

The Company prioritizes the security of personal data and follows laws, regulations, guidelines, and best practices for data protection. Security measures, including IT safeguards, are in place to ensure that personal data is not lost, accidentally destroyed, disclosed, misused, or accessed by anyone other than authorized Company employees or data processors.

### **9. Review and Changes to the Privacy Notice**

The Company may update or revise this Privacy Notice to meet legal requirements, adapt to changes in its operations, or follow recommendations and feedback from government agencies. The Company will inform personal data owners of any changes before they take effect.

### **10. Contact Information**

Personal Data Protection Officer

**Right Tunnelling Public Company Limited**

292 Moo 4, Bang Bo Subdistrict, Bang Bo District, Samut Prakan Province

Tel: 02-313-4848 ext. 124

Fax: 02-313-4847

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