

(Translation)

**Privacy Notice for the 2026 Annual General Meeting of Shareholders**

Right Tunnelling Public Company Limited (hereinafter referred to as the “**Company**”) priorities 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, employment history, and management or executive positions in other companies or organizations.</li> </ol>

(Translation)

Types of Personal Data	Details
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 your personal data to comply with the law, fulfill a contract, or enter into any agreement or transaction between you and the Company, and should you choose not to provide your 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 your personal data for the purposes and on the legal bases for personal data processing as follows:

Objectives	Legal Base for Personal Data Processing
<p>1. To comply with legal requirements and for the Company's operational purposes, for example the issuance of share certificates and shareholder register book, 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. For the purpose of convening and organizing Shareholders' Meetings, including verification the identity of personal data owners to participate in the meeting or to perform other actions related to the shareholders' meeting, exercising shareholder's rights, voting, appointing proxies, as well as preparing the minutes of the Company's Annual General Meeting of</p>	<ul style="list-style-type: none"> <li>• Compliance</li> <li>• Legitimate Interests</li> <li>• Consent</li> </ul>

(Translation)

Objectives	Legal Base for Personal Data Processing
Shareholders and any other documents related to the shareholders' meeting.	
3. To communicate with shareholders on shareholder-Related matters, such as notifying shareholders 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 you of the new purposes and seek your 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 Data Subject:** Personal data is collected when data subject carry out transactions with the Company, such as subscribing to stock or registering as a shareholder, or when providing identity verification documents, interactions during shareholder meetings, participation in Company activities, or data collected from using the Company's website through the data subject'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 your 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.

### 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.

*(Translation)*

- 5.2.2 **Partners, business affiliates, service providers, recipients of services, 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**, such as requests for information to support legal proceedings or related processes. Examples of such entities include 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 Data Subject Regarding the Management of Personal Data

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

- 6.1 Data Subject have the right to be informed about the details of the collection, retention period, use, disclosure, or processing of personal data..
- 6.2 Data Subject can withdraw consent for the Company to process their personal data at any time. This does not affect the collection, use, disclosure, or processing of personal data that was consented to before the withdrawal.
- 6.3 Data Subject have the right to access and request a copy of their personal data, including the right to request information on the source of any data collected without consent.
- 6.4 Data Subject have the right to rectify your personal data to ensure that it is accurate, up-to-date, complete, and does not cause misunderstandings.
- 6.5 Data Subject can request that their personal data be erased, destroyed, or anonymize personal data.
- 6.6 Data Subject 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 compliance or for the exercise of legal claims.
- 6.7 Data Subject can request that their data be transferred to another data controller through automated means.
- 6.8 Data Subject can object to the collection, use, disclosure, or processing of their data.
- 6.9 Data Subject can file a complaint with the relevant authorities if the Company violates the law.

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 data subject understands that you have the right to withdraw your consent for the collection, use, or sharing of personal data previously given to the Company. However, you also understand that withdrawing consent will not affect any collection, use, or sharing of personal data that was consented to before the withdrawal.

*(Translation)*

## **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, changes in the Company's operations, or recommendations and feedback from government agencies. The Company will inform you 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: 02-313-4780 ext. 124

Fax: 02-313-4847

Email: [dpo@rtco.co.th](mailto:dpo@rtco.co.th)