

EXTERNAL DATA PROTECTION POLICY

We at Thai CC Innovation Co., Ltd. (the “**Company**”) take our responsibilities under the Personal Data Protection Act B.E. 2562 (2019) (the “**PDPA**”) and other applicable Personal Data (as defined below) protection laws and regulations (collectively, the “**Law**”) seriously. We also recognize the importance of the Personal Data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your Personal Data.

This External Data Protection Policy (this “**Policy**”) is designed to assist you in understanding how we collect, use and/or disclose the Personal Data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your Personal Data.

This Policy shall be effective as of 26, December 2022 and is subject to further changes or revisions (which shall be notified to you.) The Company shall continue to review the effectiveness of this Policy from time to time.

This Policy applies to the processing of Personal Data by the Company within Thailand and elsewhere in the world or processed in the context of our affiliated companies in Thailand. Any breach of the Law or this Policy will be taken very seriously.

If you, at any time, have any queries on this Policy or any other queries in relation to how we may manage, protect and/or process your Personal Data, please do not hesitate to contact us at:

Thai CC Innovation Co., Ltd. Email: bangkok@hokkokubank.co.th TEL: +66(0)2-163-2870

1 INTRODUCTION TO THE LAW

1.1 “**Personal Data**” is defined under the Law to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organization has or is likely to have access. Common examples of Personal Data that we collect from you could include names, national ID number, contact information, date of birth, nationality, passport number, driver’s license, tax ID number, business card, occupation/title, place of work, photographs and video images. Please note that the examples are not exhaustive.

1.2 We will collect your Personal Data in accordance with the Law. In general, before we collect any Personal Data from you, we will notify you of the purposes for which your Personal Data may be collected, used and/or disclosed, as well as obtain your consent, if necessary, for the collection, use and/or disclosure of your Personal Data.

1.3 Your rights under the Law are as follows:

- (a) to access your Personal Data;
- (b) to learn of the source of collection of your Personal Data;
- (c) to revoke consent you have given to us;
- (d) to request to delete, destroy, or anonymize your Personal Data;
- (e) to request to suspend use of your Personal Data by us;

- (f) to request for a copy of your Personal Data;
- (g) to object to collection, use, and disclosure of your Personal Data;
- (h) to access records of communication with the Company regarding your Personal Data;
- (i) to lodge complaint to the Company regarding processing of your Personal Data; and
- (j) to lodge complaint to the overseeing authority for any reason.

2 PURPOSES FOR COLLECTION, USE & DISCLOSURE OF PERSONAL DATA

2.1 The Personal Data which we collect from you may be collected, used and/or disclosed for the following purposes:

- (a) provide consultation service on management strategy, business planning, and other general management issues;
- (b) provide consultation service on information technology and information systems;
- (c) provide consultation service on personnel, labor, welfare, education, and training;
- (d) provide consultation service on establishing a new company and general company's operation;
- (e) conduct investment and capital contribution review;
- (f) conduct research and study on economy and business industry;
- (g) conduct general work related to the above topics in relation to business, economy, and development;
- (h) maintain security on data protection;
- (i) manage enquiries and instructions from you;
- (j) conduct customer due diligence and personal identification in accordance with laws, regulations and policies including our internal policies;
- (k) update you on news and events in relation to the Company's business;
- (l) conduct overseas market research and data analysis;
- (m) report and share your information with our Japanese Head Office, affiliates, and related corporations;
- (n) collect and retain personal data for the purpose of the respective transaction, registration, license, permission, certification, authorization, acknowledgement, taxation or any other action to which the government official sign their signature or execute their authority for or related to the Company;
- (o) maintain contact records of business partners;
- (p) enter into a project agreement with business partners to launch new projects and operate businesses; and
- (q) make disclosures of your information as permitted or required by applicable law, such as disclosures in connection with investigations, to enforce our rights or fulfil contractual or statutory obligations.

(collectively, the "**Purposes.**") Please note that the list above is not exhaustive, although we have afforded our utmost ability to provide as complete a list as possible.

2.2 In order to conduct our business operations more smoothly, we may also be disclosing the Personal Data you have provided to us to our third party service providers, agents, and/or our

affiliates or related corporations, which may be sited in Thailand, or to relevant government authorities when there is legal obligation or legitimate interest to do so, for one or more of the above-stated Purposes. This is because such third party service providers, agents and/or affiliates or related corporations, or relevant government authorities would be processing your Personal Data on our behalf for one or more of the above-stated Purposes. We will rely on the same basis as notified or consented by you for these domestic transfer and processing activities. In such cases, we will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Law and our standards.

- 2.3 In order to conduct our business operations more smoothly, we may also be disclosing the Personal Data you have provided to us to our third party service providers, agents, and/or our affiliates or related corporations, which may be sited outside of Thailand, or to relevant government authorities when there is legal obligation or legitimate interest to do so, for one or more of the above-stated Purposes. This is because such third party service providers, agents and/or affiliates or related corporations, or relevant government authorities would be processing your Personal Data on our behalf for one or more of the above-stated Purposes. If we have contract basis for any such processing, we will rely on such for offshore transfer or processing. However, for non-contract basis transfer or processing, we will rely on your consent as given in your respective Consent Form. In such cases, we will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Law and our standards.

3 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- 3.1 We respect the confidentiality of the Personal Data you have provided to us.
- 3.2 In that regard, we will not disclose any of your Personal Data to any third parties without first obtaining your express consent permitting us to do so. However, please note that we may disclose your Personal Data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:
- (a) as a general principle, cases in which disclosure under any other proper basis is possible;
 - (b) cases in which the disclosure is required based on the applicable laws and/or regulations;
 - (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
 - (d) cases in which there are reasonable grounds to believe that the health or safety of yourself or another individual will be seriously affected and consent for the disclosure of the data cannot be obtained in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;
 - (e) cases in which the disclosure is necessary for any investigation or proceedings;
 - (f) cases in which the Personal Data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorization signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that

the Personal Data is necessary for the purposes of the functions or duties of the officer; and/or

- (g) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest.
- (h) cases in which the disclosure is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering the contract.
- (i) cases in which the disclosure is necessary for legitimate interests of the Company or any other juristic persons other than the Company, except where such interests are overridden by your fundamental rights on your Personal Data.

3.3 The instances listed above are not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to peruse the PDPA.

3.4 In all other instances of disclosure of Personal Data to third parties with your express consent, we will endeavor to provide adequate supervision over the handling and administration of your Personal Data by such third parties, as well as to provide for adequate forms of protection over such Personal Data.

4 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

4.1 You may request to access and/or correct the Personal Data currently in our possession at any time by submitting your request through the following methods:

Thai CC Innovation Co., Ltd.

Email: bangkok@hokkokubank.co.th TEL: +66(0)2-163-2870

4.2 For a request to access Personal Data, we will provide you with the relevant Personal Data within a reasonable time from such a request being made.

4.3 For a request to correct Personal Data, we will undertake the following:

- (a) we will correct your Personal Data as soon as practicable after the request has been made; and
- (b) subject to paragraph 4.4, we will use reasonable effort to send the corrected Personal Data to every other organization to which the Personal Data was disclosed by the organization within a year before the date the correction was made, unless that other organization does not need the corrected Personal Data for any legal or business purpose.

4.4 Notwithstanding paragraph 4.3(b), we may, if you so consent, send the corrected Personal Data only to specific organizations to which the Personal Data was disclosed by us within a year before the date the correction was made.

5 REQUEST TO WITHDRAW CONSENT

- 5.1 You may withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession or under our control at any time by submitting your request through the following methods:

Thai CC Innovation Co., Ltd.

Email: bangkok@hokkokubank.co.th TEL: +66(0)2-163-2870

- 5.2 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter refrain from collecting, using and/or disclosing your Personal Data in the manner stated in your request.
- 5.3 Please note that there may be consequences of withdrawing the consent, which the Company will determine and notify to you before the withdrawal or as soon as possible after the withdrawal.

6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 6.1 We will take appropriate measures to keep your Personal Data accurate, complete, and updated.
- 6.2 We will also take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that your Personal Data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your Personal Data. However, we cannot assume responsibility for any unauthorized use of your Personal Data by third parties which are wholly attributable to factors beyond our control.
- 6.3 We will also take commercially reasonable efforts to ensure that the Personal Data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that Personal Data was collected is no longer being served by the retention of such Personal Data; and (ii) retention is no longer necessary for any other legal or business purposes. Our current policy is to generally retain your certain Personal Data for up to ten years after they cease to be employed, subject to the applicable anonymization procedures and at all times in accordance with our document retention and disposal policy, and applicable laws and regulations.

Last Updated on 26, December 2022