



Personal Data Protection Policy

Khon Kaen Sugar Industry Public Company Limited
and Group Companies

Personal Data Protection Policy

1. Principles and Objectives

Khon Kaen Sugar Industry Public Company Limited and its affiliates, namely, Tamaka Sugar Company Limited, New Kwang Soon Lee Sugar Company Limited, New Krung Thai Sugar Factory Company Limited, Khon Kaen Sugar Power Plant Company Limited, KSL Agro and Trading Company Limited, KSL Material Supplies Company Limited, KSL Real Estate Company Limited, KSL Export Trading Company Limited (collectively referred to as the "Company") recognize the importance of personal data protection. Therefore, this personal data protection policy has been established to determine key practices in the management of personal data under the Company's custody and control to ensure uniformity. This policy also helps to ensure that the collection, use, disclosure ("processing"), and transfer of personal data are conducted in compliance with the Personal Data Protection Act B.E. 2562 (2019), regardless of whether such data exists in the form of documents, photographs, digital files, electronic media, audio recordings, video recordings, or any other format.

2. Scope of Enforcement

This personal data protection policy has a scope of enforcement covering all personal data processing conducted by the Company, as well as any individuals or legal entities who have access to personal data due to the Company's operations. Such parties are required to comply with this policy and as stipulated by law. The personal data processed by the Company refers to natural persons who are customers, contractual parties, farmers, and service users of the Company, whether in the past, present, or future, whose personal data has been collected by the Company through any method. This also includes employees and staff working in the Company, such as managing directors, board of directors, executive committees, shareholders, consultants, permanent personnel, annual contract employees, daily contract employees, probationary employees, outsourced labor, and internship students, collectively referred to as "personal data subjects".

In addition to this policy, the Company may establish privacy notices ("Notices") specifically for personal data processing under any contracts or requirements of the Company, to inform personal data subjects about the personal data being processed, the purposes of processing, the retention period of personal data, as well as the rights of personal data subjects under the law.

Furthermore, for personal data that the Company collected prior to the enforcement of the Personal Data Protection Act B.E. 2562 (2019), the Company will continue to collect and use such personal data under the original purposes. However, any disclosure and other operations that are not the collection and use of the aforementioned personal data shall comply with the Personal Data Protection Act B.E. 2562 (2019) and related laws.

1. Definitions

Company	Khon Kaen Sugar Industry Public Company Limited
Affiliated Companies	Including Tamaka Sugar Company Limited, New Kwang Soon Lee Sugar Company Limited, New Krung Thai Sugar Factory Company Limited, Khon Kaen Sugar Power Plant Company Limited, KSL Agro and Trading Company Limited, KSL Material Supplies Company Limited, KSL Real Estate Company Limited, KSL Export Trading Company Limited

Personal Data Protection Policy

Refers to the policy established by the Company to inform personal data subjects about the Company's data processing and various details as stipulated by the Personal Data Protection Act B.E. 2562 (2019), as well as other relevant laws.

Personal Data

Refers to information relating to a natural person which enables the identification of such person, whether directly or indirectly (excluding information of the deceased specifically), such as name, date of birth, identification card number, address, email, telephone number, bank account information, etc.

Sensitive Personal Data

Refers to personal data concerning racial or ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any other data which may affect the personal data subject in a similar manner.

Personal Data Subject

Refers to a natural person who is the owner of personal data and/or a person who can be identified, whether directly or indirectly, by the personal data, but does not include legal entities established under the law such as companies, associations, foundations, or any other organizations.

Personal Data Controller

Refers to a person or legal entity having the power and duties to make decisions regarding the collection, use, or disclosure of personal data.

Personal Data Processor

Refers to a person or legal entity who operates in relation to the collection, use, or disclosure of personal data as instructed by or on behalf of the personal data controller. Such person or legal entity operating as mentioned is not a personal data controller.

Cookies

Refers to electronic data that will be sent to the data subject's browser to send data back to the server each time the data subject visits a website.

4. Methods of Personal Data Collection

The Company will collect personal data with lawful objectives, scope, and methods. There will be different processes for collecting personal data depending on the context of the interaction between the Company and the personal data subject. The collection of personal data will be conducted only to the extent necessary for operations under the Company's objectives. In this regard, the Company will ensure that the data subject acknowledges and provides consent electronically, or in the form and manner that the Company deems appropriate.

5. Personal Data Collected

5.1 Personal Data of Customers and Contractual Parties

- Information obtained from documents and identification of customers and contractual parties
- Sensitive personal data that may appear in identification documents of customers and contractual parties, such as religion, etc.
- Information that can be linked to other personal data, such as age, date of birth, etc.
- Information regarding various transactions of customers and contractual parties.
- Other information that customers and contractual parties have provided to the Company during coordination with the Company or as requested by the Company.
- Information that the Company collects or creates concerning customers and contractual parties, or information that the Company receives from other persons.
- Any other information that can identify customers and contractual parties.

5.2 Personal Data of Personnel, Employees, and Job Applicants.

- Information obtained from identification documents of personnel, employees, and job applicants, such as name, identification card number, date of birth, address, educational background, work history, etc.
- Sensitive personal data, such as religion, etc.
- Financial information, such as copies of bank account books, etc.
- Information that can be linked to other personal data.
- Personal data that the Company collects or creates concerning personnel, employees, or information that the Company receives from other persons, such as telephone call records, email records, internet usage history, CCTV footage, fingerprint data, etc.

5.3 Personal Data of Other Individuals.

- Information that the Company receives from job applications, such as names-telephone numbers of references, family information of personnel and employees, names-telephone numbers of emergency contacts, information of spouses, children, etc.
- Information that the Company receives from contractual agreements, such as information of guarantors under contracts, etc.

6. Purposes of Collecting, Using, and Disclosing Personal Data

6.1 Processing of Personal Data

The Company will process personal data with the following purposes:

6.1.1 Processing Data Based on Contract

When customers or contractual parties enter into agreements with the Company, it is necessary for customers and contractual parties to provide personal data to the Company so that the Company can process such data for employment, contracting, entering into agreements, or for communicating with customers and contractual parties, or for monitoring and notifying about contract compliance

When personnel apply to work with the Company or conduct transactions related to the Company through various channels, personnel must provide personal data to the Company so that the Company can process such data for consideration, selection, and approval of employment, including the use for calculating and providing work-related rights, determining and disbursing salaries, communicating with personnel, monitoring and notifying benefits received by personnel, notifying changes regarding benefits or rights related to work and duties, answering inquiries, and notifying various changes.

6.1.2 Processing Data Based on Consent

The Company may use the personal data of customers and contractual parties for processing purposes related to entering into agreements with such persons. The Company may need to process sensitive data appearing in identification documents (such as religion) for the purpose of verifying and confirming the identity of such persons.

The Company may use sensitive data of personnel for processing to provide assistance in cases where personnel are ill or need urgent assistance, including facilitating personnel regarding life insurance and medical expense claims.

However, the Company will not process such personal data without prior consent from customers, contractual parties, and personnel.

If customers, contractual parties, and personnel wish to withdraw consent for the processing of personal data in the above cases, customers, contractual parties, and personnel can contact the Company to request withdrawal of consent by notifying through the contact channels specified by the Company.

6.1.3 Processing Data Based on Legitimate Interest of the Personal Data Controller.

The Company may process personal data of customers and contractual parties for management and business operations, and for relationship management according to agreements, including but not limited to operations and invoicing, compliance with internal record-keeping requirements, internal management, auditing, reporting, submitting or filing data, data processing, or other related or similar activities.

The Company may process personal data of personnel for management, preparation of internal reports of the Company, system maintenance for maintaining operational standards and service provision, including tax operations and risk management of the Company, auditing, submitting or filing data, data processing, or other related or similar activities.

6.1.4 Processing Data Based on Legal Obligation

The Company may process personal data of customers and contractual parties to comply with currently applicable laws. This includes compliance with orders from legally authorized persons, legal obligations, rights and duties under the laws that the Company enforces, and/or internal processes, fraud detection, legal or regulatory compliance checks.

The Company may process personal data of personnel to comply with laws related to employment and business operations of the Company, such as the Labor Protection Act B.E. 2541 (and its amendments), the Student Loan Fund Act B.E. 2560, the Provident Fund Act B.E. 2530, etc., as well as other laws that the Company is subject to that require the Company to submit data.

6.2 Disclosure or Transfer of Personal Data

The Company may disclose or transfer personal data of customers, contractual parties, service users, and personnel to third parties only as necessary to fulfill the primary purposes or purposes related to personal data processing. The Company does not conduct marketing for third parties and does not disclose or transfer personal data to third parties for marketing purposes.

6.3 Transfer of Personal Data to Foreign Countries

In cases where the Company needs to transfer personal data of customers, contractual parties, service users, and personnel to foreign countries, and the destination country has personal data protection standards lower than the criteria prescribed by law, the Company will ensure that the transferred personal data receives adequate protection. For example, the Company may need to obtain contractual confirmation from third parties who have the right to access such personal data that the data will be protected under personal data protection standards equivalent to those of Thailand.

6.4 Storage and Retention Period of Personal Data

The Company has a policy for storing personal data of customers, contractual parties, service users, and personnel as follows:

6.4.1 The Company stores personal data of customers, contractual parties, and personnel in both document form (Hard Copy) and digital files (Soft copy).

6.4.2 6.4.1The Company stores personal data of customers, contractual parties, and personnel at the Company's premises, with appropriate security measures for personal data protection.

6.4.3 The Company will retain personal data according to the period specified by laws specifically governing personal data retention, such as the Accounting Act B.E. 2543 (2000), the Computer Crime Act B.E. 2550 (2007), etc.

6.4.4 In cases where the law does not specify a specific retention period for personal data, the Company will review the retention of personal data of customers and contractual parties every 10 (ten) years, and personal data of personnel every 5 (five) years from the effective date of this policy, to consider the necessity of retaining personal data of customers, contractual parties, and personnel appropriately for the Company's operations.

6.4.5 6.4.1 When there is no longer a necessity, or the Company no longer has the right to store personal data of customers, contractual parties, and personnel, the Company will destroy such personal data using methods that prevent the Company from reusing such data, and will complete this process within 30 (thirty) days from the date of reviewing the necessity of personal data retention or the date when the right to store such personal data no longer exists.

6.5 Control of Access to Personal Data

The Company establishes regulations for all personnel to follow when accessing personal data of customers, contractual parties, and other personnel. Personnel who can access such personal data must be those who need to know the information to perform their duties only, such as personnel with human resources responsibilities, personnel with accounting and finance responsibilities, personnel who manage and administer contracts between the Company and contractual parties, attorneys responsible for legal cases, etc.

The Company has security measures for personal data of customers, contractual parties, and personnel in physical, electronic, and operational system aspects that meet standards and can be practically implemented. The Company will inspect and review personal data security measures annually.

7. Rights of Personal Data Subjects

Customers and contractual parties can exercise their rights under conditions prescribed by law and the Company's rights management processes as follows:

- 7.1 Right to withdraw consent for the processing of personal data that they have given to the Company. This right can be exercised throughout the period that personal data is still stored by the Company.
- 7.2 Right of access to their personal data and the right to request copies of such personal data, including the right to request that the Company disclose the acquisition of personal data for which they have not given consent to the Company. For privacy and security of personal data, the Company may request customers, contractual parties, service users, and personnel to verify their identity before the Company provides the information.

- 7.3 Right to rectification of their personal data to ensure accuracy.
- 7.4 Right to erasure of their personal data for certain reasons.
- 7.5 Right to restriction of processing of their personal data for certain reasons.
- 7.6 Right to data portability of their personal data provided to the Company to other data controllers or to the customers, contractual parties, service users, and personnel themselves for certain reasons.
- 7.7 Right to object to the processing of their personal data for certain reasons.
- 7.8 Right to lodge a complaint with relevant authorities if they believe that the processing of personal data is unlawful or does not comply with personal data protection law.

If customers, contractual parties, service users, and personnel exercise their rights under items 7.1, 7.4, 7.5, 7.6, or 7.7 above, they must accept the consequences regarding the legal relationships that are related to or binding with the Company and cannot make any claims against the Company, unless the processing or transfer of personal data by the Company is unlawful or contrary to the agreement made with customers, contractual parties, and personnel.

Any request to exercise the aforementioned rights may be limited by relevant laws, and there may be some cases where the Company can legitimately refuse the request, such as in cases where the Company must comply with laws or court orders. The Company will consider and notify the result of the request within 30 (thirty) days from the date the Company receives such request to the data subject.

If customers, contractual parties, and personnel have additional questions about their rights, they can learn more at <http://www.kslgroup.com>

8. Changes to the Personal Data Protection Policy

The Company will regularly review this personal data protection policy to ensure compliance with practices, laws, regulations, and announcements related to personal data protection. If there are any changes to the personal data protection policy, the Company will notify by posting the information on the Company's website as soon as possible. Currently, the personal data protection policy was last reviewed on November 1, 2022.

9. Contact Channels

In case personnel or service users have any questions, suggestions, or comments regarding the personal data protection policy and practices, personnel or service users can contact the Company through the channels specified by the Company as follows:

9.1 Personal Data Controller

Name	Khon Kaen Sugar Industry Public Company Limited
Address	No. 503, K.S.L. Tower, 9th Floor, Sri Ayutthaya Road, Thanon Phaya Thai Sub-district, Ratchathewi District, Bangkok 10400
Contact	Tel. +662-642-6191-9 Fax +662-642-6097-9 Email HR@kslgroup.com

9.2 Personal Data Protection Officer

Name	Personal Data Protection Committee
Address	No. 503, K.S.L. Tower, 9th Floor, Sri Ayutthaya Road, Thanon Phaya Thai Sub-district, Ratchathewi District, Bangkok 10400
Contact	Tel. +662-642-6191-9 Fax +662-642-6097-9 Email HR@kslgroup.com