

SIC-BC-PLC-2024-017

Personal Data Protection Policy

Silicon Craft Technology Public Company Limited

1. Reasons for regulations

The Personal Data Protection Act B.E. 2562 (2019) was regulated to effectively protect personal data according to international standards. Silicon Craft Technology Public Company Limited (“The Company”) recognizes the importance of personal data protection and the restriction of individual freedom. In a bid to protect the personal data efficiently with remedial measures for the data subject from the infringement of personal data rights under the Personal Data Protection Act B.E. 2562 (2019), the Company has approved the personal data protection policy as a framework and practical guideline for legal compliance to foster trust by customers, employees, and related parties.

2. Objective

1. To have a framework and practical guideline in accordance with the Personal Data Protection Act B.E. 2562 (2019).
2. To manage the Company’s personal data efficiently and strictly according to the internal and external regulations.
3. To control and monitor the collection, use, and disclosure of the Company’s personal data with appropriate and sufficient security measures for the prevention of any risks that shall affect the Company and the data subject regarding the confidentiality, reliability, integrity, and availability of the data system and information technology.
4. To establish the Company’s internal working processes for control of personal data.
5. To promote the awareness and responsibility among the directors, management team, and employees on the importance of the Company’s personal data.

3. Scope

The personal data protection policy under this regulation covers all of the Company’s operations on the collection, use, disclosure, and alteration or any actions on personal data.

4. Definition

“Personal data”	means	Data of a person which enables for directly or indirectly identifying to such person except data of the deceased in particular
“Sensitive data”	means	Personal data as regulated in Section 26 of the Personal Data Protection Act B.E. 2562 (2019), including race, ethnicity, political opinion, religious doctrine or philosophy, sexual behavior, criminal record, health data, disabilities, labor union information, genetic and biological data, or any others which shall affect the data subject in the same manner as specified by the Personal Data Protection Committee
“Data Subject”	means	Directors, executives, management team, employees, shareholders, customers, and related persons
“Board of Directors”	means	Persons appointed by the shareholders as their representatives, responsible for making important decisions on the Company’s policies and strategies
“Executives”	means	Top executives, including the Chief Executive Officer and the Chief Officer of various divisions
“Managers”	means	Department manager, supervisor, or equivalent
“Employees”	means	The Company’s full-time employees and contract employees
“Clients”	means	Individuals and the juristic persons’ committee who use the Company’s services
“Related persons”	means	Individuals who are the Company’s contractors, sellers, and service providers, including those who contact for particular activities such as directors or attorneys or shareholders of the juristic persons as the Company’s contractors, product sellers, and service providers, as well as those who contact for particular activities
“Data Processor”	means	A person or a juristic person who operates the collection, use, or disclosure of personal data in accordance with the instructions or on behalf of a data controller
“Data Controller”	means	A person or a juristic person who has the authority to make decisions on the collection, use, or disclosure of personal data

“Data Protection Officer: DPO” means A person or a working group designated to advise and monitor the operations of personal data processors, employees, management team, and those related to the collection, use or disclosure of personal data, including deletion or destruction and confidentiality of personal data information that they obtain or know and coordinate with the Office of the Personal Data Protection Commission, while taking other actions according to the law

5. Roles, Duties, and Responsibilities

5.1 Board of Directors

Consider for the approval of regulations on personal data protection policy required by law.

5.2 Executives

- 1) Determine, review, and consider for the approval of regulations on personal data protection policy in compliance with the law.
- 2) Encourage the Company to efficiently operate the protection of personal data, including the appointment of a personal data protection officer (DPO).
- 3) Monitor and set up appropriate measures to solve personal data protection problems in a quick and timely manner.
- 4) Approve orders and announcements for the Company’s internal operations in accordance with the regulations on personal data protection policy.

5.3 The management and employees

- 1) Comply with the regulations on personal data protection policy. and strictly related laws.
- 2) Report to supervisors and related governance agencies for immediate notification upon the discovery of non-compliance with the personal data protection policy.

6. Personal Data Protection Policy

6.1 Collection, use, disclosure, and destruction of personal data

- 1) The Company shall collect, use, and disclose personal data as necessary and appropriate under the objectives for the benefit of carrying out the Company’s mission. The Company must ask for consent from the data subject in collecting, using or disclosing personal data and arrange for the data subject to be notified on such matter or at the time of data collection, unless the provision of law on personal data

protection or other related laws allow the Company to do otherwise. The request for consent must be made in writing or through an electronic system, except on the condition that the consent cannot be obtained by such means.

- 2) The Company shall not collect personal data from sources other than the data subject directly without the consent of the data subject, unless exempted by law.
- 3) The Company shall not collect personal data on race, ethnicity, political opinions, religious doctrine or philosophy, sexual behavior, criminal records, health data, disabilities, union information, genetic and biological data or any other similar information without the consent of the data subject, unless exempted by law.
- 4) The Company shall record various transactions according to the law for inspection by the data subject and the Office of the Personal Data Protection Commission.
- 5) The Company shall collect, use or disclose personal data in order to provide services in accordance with contractual obligations and relevant laws, rules, regulations, while increasing the efficiency of such services as deemed beneficial to the data subject.
- 6) The Company shall not disclose personal data to third parties without the consent of the data subject, unless it is a disclosure required by law.
- 7) The Company shall delete or destroy personal data or make the data non-identifiable to the data subject after the expiration of the storage period according to the Company's order or the period specified in other relevant laws or when the data subject withdraws consent or opposes the collection, use or disclosure of data as permitted by law.

6.2 Security for personal data

- 1) The Company shall provide appropriate security measures for personal data to prevent data loss, unauthorized access, destruction, use, alteration, modification, or disclosure of personal data without permission, and review measures when necessity or technological changes.
- 2) The Company shall supervise the personal data processor to collect, use or disclose personal data with safety, according to relevant laws, rules, and regulations.
- 3) In a bid to disclose personal data to other persons or juristic persons, the Company must prevent those persons from unauthorized or inappropriate use or disclosure of personal data.
- 4) Provide an investigation process to perform deletion or destruction of data after the expiration of the storage period or upon the request or withdrawal of consent by the data subject.

- 5) In case of a breach of personal data which is at risk of affecting the rights and freedom of individuals, the Company shall notify the personal data breach to the Office of the Personal Data Protection Commission within 72 hours from the knowledge of such incident. If the breach is at risk of affecting the rights and freedom of individuals, the data subject of personal data shall be notified without delay.

6.3 The rights of data subject of personal data

The data subject of personal data can exercise their rights as specified by law as follows:

- 1) The right to request to access and obtain a copy of personal data or disclosure of the acquisition of data without the consent, which the Company must process within 30 days from the date of receiving such request.
- 2) The right to object the collection, use or disclosure of personal data as permitted by law.
- 3) The right to obtain or request for personal data to be sent or transferred to other persons for the purposes which the Company can manage with automatic tools or devices.
- 4) The right to request deletion of personal data from the system or destruction or suspension or deidentification of the personal data of data subject unless in compliance with relevant laws.
- 5) The right to request the correction of personal data to be accurate, current, complete, and not misleading.
- 6) The right to withdraw previously given consent or to not allow personal data to be collected, used, disclosed, except as required by law.
- 7) The right to request for suspension of personal data use as permitted by law.

7. Channel of the Company's contact

Data Protection Officer: DPO

Email: privacy@sic.co.th

Silicon Craft Technology Public Company Limited

40 Thetsabanrangsan Rd., Ladyao, Chatuchak, Bangkok 10900

Tel: 66 (0) 2589-9991 Fax: 66 (0) 2589-8881

8. Review and improvement of policy

The Personal Data Protection Policy must be reviewed every 3 years or when there is a change in the law or related regulations or changes according to the environment.

This Personal Data Protection Policy was firstly approved by the Board of Directors Meeting No. 4/2021 held on May 13, 2021. It was recently reviewed and approved by the Board of Directors Meeting No. 4/2024 held on July 18, 2024.

This announcement made on July 18, 2024.



(Dr. Bodin Kasemset)

Chief Executive Officer