

SIC-BC-PLC-015

Policy on Personal Data Protection

Silicon Craft Technology Public Company Limited

1. Reason for Issuance

The Personal Data Protection Act B.E. 2562 (2019) was enacted to ensure the protection of personal data in accordance with international standards. Silicon Craft Technology Public Company Limited (the “Company”) recognizes the importance of personal data protection and the limitation of individuals' rights and liberties only to the extent necessary to ensure effective protection of personal data and to provide effective remedies for data subjects whose rights relating to personal data have been violated under the Personal Data Protection Act B.E. 2562 (2019). Accordingly, the Company has approved this Policy on Personal Data Protection to serve as the framework and guidelines for compliance with the applicable laws and to maintain the trust and confidence of customers, employees, and other related persons.

2. Objectives

- 2.1 To establish a framework and guidelines for the Company to comply with the Personal Data Protection Act B.E. 2562 (2019).
- 2.2 To ensure that the Company's management of personal data is effective and in strict compliance with all applicable internal and external rules and regulations.
- 2.3 To establish appropriate governance over the collection, use, and disclosure of personal data by the Company in an orderly manner, with adequate and appropriate security measures to prevent risks that may affect the Company and data subjects with respect to the confidentiality of systems and information, the integrity of information systems, and the availability of information technology.
- 2.4 To establish internal operating procedures for the Company's supervision and control of personal data.
- 2.5 To promote awareness among directors, executives, managers, and employees of the importance of, and their responsibility for, the Company's personal data.

3. Scope

This Policy on Personal Data Protection applies to all operations of the Company relating to the collection, use, disclosure, amendment, modification, or any other processing of 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, managers, 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
“Customers”	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

To consider, approve, and periodically review the Policy on Personal Data Protection in accordance with applicable laws.

5.2 Executives

- 1) To develop, review, and propose revisions to the Policy on Personal Data Protection for the Board of Directors' consideration and approval, ensuring compliance with applicable laws.
- 2) To support the Company in implementing effective personal data protection measures, including the appointment of a Data Protection Officer (DPO).
- 3) To supervise personal data protection practices and ensure that appropriate, prompt, and timely corrective actions are taken to address personal data protection issues.
- 4) To approve internal orders, announcements, and operating procedures to ensure consistency with the Policy on Personal Data Protection.

5.3 Managers and Employees

- 1) To strictly comply with the Policy on Personal Data Protection and all applicable laws and regulations.
- 2) To immediately report to their supervisors and the Compliance Function any operations or practices found to be inconsistent with the Policy on Personal Data Protection.

6. Policy on Personal Data Protection

6.1 Collection, Use, Disclosure, and Disposal of Personal Data

- 1) The Company shall collect, use, and disclose personal data only to the extent necessary and appropriate for the purposes relating to the Company's operations. The Company shall obtain the data subject's consent prior to the collection, use, or disclosure of personal data and shall notify the data subject of such collection, use, or disclosure before or at the time of collection, unless otherwise permitted under the Personal Data Protection Act B.E. 2562 (2019) or other applicable laws. Such consent shall be obtained in writing or through electronic means, unless the nature of the circumstances makes it impossible to obtain consent by such methods.
- 2) The Company shall not collect personal data from any source other than the data subject directly without the data subject's consent, unless otherwise exempted by law.
- 3) The Company shall not collect sensitive personal data relating to race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health information, disability, trade



union information, genetic data, biometric data, or any other data of a similar nature without the explicit consent of the data subject, unless otherwise exempted by law.

- 4) The Company shall maintain records as required by law to enable data subjects and the Personal Data Protection Committee to examine such records.
- 5) The Company shall collect, use, or disclose personal data for the purpose of providing the Company's services in accordance with contractual obligations and applicable laws, rules, regulations, and relevant requirements, as well as to improve the efficiency of the Company's operations or where such processing is considered beneficial to the data subject.
- 6) The Company shall not disclose personal data to any third party without the consent of the data subject, unless such disclosure is permitted or required by law.
- 7) The Company shall erase or destroy personal data, or anonymize such data so that the data subject can no longer be identified, upon the expiration of the retention period prescribed by the Company or applicable laws, or when the data subject withdraws consent or objects to the collection, use, or disclosure of personal data in accordance with applicable laws.

6.2 Security Measures for Personal Data

- 1) The Company shall implement appropriate security measures to protect personal data against loss, unauthorized access, destruction, use, alteration, modification, or disclosure, and shall review such measures whenever necessary or when technological changes occur.
- 2) The Company shall supervise the Data Processor to ensure that the collection, use, or disclosure of personal data is carried out securely and in compliance with applicable laws, rules, regulations, and relevant requirements.
- 3) Where the Company discloses personal data to any person or juristic person, the Company shall implement appropriate measures to prevent such person from using or disclosing the personal data without authority or unlawfully.
- 4) The Company shall establish procedures to review and ensure the deletion or destruction of personal data upon the expiration of the applicable retention period or upon the request of the data subject or withdrawal of consent, as applicable.
- 5) In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of individuals, the Company shall notify the Personal Data Protection Committee without undue delay and, where feasible, within 72 hours after becoming aware of the breach. Where the breach is likely to result in a high risk to the rights and freedoms of individuals, the Company shall also notify the affected data subject without undue delay, together with appropriate remedial measures.



6.3 Rights of Data Subjects

Data subjects may exercise their rights as provided by applicable laws, including the following:

- 1) The right to request access to and obtain a copy of their personal data, or to request disclosure of the source of personal data obtained without their consent. The Company shall respond to such request within 30 days from the date of receipt of the request.
- 2) The right to object to the collection, use, or disclosure of their personal data as provided by law.
- 3) The right to receive, or request the transfer of, their personal data to another person for their own purposes, where technically feasible through automated means.
- 4) The right to request the erasure or destruction of their personal data, the suspension of the use of such data, or the anonymization of their personal data so that the data subject can no longer be identified, except where the Company is required by applicable laws to retain such personal data.
- 5) The right to request the rectification of their personal data to ensure that such data is accurate, current, complete, and not misleading.
- 6) The right to withdraw consent previously given, or to refuse the collection, use, or disclosure of their personal data, except where otherwise permitted by applicable laws.
- 7) The right to request the restriction of the use of personal data as provided by applicable laws.

7. Company Contact Information

Data Protection Officer: DPO

Email: privacy@sic.co.th

Silicon Craft Technology Public Company Limited

40 Thetsabanrangsannua Rd., Ladyao, Chatuchak, Bangkok 10900 Thailand

Tel: +66 2 589 9991 Fax: +66 2 589 8881

8. Policy Review and Revision

This Policy shall be reviewed at least once a year, or whenever there are amendments to applicable laws, regulations, or relevant requirements, or changes in the Company's business environment.



Initial Approval	Approved by the Board of Directors at Meeting No. 4/2021 held on 13 May 2021.
Latest Approval/Review	Approved/reviewed by the Board of Directors at Meeting No. 4/2026 held on 25 June 2026.

Announced on 25 June 2026.



(Dr. Bodin Kasemset)

Chief Executive Officer



Approval and Revision History		
SIC-BC-PLC-015: Policy on Personal Data Protection		
Board Resolution	Board Resolution	Board Resolution
Initial Approval	BOD 4/2021: 13 May 2021	Approved the Policy on Policy on Personal Data Protection.
Revision No. 1	BOD 2/2022: 17 March 2022	Updated the definitions to align with the Personal Data Protection Act B.E. 2562 (2019) and the Company's governance structure, and revised the contact channel to designate the Data Protection Officer (DPO).
Revision No. 2	BOD 4/2023: 21 July 2023	Annual review with no material changes.
Revision No. 3	BOD 4/2024: 18 July 2024	Annual review with no material changes.
Revision No. 4	BOD 4/2025: 17 July 2025	Annual review with no material changes.
Revision No. 5	BOD 4/2026: 25 June 2026	Annual review with no material changes.

