

Privacy Notice

Rockworth Public Company Limited

Public Company Limited (hereinafter referred to in this notice as "**the Company**") values the privacy of its **customers, service providers, suppliers, and stakeholders ("You")**. Therefore, this Privacy Notice has been created to inform you of the Company's policy regarding the collection, use, and disclosure of personal data.

This process is conducted in accordance with the Personal Data Protection Act B.E. 2562 (2019) ("**PDPA**"), including other relevant laws and regulations, to ensure your personal data is correctly and appropriately protected. This Privacy Notice is intended to inform you of:

- The methods by which the Company collects, uses, or discloses your personal data.
- The types of data and the purposes of such operations.
- The data retention period.
- Disclosure of personal data to third parties.
- Your legal rights under PDPA.
- The confidentiality and security of personal data, and channels for contacting the Company.

Scope of Application for this Privacy Notice:

(1) Customers of the **Company**

- **Individual Customers:** This refers to former, current, and prospective customers who are in the process of completing documentation to become a customer of the Company.
- **Juristic Person Customers:** This refers to authorized directors, groups of individuals, or legal representatives of juristic person customers (e.g., limited companies, limited partnerships, foundations, associations, and public limited companies), including former, current, and prospective juristic person customers of the Company.

The Company requests the cooperation of its juristic person customers to ensure that their authorized representatives or any relevant individuals are fully informed of this Privacy Notice.

(2) **Individuals who are not customers of the Company:**

Non-customer refers to individuals who do not have a contract or obligation for the sale of products and/or use of services with the Company, but for whom the Company needs to collect, use, or disclose personal data. Examples include persons making payments to or receiving payments from the Company's customers, visitors to the Company's website or applications, visitors to our offices, factories, or branches, guarantors or security providers, ultimate beneficial owners, directors or legal representatives

of juristic persons using the Company's services, debtors of the Company's customers, professional advisors, as well as directors, investors, and shareholders of the Company, their legal representatives, and any person involved in transactions with the Company or its customers.

Please be advised that if you engage in transactions or activities with the Company through platforms operated in conjunction with third parties, the processing of your personal data will be subject to the privacy notice of that platform provider. The Company recommends that you read and understand such notices/policies before use.

1. Collection, Use, and Disclosure of Personal Data

The Company collects, uses, or discloses your personal data **only when necessary** and/or when a legal basis is established under personal data protection laws. These bases include legal **compliance, contractual obligations, legitimate interests, your consent**, and/or other bases as prescribed by law, for the following purposes:

1.1. Legal Obligations of the Company

As the Company is subject to supervision and must comply with relevant laws and regulations, it is necessary to collect, use, or disclose your personal data to comply with the laws and regulations of government agencies and/or regulatory bodies. The purposes include:

1.1.1 Compliance with the PDPA and any amended laws/announcements.

1.1.2 Compliance with laws related to business operations and associated work activities (e.g., sales contracts, transportation permits in Thailand and abroad, customer due diligence, and other checks from public databases of regulatory agencies or designated persons), including ongoing actions to maintain compliance with relevant laws.

1.1.3 Compliance with regulations or orders from competent authorities (e.g., court orders, orders from government agencies, regulatory bodies, or authorized officials).

1.2. Contracts or Agreements You Have with the Company

The Company collects, uses, or discloses your personal data based on your request and/or agreements made with the Company, for purposes including:

1.2.1 Pre-contractual processing, approval consideration, service provision, product delivery, providing advice, and managing products and/or services, including Company actions that may affect its operations or service provision, or are necessary for the continuity and fairness of services.

1.2.2 Identity verification according to the procedures notified before using the Company's platform.

1.2.3 Processing your instructions (e.g., purchase orders, requests for goods delivery and/or services, responding to inquiries or suggestions, or handling complaints).

1.2.4 Tracking or recording transactions and the receipt of your rights and benefits.

1.2.5 Preparing relevant reports (e.g., reports on product and service orders as you requested, or internal Company reports).

1.2.6 Notifying you of transactions or the renewal of your benefits.

1.2.7 Collecting outstanding debts (e.g., payment for goods and/or services, deposits, penalties from contracts and/or related agreements).

1.2.8 Executing financial transactions such as payments/receipts, debt settlements, invoicing, account deductions, and managing the relationship with the Company, including registration activities with the Company regarding your account as a customer.

1.2.9 Enforcing legal or contractual rights, such as providing IT/Helpdesk support, creating and maintaining your user ID and account, managing access rights to any authorized systems, and deactivating inactive accounts according to Company criteria.

1.3. Legitimate Interests of the Company

The Company relies on the **legal basis of legitimate interest** to collect, use, or disclose your personal data, balancing the maximum benefit to the Company or relevant persons with your fundamental rights. This includes (but is not limited to) the following purposes:

1.3.1 Business administration (e.g., supervision, auditing, risk management, financial and accounting management, internal audits to monitor, prevent, and investigate fraud, money laundering, terrorism, misconduct, or other crimes, including but not limited to verifying the credibility of any individual associated with the Company's corporate clients, even when not legally required, and including identifying you to prevent such crimes).

1.3.2 Managing the relationship between the Company and you (e.g., customer care, satisfaction surveys, and complaint management).

1.3.3 Security (e.g., recording CCTV footage, registration or issuing visitor passes, and/or capturing images of visitors before entering Company premises, including the head office, its surroundings, showroom areas, and all factory branch perimeters; and data access control, including appropriate encryption, event logging and monitoring, and information system security testing).

1.3.4 Developing and improving the Company's products, services, and systems to enhance service standards and/or meet your needs, as well as offering suitable products, services, and benefits while respecting your fundamental rights to personal data. If you do not wish to receive offers for products, services, and benefits, you can opt-out via the Application/channels specified by the Company.

1.3.5 Recording images or audio during Company activities (e.g., meetings, training, seminars, recreational events, or marketing promotions).

1.3.6 Processing data of directors, authorized representatives, or agents of corporate clients.

1.3.7 Operating for the Company's business continuity.

1.3.8 Managing claims and disputes, litigation, and legal proceedings.

1.3.9 Contacting you prior to entering into a contract with the Company.

1.3.10 Assessing suitability and qualifications, submitting claims, providing quotations, bidding, and entering into contracts with you.

1.3.11 Ensuring security and risk prevention (e.g., monitoring network usage, identifying/managing security incidents, and investigating and preventing malicious, deceptive, fraudulent, or illegal activities).

1.3.12 Complying with applicable foreign laws.

1.3.13 Research, planning, and statistical analysis (e.g., limitations on product and service usage, data analytics, evaluations, surveys and reports on the Company's products/services, and behavioral responses to goods and/or services to identify business opportunities).

1.3.14 Organizing sales promotions, meetings, seminars, and corporate visits.

1.3.15 Receiving services from legal/financial advisors or any other consultants appointed by you or the Company.

1.3.16 Disclosing and transferring your personal data in the event of a sale, transfer, merger, reorganization, or similar transaction.

1.3.17 Maintaining and updating customer data (which includes your personal data) and storing contracts and related documents that reference you.

1.3.18 Complying with appropriate business practices (e.g., management, training, auditing, reporting, risk management, statistical and trend analysis, planning, customer segmentation, or other related or similar activities; business controls to enable business operations; and identifying and resolving issues in the Company's IT systems).

1.4. Your Consent in Some Case:

The Company may request your consent to collect, use, or disclose personal data for your maximum benefit and to enable the Company to provide better services, for the following purposes:

1.4.1 Collection, use, or disclosure of sensitive personal data (such as a copy of the national ID card showing religion or blood group, etc.).

1.4.2 Research and analysis to develop appropriate products and services that meet your needs, including contacting You to offer products, services, and benefits specifically suited to You.

1.4.3 Sending or transferring personal data and sensitive personal data to foreign countries that may have insufficient personal data protection standards (unless the PDPA allows such operations under another legal basis).

1.4.4 In cases where You are a minor, an incompetent person, or a quasi-incompetent person, consent must be obtained from the parent, guardian, or curator (as the case may be), unless exempted by laws.

1.4.5 Disclosure of data to affiliated companies (as specified in the contract) and reliable business partners for:

(a.) Research, preparation of statistical data, development, and analysis of responsive products/services/benefits.

(b.) Contacting You to offer or provide appropriate products/services/benefits.

1.4.6 Other operations for which the Company must obtain your prior consent.

1.5. Other Legal Bases in Addition to The Aforementioned Legal Bases

The Company may need to collect, use, or disclose personal data under the following other legal bases:

1.5.1 Prevention or suppression of danger to life, body, or health of a person.

1.5.2 For public interest or for the exercise of official authority vested in the Company.

If certain types of personal data are necessary for (a.) compliance with relevant laws or regulations of the Company or (b.) pre-contractual steps or execution of a contract or transaction with you, the Company may not be able to proceed or grant some or all of the benefits related to the service provision to You if You do not provide such personal data as requested by the Company. The Company will clearly specify in each case which data is necessary and the reason for such necessity.

2. Personal Data Collected, Used, or Disclosed by the Company

The types of personal data that the Company collects, uses, or discloses may vary according to the scope of relevant laws, requirements, and/or contracts. This includes both general personal data and sensitive data, including but not limited to the following data

Data Type	Example of Personal Data
Personal Details	<ul style="list-style-type: none"> Title First name, middle name, last name, alias (if any) Gender Date/Month/Year of Birth Age Education Marital Status Nationality Spouse's information
Contact Details	<ul style="list-style-type: none"> Postal contact address Email address Telephone number Mobile phone number Name of agent or emergency contact person Social media accounts, including profile data, photos and other identifiers for electronic communication

Identification and Verification Details	<ul style="list-style-type: none"> • Photo of national ID card • National ID number • Passport information (for foreigners) • Driver's license • Signature • House registration
Employment Details	<ul style="list-style-type: none"> • Occupation • Details about employer • Position • Salary or income • Remuneration • Job title • Bonus or welfare • Workplace
Financial Details and Information about Your Relationship with the Company	<ul style="list-style-type: none"> • Channels and methods of your interaction with the Company • Employment history with the Company (if any) • Account number and account type • Account name
Satisfaction Research Data	<ul style="list-style-type: none"> • Opinion survey before resignation • Details of services and welfare received and your needs • Preferred communication and details or content of communication between You and the Company
Access Data, Service Request Data, and User Account Details	<ul style="list-style-type: none"> • Data on accessing the Company's systems • Information that can identify the user account • Username and password
Usage Details	<ul style="list-style-type: none"> • Data on the usage of websites, platforms, products, and/or services by You
Security Information	<ul style="list-style-type: none"> • Photos • Physical characteristics • Fingerprints or facial features • Still or motion images via closed-circuit television (CCTV) • Video recordings
Sensitive Personal Data	<ul style="list-style-type: none"> • Religion, as shown on the national ID card • Blood group, as shown on the national ID card • Criminal record
Other Data	<ul style="list-style-type: none"> • Information You have provided to the Company through any channel

3. Sources of Your Personal Data

The Company collects personal data directly from You, but in some cases, the Company may obtain your personal data from **other sources** as prescribed by the PDPA. Personal data collected by the Company from other sources may include, but is not limited to, the following:

3.1 Data the Company receives from persons related to You (such as your family, friends, referrers) with your permission.

3.2 Data the Company receives from service providers, government agencies/officials, and competent legal authorities, or their representatives (if any).

If You have provided personal data of others to the Company, you must inform such individuals of the details in this notice and obtain consent (if necessary) or rely on an appropriate legal basis before providing the data to the Company.

4. Your Legal Rights

You can exercise your rights under the PDPA through the channels specified by the Company, which include the following details:

4.1 Right to access and request a copy of your personal data, except in cases where law or court order allows the refusal of the request, or when the request affects the rights and freedoms of others.

4.2 Right to request correction of your personal data.

4.3 Right to request erasure of personal data. You have the right to request the Company to delete or destroy your data or make it unidentifiable, except in cases where the Company has a legitimate reason to refuse your request.

4.4 Right to request restriction of the use of personal data, such as when the Company is reviewing a request to exercise the right to correct personal data or object to the collection, use, or disclosure of your personal data, or when the data is no longer necessary but the Company needs to retain it for legal claims.

4.5 Right to object to the collection, use, or disclosure of your personal data, except in cases where the Company has a legitimate reason to refuse your request (such as the Company can demonstrate a compelling legitimate ground, or for legal claims, or for the Company's public interest).

4.6 Right to receive or transfer personal data. You have the right to receive your personal data held by the Company or request the transfer of your personal data directly to another person, provided that the data is in a format that is readable or usable by generally automatic electronic tools or devices,

and can be used or disclosed by automatic means. This must be in accordance with the law. The Company may refuse the request if the operation is technically impossible or if there is a legitimate reason that prevents the sending or transferring of the data.

4.7 Right to withdraw consent. You have the right to withdraw the consent You have given to the Company at any time, according to the procedures and methods specified by the Company, without affecting the collection, use, or disclosure of data for which consent was legitimately given. You can review and change your consent for the use or disclosure of personal data for marketing purposes through the right exercise channels specified in Clause 11 or other channels that the Company may specify in the future.

4.8 Right to lodge a complaint. You have the right to lodge a complaint with the Personal Data Protection Committee or the Office of the Personal Data Protection Committee if the Company acts in non-compliance with the PDPA.

5. Disclosure of Your Personal Data

The Company may disclose your personal data to the following individuals or organizations, in accordance with the principles of the PDPA:

- a) **Affiliated companies and/or branch factories, business partners**, and/or any other person with whom the Company has a legal relationship, including directors, executives, employees, staff, contractors, agents, and advisors of the Company and/or of such persons.
- b) **Government agencies** and/or agencies supervising the Company, such as the Revenue Department, Social Security Office, Industrial Estate Authority, etc.
- c) **Partners, agents, vendors, or other organizations** where the disclosure of your personal data has a specific objective, under a legal basis, commercial agreement, service contract, and appropriate security measures, with a personal data confidentiality agreement under the PDPA.
- d) **Third parties providing various services to the Company** (such as IT service providers, market analysis, and benchmarking).
- e) Third-party collaterals providers.
- f) Your authorized representative, sub-agent, agent, or legitimate representative who has legal authority.

6. Sending or Transferring Your Personal Data to Foreign Countries

Since the Company's business currently covers the global market, the Company may need to send or transfer your personal data to foreign countries. In this case, the Company will use its **best efforts** to send or transfer your personal data to the Company's trustworthy business partners, service providers, or data recipients, using the **safest methods** to maintain the security of your personal data.

In cases where the destination country has insufficient personal data protection standards, the Company will manage the sending or transfer of personal data in accordance with the requirements of the PDPA and with the necessary and appropriate data protection measures.

7. Personal Data Retention Period

The Company will retain your personal data while You are a customer of the Company and after your relationship with the Company ends (such as after You conduct a transaction with the Company, or if the Company refuses your request, or You request to cancel the use of the Company's goods and/or services). The Company will retain your personal data for a period that is **appropriate and necessary** for each type of personal data and purpose, as prescribed by the PDPA.

The Company retains your personal data according to the **statute of limitations** or the **period specified by relevant laws** (such as the Securities and Exchange Act, Anti-Money Laundering Act, Accounting Act, Tax Revenue Code, Labour Law, and other laws that the Company must comply with and that are related, both in Thailand and abroad). Additionally, the Company may need to retain records from **CCTV** at the head office, branch factories, and/or **audio recordings of services via Call Center** to prevent fraud and maintain security, as well as to investigate suspicious transactions that You or related persons may report to the Company.

8. Use of Cookies

The Company may collect and use **cookies and similar technologies** when You use the Company's products and/or services, including using the website, conducting transactions over the Internet, and using the Company's applications. The collection of such cookies and similar technologies will help the Company to **remember You, know your preferences, and improve the way the Company offers products and/or services to You.**

The Company may use cookies for various purposes (such as enabling basic functions to work, helping the Company understand how You use the Company's website or email, allowing the Company to provide a better experience through online channels or communication with You, and ensuring that online advertisements shown to You are relevant and of greater interest to You). For details, please see the **Cookie Policy.**

9. Use of Personal Data for Original Purposes

The Company has the right to continue collecting and using your personal data that the Company collected **before the effective date of the PDPA** (in the part related to the collection, use, and disclosure of personal data) **for the original purposes**. If You do not wish the Company to continue collecting and using such personal data, You can notify the Company to **withdraw your consent at any time**.

10. Security

The Company implements internal security measures and strictly enforces policies to keep your personal data **secure**, which includes **data encryption** and **measures to prevent data access**. The Company requires its personnel and external contractors to comply with appropriate **privacy standards and policies**, and to provide data maintenance and appropriate measures for the use or sending or transferring of your personal data.

11. How to Contact the Company

If You have questions or would like to inquire for more details about the Company's Privacy Notice, please contact the Company through the following channels:

- Call Center Tel. 02-123-8888
- Rockworth Public Company Limited (Head Office) 294-300 Asoke-Dindaeng Road, Bangkapi, Huaykwang, Bangkok 10310
- Data Protection Officer, HR Department Email: hr@rockworth.com or at the Company's address above.

If You wish to exercise your rights under the PDPA, please contact the **Company's Head Office** (for exercising all rights) and/or via Call Center Tel. 02-123-8888.

12. Changes to the Privacy Notice

To align with business operations, laws, or relevant regulations, the Company may update, change, or amend this Privacy Notice from time to time. The Company will post the current Privacy Notice on the Company's website (www.rockworth.com) so that You can check and be informed of the most current information at all times.

Review and Amendment of the Privacy Notice

This Privacy Notice must be reviewed **at least once a year** to ensure that the notice complies with current laws and can be effectively implemented.

This Privacy Notice was considered and approved by the Company's Board of Directors at the **06/2568 Meeting on September 29, 2568**.



(Mr. Chatchawal Pongsuthimanus)

Chairman of the Board,

Rockworth Public Company Limited