

## Privacy Notice

### For Director, Shareholder and Debenture holder

Last updated on 1 December 2021

Sri Trang Agro-Industry Public Company Limited, Sri Trang Gloves (Thailand) Public Company Limited and Sri Trang Agro-Industry Public Company Limited group companies (as listed in the appendix) (collectively referred to as "**we**," "**our**," "**us**," or the "**Company**") have issued this Privacy Notice (referred to as the "**Privacy Notice**") to inform you how we collect, use, disclose, and/or transfer your personal data if you are a director, shareholder, debenture holder of the Company (collectively referred to as "**you**").

This Privacy Notice applies to the collection, use, and/or disclosure of personal data via our normal communication channels such as face-to-face meetings at our premises or at events, by telephone, fax, letters, and via our online channels such as email, websites, social media, and mobile applications, including via any other channels which we may receive your personal data from.

We may amend or modify this Privacy Notice from time to time. We encourage you to read this Privacy Notice periodically for any recent changes. Any amendment or modification to this Privacy Notice will take effect once published on [www.sritranggroup.com](http://www.sritranggroup.com) and [www.sritranggloves.com](http://www.sritranggloves.com). We will notify you (or obtain your consent if consent is required) of any substantial changes or any legally required changes which are substantial to this Privacy Notice.

#### 1. Personal data we collect

Under this Privacy Notice, "**personal data**" means any information relating to a person which enables the identification of such person whether directly or indirectly, and "**sensitive personal data**" means personal data that is classified as sensitive personal data under the applicable laws.

We may collect and obtain the following personal data from various sources, including but not limited to, directly from you via our online channels and/or our normal communication channels, or indirectly from our affiliates and subsidiaries, securities brokers, custodian, registrar, business partners, government agencies, or from other sources. The types of personal data we collect will depend on the context of your relationship with us.

1. **Personal information**, including title, first name, last name, nickname, signature, fingerprint, age, date of birth, photograph, CCTV footage, nationality, gender, blood type, marital status, name card, identifiable information on government-issued cards (e.g., national identification card, passport, or driving license), copies of house registration, marriage certificates, securities holders' registration numbers, vehicle registration, work permit, visa, and/or any information that you decided to disclose to us which may be considered as personal data.
2. **Contact information**, including physical address, email address, telephone number, social media account (such as user account on LINE, WhatsApp, and WeChat), or any other relevant information.
3. **Career information and qualifications**, including position, occupation, career history, educational history, or training history.
4. **Financial information**, including bank account details.

5. **Sensitive personal data**, including sensitive personal data as shown on government-issued cards (such as religion and race), religion, criminal record and/or health data.

If you provide personal data (such as first name, last name, signature, address, and national identification card number) of any third party (such as a family member, attorney, or proxy) to the Company, you are responsible for notifying them of the details of this Privacy Notice, and obtaining consent from them (where consent is required). You must also ensure that we can lawfully collect, use, and/or disclose their personal data under applicable laws and in accordance with this Privacy Notice.

We will only collect personal data of minors, quasi-incompetent persons, and incompetent persons when their parents, curators, or guardians has given their consent (as the case may be), or only when we are permitted under applicable laws. We have no intention to collect personal data from any individuals who are under the age of 20 without obtaining their parental consent when it is required, or from any quasi-incompetent or incompetent persons without their curator or guardian's consent (as the case may be). In certain cases as required by applicable laws, we may not be able to collect, use, and/or disclose personal data of minors, quasi-incompetent persons, or incompetent persons, without obtaining their parent, curator, or guardian's consent. Therefore, if you are under the age of 20, or if you are a quasi-incompetent or incompetent person, you must ensure that you have received your parent (where consent is required), curator, or guardian's consent. In the event that we learned that we have unintentionally collected personal data from anyone under the age of 20 without parental consent when it is required, or from a quasi-incompetent or incompetent person without their curator or guardian's consent (as the case may be), we will delete such personal data immediately or will continue to collect use and/or disclose such personal data only when we can rely on other legal bases apart from consent, or where permitted by law.

## **2. Purposes of our collection, use, or disclosure of personal data**

We may rely on (1) consent basis; (2) contractual basis, for our initiation, entering or fulfilment of a contract with you; (3) legal obligation basis, for the fulfilment of our legal obligations; (4) legitimate interest basis, for the purpose of our legitimate interests and the legitimate interests of third parties; (5) vital interest basis, for preventing or suppressing a danger to a person's life, body, or health; (6) public interest basis, for the performance carried out in the public interests or to perform our duties by exercising official power; or other legal bases as permitted under the personal data protection law (as the case may be) to collect, use, and/or disclose your personal data, for the following purposes.

1. **For business purposes (for Company directors):** to verify your identity and eligibility; to evaluate your suitability and qualifications; to issue and enter into an employment agreement, to prepare work permit and employment documents; to determine salary, benefits, and any other basic contractual information; to register; and to review and update your information on a regular basis.
2. **To communicate with you:** to communicate with you about our business operations; to deliver the documents; and to support internal and external public relations activities.
3. **To administer compensations and benefits:** such as to calculate and provide remuneration to you including to validate accounting records and supporting documents for payments; to maintain an accounting record and to support financial transactions.
4. **To manage shareholders' meetings or debenture holders' meeting (for shareholders or debenture holders):** to send written invitations and relevant shareholder meeting documents; to administer a proxy to attend the shareholder meeting or debenture holder meeting; to verify your identity and check your eligibility to attend the shareholder meeting or debenture holder meeting; to conduct data analytic in

relation to the shareholders, such as the major shareholders ranking, segmentation, and classification of shareholders' nationalities.

5. **To administer dividends or interest (for shareholders or debenture holders):** to transfer dividends or interest, to transfer dividends or interest to you instead of issuing new cheques.
6. **To support the Company's operations (for Company directors):** to use as supporting information for the preparation of documents, agreements, or any other materials; to consider appointing, revoking, or authorizing you to engage in a transaction with our contractual parties, this includes inserting your name and personal data in any relevant agreement to achieve the purpose thereof and to achieve other purposes as reasonably required by the Company, or any documents relevant to human resource management; to use as supporting evidence for a transaction; to maintain as evidence and reference; to maintain and retain the Company's important business documents; to prepare a conflict of interest report; applications for licenses and permits, and any other documents which we are required to submit to the government authorities under applicable laws; and/or to prepare and publicize your personal data to allow public access and examination, such as an annual report, annual statement, and prospectuses.
7. **For IT management:** to provide IT support; to resolve issues; to administer, maintain and develop our IT systems; to facilitate and manage your access to our platforms; to create an account for you; to record your data into our systems; to control, monitor, and change the access to our system; or modify the data and logs to our systems; to monitor our internet systems and platforms and to ensure they function securely and effectively.
8. **To comply with legal obligations and orders from government authorities,** to comply with legal obligations, legal proceedings and/or government authorities orders which may include orders from government authorities outside Thailand and/or cooperate with the courts, regulators, government authorities and law enforcement bodies when we reasonably believe that we are legally required to do so and when disclosing your personal data is strictly necessary to comply with those legal obligations, legal proceedings, or government orders. This includes internal investigation procedures or preventing crime and fraud and/or to establish legal claims.
9. **To protect the interests of the Company and its related parties:** to maintain the security and integrity of the Company's business; to exercise our rights and protect our interests where it is necessary and lawfully to do so, for example, to detect, prevent, and respond to fraud claims, intellectual property infringements claims, or violations of law; to manage and prevent loss of our assets and property; to detect and prevent illegal misconduct within our workplace; to ensure the compliance of our terms and conditions.
10. **To manage disputes:** to resolve disputes; to enforce our contract; and to establish, exercise, or defend against any legal claims.
11. **Corporate Transaction:** in the event of sale, transfer, merger, reorganization, or similar events, the Company may transfer your personal data to one or many third parties as a part of that transaction.

In addition to the collection, use, and/or disclosure of the aforementioned personal data, we also collect, use, and/or disclose the following sensitive personal data.

- **Sensitive personal data in official documents (such as religion data as shown on the national identification card, or race as shown in the passport):** to verify and authenticate your identity.
- **Religion:** to prepare meals and prayer room for you.

- **Criminal records:** to examine and assess your qualifications and/or to support the applications for licenses from government agencies.

Where we need to collect your personal data as required by law, or for entering into or performing the contract we have with you and you refuse to provide that personal data when requested, we may not be able to fulfill the relevant purposes as listed above.

Where consent is required for certain activities of the collection, use, and/or disclosure of your personal data, we will request and obtain your consent for such activity separately.

### **3. Persons or entities to whom we disclose or transfer your personal data**

We may disclose or transfer your personal data to third parties, whether they are located in or outside Thailand, for the aforementioned purposes. These third parties include: (1) subsidiaries or affiliated companies<sup>1</sup>; (2) business partners (such as contractual parties, corporate customers, certification bodies, and independent auditing agencies); (3) our service providers (such as tour operators, travel agencies, flight agencies, hotels, coordinator and service provider for foreign documentation, banks and financial institutions, information technology service providers, storage and cloud service providers, independent advisors, financial advisors, auditors providing accounting or auditing services to the Company, legal advisors); or (4) government agencies (such as the Ministry of Commerce, the Revenue Department, the Customs Department, the Department of Lands, the Royal Forest Department, the Provincial Electricity Authority, the Provincial Waterworks Authority, the Stock Exchange of Thailand, Thailand Securities Depository Co., Ltd., the Office of the Securities and Exchange Commission, the Board of Investment, the Bank of Thailand, courts, and the Royal Thai Police).

In some cases, we may need to disclose or share your personal data to investors, shareholders, transferees, or potential transferees, and assignees or potential assignees in the event of a reorganization or debt restructuring, merger, acquisition of a business, disposal, purchase, joint venture, assignment, business dissolution, or any other similar events involving the transfer or other deposition of all or any portion of our businesses, assets or stock.

### **4. Cross-border transfer of personal data**

We may transfer your personal data to third parties located outside Thailand, such as: (1) affiliated companies with which we work corporately or share the same work systems, whereby we may need to transfer your personal data to these affiliated companies and allow them to access your personal data for the purposes set out in this Privacy Notice; (2) business partners (such as our contractual parties); (3) our service providers (such as banks/financial institutions, storage and cloud service providers); and/or (4) government agencies (such as foreign stock exchanges) for which the Personal Data Protection Commission under the Personal Data Protection Act, B.E. 2562 (2019) has not yet determined that such country has adequate personal data protection standards.

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<sup>1</sup> This refers to Sri Trang Agro-Industry Public Company Limited group companies (as listed in the appendix), and overseas-based group companies, including 1. Sri Trang USA, Inc.; 2. Shidong Shanghai Medical Equipment Co. Ltd.; 3. Sri Trang Indochina (Vietnam) Co. Ltd.; 4. P.T. Sri Trang Lingga Indonesia; 5. PT Star Rubber; 6. Sri Trang Ayeyar Rubber Industry Co., Ltd; 7. Sri Trang International Pte Ltd; 8. Shi Dong Shanghai Rubber Company Limited.; 9. Sri Trang Gloves Global Pte. Ltd.; 10. Sri Trang Gloves (Singapore) Pte. Ltd.; 11. PT Sri Trang Gloves Indo; 12. Sri Trang Gloves Vietnam Company Limited

When it is necessary to transfer your personal data to a country with a level of personal data protection standards which may be considered lower than in Thailand, we will use our best endeavors to ensure an adequate degree of protection is afforded to the transferred personal data, and ensure that the data recipient has adequate data protection standards in place, or that we are permitted to transfer your personal data in accordance with applicable data protection law. We may, for example, obtain contractual assurances from any third parties given access to the transferred personal data to ensure that your personal data will be protected by personal data protection standards which are equivalent to those required under the applicable laws in Thailand.

## 5. Retention period

We will keep your personal data as long as necessary to fulfill the aforementioned purposes. However, we may retain your personal data for a longer duration if we need to comply with applicable laws and regulations, our internal policies, operational rules or when necessary, when a dispute occurs.

## 6. Your rights as the data subject

Subject to the conditions prescribed by applicable laws and our data subject rights management procedures, you may have the following rights.

1. **Access.** You may have the right to access or request a copy of your personal data that we collect, use, or disclose.
2. **Rectification.** You may have the right to request the personal data that we collect, use, and/or disclose about you is corrected, updated, completed, and not misleading.
3. **Data Portability.** You may have the right to obtain personal data we hold about you in a structured, and readable electronic format, and to transmit such data to another data controller.
4. **Objection.** You may have the right to object to certain collection, use, and/or disclosure of your personal data to the extent permitted under applicable laws.
5. **Restriction.** You may have the right to restrict our use of your personal data in some cases.
6. **Withdrawal of consent.** For the purposes where you have provided your consent for our collection, use, and/or disclosure of your personal data, you may have the right to withdraw your consent in some cases.
7. **Deletion.** You may have the right to request us to delete, destroy, or anonymize your personal data that we collected, used, or disclosed.
8. **Complaints.** You have the right to lodge a complaint to the competent authority where you believe that the Company fails to comply with personal data protection laws.

If you wish to exercise any of the aforementioned rights, please contact us using the contact information provided in the "Contact Us" section below.

Your request for exercising any of the aforementioned rights may be limited by applicable laws and exceptions. There may be certain cases where we can reasonably and lawfully reject your requests, for example, due to our legal obligations or court orders. If we reject your requests, we will notify you of our reason.

## **7. Security measures**

We have reasonable security measures regarding personal data, including organizational, technical, and physical safeguards in relation to access control, to protect the confidentiality, integrity, and availability of personal data against any unauthorized or unlawful loss, access, alteration, correction or disclosure of personal data, in compliance with applicable laws.

We have implemented access control measures and the use of data storage and processing devices which are secured and suitable for the collection, use, and/or disclosure of personal data. We restrict access to personal data as well as storage and processing devices by imposing access rights or permission, allowing only authorized individuals to access personal data, and implement user responsibilities to prevent unauthorized access, disclosure, perception, unlawful duplication of personal data or theft of storage or processing devices. We also have appropriate measures to enable the re-examination of access, alteration, deletion, or transfer of personal data.

## **8. Contact us**

If you wish to contact us or if you have any questions about your personal data as described in this Privacy Notice, you may contact us at:

### **Data Protection Officer (DPO)**

**Sri Trang Agro-Industry Public Company Limited, Sri Trang Gloves (Thailand) Public Company Limited, and Sri Trang Agro-Industry Public Company Limited group companies:**

- Unit 1701, and 1707-1712, 17th Floor, Park Venture Ecoplex  
57 Wireless Road, Lumpini, Pathumwan, Bangkok 10330
- Email: [dpo@sritranggroup.com](mailto:dpo@sritranggroup.com) Telephone number: +662 207 4500

**Appendix**

Sri Trang Agro-Industry Public Company Limited Group Companies

1. Sri Trang Gloves (Thailand) Public Company Limited
2. Rubberland Products Company Limited
3. Nam Hua Rubber Company Limited
4. Anwar Parawood Company Limited
5. Premier System Engineering Company Limited
6. Starlight Express Transport Company Limited
7. Sadao P.S. Rubber Company Limited
8. Startech Rubber Company Limited
9. Semperflex Asia Corporation Limited
10. Sri Trang Rubber & Plantation Company Limited
11. Sri Trang IBC Company Limited