



# CHEMEMAN PUBLIC COMPANY LIMITED

บริษัท เคมีแมน จำกัด (มหาชน)

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## Privacy Notice

Chememan Public Company Limited and its subsidiaries (collectively referred to as the "Company") has full awareness of the vital importance of the protection of personal data and respects the rights to privacy of those involved with or in conducting transactions with the Company, including but not limited to shareholders, customers, business partners, employees, personnel, agents and any other person in connection with the operations of the Company (hereinafter referred to as "you" or "your"). The Company, therefore, has created the Privacy Notice (the "Notice") to inform you as a person involved with or in conducting transactions with the Company of the details regarding purposes of the collection, use, or disclosure (collectively referred to the "processing") of personal data, as well as your rights under the Personal Data Protection Act B.E. 2562 (2019).

In this regard, the processing of your personal data in accordance with the purpose specified in this Notice, the Company shall act as a Data Controller, which means that the Company shall be responsible for making decisions regarding the collection, use, or disclosure of personal data collected from you.

### 1. Definitions

"**Subsidiaries**" means affiliates or subsidiaries of Chememan Public Company Limited, whether a limited company or a public company limited, which are eligible under the notification of the Securities and Exchange Commission.

"**Personal Data Protection Law**" means the Personal Data Protection Act B.E. 2562 and subordinate laws issued thereunder, including any amendments which may be made thereto.

"**Data Subject**" means any individual person who owns personal data which is collected, used, disclosed by the Company, including but not limited to shareholders, customers, employees, personnel, agents and any person related to the operations of the Company.

"**Personal Data**" means information regarding a person which enables identification of such person, whether directly or indirectly, but not including information on the deceased in particular.

## 2. Legal Basis for Collecting Personal Data

The Company may collect your Personal Data in accordance with a legal basis as follows:

Legal basis for collecting Personal Data	Description
Contractual basis	To perform the contract or take any necessary action to enter into the contract with the Company, such as employment, hire of work, memorandum of understanding, or other forms of contracts, etc.  In case you refuse to provide your Personal Data to the Company, or object to the processing of Personal Data for carrying out the purpose of activity, such may result in the Company being unable to perform or provide all or part of the services you have requested.
Legal Obligation	To perform duties as required by law, such as, Public Limited Companies Act, labour protection law, including the execution of court orders, etc.
Legitimate Interest	For the legitimate interest pursued by us or by a third party where such interests are not overridden by the fundamental rights of the Data Subject of their Personal Data, such as for security within the Company's premises, or the processing of Personal Data for the internal affairs of the Company, etc.
Consent	For the collection, use, or disclosure of Personal Data in cases where the consent is required.

## 3. Personal Data Collection

The Company shall collect your Personal Data from you directly or from any other source that carries out the processing according to the instructions of the Company within the purpose, scope and lawful and fair methods. The Company shall collect the Personal Data as is necessary for the operations which are defined in the scope of the Company's objectives. Accordingly, the Company shall inform the Data Subject to gain acknowledgment and consent through methods as specified by the Company. In the case of collection of sensitive data, the Company shall request explicit consent from the Data Subject with the Company's method before such collecting, except for when this is allowed by the Personal Data Protection Act B.E. 2562, or other laws.

#### **4. Purpose of Collection and Use of Personal Data**

The Company shall collect, use or disclose Personal Data for the benefit of the Company's operations, or for the purposes that have previously been notified to the Data Subject, or the improvement of the Company's processes, or in compliance with the legal obligations or regulations applicable to the Company's operations. The Company shall not conduct any processes which are different from the purposes of data collection as have been notified to the Data Subject, except for when the Data Subject has been informed of such a new purpose, and prior consent is obtained, or it is necessary for the Company to be in compliance with the Personal Data Protection Act or other related laws.

#### **5. Categories of Personal Data Collected by the Company**

The Company may collect or obtain your Personal Data as necessary, including:

5.1 Personal Data means information regarding a person which enables identification of such person, whether directly or indirectly, but not including information on the deceased in particular.

5.2 Sensitive Data means any information relating to a particular person which is sensitive and presents significant risks of unfair discrimination, such as races, ethnic origin, political opinions, cults, religious or philosophical beliefs, sexual behavior, criminal records, health data, disabilities, trade union information, genetic information, biological information or any other data which may affect the Data Subject in the same manner.

#### **6. The Personal Data Retention Period**

The Company will retain your Personal Data for the period necessary to meet the purposes of collection of Personal Data, and in accordance with the details prescribed in the policies or practices of the Company, or to comply with the laws. At the end of the retention period and when your Personal Data are no longer necessary for such purposes, the Company will delete, or destroy, or anonymize the Personal Data to become the anonymous data which cannot identify the Data Subject in accordance with the form and standard as specified by the Company, the laws, or international standards. Nevertheless, in the event of a dispute, rights claim, or lawsuits related to your Personal Data, the Company reserves the right to retain such Personal Data until the dispute has reached the final judgement.

#### **7. Disclosure of Personal Data**

For the benefit of the Company's operations and service provision to the Data Subject, the Company may be required to disclose Personal Data to the Company's Subsidiaries, or other persons or entities, domestically and internationally. In this regard, the Company shall govern the above-mentioned persons to treat the Personal Data as confidential and not use the data for purposes which are out of scope specified by the Company.

In addition, the Company may disclose Personal Data of the Data Subject as required by laws and regulations, such as disclosing it to a government agency, state enterprise, regulator. Also, the Company may disclose Personal Data by virtue of laws.

## **8. Direction of Personal Data Protection**

The Company shall establish measures for the security of Personal Data in accordance with the laws, regulations, rules, and practices on the protection of Personal Data for the collection, use, or disclosure of Personal Data, whether in document or electronic form or any other form. Also, the Company shall promote and encourage employees to learn and recognize the duties and accountabilities in the collection, use, and disclosure of Personal Data. All employees are required to follow the policies and practices regarding Personal Data protection as specified by the Company.

In a case where the Company has sent, transferred, or disclosed Personal Data to third parties, whether for the provision of services under a mission, contract, or other form of agreement, the Company shall establish appropriate Personal Data security measures as required by law to ensure that the Personal Data which is sent, transferred, or disclosed by the Company will be secure and safe.

## **9. Cross-border Transfer**

The Company shall send or transfer your Personal Data to foreign countries for processing in accordance with the contractual transaction. The Company will comply with the rules for the protection of Personal Data which have been sent or transferred to foreign countries as prescribed by the Personal Data Protection Committee of Thailand, except in the following circumstances:

- 9.1 where it is for compliance with the law that requires the Company to send or transfer Personal Data to foreign countries;
- 9.2 in a case the receiving foreign country does not have adequate Personal Data protection standards, (this shall be in accordance with the list of countries announced by the Personal Data Protection Committee of Thailand), the Company shall inform and request consent from the Data Subject.

## **10. Rights of Data Subjects**

The Data Subject is entitled to the rights as prescribed in the Personal Data Protection Act, B.E. 2562 (2019) as follows:

- 10.1 Right to be informed regarding the collection, retention period, use or disclosure of the Personal Data;
- 10.2 Right to withdraw consent for the processing of Personal Data. The Company shall inform the Data Subject of consequences of such consent's withdrawal. In this regard, the withdrawal of consent shall not affect the collection, use, or disclosure of Personal Data for which the Data Subject has already given consent;

- 10.3 Right to access the Personal Data and request the Company to make a copy of the Personal Data, including the right to ask the Company to disclose any acquisitions of the Personal Data for which consent has not been given;
- 10.4 Right to rectify incorrect or incomplete data to ensure that the Personal Data remains accurate, up-to-date, complete, and not misleading;
- 10.5 Right to erase or destroy the Personal Data, or anonymize the Personal Data to become the anonymous data which cannot identify the Data Subject;
- 10.6 Right to restrict the use of the Data Subject;
- 10.7 Right to transfer the Data Subject;
- 10.8 Right to restriction of the processing of the Data Subject;
- 10.9 Right to lodge a complaint with the relevant authority.

In this regard, the Data Subject can make a request in the exercise of the aforesaid rights by submitting a request to the Company through the contact channel indicated by the Company. Nevertheless, the Company may refuse to take action as requested where legal grounds exist under the law.

## 11. Review and Modification of Privacy Notice

The Company may modify or amend this Notice at least once a year, or when any change in the Company's operations occurs to ensure its consistency with the laws. The Company encourages you to regularly check for updates, especially before disclosing your Personal Data to the Company.

Your transaction performing under this processing activity is considered to be an acknowledgment of the terms of this Notice. If you do not agree with this Notice, please suspend the transactions and notify the Company through the channels as specified by the Company.

Any transaction which has occurred after the Notice has been announced on the Company's website will be considered to be an acknowledgment of any changes to this Notice.

## 12. Contact Channel

To notify issues related to this Privacy Notice:

Chememan Public Company Limited

195/11-12 Lake Rajada Office Complex, 10th - 11th floor,

Rajadapisek Road, Klongtoey Sub-district, Klongtoey District, Bangkok 10110

Telephone: 66 (0) 2661-9734-8

Email: [privacy@chememan.com](mailto:privacy@chememan.com)

This Privacy Notice is effective as of June 1, 2022.