

## Personal Data Protection Policy

Absolute Clean Energy Public Company Limited and its subsidiaries (collectively referred to as the "Company") respect individuals' privacy rights and place great importance on the protection of personal data related to transactions with the Company. Therefore, this Personal Data Protection Policy has been established to define clear principles, mechanisms, supervisory measures, and management guidelines for the appropriate protection of personal data in compliance with applicable laws, as follows:

### 1. Scope of Application

This Personal Data Protection Policy applies to the Board of Directors, directors, executives, and all employees in the performance of their duties, including permanent employees, fixed-term contract employees, temporary employees, contractors, business partners, affiliates, stakeholders, and personal data processors acting on behalf of the Company. This Policy is intended to protect the personal data collected from the following individuals: employees, job applicants, former employees, individuals under the care of or having a familial relationship with job applicants and/or employees whose names have been provided to the Company by such applicants and/or employees, customers, business partners, shareholders, company directors, representatives acting on behalf of the aforementioned individuals, and any other relevant persons from whom the Company may, from time to time, collect personal data. The channels through which personal data may be collected include, but are not limited to, documents, the Company's website, or any mobile applications provided by the Company, as well as external channels through which data subjects provide their personal data. This Policy shall not constitute part of any contract or agreement unless expressly specified by the Company as being part thereof.

### 2. Definitions

"Personal Data"	means any information relating to an individual that can be used to identify that individual, whether directly or indirectly, but does not include information about deceased persons.
"Sensitive Personal Data"	means information of a highly personal nature that is sensitive and may pose a risk of unfair discrimination, such as racial or ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal history, health data, disability, trade union information, genetic data, biometric data, or any other data that similarly affects the data subject as prescribed by the Personal Data Protection Committee.
"Processing"	means any operation related to the collection, use, disclosure, deletion, or destruction of personal data.
"Data Subject"	means a natural person who owns personal data that can identify such person, either directly or indirectly.
"Data Controller"	means a person or juristic person who has the authority and duty to make decisions regarding the collection, use, or disclosure of personal data.

"Data Processor"	means a person or juristic person who collects, uses, or discloses personal data under the orders of, or on behalf of, the Company. Such person or juristic person shall not be deemed a Data Controller.
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### **3. Personal Data Collected by the Company**

The Company collects personal data, including but not limited to the following:

- (1) Identity Data – such as name, surname, national identification number, passport number, date of birth, gender, age, nationality, marital status, and photographs.
- (2) Contact Data – such as address, telephone number, email, LINE ID, Facebook account, and other similar contact information.
- (3) Financial or Transaction Data – such as bank account information, credit or debit card number, income detail, and transaction data through the Company's products or services.
- (4) Communication Data – such as recorded images or voices when contacting the Company.
- (5) Sensitive Data – such as race or religion as indicated on the national identification card.
- (6) Technical Data – such as technical data obtained from the use of the Company's website or application, usage and access log, IP address, and cookies.

### **4. Sources of Personal Data**

The Company may collect personal data from various sources, including:

#### **4.1 Personal data obtained directly from the data subject**, such as:

- (1) Contract signing, form completion, survey participation, registrations, or procedures for filing claims or exercising rights.
- (2) Contact with the Company through various channels, such as telephone, email, LINE, Facebook Messenger, or other similar channels.
- (3) Data from participation in the Company's activities, such as still images or video recordings.
- (4) Automatic collection of data, such as when data subjects access the Company's website or applications.

#### **4.2 Personal data obtained from other sources**, such as:

Representatives or service providers of the Company, its subsidiaries, affiliated or group companies, business partners, government agencies, or other public sources — including, but not limited to, the Company's website, information available on the internet, or social media platforms such as Facebook.

### **5. Collection of Personal Data**

The Company shall collect personal data for specific purposes, within an appropriate scope, and by lawful and fair means. Such collection shall be limited to what is necessary for the Company's operational purposes. The Company shall obtain consent from the data subject prior to collecting personal data to ensure that the data subject is informed of such collection, whether through electronic systems or by other means as prescribed by the Company. However, consent may not be required in cases where the collection is required by law, for the benefit of the data subject and obtaining consent is impracticable at that moment, for the prevention or suppression of

danger to life, body, or health, for lawful investigations by authorized officials or judicial proceedings, for the performance of tasks carried out in the public interest, or for compliance with contractual obligations.

## **6. Purposes for Collection, Use, or Disclosure of Personal Data**

The Company shall collect, use, or disclose personal data only as necessary for its ordinary business operations, including entering into contracts or financial transactions, executing business agreements, and facilitating communication and coordination. Such activities may involve creating databases and using the data to develop or improve the Company's operations, as well as for any other purposes not prohibited by law and/or to comply with applicable laws or regulations related to the Company's business. In this regard, the Company shall retain and use personal data only for as long as necessary to fulfill the stated purposes or as required by law. In the event of any change to the purposes of personal data collection, the Company shall notify the data subject of the new purposes accordingly.

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

The Company shall not use or disclose the personal data of data subjects to any person without consent. Personal data shall only be used or disclosed as necessary for the purposes previously notified. However, for the benefit of the Company's operations and to provide services to data subjects, the Company may disclose such personal data to its subsidiaries, affiliated or group companies, or other persons both domestically and internationally — such as service providers involved in personal data-related operations.

When disclosing personal data to such parties, the Company shall ensure they maintain confidentiality and use the personal data only for purposes defined by the Company.

Additionally, the Company may use or disclose the personal data under conditions prescribed by law, such as disclosure to government agencies, public sector entities, regulatory bodies, or in cases where disclosure is legally requested — for example, for filing lawsuits or legal proceedings, or in response to requests from private organizations or other external parties involved in legal processes.

## **8. Transfer or Disclosure of Personal Data to Foreign Countries**

The Company may disclose or transfer personal data to its subsidiaries, group companies, affiliates, third parties, or servers located outside Thailand for lawful purposes. The Company shall comply with applicable Personal Data Protection laws and implement appropriate measures to ensure that personal data is adequately protected and that data subjects are able to exercise their rights relating to their personal data as in accordance with the law. The Company shall also require recipients of personal data to implement proper data protection measures, process the personal data only as necessary, and take steps to prevent any unauthorized use or disclosure.

## **9. Retention Period of Personal Data**

The Company shall retain personal data only for as long as necessary to fulfill the purposes stated in this Policy. The retention period shall be determined appropriately and in accordance with contractual terms, applicable legal prescription periods, and the necessity of continued retention. Personal data shall be retained throughout the period in which the data subject maintains a relationship with the Company and for no longer than ten (10) years following the termination of such relationship.

## **10. Security Measures for Personal Data**

The Company shall provide appropriate security measures for the protection of personal data in accordance with applicable laws, policies, regulations, requirements, and best practices relating to personal data protection. The Company shall also promote and encourage employees to be knowledgeable and aware of their duties and responsibilities in collecting, storing, using, and disclosing personal data. This is to ensure that the Company complies with personal data protection laws and this Policy correctly and effectively.

## **11. Rights of Data Subjects**

11.1 Data Subjects shall have the following rights:

- (1) Right to withdraw consent for the processing of personal data previously given. Withdrawal of consent shall not affect the collection, use, or disclosure of personal data for which consent has already been granted.
- (2) Right to access personal data and request a copy thereof, as well as request disclosure of the source of personal data obtained without consent.
- (3) Right to rectify inaccurate personal data.
- (4) Right to erase personal data.
- (5) Right to restrict the use of personal data.
- (6) Right to data portability.
- (7) Right to object to the processing of personal data.
- (8) Right to lodge a complaint with the Personal Data Protection Committee.

11.2 Data Subjects may exercise the aforementioned rights by submitting a written request to the Company at the following address. The Company may refuse such requests in cases prescribed by law.

Absolute Clean Energy Public Company Limited

140/6, ITF-Tower, 7th Floor, Silom Road, Suriyawong, Bang Rak, Bangkok 10500, Thailand

## **12. Policy Review and Amendment**

The Company shall review, revise, amend, and update this Personal Data Protection Policy on an annual basis to ensure its consistency with relevant practices, requirements, regulations, and applicable laws. In the event of any amendment to this Policy, the Company shall promptly publish the revised version on the Company's website and through other communication channels.

**This policy shall be effective from May 11, 2022 onwards.**

### **Committees**

**Absolute Clean Energy Public Company Limited**