

PRIVACY POLICY

ROCTEC GLOBAL PUBLIC COMPANY LIMITED

Roctec Global Public Company Limited and the Roctec's Group Companies include Master and More Company Limited, Eye on Ads Company Limited, Green Ad Company Limited, and Gold Star Group Company Limited. (the “**Company**”, “**we**”, “**us**”, or “**our**”) recognizes the importance of the Personal Data of the Company's stakeholders, including shareholders, directors, employees, outsourced staff, consultants, customers, contractors, and/or other person whose Personal Data has been received by the Company and BTS Group Companies (as defined in the “TO WHOM WE MAY DISCLOSE OR TRANSFER PERSONAL DATA” section below). The Company has therefore created this privacy policy to inform such stakeholders of the purposes of collecting, using, and/or disclosing Personal Data, as well as the period for keeping the data, and to acknowledge your rights as the owner of Personal Data by adhering to the guidelines in accordance with the Personal Data Protection Act B.E. 2562 (2019).

DEFINITIONS

“**Company**” means Roctec Global Public Company Limited, Master and More Company Limited, Eye on Ads Company Limited, Green Ad Company Limited, and Gold Star Group Company Limited.

“**Personal Data**” means any information relating to an identified or identifiable individual, directly or indirectly, but it does not include information about the deceased.

Examples of Personal Data :

1. Name, surname, or nickname;
2. ID number, passport, work permit, social security card, driver's license, tax ID, professional card, and bank account;
3. Address, telephone number, and email;
4. Device information (e.g., IP address, MAC address, Cookie and Line ID);
5. Biometric data (e.g., facial images, fingerprints, x-ray films, voice identity information, genetic information);
6. Information identifying a person's property (e.g., vehicle registration, title deed);
7. Linked information that can identify a person (e.g., date of birth, place of birth, nationality, religion, weight, height, location information, medical information, educational information, financial information, employment information, criminal history);
8. Information on employee skills and abilities and performance evaluation information, including the Company's opinions on the work of employees;
9. Record data used to monitor the activities of individuals (e.g., log files);
10. Information that can be used to search for other Personal Data on the internet.

“Data controller” means a person or juristic person who has the authority to make decisions regarding the collection, use, and/or disclosure of Personal Data.

“Data processor” means a person or juristic person who collects, uses, and/or discloses Personal Data in accordance with the order or on behalf of the data controller.

“Personal Data Protection Officer” means a person assigned with the duty to give advice and inspect operations, coordinate, and cooperate with the Office of the Personal Data Protection Commission and other related agencies.

POLICIES AND GUIDELINES

We collect, use, store, and disclose Personal Data with great emphasis on accuracy, complete and up-to-date Personal Data through lawful and fair means. We will store Personal Data only as necessary to carry out the Company's duties and business objectives, as required by law. We will inform the owner of Personal Data and request consent before collecting, using, or disclosing that Personal Data, except in cases specified by law and/or in other cases as specified in this policy.

1. WHAT PERSONAL DATA WE COLLECT

The type of Personal Data collected, processed, or disclosed depends on the purpose for which the information is provided. The Company intends to collect Personal Data only as necessary or relevant as follows:

- 1.1 Personal Data of Shareholders** is information used to prepare documents for rights in holding shares, which is Personal Data of shareholders of the Company (e.g., name and surname, national identification card number, or other identification cards, telephone number, date of birth, gender, address, email).
- 1.2 Personal Data of Directors** is information that the Company uses to carry out transactions or act on behalf of the Company (e.g., name and surname, national identification card number, or other identification cards, telephone numbers, date of birth, gender, address, email, family information, work skills, signature, criminal history).
- 1.3 Personal Data of Employees, Consultants, and Intern** is information that is transferred from filling out a job application for employment consideration and is used to create an employee file register. It is used in allocating human resources, managing and developing personnel, providing welfare, and taking care of health for employees. Increasing the knowledge, skills, and abilities of employees. Including the use of information in other activities with the Company (e.g., name, surname, copy of national ID card, or other identification card, copy of house registration, copy of educational qualifications at all levels, telephone number, date of birth, gender, address, email, Line ID, picture, information about work history, copy of employment certificate which may include name and address of previous employer, health information, family information, information of father, mother, wife, husband, legal children,

blood type, job skills, signature, photograph, records of civil proceedings, or other proceedings including daily police reports and related court orders, criminal history, physical examination results document, current address map, employment guarantee documents, copy of bank account number. Health history information and annual health check results of employees, including advice from doctors or treatment guidelines).

- 1.4 Personal Data of Employees** is information that the Company uses for advertising and public relations activities. Including promoting the image of the Company (e.g., name and surname, national ID card number, or other identification cards, telephone numbers, date of birth, gender, address, email, picture, animated video).
- 1.5 Personal Data of Employees** is information that the Company uses to carry out transactions or perform various actions on behalf of the Company (e.g., name and surname, identification card number, or other identification card, telephone number, date of birth, gender, address, email).
- 1.6 Personal Data of Applicants** is information that the owner of Personal Data has consented to provide to be considered for employment, depending on the application or form that the owner of Personal Data has filled out in the application or other forms (e.g., name and surname, copy of national ID card, or other identification card, copy of house registration, copy of educational qualifications at all levels, telephone number, date of birth, gender, address, email, Line ID, picture, information about employment history, copies of employment certificates which may include the name and address of previous employers, health information, family information such as information about father, mother, wife, husband, legal children, blood type, job skills, signature, photograph, criminal history, records regarding civil litigation, or other legal proceedings. Including daily police reports and related court orders).
- 1.7 Personal Data of the Owner of land, Building rights or Space lessor** is information created between the data subject and the Company for use in managing advertising media space, entering into land rental contracts, premises rental contracts, and other contracts depending on the mutually agreed upon contract conditions (e.g., name, surname, identification card number or other identification card, telephone number, date of birth, gender, address, email, information about the area or property, bank account number).
- 1.8 Personal Data of Contractors, Project consultants, Partners, or Contracting party** is information that the Company uses in preparing contracts for hiring contractors, project consulting contracts, including trading with business partners or contractual partners, bidding submission documents, or bidding for various works (e.g., name and surname, identification card number, identity card or other identification card, various professional cards, passport, telephone number, date of birth, gender, address, and email) depending on contract conditions or documents required for each job.

- 1.9 Personal Data of the Customer Coordinator** is information that the Company uses for coordination, marketing, promotion, or sales of the Company's products and for sending reports on the use of the Company's advertising media services (e.g., name and surname position, workplace, telephone number, date of birth, gender, address, email, information, personal behavior and preferences) depending on the conditions or information to which the coordinator agrees to disclose Personal Data. Some of the customer coordinator's information may be out of date because, at present, the Company is not managing sales or contacting customers directly. But companies still need to store data for future use.
- 1.10 Personal Data of Guests or Visitors to the Company** is information used to participate in various activities according to the Company's projects that are organized for the community to participate (e.g., name, surname, ID card number or other identification, telephone number, date of birth, gender, address, email).
- 1.11 Personal Data of People living in the vicinity of the Company** is information used to participate in various activities according to the Company's projects that are organized for the community to participate (e.g., name, surname, ID card number or other identification, telephone number, date of birth, gender, address, email).
- 1.12 Other types of Personal Data** are information that is required by law to obtain consent from the owner of Personal Data before collecting it. The Company will inform the owner of Personal Data and ask for consent from the owner of Personal Data before collecting the data, or according to the period specified by law.

2. HOW TO COLLECT PERSONAL DATA

We have determined the method for collecting Personal Data of data subjects through the following process:

- 2.1 Personal Data of Shareholders**, which is Personal Data used to prepare documents for rights in holding shares, is controlled and maintained by the Company's regulatory compliance section in the computer system linked to the Thailand Securities Depository Co., Ltd., which acts as the securities registrar and prepares a register of the Company's securities holders
- 2.2 Personal Data of Directors**, which is information that the Company uses to carry out transactions or perform various actions on behalf of the Company. The information is stored in the computer system database and the director registration file under the responsibility of the Company Secretary Office.
- 2.3 Personal Data of Employees, Consultants, and Interns**, which is information that the Company uses for employment purposes, is stored in a computer database system (Intranet and Payroll Program) and stored in a separate personal file in the Human Resources division.

- 2.4 **Personal Data of Employees**, which is information that the Company uses to carry out advertising and public relations activities, including promoting the corporate image, is stored in a file format in the Human Resources division's computer system.
- 2.5 **Personal Data of Employees**, which is information that the Company uses to carry out transactions or perform on behalf of the Company. Storing as a file in the computer system of the person responsible for each division.
- 2.6 **Personal Data of Applicants**, which is information that the owner of the Personal Data has filled out to be selected for employment. The information is stored in a computer database (intranet) and document files in the Human Resources division.
- 2.7 **Personal Data of the Owner of land, Building rights or Space lessor**, which is information created between the data subject and the Company for use in managing advertising media space, entering into land rental agreements, location rental agreements, and other contracts, depends on the mutually agreed-upon contract conditions. The information is stored in the space rental file of the Financial Accounting Department. and in computer system databases.
- 2.8 **Personal Data of Contractors, Project consultants, Partners, or Contracting party**, which is information prepared for the performance of a contract to which the data subject is a party. The Company uses it to prepare contractor contracts, consulting contracts, including trading with partners or contracting parties, and documents submitted for bidding. The information is stored in the employment contract file at the Financial and Accounting department and/or the Business Development and Operations department.
- 2.9 **Personal Data of the Customer Coordinator**, which is information that the Company uses for coordination, promotion, marketing, or sales of the Company's products, is used to submit reports on customers' use of advertising media services. The information will be stored in a computer database (Sugar CRM, Navision Program).
- 2.10 **Personal Data of Guests or Visitors to the Company**, which is the record of entering and exiting the office building and used for security checking. It is recorded in the logbook of visitors, which the building management department will take care of and store.
- 2.11 **Personal Data of People living in the vicinity of the Company**, which is information that is used to participate in various activities according to the Company's projects that are organized for the community to participate, is stored in a document file in the Human Resources division.
- 2.12 **Other types of Personal Data**, which the Company has collected and stored for the purposes of its business operations. The Company stores and maintains data by responsible persons.

3. PURPOSE FOR COLLECTING AND USING PERSONAL DATA

We will collect, use, or disclose Personal Data of the data subject in Section 2 according to the purpose of collecting, using, or disclosing Personal Data. We will inform you of such purposes and the possible consequences of not providing Personal Data and requesting consent from the data subject so that the data subject gives consent before processing, except for the processing of Personal Data as follows:

- 3.1 For the benefit of the Company's business operations (e.g., such as data analysis, inspection, improvements and changes to the Company's services)
- 3.2 To achieve objectives related to research studies or statistics, which have provided appropriate protection measures to protect the rights and freedoms of data subjects.
- 3.3 To take care of prevent or stop danger to the life, body, or health of a person.
- 3.4 For the performance of a contract to which the data subject is a party or for use in carrying out the request of the data subject before entering the contract.
- 3.5 For the legitimate interests of the Company or of persons or juristic persons other than the Company, unless such interests are less important than the basic rights of the data subject.
- 3.6 To evaluate and develop work ability or to achieve better work efficiency.
- 3.7 To manage labor protection work, social security, and welfare provision.
- 3.8 To check information about job applicants and to contact job applicants.
- 3.9 To protect the security of the Company.
- 3.10 For use in managing, storing, recording, backing up, or destroying Personal Data.
- 3.11 Any action that the Company believes is necessary or appropriate, as follows:
 - (1) To inspect, prevent, and detect illegal or suspected illegal acts.
 - (2) To comply with applicable law.
 - (3) To comply with legal processes, including legal proceedings
 - (4) To respond to requests from government agencies, including government agencies and foreign governments where the Personal Data subject resides.
 - (5) To enforce the Company's terms of service and privacy notices.
 - (6) To protect the Company's operations.
 - (7) To protect the privacy rights, safety, or property of the Company, data subject, or another person
 - (8) To be able to find remedies or limit the damage that may occur.

The data subject does not provide certain types of Personal Data. Failure to give consent and/or withdraw your consent to collect, use, and/or disclose Personal Data may result in the Company being unable to process your request or provide services to the subject.

Whoever provides any Personal Data related to third parties to the Company, such as work guarantees or work certifiers, etc., who provide information to the Company has notified and guaranteed that the information provider has fully informed the persons who own the data about the details according to this policy.

4. SECURITY MEASURES

As a way to protect personal privacy of your Personal Data, we maintain appropriate security measures, which include administrative, technical and physical safeguards in relation to access control, to protect the confidentiality, integrity, and availability of Personal Data against any accidental or unlawful or unauthorized loss, alteration, correction, use, disclosure or access, in compliance with the applicable laws.

In particular, we have implemented access control measures which are secured and suitable for our collection, use, and/or disclosure of Personal Data. We restrict access to Personal Data as well as storage and processing equipment by imposing access rights or permission, access management to limit access to Personal Data to only authorized persons, and implement user responsibilities to prevent unauthorized access, disclosure, perception, unlawful duplication of Personal Data or theft of device used to store and process Personal Data; This also includes methods that enabling the re-examination of access, alteration, erasure, or transfer of Personal Data which is suitable for the method and means of collecting, using and/or disclosing of Personal Data.

5. HOW LONG DO WE KEEP PERSONAL DATA

We store Personal Data of the data subject for the following periods of time:

- 5.1 The Company will retain the Personal Data of the data subject for the period necessary to achieve the specified purpose of processing that Personal Data. The retention period for Personal Data will change depending on the purposes specified for collecting and processing that Personal Data.
- 5.2 The Company will retain Personal Data for the period specified by relevant laws, taking into account the business practices for each type of Personal Data. After such a period, the Company may take appropriate steps to delete or destroy such Personal Data from storage or make Personal Data non-identifiable to the data subject without notifying the data subject in advance.

6. TO WHOM WE MAY DISCLOSE OR TRANSFER PERSONAL DATA

We may disclose or transfer Personal Data to the following third parties who collect, use, and/or disclose Personal Data in accordance with the purpose under this Privacy Policy. These third parties may be located in Thailand and areas outside Thailand. You can visit their privacy policy to learn more details on how they collect, use and/or disclose Personal Data since you could also be subject to their privacy policies.

6.1 ROCTEC¹ Group Companies, their affiliates and subsidiaries

Under the management and operations. The Company may need to disclose, transfer or access to your Personal Data, for the purposes set out in this Privacy Policy to our subsidiaries, associate companies, or our affiliates, such as accounting systems or the Company's database. Therefore, Other the ROCTEC Group Companies may rely on the consent obtained by us to use your Personal Data.

6.2 BTS² Group Companies, their affiliates and subsidiaries

As the Company is part of BTS Group Companies which all, including their affiliates and subsidiaries, may collaborate. For instance, the Company may refer or recommend you to the BTS Group Companies, their affiliates or subsidiaries, or partially share systems, including service systems and/or database, we may need to transfer your Personal Data to, or otherwise allow access to such Personal Data by BTS Group Companies, their affiliates or subsidiaries, for the purposes set out in this Privacy Policy. Other BTS Group Companies, their affiliates and subsidiaries, may rely on the consent obtained by us to use your Personal Data.

6.3 Our service providers

We may use other companies, agents or contractors to perform services on behalf or to assist with the provision of our services. We may share Personal Data to third-party service provider, including but not limited to (1) companies that coordinate and prepare employment documents for foreign employee; (2) service providers who provide employee's benefit calculation services; (3) service providers who provide payroll and payment system; (4) fund management companies who manage provident fund; (5) infrastructure, software, internet and website developers and IT service providers; (6) data storage and cloud service providers; (7) document storage and eradication service providers; (8) warehouse and logistic service providers; (9) travel service providers/ travel agencies; (10) event organizers; (11) credit rating agencies; (12) printing houses; (13) voting and vote counting service providers; (14) uniform manufacturers; (15) card manufacturers; (16) training institutions; and/or (17) inspection agencies to inspect standard compliance.

In the course of providing such services, the service providers may have access to your Personal Data. However, we will only provide our service providers with the Personal Data that is necessary for them to provide the services, and we will ask them not to use your Personal Data for any other purposes. We will ensure that all the service providers we work with will keep your Personal Data secure.

¹ Please see the list of ROCTEC Group Companies at <https://www.roctecglobal.co.th/en/about-us/structure>

² Please see the list of BTS Group Companies at <https://www.btsgroup.co.th/en/about/subsidiaries-and-associated>

6.4 Our business partners

We may transfer your Personal Data to our business partners to operate our business and provide the services including, but not limited to, outsourcers, project owners, financial institutes or banks, securities companies, Securities Depository, business partners, insurance companies, hospitals, training agencies/institutions, hotels, provided that the receiving business partner shall agree to treat Personal Data in a manner consistent with this Privacy Policy.

6.5 Third parties permitted by law

In certain circumstances, we may be required to disclose or share your Personal Data to third party in order to comply with a legal or regulatory obligations. This includes, without limitation, Ministry of Interior, Ministry of Commerce, Ministry of Labor, Ministry of Health, Revenue Department, Department of Labor Protection and Welfare, Department of Intellectual Property, Department of Business Development, Excise Department, Customs Department, Consular Department, Department of Rail Transport, Legal Execution Department, Department of Skill Development, Department of Disease Control, district office, Social Security Office, Immigration office, Stock Exchange of Thailand (SET), Securities and Exchange Commission (SEC), Bank of Thailand (BOT), Office of Insurance Commission (OIC), Board of Investment (BOI), Anti-Money Laundering Office (AMLO), Student Loan Fund, police, embassy, consulate, government authority, law enforcement agency, court, regulator, or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety; or to detect, prevent, or otherwise address fraud, security or safety issues.

6.6 Professional advisors

We may disclose Personal Data to our expert advisors including, but not limited to, (1) independent advisors, project advisors, financial advisors; (2) legal advisors who assist us in our business operations and provide litigation services such as defending or initiating legal actions; and/or (3) auditors who provide accounting services or conduct financial audit for the Company.

6.7 Other third parties

We may be required to disclose Personal Data based on the legal grounds in accordance with the purposes as specified in this Privacy Policy to other third parties such as the Thai Institute of Directors, educational institutions, shareholders, creditors, debtors, customers, complainants or other third parties that we receive a request to access our CCTV records, and/or other person as the case may be.

6.8 Third parties connected with business transfer

We may disclose or transfer your Personal Data to our business partners, investors, significant shareholders, assignees or transferees in the event of any reorganization, restructuring, merger, acquisition, sale, purchase, joint venture, assignment, or any other similar events involving transfer or other disposition of all or any portion of our business, assets or stock. If any of above events occurs, the receiving party will comply with this Privacy Policy to respect your Personal Data.

7. Cross-BORDER TRANSFERS OF PERSONAL DATA

We may disclose or transfer Personal Data to third parties or servers located overseas, which the destination countries may or may not have the same data protection standards as Thailand's. This includes, without limitation, IT service providers, system developers and maintenance service providers, data storage and cloud service providers, bank/financial institutes, securities companies, shareholders, companies that we invest in, business alliances, agents and distributors, advisor companies, in case of international transfer to customers overseas, business partners or alliances overseas, hotels, training agencies, embassies, and/or consulates. We take steps and measures to ensure that Personal Data is securely transferred, that the receiving parties have in place suitable data protection standard and that the transfer is permitted under the law.

8. COOKIES AND HOW THEY ARE USED

If you visit our websites, we will gather certain information automatically from you by using tracking tools and cookies (including, but not limited to, Google Tag Manager, Google Analytics, Hotjar, Matomo, Zendesk, Facebook Pixel Analytics, Facebook Ad Manager, and Google Cloud). Cookies are tracking technologies which are used in analyzing trends, administering our websites, tracking users' movements around the websites, or to remember users' settings. Some of the cookies are necessary because otherwise the site is unable to function properly. Other cookies are convenient for the visitors and they remember your username in a secure way as well as your language preferences.

Most internet browsers allow you to control whether or not to accept cookies. If you reject cookies, your ability to use some or all of the features or areas of our websites may be limited. Please see our Cookies Policy for more details at https://www.roctecglobal.co.th/wp-content/uploads/2024/08/07-Cookie-Policy-Rev.02_Public_1092024.pdf

9. RIGHTS AS A DATA SUBJECT

Subject to applicable laws and exceptions thereof, a data subject may have the following rights to:

- 1) **Access:** Data subjects may have the right to access or request a copy of the Personal Data we are collecting, using and/or disclosing. For privacy and security, we may require proof of the data subject's identity before providing the requested Personal Data;

- 2) **Rectification:** Data subjects may have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data that we collect, use and/or disclose rectified;
- 3) **Data Portability:** Data subjects may have the right to obtain Personal Data we hold about that data subject, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) if we are collecting, using and/or disclosing that data on the basis of data subject's consent or to perform a contract with the data subject;
- 4) **Objection:** Data subjects may have the right to object to certain collection, use and/or disclosure of Personal Data subject to the applicable law;
- 5) **Restriction:** Data subjects may have the right to restrict our use of Personal Data where the data subject believes such Personal Data to be inaccurate, that our collection, use and/or disclosure is unlawful, or that we no longer need such Personal Data for a particular purpose;
- 6) **Withdraw Consent:** For the purposes the data subjects have consented to our collection, use and/or disclosure of Personal Data, data subjects may have the right to withdraw consent at any time;
- 7) **Deletion:** Data subjects may have the right to request that we delete, destroy or anonymize Personal Data that we collect, use, and/or disclose, except we are not obligated to do so if we need to retain such Personal Data in order to comply with a legal obligation or to establish, exercise or defend legal claims; and
- 8) **Lodge a complaint:** Data subjects may have the right to lodge a complaint to the competent authority where the data subject believes our collection, use and/or disclosure of Personal Data is unlawful or non-compliance with applicable data protection law.

10. Participation of the owner of personal data

In exercising the rights under Section 9, the owner of personal data, successor, heir, legal representative, or legal guardian must notify the Company in writing to proceed with the request within the period prescribed by law.

The Company's action in response to the request under the rights of the owner of personal data may limit the provision of services, transactions, or any action that is beneficial to the owner of personal data that should be received under the conditions of the Company and as prescribed by law.

11. Rights Reservation

The Company reserves the right to reject a request under Section 9 in the following cases:

- 11.1) The law grants the Company the right to reject a request from a personal data owner.
- 11.2) The requested personal data is anonymous or identifies the personal data owner.
- 11.3) The requester does not have evidence to confirm ownership of the personal data or is an authorized person or a person with a stake in acting on behalf of the personal data owner.
- 11.4) The requested personal data is not stored at the Company.
- 11.5) The personal data owner, an authorized person, or a person with a stake in the personal data owner has requested the Company act in the same manner or with the same content repeatedly, more than necessary, or without reasonable cause.

12. Changes to the Privacy Policy

The Company will improve its security measures to increase the efficiency of the security of Personal Data appropriately and in accordance with the standards stipulated by law. In the event of any changes to the Privacy Policy, the Company will notify the owner of the personal data by publishing it on the Company's website at <https://www.roctecglobal.co.th/en/about-us/#privacy-policy>

13. OUR CONTACT DETAILS

If the data subject wishes to contact us to exercise the rights relating to your Personal Data or if there are any queries about your Personal Data under this Privacy Policy, please contact our Data Protection Officer (DPO) at:

- (1) Roctec Global Public Company Limited
- (2) Office: 1000/9 BTS Visionary Park - South Tower, 18th Floor, Unit No. 1801 – 1807
Phahonyothin Road, Chomphon Sub-district, Chatuchak District, Bangkok 10900
- (3) Telephone: +662-938-3388, Monday to Friday, 9.00 a.m. – 6.00 p.m.
- (4) Email: dpo@roctecglobal.co.th

This Privacy Policy is effective as of April 1st, 2025, onwards.

Mr. Weng Sam Lam

Chief Executive Officer