

DIRECTOR 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 protection of personal data. We follow security procedures when collecting, using, and/or disclosing your Personal Data (as defined below).

This privacy policy ("**Privacy Policy**") was made to inform you that in the process of business operation of the Company as well as legal compliance including but not limited to the Civil and Commercial Code, Public Limited Companies Act B.E. 2535 (1992) (as amended), Securities and Exchange Act B.E. 2535 (1992) (as amended), we may collect, use, and/or disclose Personal Data relating to you, who is the Company's director.

This Privacy Policy applies to our process of business management and legal compliance at the Company's place of business, via websites, electronic system, telephone, email, walk-in job application, post, social networking sites, online communication channels and other means where we collect your Personal Data.

From time to time, we may change and/or update this Privacy Policy. We will provide additional notice of significant changes and/or updates. We will post the date on which our Privacy Policy was last updated at the top of the Privacy Policy. We encourage you to read this Privacy Policy carefully and to check Privacy Policy regularly to review any changes and/or updates we might take in accordance with the terms of this Privacy Policy.

1. WHAT PERSONAL DATA WE COLLECT

For the purposes of this Privacy Policy, "**Personal Data**" means any identified or identifiable information about you as listed below.

We may directly or indirectly collect your Personal Data from other sources. For example, we may directly collect your Personal Data in the process of selection, appointment, or throughout your director term at the Company. In addition, we may indirectly collect your Personal Data, e.g., from BTS Group Companies¹, affiliates, subsidiaries, our third-party business alliances, other third parties (e.g., reference persons), public sources, and website of third parties or relevant governmental agencies. The specific types of Personal Data collected will depend on the relationship which you have with the ROCTEC Group companies², the Company or BTS Group Companies, affiliates or

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

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

subsidiaries, your role as the Company's director, or benefits from the Company or BTS Group Companies to which you are entitled. The followings are example of Personal Data that may be collected:

- 1) **Personal details**, such as title, name, surname, gender, age, nationality, date of birth, signature, photo, VDO records, vehicle plate number, vehicle brand, educational backgrounds, work experience, training experience, occupation, job title, workplace, professional license, certificate of training, marital status, and/or military status;
- 2) **Contact details**, such as postal address, house registration address, national identification card address, work address, house/workplace map, phone number, business phone number, mobile phone number, facsimile number, email address, LINE ID, Facebook account, and/or other information-related to social networking sites;
- 3) **Identified information from the government agencies**, such as national identification card, passport, house registration, car registration, driving license, work permit, death certificate, company affidavit, certificate of personal name change, military record, conscription certificate, VISA, and/or immigration form;
- 4) **Work details**, such as staff identification number, job title, employment beginning/termination date, work experience, performance report, information relating to work outside of the workplace (e.g., place, time, and date of the work outside the workplace, travel plan) work record, disciplinary record, transfer record, promotion record, log book (e.g., clock-in, clock-out) complain details, litigation details, bankruptcy record, application or request for withdrawal of any extraordinary rights, and/or inspection form of the director's qualifications;
- 5) **Financial details**, such as details relating to the opening of bank account, copy of bank book, bank account number, amount of money, credit/debit card number, transaction details, expense details, disbursement document, current return, salary, meeting allowance, other income and deduction, withholding tax details, details in the loan application, document/minutes of shareholder's meeting, copy of shareholder register, shareholder/security holder number, security account number, number of shares/securities, and/or amount of dividend;
- 6) **Transaction details**, such transaction data, contract details, power of attorney, and other receipts (e.g., advertisement space lease agreement, land deed);
- 7) **Profile details**, such as user account, password, and data in Rabbit card;
- 8) **Technical details**, such as Internet Protocol (IP) address, media access control, computer traffic record, website history, operating system and platform, and other technology on devices used to access the platform;
- 9) **Other details**, such as other details in job application, resume, terms of reference (TOR), details of bidding, report of interests, and/or details of engineering project;

10) **CCTV** details, please see our CCTV Policy for more details on how we collect, use and/or disclose Personal Data by our CCTV at “**CCTV Privacy Policy**” at <https://www.roctecglobal.co.th/wp-content/uploads/2024/09/06%20CCTV%20Policy.pdf>

11) **Sensitive data**, such as Sensitive Data as shown in the identified document (e.g., religion) and health information (for the purpose of control of disease/epidemic such as COVID-19) (“**Sensitive Data**”)

We do not intentionally collect your sensitive data. However, in case that we do, we will only collect, use, and/or disclose Sensitive Data on the basis of your explicit consent or where permitted by law.

If you provide Personal Data of any third party (such as parent, spouse, children, emergency contact, or referral person, guest) to us, e.g., their name, family name, address, relationship, contact details, and related documents, you represent and warrant that you have the authority to do so by (i) informing such other persons about this Privacy Policy; and (ii) obtaining consents (where required by law or necessary) to permit us to use such Personal Data in accordance with this Privacy Policy.

We only collect the Personal Data of children, quasi-incompetent person and incompetent person where their parent or guardian has given their consent. We do not knowingly collect Personal Data from any person under the age of 20 without their parental consent when it is required, or from quasi-incompetent person and incompetent person without their legal guardian's consent (as the case may be). In the event that we learn that we have unintentionally collected Personal Data from anyone under the age of 20 without parental consent when it is required or from quasi-incompetent person and incompetent person without their legal guardians' consent, we will immediately delete such Personal Data or only collect, use and/or disclose if we can rely on other legal basis apart from consent or where permitted by law.

2. WHY WE COLLECT, USE AND/OR DISCLOSE PERSONAL DATA

We collect, use and/or disclose Personal Data for the following purposes:

2.1 THE PURPOSES OF WHICH WE RELY ON CONSENT:

We rely on consent for the collection, use, and/or disclosure of **Sensitive Data as shown in the government issued document (e.g., religion specified on the national identification card)** to identify and verify. Where we rely on consent for the collection, use and/or disclosure of Personal Data, you have the right to withdraw your consent by contacting (see details in Section 8 of this Privacy Policy). The withdrawal of consent will not affect the collection, use and/or disclosure of Personal Data and Sensitive Data that was previously consented before the withdrawal. However, if you do not give consent for Sensitive Data, do not provide Sensitive Data to us, or withdraw your consent, we may not be able to proceed or provide services which rely on such Sensitive Data for you.

2.2 THE PURPOSE THAT WE MAY RELY ON OTHER LEGAL BASES FOR COLLECTION, USE, AND/OR DISCLOSURE OF PERSONAL DATA

We may also rely on (1) contractual basis, for our initiation, execution, or fulfilment of a contract with data subjects; (2) legal obligation, for the fulfilment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties. We will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your Personal Data; (4) vital interest, for preventing or suppressing a danger to a person's life, body or health; (5) public interest, for the performance of a task carried out in the public interest or for the exercising of official authorities; (6) for establishing and raising the right to claim in the future; and/or (7) for legal compliance, e.g., for fulfilment of the objectives in relation to report of information to the Department of Business Development, the Ministry of Commerce, Securities Exchange Commission or the Stock Exchange of Thailand or other legal grounds permitted under applicable data protection law (as the case may be). Depending on the context of the interactions with us, we may collect, use and/ or disclose Personal Data for the following purposes:

- 1) **To appoint directors:** such as, verification and background check, assessment of your suitability and qualifications, selection and appointment, initiation and fulfilment of an agreement, the preparation of work permit and employment document, and/or determination of salary, welfare, and other basic contractual information in your director position;
- 2) **To contact and communicate:** such as, to contact and communicate relating to your work activity, document delivery, to contact your emergency contact when necessary;
- 3) **To administrate, pay remuneration, and provide welfare:** such as to pay salary and meeting allowance and provide welfare, expense, bonus, compensation, medical and health disbursement, and other rights and privileges to you and other related person, e.g., annual health check-up, medical treatment, insurance, social security, provident fund management, reward, gym membership, meal support via staff identification card, welfare of cooperative member, scholarship, or baby-sitting welfare after school and during school break, including benefit payment according to insurance policy and life insurance policy;
- 4) **To arrange for meeting and training:** such as meeting of the Company's directors and subcommittee, orientation, internal and external training and seminar, including facilitating the event and evaluate the training and attendee's satisfaction;

- 5) **For the operation of the Company, BTS Group Companies, affiliates and subsidiaries:** such as to administrate the internal operation and assets of the Company, to contact and communicate with BTS Group Companies, affiliates, subsidiaries and business alliance, to consider and assign, withdraw, or grant authority to you to make any transaction with BTS Group Companies, affiliates, subsidiaries and business alliance, including stating your name and Personal Data in the relevant contract for such purposes, and for other purposes determined by the Company and related to or as specified in the employment agreement, to use as supporting evidence for any transaction, to assess risks and make decision regarding investment and fund raising, to use as evidence and reference, to prepare and keep important document of the Company;
- 6) **To fulfil financial obligation of the organization, including (internal and external) audit and accounting requirements:** such as to project and determine budget, and analyse and control cost/budget, e.g., to use as a supporting information for opening account, complete financial statement, borrow and procure funds for the Company, to evaluate salary and other income, to proceed tax procedures (e.g., withholding income tax) and disbursement, make payment, issue bill for debt collection, to verify the accuracy of accounting and document relating to payment, and/or to prepare accounting, balance sheet, and expense summary of the Company or BTS Group Companies;
- 7) **To manage IT system:** such as to manage IT system, communication system, IT security system, for control access to data system and IT security audit; to manage internal business for internal compliance requirements, policies and procedures; and to update our database;
- 8) **To comply with laws and orders of competent authority:** such as, in case the Company, BTS Group Companies, affiliates or subsidiaries has reasonable reason to believe that it shall comply with the law, order or provide cooperation, to comply with the law, legal proceedings or government authorities' orders which can include orders from government authorities outside Thailand and/or cooperate with court, regulators, government authority and law enforcement bodies, the Company may need to disclose Personal Data to strictly comply with the said legal obligations, proceedings or government orders. This includes to investigate or prevent crime, fraud, and/or establish the right to claim under the law;
- 9) **To protect our interests:** such as, to protect the security and integrity of our business and the business of BTS Group Companies, affiliates, subsidiaries or other relevant party; to exercise our rights or protect interest of the Company, BTS Group Companies, affiliates, subsidiaries or other relevant party where it is necessary and lawfully to do so, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims or violations of law; to manage and prevent loss of our assets and property; to validate the credibility and completeness of internal operation, to monitor and prevent wrongdoings in

the workplace of the Company and BTS Group Companies, affiliates, subsidiaries to secure the compliance of laws, rules, policies, terms and conditions of the Company, BTS Group Companies, affiliates, subsidiaries and other relevant party; to detect and prevent misconduct within our premises; to follow up on incidents; to prevent and report criminal offences and to protect the security and integrity of the business of the Company and BTS Group Companies, affiliates and subsidiaries;

- 10) **Business transfer or merger:** in case of sale, transfer, merger, organizational restructuring, or other event of the same nature, the Company may transfer your Personal Data to one or many other third party(ies) as part of such transaction;
- 11) **To manage risks:** such as, to perform risk management, performance monitoring and risk assessments; and/or
- 12) **To provide security:** such as, to prevent or suppress a danger to a person's life, body, health, or asset, or for disease/epidemic control, and to proceed in case of emergency.

Where the Personal Data we collect from you is needed to meet our legal, regulatory, or contractual obligations or enter into an agreement with you, if you do not provide your Personal Data when requested, we may not be able to achieve the aforementioned purposes.

3. TO WHOM WE MAY DISCLOSE OR TRANSFER PERSONAL DATA

We may disclose or cross-border 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.

3.1 ROCTEC 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.

3.2 BTS Group Companies, affiliates and subsidiaries

As the Company is part of BTS Group Companies which all companies including affiliates and subsidiaries may collaborate, for instance, the Company, BTS Group Companies, affiliates and subsidiaries may partially share systems, such as 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, affiliates or subsidiaries for the purposes set out in this Privacy Policy. Other BTS Group Companies, affiliates or subsidiaries may rely on the consent obtained by us to use your Personal Data as well.

3.3 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.

3.4 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, 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.

3.5 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 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.

3.6 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.

3.7 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.

3.8 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.

4. 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 cross-border 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.

5. HOW LONG DO WE KEEP PERSONAL DATA

We retain Personal Data for as long as is reasonably necessary to fulfil purpose for which we obtained them and to comply with our legal and regulatory obligations. However, we may have to retain Personal Data for a longer duration, as required by applicable law.

6. 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 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. For additional details on the Company's data security, please see our full Privacy Policy at https://www.roctecglobal.co.th/wp-content/uploads/2024/08/01-Privacy-Policy_English-Translation-Rev.00_Public_1092024.pdf

7. 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 de-identity 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.

8. 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