

Appendix B-2

Privacy Notice for Shareholder/Director

Dear Shareholder/Director,

SC Machinex Asia Ltd. (“**Company**”, “**we**” or “**our**”) values your privacy and strives to protect your personal data (“**Personal Data**”) based on the Thai Personal Data Protection Act B.E. 2562 (“**PDPA**”). We will collect, use and/or disclose your Personal Data in connection with your relationship with us as the Shareholder/Director.

This Privacy Notice explains: -

- what kind of Personal Data do we collect? This includes what you tell us about yourself (“**you**”, “**your**” or “**yourself**”) and what we learn through your time being the Company’s shareholder/Director.
- how do we use your Personal Data?
- who do we disclose the Personal Data to?
- what are the choices we offer? This includes how to access and update your Personal Data.
- what are your privacy rights and how does the law protect you?

1. What kind of Personal Data do we collect?

We collect many different kinds of the Personal Data, depending on various circumstances that are relevant to your relationship with us as the shareholder/director.

We may collect the Personal Data about you from a variety of sources, including but not limited to: -

- From you directly as part of a board registration, other necessary processes required by laws and/or our contractual relationship;
- Identification documents such as ID card, passport, etc.; and/or
- Correspondences with you through meetings or other assessments e.g., CCTV, recording equipment, etc.

In some cases, we may collect the Personal Data about you from third parties, such as recruiting agencies, public authorities, screening agencies, publicly available sources to confirm signatory powers, publicly accessible information sources such as internet, public social media profiles, etc.

The categories of Personal Data about you that we process, subject to the applicable law, including but not limited to: -

- **Personal details:** Name, surname, gender, date of birth, marital status, personal identification number, passport number, address, contact details (e.g., email address, telephone number, social media, etc.), nationality, image of personal identification card or passport, signatures, photographs, and CCTV images;

- **Contractual details:** The terms and conditions of your shareholder/Director agreement;
- **Financial details:** The details of your bank account, salary, tax payment and benefits (such as pensions or insurance cover);
- **Electronic data:** IP address, cookies, activity logs, online identifiers, unique device identifiers and geolocation data;
- **Professional details:** The details of profession, professional memberships, your qualifications, skills, experience and employment and director history;
- **Educational details:** The details of educational background, educational achievements, etc.;
- **Transactional details:** The details of your shareholding activities;
- **Family details:** Names and other details of family members and dependents, including their shareholding activities, employment and director history, etc.;
- **Sensitive Personal Data:**
 - Racial or ethnic origin; and
 - Religious.

During a processing of your Personal Data, we may also collect some sensitive Personal Data about you to enable you to perform your role as the shareholder/director and to ensure that we comply with regulatory obligations placed on us with regard to your position. We will not collect, use and/or disclose this type of data without your consent unless the law allows us to do so.

2. How do we use your Personal Data?

We will collect and use your Personal Data only if we have proper reasons and it is lawful to do so. This includes sharing it outside the Company.

We will rely on one or more of the following reasons when processing/holding Personal Data: -

- When it is to fulfill a contractual relationship where you are the shareholder/ director;
- When it is our legal duty;
- When it is in our legitimate interest;
- When it is vital to yourself; and/or
- When you consent to it.

The law and other regulations treat the sensitive Personal Data more stringently. We will not collect, use and/or disclose this type of Personal Data without your consent unless the law allows us to do so. If we do, it will only be when it is necessary: -

- for contractual purposes;
- for the reasons of vital interests;

- for the reasons of substantial public interests;
- for a detection and prevention of fraud and crime; and/or
- for establishing, exercising and/or defending legal claims.

The purposes for which we may process your Personal Data, subject to the applicable law, and the legal basis on which we may perform such processing, are: -

Purposes of data processing	Legal basis
<ul style="list-style-type: none"> • To approve, manage, administer and/or execute your appointment as the shareholder/director; • To manage invoices and payments of expenses; • To manage dividend payments; • To provide IT services to you (e.g. system access, communication services, system security, etc.); • To respond to requests of regulators and/or public authorities; • To prevent and detect security threats to our IT infrastructure or buildings; • To perform an internal audit; and/or • For social events/ CSR 	<ul style="list-style-type: none"> • Fulfilment of contract • Our legal duties • Our legitimate interests • Your consents

When we rely on the **legitimate interests** as the reason for processing the Personal Data, it has considered whether or not your rights are overridden by our interests and has concluded that they are not.

3. Who do we disclose Personal Data to?

We may share your Personal Data with others where it is lawful to do so, including where we or they: -

- need to provide you with the requirement under the shareholder/director contract (e.g., make the payment, etc.);
- have a public or legal duty to do so (e.g., prevent and detect fraud, assist in a tax deduction, criminal and mental/health check, etc.);
- need to in connection with a regulatory reporting, litigation, asserting or defending legal rights and interests;
- have legitimate business reasons to do so (e.g., manage risk, internal report, assess data analysis, performance director, etc.); and/or
- ask for your permission to share it, and you agree.

We may also need to share your Personal Data for the above purposes with others, including but not limited to: -

- Other group companies, sub-contractors, agents or service providers who work for us (e.g. professional advisors, brokers, administration and IT service providers, etc.), including their employees, representatives, sub-contractors, service providers, directors and officers;
- Third parties in order to obtain employment background checks, necessary criminal record checks and physical health checks;
- Any trustees, beneficiaries, administrators or executors;
- Financial institutions or payment service providers, tax authorities, trade associations and credit reference agencies;
- Third parties in the context of potential or actual corporate restructuring, merger and acquisition and sale of some or all of our business;
- Law enforcement, government, courts, court procedure, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities;
- Other parties involved in any disputes, including disputed transactions;
- Fraud prevention agencies who will also use it to detect and prevent fraud and other financial crime and to verify your identity;
- Anyone who provides instructions or operates on your behalf (e.g., power of attorney, solicitors, intermediaries, etc.);
- Other parties who are our business partners; and/or
- Anybody else that we have been instructed to share your Personal Data with by you.

Except as described in this Privacy Notice, we will not use the Personal Data for any purposes other than the purposes as described to you in this Privacy Notice. Should we intend to collect, use and/or transfer additional Personal Data which are not described in this Privacy Notice, we will notify you and obtain your consent prior to the collection, use and disclosure unless we are permitted to do so without your consent under the law. You will also be given the opportunity to consent or decline to such collection, use and/or transfer of your Personal Data.

We will continue to adhere to this Privacy Notice with respect to the Personal Data we have in our possession relating to prospective, existing and former shareholder/director.

Cross-border Transfer of Personal data

Your Personal Data may be transferred to and stored/processed in other countries.

Such countries may not have the same level of protection for the Personal Data. When we do this, we will ensure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer the Personal Data in this way to carry out our contract with you, fulfill the legal obligations, protect the public interests and/or for our legitimate interests. In some countries, the law might compel us to share certain Personal Data (e.g., with tax authorities). Even in this case, we will only share the Personal Data with people who have rights to see it.

4. Retention of Personal Data

We retain your Personal Data for as long as it is necessary to carry out the purposes for which it was collected i.e., for contractual and legal reasons, or compliance with the applicable laws.

We may keep your Personal data as long as you remain the Company's shareholder/director plus 10 years, unless otherwise in the event of regulatory or technical reasons, we may keep your personal data for longer than 10 years. If we do not need to retain the Personal Data for longer than it is legally necessary, we will destroy, delete or anonymize it.

5. Accuracy of your Personal Data

We need your help to ensure that your Personal Data is current, complete and accurate. Please inform us of any changes to your Personal Data by: -

- Contacting our representative at Ms. Tanaporn Waewpetch;
- Updating your information at/via tanaporn.w@sc-ma.co.th

We will occasionally request an update from you to ensure that the Personal Data we use to fulfil the purposes of collection, use and/or disclosure are current, accurate and complete.

6. What are your privacy rights and how does the law protect you?

- **Right to Withdraw:** This enables you to withdraw your consent to our processing of your Personal Data, which you can do at any time. We may continue to process your Personal Data if we have another legitimate reason to do so;
- **Right to Access:** This enables you to receive a copy of Personal Data we hold about you and to check that we are lawfully processing it;
- **Right to Correct:** This enables you to have any incomplete or inaccurate Personal Data we hold about you corrected;
- **Right to Erasure:** This enables you to ask us to delete, destroy or anonymize your Personal Data where there is no good reason for us to continue processing it. You also have the right to ask us to delete your Personal Data where you have exercised your right to object to processing (see below);
- **Right to Object:** This enables you to object to the processing of your Personal Data where we are relying on the legitimate interest and there is something about your particular situation which makes you want to object to the processing on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes and profiling activities;
- **Right to Restrict Processing:** This enables you to ask us to suspend the processing of your Personal Data, for example, if you want us to establish its accuracy or a reason for processing it;
- **Right to Portability:** This enables you to request for the transfer of your Personal Data to another party; and

- **Right to Lodge a Complaint:** This enables you to file the complaint with a related government authority, including but not limited to, the Thailand Personal Data Protection Committee.

You may exercise your rights at any time by informing the Company via the contact specified in Article 10 below, without having to pay any fees to access your Personal Data or exercising any other rights. However, the Company may charge a reasonable fee if your request does not have a rigid ground, is duplicated or is clearly more than necessary. In other words, the Company may refuse to proceed with your request under those situations.

The Company may need to request certain Personal Data from you in order to verify your identity and guarantee your right to access the Personal Data (or to exercise any other rights) which is considered a security measure to ensure that your Personal Data will not be disclosed to those who is not authorized to access the Personal Data. The Company may also contact you for more information about the request for a quicker response.

The Company will make every effort to respond to your legitimate request within 30 days. Under some circumstances, the Company may take more than 30 days depending on a complexity or duplication of your request. In such case, the Company will inform you on a status of your request.

Handling of Complaints

In the event that you wish to make the complaint about how we process your Personal Data, please contact our Data Protection Officer at [dpo@sc-ma.co.th] and we will try to consider your request as soon as possible. This does not prejudice your right to file the complaint with a government authority or Thailand Personal Data Protection Committee.

7. Security of your Personal Data

Information is our asset and therefore we place a great importance on ensuring the security of your Personal Data. We regularly review and implement up-to-date physical, technical and organizational security measures when processing your Personal Data. We have internal policies and controls in place to ensure that your Personal Data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties. Our employees are trained to handle the Personal Data securely and with utmost respect, failing which they may be subject to a disciplinary action.

8. Your Responsibilities

You have some responsibilities under the shareholder/director contract or protocol to provide us with the Personal Data. Certain Personal Data, such as personal details, contact details, payment details, educational details, family details, etc. have to be provided to enable us to enter into the shareholder/director contract with you and to ensure that we comply with the regulatory obligations placed on us. If you do not provide such personal data, this will hinder our ability to administer the rights and obligations arising as a result of your relationship with us as the shareholder/director efficiently.

You may also have to provide us with the Personal Data in order to exercise your statutory rights. Failing to provide the Personal Data may mean that you are unable to exercise your statutory rights.

9. Revision of our Privacy Notice

We keep our Privacy Notice under a regular review and thus the Privacy Notice may be subject to changes. The date of last revision of Privacy Notice can be found on the top page of this notice and via [<https://www.sc-ma.co.th/en/personal-data-protection>].

10. Contact us

If you have any questions in regard to the protection of your Personal Data or if you wish to exercise your rights, please do the followings, at your choice: -

- Email us at dpo@sc-ma.co.th or
- Call us at 02-017-0225