

- Translation -

Definitions

Company / Organization	refer to	Asset Five Group Public Company Limited.
Subsidiary	refer to	Any company or legal entity in which Asset Five Group Public Company Limited holds, directly or indirectly, more than fifty percent (50%) of the voting rights.
Asset Five Group or the Group	refer to	1. Asset Five Group Public Company Limited; and 2. its subsidiaries.
The Board of Directors	refer to	The directors of Asset Five Group Public Company Limited.
Executives	refer to	The Chief Executive Officer (CEO) and the next four highest-ranking executives following the CEO, including all persons holding equivalent positions to the fourth-ranking executive, as well as executives in accounting or finance functions at the level of department head or higher, or equivalent.
Employees	refer to	Any employees of the Company and its subsidiaries, including probationary employees, permanent employees, and employees engaged under fixed-term employment contracts.

Asset Five Group Public Company Limited and its subsidiaries (the “Group”) are committed to conducting business with integrity and in accordance with ethical principles, professional standards, applicable laws, and the Personal Data Protection Act B.E. 2562 (2019). The Group recognizes the importance of safeguarding personal data relating to its business operations and ensuring that such personal data is securely maintained and handled in a trustworthy manner.

The Group has established this Personal Data Protection Policy to provide a framework for the management of personal data, including the determination of access rights to personal data of relevant persons and the secure and effective storage of such data. All relevant persons are required to have appropriate knowledge and understanding of personal data protection, respect the right to privacy, and be aware of their responsibilities in using personal data in the course of their work in compliance with applicable laws.

Practices

Objectives

This Policy is intended to inform relevant persons, in their capacity as data subjects, of the purposes and details relating to the collection, use and/or disclosure of their personal data, as well as their legal rights under applicable personal data protection laws. This Policy covers both individuals within and outside the organization.

Personal Data Collected, Used and/or Disclosed

1. Personal Data: Personal Data refers to any information relating to an individual that enables the identification of such individual, whether directly or indirectly, including:

1.1 Personal Data provided directly to the Company, provided through the Company, or otherwise held by the Company because of communications, visits, searches or interactions through digital channels, e-mail, websites, quotation processes, job applications, or any other channels.

1.2 Personal Data obtained or accessed by the Company from sources other than the individual and/or relevant person directly, such as government agencies, business partners, and data service providers. The Company shall collect Personal Data from such other sources only where consent has been obtained as required by law, unless such collection is necessary under circumstances permitted by law.

Personal Data collected, used and/or disclosed by the Company may include the following:

(1) General Personal Data: such as first name and last name, national identification number, address, telephone number, date of birth, e-mail address, educational background, gender, occupation, photograph, and financial information.

(2) Sensitive Personal Data: such as medical or health information, genetic and biometric data, race, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, and trade union information.

(3) Information contained in relevant documents: such as copies of national identification cards, household registration documents, driving licenses, educational certificates, bank account details, and other certification documents.

(4) Transaction Information: such as employment agreements, guarantee documents (if any), and other relevant material documents.

(5) Device or Technical Information: such as IP address, MAC address, Cookie ID, and online payslip information.

Purposes of the Collection, Use and/or Disclosure of Personal Data

1. To enable personnel to exercise their benefits in accordance with their intended purposes and for other purposes necessary under applicable laws

1.1 To enable personnel to exercise the benefits provided by the Company in accordance with their entitlements, where the Company has entered into an employment agreement or has other obligations, and to process requests for the exercise of benefits provided by the Company (Contractual Basis), including:

- Considering and approving employee benefits, such as remuneration and other welfare benefits or assistance to which employees are entitled as employees of the Company.
- Carrying out activities relating to the Company's business operations, such as bidding, submitting quotations, and/or providing relevant information.

1.2 To comply with applicable legal obligations (Legal Obligation), including:

- Complying with orders issued by legally authorized authorities.
- Complying with applicable laws, rules, regulations, and requirements of relevant authorities, including the Ministry of Labour, Department of Labour Protection and Welfare, Department of Skill Development, Revenue Department, Social Security Office, Immigration Bureau, Thailand

Institute of Nuclear Technology (Public Organization), Department of Energy Business, Legal Execution Department, and other relevant authorities, as well as other laws with which the Company is required to comply, whether in Thailand or overseas, including notifications and regulations issued pursuant to such laws.

1.3 For operations necessary for the legitimate interests of the Company or of other individuals or legal entities, provided that such interests do not override the fundamental rights and freedoms of the data subject (Legitimate Interest), including:

- Visitor identification and access control prior to entering the premises, including the exchange of identification cards and the recording of images through closed-circuit television (CCTV).
- Employee relations and/or matters involving relevant persons, such as complaint handling, opinion surveys, performance evaluations, satisfaction surveys, and notifications or Company news that may be beneficial to employees.
- Risk management, supervision and monitoring, and internal organizational management, including the transfer of Personal Data to affiliated companies for such purposes under the Group's personal data protection rules (Binding Corporate Rules).
- Anonymization of Personal Data so that individuals can no longer be identified (Anonymous Data).
- Preventing, responding to, and mitigating risks arising from fraud, cyber threats, and unlawful acts, such as offences against property, life, body, liberty, or reputation, including the sharing of Personal Data to enhance the operating standards of companies within the same group and/or business in preventing, responding to, and mitigating such risks.
- The collection, use and/or disclosure of Personal Data of directors, authorized persons, and representatives of corporate customers.
- Communications and the recording of images and audio in connection with meetings, training sessions, recreational activities, or exhibition booths.
- The collection, use and/or disclosure of Personal Data of persons who are subject to a court order for receivership.
- The receipt and delivery of parcels.

2. To Enable Personnel to Receive Benefits Based on the Consent They Have Provided, including:

2.1 Company Personnel: To provide Company personnel with information regarding the Company's policies, news, and activities, and to provide enhanced benefits that are aligned with their needs and preferences.

2.2 External Persons: To provide external persons with offers, special benefits, recommendations, and news, as well as opportunities to participate in special activities. Such benefits, promotions, news, or special activities may be provided by the Company, its business partners, or third parties associated with the Company, as applicable and in accordance with the consent provided by the data subject.

Disclosure of Personal Data

The Company may disclose Personal Data to other persons or entities with the consent of the data subject or on other legal bases permitted by applicable laws. Any person or entity receiving such Personal Data shall collect, use and/or disclose the Personal Data only within the scope of the consent provided by the data subject or within the scope relevant to this Policy.

The Company may disclose Personal Data to other persons or entities, with the consent of the data subject or on other applicable legal bases, for the purposes specified in this Policy. Such recipients may include, for example, parties involved in tendering processes, Personal Data Processors, business partners, the Company's representatives, subcontractors, auditors, external auditors, and competent authorities, as part of the Company's normal business operations and subject to appropriate confidentiality standards. Such recipients may also include the executives, employees, personnel, contractors, representatives, and advisors of the Company, as well as those of any person or entity receiving such Personal Data.

Cross-Border Transfer of Personal Data

- **Company Personnel:** The Company may transfer Personal Data to recipients located outside Thailand where necessary for the purposes specified in this Policy. In doing so, the Company shall ensure that such transfer is carried out in accordance with the requirements of applicable personal data protection laws, including requirements relating to adequate data protection standards, appropriate safeguards, applicable statutory exemptions, or the consent of the data subject, as the case may be.

- **External Persons:** Where Personal Data of external persons is to be transferred outside Thailand, the Company shall notify the data subject and obtain his or her consent to such cross-border transfer of Personal Data.

Retention Period of Personal Data

- **Company Personnel:** The Company shall retain the Personal Data of its employees throughout the period of their employment with the Company and/or, after the termination of their employment or other relationship with the Company, for as long as necessary to fulfill the relevant purposes specified in this Policy. The Company may retain such Personal Data for a longer period where required or permitted by law, including for the purpose of establishing, exercising, or defending legal claims or verifying matters in the event of a dispute within the applicable statutory limitation period. The retention periods for certain categories of Personal Data are as follows: employment records and related documents shall be retained for 3 years after termination of employment, and health examination results shall be retained for 10 years after termination of employment.

- **External Persons:** The Company shall retain the Personal Data of external persons for as long as necessary while such persons are customers, business partners, or otherwise maintain a relationship with the Company, or for as long as necessary to fulfill the relevant purposes specified in this Policy. The Company may retain such Personal Data for a longer period where required or permitted by law, such as for legal verification or audit purposes, including tax-related purposes, for a period not exceeding 10 years.

In this regard, the Company shall delete or destroy Personal Data or anonymize such Personal Data so that the data subject can no longer be identified, when such Personal Data is no longer necessary or upon the expiration of the applicable retention period.

Personal Data Protection

The Company shall securely maintain Personal Data by implementing appropriate technical measures (Technical Measures) and organizational measures (Organizational Measures) to ensure the security of Personal Data processing and to prevent Personal Data breaches. The Company has established policies, procedures, and guidelines for the protection of Personal Data, including information technology security standards and measures to prevent recipients of Personal Data from using or disclosing such Personal Data beyond the specified purposes

or without proper authorization. The Company shall periodically review and update such policies, procedures, and guidelines as necessary and appropriate.

In addition, the Company's executives, employees, personnel, contractors, representatives, advisors, and recipients of Personal Data are required to maintain the confidentiality of Personal Data in accordance with the confidentiality measures established by the Company.

Rights of Data Subjects

The rights of data subjects set out in this section are statutory rights of which data subjects should be aware. Data subjects may exercise their rights subject to the requirements of applicable laws and the policies currently in effect or as may be amended in the future, as well as the rules and procedures prescribed by the Company.

1. Right to Withdraw Consent: Where a data subject has given consent to the Company for the collection, use and/or disclosure of his or her Personal Data, whether such consent was given before or after the applicable personal data protection law came into effect, the data subject has the right to withdraw such consent at any time for as long as the Company retains such Personal Data, unless the exercise of such right is restricted by law or by a contract that provides benefits to the data subject.

The withdrawal of consent may affect the data subject's ability to exercise certain rights or receive certain welfare benefits. For example, the data subject may no longer be entitled to certain benefits or welfare arrangements tailored to his or her needs or may no longer receive information or news that may be beneficial to him or her. Therefore, for the data subject's benefit, the data subject should consider and inquire about the potential consequences before withdrawing consent.

2. Right of Access: The data subject has the right to request access to his or her Personal Data under the responsibility of the Company and to request that the Company provide a copy of such Personal Data. The data subject also has the right to request disclosure of how the Company obtained his or her Personal Data.

3. Right to Data Portability: The data subject has the right to obtain his or her Personal Data where the Company has arranged such Personal Data in a format that is readable or commonly usable by automated tools or devices and can be used or disclosed by automated means. The data subject also has the right to request that the Company transmit or transfer such Personal Data in such format to another data controller where this can be carried

out by automated means, and to request that the Personal Data transmitted or transferred by the Company be sent directly to another data controller, unless such transfer is technically infeasible.

The Personal Data referred to above must be Personal Data for which the data subject has given consent to the Company for its collection, use and/or disclosure, or Personal Data that the Company is required to collect, use and/or disclose in order to enable the data subject to exercise or receive benefits in accordance with his or her request, or other Personal Data as prescribed by a competent authority under applicable law.

4. Right to Object: The data subject has the right to object, at any time, to the collection, use and/or disclosure of his or her Personal Data where such collection, use and/or disclosure is carried out on the basis of the legitimate interests of the Company or of another individual or legal entity, provided that such interests do not override the fundamental rights and freedoms of the data subject, or where such processing is necessary for the performance of a task carried out in the public interest. Where the data subject objects to such processing, the Company may continue to collect, use and/or disclose the data subject's Personal Data only where the Company can demonstrate compelling legitimate grounds that override the fundamental rights and freedoms of the data subject, or where such processing is necessary for the establishment, exercise or defense of legal claims or for compliance with applicable laws, as the case may be.

In addition, the data subject has the right to object to the collection, use and/or disclosure of his or her Personal Data for marketing purposes or for purposes relating to scientific, historical or statistical research.

5. Right to Erasure: The data subject has the right to request the deletion or destruction of his or her Personal Data, or to have such Personal Data anonymized so that the data subject can no longer be identified, where the data subject believes that the Personal Data has been unlawfully collected, used and/or disclosed under applicable laws, or where the Company no longer needs to retain such Personal Data for the purposes specified in this Policy, or where the data subject has exercised the right to withdraw consent or the right to object as described above.

6. Right to Restriction of Processing: The data subject has the right to request the temporary restriction of the use of his or her Personal Data while the Company is verifying a request to exercise the right to rectification or the right to object, or in any other circumstances where the Company no longer needs the Personal Data and is required to delete or destroy such Personal Data under applicable laws, but the data subject requests the Company to restrict its use instead.

7. Right to Rectification: The data subject has the right to request that his or her Personal Data be corrected and kept accurate, up to date, complete, and not misleading.

8. Right to Lodge a Complaint: The data subject has the right to lodge a complaint with the competent authority under applicable laws if the data subject believes that the collection, use and/or disclosure of his or her Personal Data is in violation of or fails to comply with applicable laws.

9. Exercise of the Data Subject's Rights: The exercise of the data subject's rights set out above may be subject to limitations under applicable laws. In certain circumstances, the Company may have necessary grounds to refuse or may be unable to comply with a request to exercise such rights, for example, where compliance with applicable laws or a court order is required, where it is necessary for the public interest, or where the exercise of such rights may infringe upon the rights or freedoms of other persons. If the Company refuses such a request, the Company shall inform the data subject of the reasons for such refusal.

Data subjects may exercise their rights through the following channels:

Right	Channels for Exercising Rights			Processing Period
	E-Mail	Postal Mail	Internal Memorandum	(Business Days)
Right to Withdraw Consent	/	/	/	7 Days
Right of Access	/	/	/	30 Days
Right to Data Portability	/	/	/	
Right to Object	/	/	/	
Right to Erasure or Destruction of Personal Data	/	/	/	
Right to Restriction of Processing	/	/	/	7 Days
Right to Rectification	/	/	/	

In this regard, the processing period shall commence from the date on which the Company has completed the verification and confirmation of the data subject's identity. Where documents and/or supporting evidence are required to be submitted for the purpose of identity verification and confirmation, the processing period shall commence from the date on which the Company has received all required documents and supporting evidence in full.

Contact Channels for the Data Protection Officer

If a data subject has any suggestions or wishes to inquire about the collection, use and/or disclosure of Personal Data, including the exercise of rights under this Policy, the data subject may contact the Company and/or the Data Protection Officer during the Company's business hours (Monday–Friday, 8:00 a.m.–5:00 p.m.) through the following channels:

Contact Address / Postal Mail: Data Protection Officer

Company: Asset Five Group Public Company Limited

199 S-OASIS Building, 12th Floor, Room Nos. 1210, 1211 and 1212, Vibhavadi Rangsit Road,
Chom Phon, Chatuchak, Bangkok 10900

Tel.: 02-026-3512 ext. 504

E-Mail: hr@assetfive.co.th

In Case of Questions

If any director, executive, employee, or relevant person has any questions or concerns regarding this Policy, the collection, use and/or disclosure of Personal Data, or the exercise of data subject rights, he or she may contact the Company and/or the Data Protection Officer through the contact channels specified above.

Policy Review and Revision

To achieve the objectives of this Policy and ensure effective implementation, the Company shall review the Personal Data Protection Policy at least once a year or whenever there is a significant change.

This Personal Data Protection Policy was amended for the first time and reviewed at the Board of Directors' Meeting No. 5/2025, held on 12 November 2025, and shall be effective from 12 November 2025 onwards.

Announced on 12 November 2025

-Manop Bongsadadt-

(Associate Professor Manop Pongsadadt)

Chairman of the Board of Directors

Asset Five Group Public Company Limited