



บริษัท สโตนวัน จำกัด (มหาชน)

Stone One Public Company Limited

29 อาคาร บางกอกบิซิเนสเซ็นเตอร์ ชั้น 14 ถนนสุขุมวิท 63 แขวงคลองตันเหนือ เขตวัฒนา กรุงเทพฯ 10110

29 Bangkok Business Center 14 Fl. Sukhumvit 63 Road Klongton Nua Wattana Bangkok 10110

Tel : 02 391 9301

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Announcement No. ST1/010/2022

Subject: Policies and Guidelines on Personal Data Protection for Customers and Trade Partners or Contact Persons

Stone One PCL and its subsidiary (“**Company**”) has established policies and guidelines on personal data protection for its customers, trade partners, contact persons or an involved third party, so the data of such people is kept correctly, safely and used with integrity. Moreover, it shall comply with the Personal Data Protection Act 2019, with the following details:

The policy on this privacy (“**Privacy Policy**”) is applicable with the personal data (as defined in (1) below) of,

- (1) The customers, trade partners and contact persons who are individuals and companies, included the customers, trade partners and contact persons who come to contact on a targeting work (Potential customers, trade partners and contact persons in the future) as well as the present and past customers, trade partners and contact persons.
- (2) The staff, personnel, officials, representatives, shareholders, authorized persons, directors, contact persons, agents and other individuals involved with the customers, trade partners and contact persons with the company, including the customers, trade partners and contact persons for a targeted job (could be a customer, trade partner and future contact person), customers, trade partners including present and past contact persons.

This privacy policy explains how the company collects, gathers, applies, discloses and transfers the personal data of its customers, trade partners or contact persons to overseas. It applies with the businesses, websites, applications on the mobile equipment, call centers, activities and exhibitions and other online locations and any methods that the company collects, gathers, applies and discloses or transfers your personal data to overseas.

1. Personal data that the company collects

“**Personal Data**” means the information relates to you, which it identifies your identity or can define you as specified below is for the company can provide the service to its customers, trade partners or contact persons. The company may collect your data using the various means, which it may collect it directly from you (For instance (e.g.), its public relations manager, sales or call center) or from other indirect sources (e.g. social media, online platforms of a third party or other public domains) and through its subsidiary, service providers, business allies, governmental agencies or a third party (e.g. property depository who is a third party, subcontract depository and securities broker). This type of the data that the company collects depending on its relations with the customers, trade partners or contact persons, with whom the company and other services or products they want from us.

“**Sensitive Data**” means the personal data that the law classifies as sensitive material, the company shall collect, apply, disclose and/or transfer it domestically or overseas upon prior consent explicitly from you or as permitted by law.



Individuals

Your personal data, which the company shall collect, use, disclose and/or transfer overseas, include but are not limited to just the following personal data:

- (a) **Personal data**, e.g. honorific, name, gender, age, occupation, title, salary, office, academic title, nationality, birth date, marital status, data on the cards issued by the government, (e.g. ID card number, passport number, tax ID number, driver's license data, etc.) signature, voice recording, records on the telephone conversation, photographs, CCTV records, household registration and other personal data.
- (b) **Contact data**, e.g., address, telephone number, mobile phone number, fax number, email address and email and social media passwords.
- (c) **Accounting and financial data**, e.g. credit card and debit card data, accounting number and its type, PromptPay data, current assets, incomes and expenditures, including payment data.
- (d) **Transaction data**, e.g. goods or service transaction prices, records on sales/purchases and the remaining amount, records on payments and involved with the company's transactions, financial statement, liabilities, taxes, income, agency, sale/purchase records, default records, value of business guarantee, source of production or relay of the goods or service.
- (e) **Technical data**, e.g. IP address numbers, web beacon, log, device ID, equipment model and type of equipment, network, interfaced data, access data, access data of the Single Sign-On (SSO), login logs, access time, duration used on the company's web page, cookies, records on access system access, search records, retrieval data, search data, type and version of the browser, time zone setting and location, type and version of plug-in browser, operating system and platform and other technologies on the equipment you use to access the platform.
- (f) **Person details**, e.g. account identifiers, name of the user and password, PIN ID code for transaction, interest and satisfaction, activities, investment target, knowledge and experience on the investment and risk tolerance.
- (g) **Applicable data**, e.g. data on your website, platform, product use and service.

Juristic persons

Your personal data, which the company shall collect, use, disclose and/or transfer overseas, include but are not limited to the personal data of the following types:

- (a) **Personal data identifier**, e.g. name, family name, honorific, age, gender, photograph, personal data, education and the data related to the employment (e.g. status, duty, occupation, title, your employer or you are an employee or a shareholder), the data on the card issued by the government (e.g. ID card number, passport number), signature and your other personal data.
- (b) **Contact data**, e.g. telephone number, address, country, email address and other data of the same way.



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- (c) **Created personal data related to the relations among the customers, trade partners and contact persons**, e.g. opening an account, management, operation, payment, liquidation, processing and reporting in the customer names, trade partners and contact persons, which such personal data could include a signature and the letters contacting the company.
- (d) **Other data** with collection/gathering, use or disclosure involved with the relations with our company, e.g. the information you give to the company in the contract, forms or surveys or data collected while you joining a business activity and seminar or social activity of the company.

Your sensitive data, which the company shall collect/gather, use, disclose and/or transfer overseas are:

- (a) Bio-metric data (e.g. face recognition, fingerprint).
- (b) Health data, e.g. data on healthcare.
- (c) Criminal record.
- (d) Religion and,
- (e) Other sensitive data that is shown in the personal document (e.g. race and religion).

2. The objective that the company collect/gather, use or disclose your personal information.

The company may collect/gather, use, disclose and/or transfer your personal data and sensitive information to overseas is for the following objectives:

2.1 The objective that the company needs to receive consent.

The company needs your consent for,

- (a) Marketing communication/contact, special offers, sales promotion related to the Products and services of the company, its subsidiaries and affiliates as well as the outsiders, which it cannot use other criteria or legal basis.
- (b) Collection/gathering, use and/or disclosure of your sensitive data for the following objectives:
 - (1) Bio-metric (e.g. face recognition, fingerprint) to access the place, service application and identity confirmation and identification.
 - (2) Criminal records for background verification.
 - (3) Religion for facilitation.
 - (4) The sensitive data that is shown in the ID card, e.g. race and religion to confirm and identify a person.
- (c) A transfer of your personal data to the country that may have no data protection sufficiently, which the law requires consent.

In a situation that the criteria or legal basis is to seek consent, you have the right to withdraw your consent at anytime by contacting the data administrator (details of the contact data) to withdraw the consent, while it shall not affect the legality of the collection/ gathering, use and disclosure of your personal data and sensitive data before your withdrawal.



2.2 Objective that the company implement based on other criteria or legal basis in processing your personal data.

The company may use the following criteria or legal basis to collect/gather, use, disclose and/or transfer your personal data to overseas are (1) Necessity to comply with the contract for signing the contract or complying with your contract. (2) Compliance with the legal obligations. (3) Necessity for the legal benefit of the company and the third party to balance the interest, basic rights and liberty related to your personal data. (4) Protection or stopping a danger to life, body or individual health and (5) Public interest for public benefit or compliance with the national law enforcement.

The company shall apply the criteria or legal basis in (1) to (5) above to collect/gather, use, disclose and/or transfer your personal data overseas for the following purposes:

Individuals

- (a) Contact with you before signing the contract with the company.
- (b) Process a request to open an account, maintain the account and engage in your account, include but are not limited to just processing an application or request for the service or product, processing your transaction, issue a report on the account statement and implementation as well as closing your account.
- (c) Provide the services for you, e.g., planning a purchase, use of service for the goods and/or service of the company once in awhile and manage all the things involving with these services.
- (d) Manage the relations between you and the company and the account you have with the company.
- (e) Execute your order or answer your question or opinion and remedy your complaint.
- (f) Verify the identity and check the credit data, the know-your-customer (KYC) process, trade partner or contact person and perform the customer due diligence (CDD), verification and other screening and follow-up on the monitoring continuously may be necessary as stipulated by law.
- (g) Prevent, inspect and investigate a fraud, corruption or illegal activities, regardless of by a request from a state agency or regulator or not, as well as performing a risk analysis and management.
- (h) Comply with the law, rules, regulations, guidance, orders, advice and request from state or tax agencies or other agencies or regulating agencies (regardless of domestic or overseas), e. g. The Stock Exchange of Thailand (SET), The Securities and Exchange Commission of Thailand (SEC), Anti-Money Laundering Office and The Revenue Department.
- (i) Manage the company's infrastructure, internal control, internal audit and business operations as well as compliance with the policy and procedure of the company that may be necessary by the applicable law and regulation. Including the related laws and rules with a risk control, security service, inspection, finance and accounting of the various systems and the going concern.



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- (j) Engage or investigate on a complaint, claim or any dispute.
- (k) Perform marketing communication, data application, special offer and sales promotion related to the product and service of the company, its subsidiary and affiliate as well as a third party.
- (l) Develop new service and product and giving the updated data to you related to service and products of the company once in awhile.
- (m) Make a research, planning and analysis statistically, for example, on the financial limit of purchasing of goods or service for the purpose of service and product development of the company.
- (n) Arrange a project or activity on sales promotion, meeting, seminar and visit to our company.
- (o) Perform a lawful or contractual enforcement of the company, include but are not limited to just a debt collection for any entire amount of money owed to the company.
- (p) Provide convenience on financial audit to be performed by an auditor or receive a service on legal counseling from the legal consultant appointed by you or the company.
- (q) Perform the duties of the company under any contracts that the company is a party, e.g. business alliance contract by the company, seller or under the contract that the company acts as an agent.

However, if the personal data that the company collects from you needs to comply with the legal duty of the company or signing a contract with you, it may not be able to procure the product and service for you (or cannot procure the product and service for you anymore), if it cannot collect your personal data upon request.

Juristic Persons

- (a) **Business communication**, e. g. communication with the customer related to the company's product or service, for instance, by answering an inquiry or upon request.
- (b) **Selection of the customers, trade partners and contact persons**, e.g. verification of identity and customer status and contact persons, status or background in other formats or identify the risk related to you and customers (included screening with the sanction lists of the state law enforcement agencies and/or formally in general disclosure as stipulated by law), evaluation of your suitability and qualification as well customers, issue of a request for quotation and invitation to bid and signing a contract with your or customer.
- (c) **Handling the data of customers, trade partners and contact persons**, e. g. maintenance and update the names of customers (included your personal data), storing the involved contract and document, which may refer to you.
- (d) **Management of relationships**, e. g. planning, implementation and management of relations (contractually) with the customer, i. e. , making a transaction and implementation on the order for the product or service, processing of payment, engagement on accounting, inspection, money collection and storing, delivery management and supportive service.
- (e) **Business analysis and improvement**, e. g. research, data analysis, evaluation, survey and report on the product and service of the company, and your operation or customer's



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result, development and improvement of the marketing strategy for a product and service.

- (f) **Information technology (IT) and supports**, e.g. , procurement of IT and help desk supports, creation and perseverance of a password and personal data for you. The management of access to the system that the company allowed you to access, removal of inactive accounts, business controls for your business going concern, it also helps the company to identify and resolve the various problems in the company's IT system and take care of the company's systems to be secure and application development, operations and maintenance of the IT system.
- (g) **Monitoring of the security and systems**, e.g. verification of identity, control and record on the system access, monitoring the systems, equipment and the Internet, inspection of the IT security, prevention and remedy of crime, including the management of risks and prevention of fraud.
- (h) **Management of disputes**, e.g. remedy of a dispute, company's enforcement of contract and designation of application or fight for a legal claim.
- (i) **Internal audit**, investigation and prevention of a complaint and/or crime or fraud.
- (j) **Compliance with the rules within the organization**, e.g. compliance with the internal policy of the organization and the law, rules, orders and guidelines of the regulator taking effect.
- (k) **Compliance with the law and state agencies**, e.g. coordination, interaction and response to a state agency or court.
- (l) **Marketing objectives**, e.g. report of news and public relations of the company, which you may be interested in the various activities, new service offer and making a survey.
- (m) **Compliance with the justified business requirements**, e.g. , management, training, inspection, reporting, control or risk management, statistics, analysis of the trend and planning or other activities that are involved with or similar to.

3. The methods that the company may disclose or transfer your personal data

The company may disclose or transfer your personal data to a third party (Including the personnel and agent of the third party), domestic or overseas as follows. Processing the personal data for the purpose per this privacy policy. Meanwhile, you can read the policy on privacy of a third party to study additional data related to the method that the third party processing your personal data.

Individuals

3.1 Company group

The company may have to transfer your personal data to other companies within Stone One PCL or allow other companies within the company group to access your personal data for the purposes as specified above.



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3.2 Company's service providers

The company may use a company and agent or contractor to provide the various services on its behalf, or to help in the procurement of a product and service to you, while it may disclose your personal data to these service providers, include but are not limited to (a) Provider of IT service. (b) Research agent. (c) Provider of analysis. (d) Survey agent. (e) Agent on marketing, advertising media and communication. (f) Service provider on payment and (g) Service provider on office work and operations. In providing these services, the providers may access your personal data. However, the company shall give the personal data to the company's service providers only necessary for the service. Meanwhile, these service providers and the company shall request those providers not to use your personal data for other purposes. Moreover, the company shall implement to make sure that all the service providers that the company used to work with shall store your personal data safely.

3.3 Company's business allies

The company may transfer your personal data to the people who act on your behalf, or involved with procuring a product or service of the type you received from the company. It included the money receiver, beneficiary, property depository, bank's representative, sales agent, co-brand partners, marketing counterpart, and global trade depositories that the company disclose your personal data to supply a product and service to you, and you have allowed the company to disclose your personal data. However, these data receivers have to agree to treat your personal data to be consistent with this copy of privacy policy.

3.4 A third party as permitted by law

In some situations the company need to disclose or disclose your personal data to a third party to comply with the legal duties or rules, including compliance with the law enforcement agencies, courts, regulator, state agencies or other third party. In the case the company believes the disclosure or transfer is necessary to comply with the legal duty or regulation or for protection of the right of other people or for safety of people or a third party or for inspection, prevention or management of a problem on a fraud or security or safety.

3.5 Professional consultant

The company may disclose or transfer your personal data to its professional consultant related to the service on inspection, law, accounting and tax, which help in the business operation and plea or management related to a legal claim.

3.6 Third party, e.g. a right transferee, transferee or novation

The company may give, transfer or novate its right or obligation to a third party just as permitted by the terms and conditions of any contract executed with you. It may disclose or transfer your personal data to a right transferee, transferee or novation receiver, including such probable persons. Nonetheless, such data receivers must agree to treat your personal data to be consistent with this privacy policy.



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3.7 A third party that is involved with a business transfer

The company may disclose or transfer your personal data to its business ally, investor, major shareholder, right transferee and probable right transferee. In a situation there is a business rehabilitation, restructuring, merger, buyout, sale, purchase, joint venture, dissolution or any event in the same way that is involved with the transfer or disposal of a business, assets or entire

shares or any of its parts. If there is such incident happens as mentioned above the data receivers shall abide by the privacy policy on the part related to your personal data.

Juristic persons

The company may disclose your personal data to other people for the purpose as specified in No. 3 above, other business allies, outsourcing providers, and in some situations, and it may disclose it to a state agency, law enforcement, court, regulator or other outsiders. In a situation that the company believes it is necessary to perform the duty under the law or regulation or for protection of your right and other people's rights. Moreover, it is for the people's safety or of a third party or for verification, protection or handling of a fraud or for security or safety reason.

When the company transfers your personal data to a third party, it shall make sure on protection of your personal data, e.g. by an agreement on confidentiality or other suitable security measures as prescribed by law.

4. International transfer of personal data

The company may disclose or transfer your personal data to a third party or the hosts situated overseas, which the destination country may or may not have a standard to protect your personal data in the same way as in Thailand. However, the company shall follow the various procedures and measures for you to be sure that the transfer of your personal data shall be safe, and the transferee of such data has the appropriate measures to protect the personal data, and the transfer is legal based on the exemption as permitted by law.

5. Duration that the company collects your personal data

The company shall collect your personal data within the necessary duration reasonably to achieve the objectives that it received such personal data as specified in this privacy policy and to comply with the legal obligations and the various rules. Nonetheless, the company may collect your personal data longer if necessary as per the applicable law.

6. Other important data related to your personal data

6.1 Cookies and method of using the cookies

The company's cookies

Should you visit our website, the company shall collect some data automatically by using the cookies, which is the follow-up technology applied on analysis of trends. The website management, follow-up of the movements on our use of the website, or to memorize the setting of the Internet browser users mostly shall give you the control whether to accept the cookies or not. However, should you refuse the follow-up by the cookies your ability on the use of the attributes or the entire or partial area may be limited.

The company may use the cookies when you visit our websites by using the cookies can be



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classifies by the applications as follows:

* **Strictly necessary cookies** of this type is necessary for the website working for it to work normally with safety and enable you to enter the website, e.g. log in to the website and identity verification. Nonetheless, you cannot close the use of this type of cookies via the company's website.

- **Analytic cookies** of this type shall collect data on your website used for the company can measure, assess, update and develop the product/service content and company's website to increase good experience on your website use. However, should you disapprove us from using this type of cookies we cannot measure, assess and develop the website.
- **Functional cookies** of this type can help to memorize the computer data or electronic equipment that you use to view a website, registration data or log in. The data setting or the elective you used to choose on the website, e.g. the language shown on the website, the address for sending goods is for you can use the website more convenient without giving data or establishing a new setting each time you use the website. Nonetheless, should you disapprove us to use this type of cookies you could use the website inconveniently with less efficiency.
- **Targeting cookies** of this type shall collect various data, which included your personal data and build your profile, so the company can analyze and present the content of goods/service and/or suitable advertising for your interest. Nevertheless, should you disapprove it you may receive general data and advertising that do not match your interest.

Third-Party Cookies

The company's website uses third-party cookies, which the characteristics of use and setting shall comply with the above-mentioned paragraph, but you cannot choose to set the value on its use, especially the third-party cookies.

In addition, the company cannot control the data use of the third-party cookies, but you can verify the list of the third-party, privacy notice and its policy, which is different from our website at the third-party websites.

Management of cookies

You can choose to set the value of the cookies except the strictly necessary cookies by "setting the cookies value" or set it in the web browser, e.g., it is prohibited from installing cookies on your equipment. Nevertheless, closing of the cookies may result in you cannot use the various websites effectively.

6.2 Personal data used by minors, incompetent persons or quasi-incompetent persons

Generally, our activities does not target minors, incompetent persons or quasi-incompetent persons, and it does not intend to collect personal data from the minors without consent from their guardian in case of necessity, nor from incompetent persons or quasi-incompetent persons



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without consent from the carer in compliance with the law. In addition, if you are a minor, incompetent person or quasi-incompetent person, who wishes to have contractual relations with the company, you need consent from the guardian or caregiver in compliance with the law before you can contact the company or give your personal data to us. If the company knows that it collects personal data unintentionally from a minor without consent from their guardian, if necessary, or from an incompetent person or quasi-incompetent person, without consent from the guardian, it shall delete the data of such person promptly. Furthermore, if it still processes such personal data, it can apply the guidelines or other legal basis besides seeking consent.

6.3 Personal data related to outsiders

Should you give personal information to a third party, e.g. your spouse and offspring, shareholder, director, beneficiary, details on emergency contact and referral in case of emergency treatment, you should be sure that you have the power to give such personal information and the company to use such personal data as per the policy on privacy. Moreover, you have to be responsible to notify such third party on the privacy policy and seek consent from the involved people, if necessary, or based on the criteria or other legal basis.

7. Right to your personal data

Under the legal provisions and exemptions pursuant to the relevant laws, you could have the right as specified related to your personal information.

- (a) **Accessibility:** You may have the right to access or receive a copy of the personal data that the company process related to you.
- (b) **Transfer of data:** You may have the right to receive the personal data that the company has involved with you in the format to regulate and could be read in the e-Format and to send or transfer such data to the other controller of personal data.
- (c) **Opposition:** In some cases you may have the right to protest the method that processes your personal data in some activities, which specified in this policy document.
- (d) **Data deletion or destruction:** You may have the right to request the company to delete or destroy or make your personal data that the company processed to unable to identify the data owner, e.g. if such data is necessary for the purpose of data processing anymore.
- (e) **Limitations:** You may have the right to limit the processing of your personal data, if you believe that such data is incorrect or is illegal or the company needs not process such data for any objective anymore.
- (f) **Correction:** You may have the right to revise the personal data that is incomplete or incorrect to cause misunderstanding or not updated.
- (g) **Withdrawal of consent:** You may have the right to withdraw your consent given to the company for processing your personal data except there is a limitation on the right to withdraw of the consent as stipulated by law, or there is a contract that benefits you.
- (h) **Filing a complaint:** You may have the right to file a complaint to the competent agency in the case you believe the company can process your personal data illegally or is insistent with the law on the applicable data protection.

8. A change in this privacy policy



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The company may change or update this privacy policy once in a while, our company recommends you to read the policy on this privacy policy copy in detail prudently, and check for any changes that could happen by the requirements of this privacy policy periodically. Meanwhile, the company shall give you a warning or seek another consent from you, if there is a change significantly in this privacy policy, or the company has necessity by law to change it significantly in this privacy policy.

9. Details on the contact with the company

Should you wish to exercise the right involving your personal data, or you have a doubt or complaint on your personal information, please contact our company or the official protecting personal data at

Stone One PCL

29 Bangkok Business Center, 14th floor, Sukhumvit 63 Road, Khlong Ton Nuea Sub-district, Wattana District, Bangkok Metropolis 10110, Tel. 02-391-9301.

Official protecting personal data

Ms. Sunantha Techathanopajai

Tel. 02-391-9301 ext. 1115, email: privacy.corporate@stoneone.co.th

In a situation there is a violation of personal information our company shall notify The Office of the Personal Data Protection Committee within 72 hours from learning of the offense.

To be effective from October 2022 onward.

Announced on 5 October 2022

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(Mr.Songwut Vejjanukroh)

Chief Executive Officer



บริษัท สโตนวัน จำกัด (มหาชน)
Stone One Public Company Limited
29 อาคาร บางกอกบิซิเนสเซ็นเตอร์ ชั้น 14 ถนนสุขุมวิท 63 แขวงคลองตันเหนือ เขตวัฒนา กรุงเทพฯ 10110
29 Bangkok Business Center 14 Fl. Sukhumvit 63 Road Klongton Nua Wattana Bangkok 10110

Tel : 02 391 9301
Fax : 02 391 9302

Letter of Consent

For Collection, Use and Disclosure of Personal Data (for customers, partners, and business contacts).

I certify that I have read and agreed to comply with the Privacy Policy and Personal Data Protection Practices for Customers, Partners, or Business Contacts dated October 5, 2022, issued by Stone one Public Company Limited and Ratchaburi Enterprise Co., Ltd. (“the Company”)

Consent Not consent. I authorize the Company to collect, use, and disclose my personal data for the purposes specified in the Privacy Policy for the Protection of Personal Data for Customers, Partners, or Business Contacts.

I acknowledge that I have the right to withdraw my consent at any time by notifying the Company in writing or via email at privacy.corporate@stoneone.co.th. I understand that in some cases, my right to withdraw consent may be limited by law or contractual obligations that benefit me. Additionally, withdrawing my consent will not affect the collection, use, or disclosure of personal data to which I have already consented.

Name.....
(.....)
Date/...../.....



You can scan the QR code for the Privacy Policy and Personal Data Protection Practices for Customers, Partners, or Business Contacts.