



# **Personal Data Protection Policy for Website Users**

## **CH. Karnchang Public Company Limited**



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#### 1. Objectives

Ch. Karnchang Public Company Limited ("**Company**") realizes the importance of your privacy and sees the necessity of appropriate personal data management (according to the definitions below) in accordance with the law. The Company has therefore enforced this Personal Data Protection Policy for Website Users ("**Policy**") to protect your rights concerning the processing (according to the definitions below) and personal data management of the Company. The Company will use all reasonable and necessary measures to protect personal data in line with the Personal Data Protection Act 2019 (B.E. 2562) including other governing law and regulations (collectively "**Law**"), as well as maintain appropriate information protection measures.

In order to achieve the objectives of this Policy, the Company will act as the controller of personal data and/or the data processor, as defined by law, to process your personal data. The details are as follows:

#### 2. Scope

- 2.1 This Policy will come into force on June 1, 2022. The Company will review the enforcement of this Policy from time to time and subject to changes or amendments which will be notified to you by the Company.
- 2.2 This Policy applies to the processing of personal data by the Company to the information of users of the website. If any illegal acts are found or considered to be a violation of this policy, the Company will take action strictly and to the maximum, including imposing appropriate penalties.
- 2.3 Unless otherwise specified, this Policy shall supersede all prior policies or measures of the Company with respect to the external personal data.
- 2.4 This Policy is consistent with the website users consent form on which you have signed your consent. Please carefully review such consent form for website users to understand which of your data is processed on the basis of consent.

#### 3. External personal data

##### 3.1 personal data and Uses

"**personal data**" refers to information about a person which makes the person identifiable, whether directly or indirectly, including how such information is related to or combined with other information to be processed for any specific purposes. However, this does not include the information of the deceased in particular.

"**Data Processing**" and any other related actions refer to any practice and/or handling of all personal data including collecting, gathering, transfer, disclosure, use, etc.



A list of your personal data that the Company uses and/or is going to use, the purpose of use, and other additional details are shown in the table below. Please study carefully to understand how we process your personal data. The Company has made every effort to clarify the activities of processing your personal data by the Company but the list below may not be able to detail all of the Company's processing.

Types of Data Subject	Objectives and Data Processing	Base	Examples of personal data	Data Retention Period
<b>Office of President</b>				
Website users	<b>Contacting through the website.</b> Website users can contact the Company through the Company's website where information is kept for such contact.	Legitimate interest Legal rights creation	<ul style="list-style-type: none"> <li>Name Surname</li> <li>Phone number</li> <li>Email</li> <li>Messages to communicate without sensitive information (in the case of sensitive information, the Company will exercise its legal right base or delete the information if there is no database and consent is not obtainable).</li> </ul>	Ten years after the information is collected.
Website users	<b>Sending email notifications.</b> Users of the website can subscribe to the email notification of the Company's news through the website of the Company, which the Company will keep in order to send news emails.	Legitimate interest	<ul style="list-style-type: none"> <li>Email</li> </ul>	Forever until the subscription is cancelled.
Website users	<b>Collection of cookies.</b> The Company will store cookies that are necessary for the operation of the website, and will collect such information through the Company's website.	Legitimate interest	<ul style="list-style-type: none"> <li>cookie_persistence</li> <li>blazecms_session,</li> <li>laravel_session,</li> <li>&lt;domain&gt;_session</li> <li>PHPSESSID</li> <li>XSRF-TOKEN</li> </ul>	Ten years after the information is collected.
<b>Other activities that require a consent base</b>				
Website users	Other activities that use the consent base for processing.	Please refer to the online form requesting website users' consent.		

### 3.2 Data Collection Format

The Company will, at its sole discretion, determine whether to store your personal data related to it in document format, electronic media, or in other formats. The Company will



exercise the best effort to provide appropriate security measures to retain such files and documents.

### **3.3 Consent and Withdrawal of Consent**

- (a) The Company will seek your consent (via an online form requesting website users' consent) prior to collecting, using, or disclosing personal data that requires consent.
- (b) You may choose to withdraw your consent through written notice to the Company (except for retrospective withdrawal of consent) with fourteen (14) days advance notice. You must contact the Personal Data Protection Officer (relevant details as below) directly to complete the withdrawal of consent. However, please note that the withdrawal of your consent may affect the Company's processing, which the Company will notify you as soon as possible before or after you withdraw your consent. Furthermore, when you withdraw your consent, the Company will cease collecting, using, or disclosing your personal data, as well as taking actions to stop intermediaries and agents doing so, unless such action is required by relevant laws.

### **3.4 Correction and updating of personal data**

- (a) You must at all times ensure that the personal data relating to you or your family members that you have provided to the Company is true, accurate, and complete. In the event of any change, you must notify the Data Protection Officer or any other personnel designated to handle the change within seven (7) days after the change becomes effective.
- (b) The Company will correct your personal data as soon as possible and notify you of confirmation of such change. In the event that the Company is unable to process the correction within thirty (30) days after receiving the request, the Company will notify you of the time required to process it.

### **3.5 Transferring and Sharing of Your Personal Data**

- (a) The Company may transfer your personal data to subsidiaries or related companies or external service providers located in Thailand so that such service providers can perform certain activities on behalf of the Company such as cloud storage and non-cloud storage services, analytics services and miscellaneous support or in the case of a legal or legitimate obligation to process personal data such as audits, divestments, or restructuring. The Company will transfer and process such personal data using the same base as notified to you or with your consent. The Company will ensure that the transfer of personal data is supported with protection measures that are equivalent to the protection measures under the law and the Company's standards.
- (b) The Company may transfer your personal data to subsidiaries or related companies or external service providers around the world to enable such service providers to perform certain activities on behalf of the Company such as both cloud and non-cloud storage services, analytics services, and miscellaneous assistance or in the event of a legal or legitimate obligation to process personal data such as audits, divestments, or restructuring. In the event that the Company uses the contract base for processing for any business, the Company will use the original contract base for data transfers outside the country and/or processing. However, in the event of a transfer or processing without a contractual basis, the Company may use any other legally sanctioned measure or may use the consent base you have provided in the online form requesting for website users' consent. The Company will ensure that the transfer of personal data is supported with protection measures that are equivalent to the protection measures under the law and the Company's standards.



### **3.6 Personal Data Retention**

- (a) The Company will retain your personal data for the period necessary for legal and business purposes, and the Company will immediately cease retaining such personal data if it considers it reasonable to conclude that the retention of personal data is no longer in accordance with the purpose of collecting such personal data, and retaining such personal data is no longer necessary for legal and business purposes. At present, the Company's policy is that the Company may retain some of your personal data for a period of up to ten (10) years (unless otherwise stated in the table in Article 3.1 above). There may be an anonymization process adopted in the retention of the personal data and it must comply with the Company's document retention and destruction policy and relevant laws and regulations.
- (b) The Company will notify you if the policy or retention of any of your personal data changes in a way that is inconsistent with the current policy or in any other way and is required that you are notified.

## **4. Personal Data Protection Officer**

### **4.1 Details of the Personal Data Protection Officer are as follows:**

Vice President: Legal Department is the Data Protection Officer: DPO)  
Ch. Karnchang Public Company Limited, No. 587 Viriyathavorn Building, Sutthisan  
Winitchai Rd., Ratchadaphisek Subdistrict, Dindaeng District, Bangkok 10400.  
Tel: 02-2750026  
Email address: [dpo@ckplc.com](mailto:dpo@ckplc.com)

### **4.2 The procedure for receiving and responding to inquiries and/or complaints related to the protection of personal data is detailed below.**

The Company realizes the importance of safeguarding and protecting your personal data and has prepared various documents related to the collection and use of your personal data in accordance with the provisions of the Personal Data Protection Act. If you have any questions or complaints or want to submit a complaint or wish to exercise your legal rights, you can contact the Company or the Company's Personal Data Protection Officer. The Company will respond as soon as possible or proceed with the request to exercise the rights of the data subject within 30 days from the date the Company receives the request for the right to exercise with reasons and information supporting the request including documentary evidence supporting the exercise of the data owner's rights in order to verify and confirm the identity of the data subject. In the event that the process cannot be completed within the said period, the Company reserves the right to notify the data subject in order to extend the processing period as required by law.

## **5 Rights of Data Subject**

- 5.1 Right to be notified.** The Company will notify and/or request your additional consent prior to processing your personal data under a wider scope in cases where the Company plans to collect, gather, retain, use, or disclose your personal data in other formats exceeding the scope to which you have previously given consent or the scope which the Company has previously disclosed to you.
- 5.2 Right to access.** You may request access to your personal data for verification at any time, and you may also inquire regarding ways in which we process your personal data.



- 5.3** Right to copies. You may request a copy of your personal data in a form that is reasonably practicable.
- 5.4** Right of portability. You can request that the Company transfer your personal data to another agency of your choice in a reasonable and acceptable manner.
- 5.5** Right of rectification. You are obligated to ensure that your personal data is accurate, current, complete, and not misleading. If your personal data has been changed, you must submit a request to correct the information by following the procedures as announced by the Company. In addition to being an obligation, the correction of information is also your right.
- 5.6** Right to withdraw consent. You may withdraw your consent at any time. The Company may refuse your consent withdrawal where it is prohibited by law or contract. Withdrawing your consent will not affect the collection, use, and disclosure of your personal data that the Company has done in the past. In the event that withdrawing your consent would affect any other part of your personal data, including your rights or interests, the Company will notify you of such impact before proceeding your consent withdrawal or will notify you as soon as possible after the consent has been withdrawn.
- 5.7** Right to erasure. You may submit a request for deletion or request that your personal data be converted to anonymity under the following circumstances: (a) in the event that your personal data is no longer necessary for its original purpose; (b) you have withdrawn your consent and the Company has no legal right to collect, retain, use, or disclose your personal data; (c) you object to the collection, retention, use, or disclosure of your personal data and the Company has no right to refuse your objection; or (d) your personal data is collected, retained, used, or disclosed contrary to the law. However, the Company may reject your request in the event that our collection of information is for purposes set out by law, including the collection of research or statistical data for which appropriate safeguards have been taken, or it is necessary for the establishment of a statutory claim, the performance or exercise of a statutory claim, or a defense of a statutory claim.
- 5.8** Right to suspension. You may submit a request to restrain the use of your personal data in the following situations: (a) in the event that the Company is in the process of verifying the accuracy of the information for the purpose of preparing, correcting or updating the personal data according to your request; (b) in the event that your personal data is about to be erased but you have requested that we suspend the use instead; (c) when it is not necessary to retain your personal data but you have requested that the Company continue to retain your personal data for the establishment of a statutory claim, the performance or exercise of a statutory claim, or a defense of a statutory claim; or (d) in the event that the Company is in the process of verifying its legal Legitimate interest against your objection or against the collection, retain, use, or disclosure of your information for various purposes including research or statistics as may be permitted by law.
- 5.9** Right to object the processing of Personal Data. You may object to the collection, retention, use, or disclosure of your personal data in the following cases.
- (a) In the event that your personal data is collected for: (1) public benefit; (2) compliance with orders from the government; (3) legal Legitimate interest of the Company or of other juristic persons (which the Company may reject your objection in the event that (3.1) your objection leads to unlawful conduct or (3.2) your objection relates to the establishment of a legal claim, performance or exercise of that right, statutory claims, or raises a statutory defense)
  - (b) In cases where we have collected, retained, used, or disclosed your personal data for direct marketing purposes; or



- (c) In the event that we have collected, retained, used or disclosed your personal data for research purposes as required by law, including for statistical studies purpose.

(Mr. Nattavut Trivisvavet)

President

As at June 1, 2022