



Privacy Policy

SYNTEC CONSTRUCTION PUBLIC COMPANY LIMITED ("Company") conducts ethical business. Also, the Company recognizes and gives importance to compliance with applicable laws regarding the protection of personal data privacy. Therefore, this Privacy Policy is prepared to comply with Section 23 of the Personal Data Protection Act B.E. 2562 (2019) ("PDPA") and explains how the Company processes your personal data such as by collecting, using, disclosing, saving, modifying and transferring it as well as deleting, destroying and accessing all online channels and other channels, as required by the law. The Company would like to recommend you, as a data subject, to study and understand as follows:

1. Scope

This Privacy Policy applies to the Company's customers, business partners, tenants, lessors, visitors and other persons who are necessary for the operation of the Company including directors, shareholders, representatives and employees of the juristic person who contact the Company.

2. Personal Data that the Company collects, uses and/or discloses

The Company (which may include its subsidiaries and affiliated companies) needs to collect, use and/or disclose your Personal Data which the Company has directly obtained from you or from authorized third parties (e.g., government agencies, regulatory authorities or public information sources), as follows:

Category of Personal Data	Examples of Personal Data
Personal Details	Name-surname, date of birth, ID number, passport number, gender, age, nationality, photo, autograph and vehicle license plate number.
Contact Details	Address, phone number, email, LINE and other social media accounts.
Qualification Details	Work records and licenses.
Financial Information	Bank account number and financial transaction details.
Sensitive Personal Data	Religion and blood group on a copy of an ID card.
Security Details	CCTV records.

Category of Personal Data	Examples of Personal Data
Technical and Usage Data	IP address number, website browsing information from cookies, device type, settings information of platforms and other technologies used to access the Company's website.

3. The Company's activity, purpose and lawful basis of the collection, use and/or disclosure of your Personal Data

The Company as well as its subsidiaries and affiliated companies collect, use and/or disclose your Personal Data for the activities, purposes and lawful bases as follows:

Lawful Bases	Activity/Purpose of Collection, Use and/or Disclosure of Personal Data
Legal Obligation	<ol style="list-style-type: none"> Operate the Company in compliance with applicable laws, rules and regulations, including in relation to personal data protection, tax, labour, social security, prevention of contagious diseases, building control, city planning, immigration, work permits as well as securities and exchange. Follow orders of courts or government agencies.
Performance of Contract	<ol style="list-style-type: none"> Carry out procurement matters and any transactions with our customers, contractors, business partners or other persons who are contractual parties with the Company. Registration of business partners, procurement and performance related to the employment agreement. Process financial transactions such as payment or issue an invoice. Process your claims. Handle your complaints.
Legitimate Interest	<ol style="list-style-type: none"> Use your Personal Data as you are a representative of or a person related to the Company's customers, contractors, business partners or other persons who are contractual parties with the Company. Business communications with a representative of or a person related to the Company's customers, contractors, business partners or other persons who are contractual parties with the Company.



Lawful Bases	Activity/Purpose of Collection, Use and/or Disclosure of Personal Data
	3. Prevention of accidents and crimes including internal investigations or audits in areas such as safety operations including remedying, preventing or limiting damage that may occur. 4. Security in the Company. 5. Process for insurance, life insurance or various claims in case you are a beneficiary under such insurance contracts. 6. Develop the Company's quality of work to be more efficient, for example, by providing a database as well as analyzing and developing the operating processes of the Company and affiliated companies.
Consent	1. Collect, use and/or disclose your sensitive personal data.

In the event you do not provide such Personal Data to the Company, this may cause a delay in our processes or we may not be able to process in accordance with your request.

4. Retention Period

The Company will retain your Personal Data while you have a transaction or any relationship with the Company and will continue to retain such Personal Data for 10 years after the termination of your relationship with the Company, after which the Company will delete, destroy or anonymize your Personal Data, except in case of legal necessity or technical reasons where we may retain your Personal Data for longer than that.

5. Disclosure of Personal Data

Access to your Personal Data is restricted to individuals who need to know in order to perform their work and responsibilities to achieve the objectives in this Privacy Policy.

However, the Company may disclose or forward your Personal Data to third parties to process your Personal Data or to other Data Controllers which are as follows:

- (a) Third parties required by law who the Company may be required to disclose your Personal Data to in order to comply with the law including orders of government agencies that are issued under the law such as public disclosures under the Securities and Exchange Law.
- (b) The Company's internal groups for internal management purposes only as necessary.

- (c) Service providers which the Company may use to assist in its operations such as internet service providers, software, website developers, digital media, transportation service providers, payment and financial systems providers, research and analytics providers, auditors, marketing and events providers, telecommunication services providers, storage and cloud services providers, printing service providers, attorneys, legal consultants, archiving and shredding providers and other professionals.
- (d) Any other person involved in any dispute arising including disputes related to transactions.
- (e) Any person entrusted to manage any interest, intermediaries, contact person and your representatives.
- (f) Any person who you order the Company to disclose your Personal Identifiable Information to.

6. Security

The Company as well as its subsidiaries and affiliated companies have appropriate security measures for their IT systems to prevent the unauthorized or unlawful loss, access to, use, alteration, correction or disclosure of your Personal Data.,

7. Your rights

You have rights to your Personal Data under the PDPA. You may exercise the following data subject rights unless the Company has grounds to lawfully reject your request:

- (a) **Right to withdraw consent** – You have the right to withdraw your consent. The withdrawal of consent will not affect the lawfulness of the collection, use and/or disclosure of your Personal Data based on your consent before it was withdrawn.
- (b) **Right to access and obtain a copy** – You have the right to access and obtain a copy of your Personal Data that is retained by the Company.
- (c) **Right to data portability** – You have the right to receive your Personal Data where we can arrange for such Personal Data to be in a readable or commonly used form through automatic tools, equipment or format, and such Personal Data can be used or disclosed by automated means. Also, you have the right to request the Company to send or transfer your Personal Data to a third

party, or to receive your Personal Data which has been sent or transferred to a third party by the Company.

- (d) **Right to object** – You have the right to object to the collection, use and/or disclosure of your Personal Data where the Company proceeds on a legitimate interest basis, or it is for a direct marketing purpose.
- (e) **Right to erasure** – You have the right to request us to delete, destroy or anonymize your Personal Data in case the Company does not need or has no legal right to keep such Personal Data.
- (f) **Right to restrict** – You have the right to request the Company to restrict the use of your Personal Data under certain circumstances when there is a pending examination of the Company in accordance with your request to rectify your Personal Data or object to the collection, use and/or disclosure of your Personal Data, or your request to restrict the use of your Personal Data instead of to delete or destroy your Personal Data.
- (g) **Right to rectification** – You have the right to rectify your Personal Data that is inaccurate and to update your Personal Data in order to avoid any misunderstanding.
- (h) **Right to lodge a complaint** – You have the right to make a complaint with the Personal Data Protection Committee or their office where the Company does not comply with the PDPA.

You may exercise your rights by contacting us at the contact information in clause 9. The Company will review and notify the result of your request within thirty (30) days from the date of receipt of the request. The Company as well as its subsidiaries and affiliated companies may decline to process your request if required by law.

8. Modification of the Privacy Policy

The Company may modify or amend this Privacy Policy at any time without prior notice to you for the purposes of suitability and consistency with changes in the Company's operations and affiliates, or to comply with rules of law that have changed.

9. Contact channel

In the event you have a privacy concern or question related to this Privacy Policy or would like to exercise your rights, please feel free to contact us at:



Data Controller:

SYNTEC CONSTRUCTION PUBLIC COMPANY LIMITED

No. 555/7-11 Soi Sukhumvit 63 (Ekamai), Sukhumvit Rd.,
Klongton Nua, Wattana, Bangkok, 10110

Tel : 02-026-2288

E-Mail : DPO@synteccon.com

Website : <https://www.synteccon.com>

This Privacy Policy was announced on 16 August 2022 (Version 1)

A handwritten signature in blue ink, appearing to be "Somchai Sirilertpanich".

(Somchai Sirilertpanich)

Chief Executive Officer