



Directors, Equity holders, and Bond holders' Personal Data Protection Notice

of

STARK CORPORATION'S GROUP

We, STARK Corporation Public Company Limited and its subsidiaries (the “Company”, “We”, or “us”) is aware of the importance of the protection of your personal data as directors, equity holders, and bond holders of the Company. Thus, We suggest you that please read and make yourself familiar with this Directors, Equity holders, and Bond holders' Personal Data Protection Notice to acknowledge the purpose for collecting, using, and disclosure of the personal data, the period that the Company will keep your Personal Data, including the rights of the owner of the Personal Data which will be in accordance with the Personal Data Protecting Act B.E. 2562 (and its amendments), and the other related ministerial regulations, announcements, and rules (the “PDPA Act”).

The details are as follows:

1. Definition

“Personal Data”	means	the data that related to the person which can be used to specify, whether directly or indirectly, such person such as name, surname, contact information, financial information.
“Sensitive Data”	means	the Personal Data that related to the nationality, race, political ideology, religious, philosophy, sexual preference, criminal records, health records, disability, labor union membership, genetic information, biological information, fingerprint information, face scanned image, including the other information that will effected the Personal Data's owner in the same manners.
“Company”	means	STARK Corporation Public Company Limited and the Group Company (as listed in the table in an Annex)
“Group Company”	means	the companies as listed in the attached Annex.
“Notice”	means	Directors, Equity holders, and Bond holders' Personal Data Protection Notice of STARK CORPORATION'S GROUP

“You” or “you” means directors, any equity subscribers, any bond subscribers, any equity holders, or any bond holders which such equity or bond is issued by the Company, including the attorney-at-fact or proxy holder from you to attend any equity or bond holders meeting.

## 2. Collecting of the Personal Data

2.1 The Collection of the Personal Data will be collected with the legitimate purpose, scope, and by the legitimate and fair means. The Company will limited your Personal Data that will be collected and only if required under the purpose of the collection of Personal Data.

2.2 The Company will request for your consent prior collecting of your Personal Data unless:

2.2.1 our obligations under the laws;

2.2.2 such Personal Data is collected from you or other third party where the Company is entitled to do so before the PDPA Act is effective;

2.2.3 it is necessary for our obligations under the contract which you are the contract party or to proceed with your request before entering into the contract;

2.2.4 it is necessary for the proceeding of public interest or exercise of the state power that we received;

2.2.5 it is necessary for the legitimate interest of the Company or any other third party unless such interest is less important than your basic rights of the Personal Data;

2.2.6 to complete the purpose that related to the making of the historical documents or archives, public interest, or related to the research or statistic which has the necessary measurements to protect your rights and freedom.

However, in compliance with the relevant laws, the Company will not collect the Sensitive Data (as defined above) without your prior consent unless:

2.2.6.1 to prevent or restrain the life, body, or health danger which you cannot give the consent whether by any reason;

- 2.2.6.2 to proceed the legitimate activity, which has proper protection, of foundation, club, or non-profit organization, which has objective related to the politics, religious, philosophy, or labor union, for its member, former member or regular contact of such foundation, club, or non-profit organization in accordance with the objective of the foundation, club, or non-profit organization without disclosing such Sensitive Data outside the foundation, club, or non-profit organization.
- 2.2.6.3 such Sensitive Data is disclosed to public with your express consent
- 2.2.6.4 it is necessary for the grant, compliance, exercise, or contestant of the legitimate claim.
- 2.2.6.5 for the interest of the investigation of the inquiry officer or the adjudication of the court
- 2.2.6.6 it is necessary for the legal compliance of the law to complete the following objective:
- (a) for preventive medicine or occupational medicine that assets the capability of performance of the employee, medical diagnosis, health or social service, medical treatment, health or service management, or social service. In case it is not the legal compliance and such Sensitive Data is responsible by the professional career or the person that has a duty to keep confidential of such Sensitive data in accordance with the applicable law, it must be required to perform the duty under the contract between you and the medical professional.
  - (b) for health public interest, as such the health prevention from the dangerous contagious disease or the disease that likely to spread within or to the kingdom, standard or quality of drug or medical tool, with the proper and specified procedure to protect your right and freedom especially the confidentiality of the Sensitive Data om accordance with its duty or professional ethics

- (c) for labor protection, social security, national health insurance, welfare related to the medical treatment of the rightful person in accordance with the protection of the car incident victim law or social protection which such collection of the Sensitive Data is required to perform rights or duty of you or data controller with the proper procedure to protect your basic rights and interest.
- (d) for scientific, historical, or statistic research or other public interest. However, it must only to complete and required by such purpose in accordance with condition set out by the Office of the Personal Data Protection Commission
- (e) for important public interest, with the proper measure to protect your basic rights and interest.

2.3 However, we may cannot proceed with our objective in item 2.1 in case we cannot collect your Personal Data which we requested from you that is necessary for our compliance with the laws or rules, performance under the contract which you are the contract party, or proceeding with the request before entering into the contract.

2.4 We have no policy to collect the Sensitive Data from you unless:

2.4.1 under the express consent from you; or

2.4.2 any other circumstance specified by laws

### 3. Proceeding with the Personal Data

Your Personal Data that we received, such as name, address, telephone number, identity card number, or financial data, can be identified yourself, completed, and be present will be used in accordance with the objective for our operation only. We will set the proper measure to secure the safety throughout the protection to prevent the use of your Personal Data without your consent.

### 4. Objective of the collecting, using, and disclosing of the Personal Data

4.1 We collect, use, and disclose your Personal Data for our following operation that related to you:

- 4.1.1 for the business structure management within the Company Group, such as company incorporation, capital increase, capital decrease, company restructuring, change of the company record;
  - 4.1.2 for calling the meeting of board of directors, audit committee, nomination and remuneration committee, risk management committee, bondholder or shareholder meeting;
  - 4.1.3 for the nomination and appointment of the director;
  - 4.1.4 for managing the rights and obligations of equity and bond holders of the company, dividend payment, bond interest payment; and
  - 4.1.5 for accounting and reporting, examining, preparing the legal document, sending any documents or notice, including our obligations stated in the relevant laws whether limited company and partnerships laws, public company laws, listed company laws, or securities laws.
- 4.2 In case we change the purpose of the collecting, using, and disclosing your Personal Data, we will inform you and request for your consent later.
5. Restriction on the usage and disclosure of the Personal Data
- 5.1 We will use and disclose your Personal Data in accordance with your consent. The usage and disclose will be aligned with the objective that we inform before or at the time we collect such Personal Data.
  - 5.2 We will supervise our personnel to not collect, use, disclose, or display in any manner of your Personal Data beside for the objective or to the third person except where we allow to as stated in item 2.2
  - 5.3 In some event, we may appoint the person, whether natural or juristic person, who is our contractor to keep and secure your Personal Data. We will prohibit such person to use your Personal Data except the objective we appoint them to proceed.

5.4 We may receive the third person's Personal Data from you for the objective as specified in item 4. You are responsible for informing and requesting the consent from such person to allow us to use such Personal Data in accordance with our objective we specified. In case we acknowledge later that you have disclosed such Personal Data to us without the third person's consent, we reserve the rights to not proceed with objective that related to the third person's Personal Data.

6. Security measure

We concern the important of the safety of your Personal Data, thus, we set out the safety measure of the Personal Data which is proper and comply with the confidentiality of the Personal Data to prevent the unauthorized or unlawful loss, access, destroy, use, transform, revise, or disclose of the Personal Data.

7. Reviewing the practice or policy related to the Personal Data

We will comply with the laws, announcement of the office of the Personal Data Protection Commission and other related applicable laws. We will review this notice or other related documents yearly or other period that we deem suitable to ensure that the notice or any other documents including practice will comply with the PDPA Act or any other related applicable law that is effective in such period.

8. Participation of the Personal Data owner

8.1 You can request the access or copy of your Personal Data in accordance with the rules and procedure we set out or request us to disclose the acquisition of the Personal Data that you does not provide the consent to us. However, we may reject your request as specified by laws or court order. *(Right of access)*

8.2 You have rights to request the existence, type of the Personal Data, objective of the collect and use of the Personal Data of the Company. However, we may deny your rights in case that specified by law or in case that your Personal Data is removed your name or the identifier that can identify yourself. *(Right of access)*

8.3 In case you find the your Personal Data is not correct, you can instruct the Company to revise, change, or delete all or part of the Personal Data. As such, we will write a report, as an evidence, on the objection of the keep, correctness, or any other action related to your Personal Data. In case you have deceased, with the court order, we will allow your successor and/or statutory heir to request for your Personal Data. *(Right of rectification) (Right to be forgotten)*

- 8.4 You are entitled the right to inform us to temporally cease the use of your Personal Data. However, we may denied to proceed as request if your Personal Data is required for our obligation, whether required by the relevant law, contract, or any other obligations that we are binding at the time you exercise your right stated in this clause. *(Right to restrict the processing)*
- 8.5 If you disagree with our lawful basis that we use for processing your Personal Data, whether public task basis, legitimate interest basis, or any other basis, you will entitle the rights to object our processing of your Personal Data *(Right to object the processing)*
- 8.6 You entitle the right to request the transfer of your Personal Data that we have retain at the time you request to do so to any other person. However, we shall not have any obligations required by laws to asset the personal data protection standard of such third party who will receive such personal data in accordance with your request but we will use our reasonable effort to ensure you that the transferee of your personal data in accordance with this clause shall have the personal data protection standard not less than our standard. We will reject your request in accordance with this clause only if your request violates the right and liberty of other person. *(Right to transfer the personal data)*
- 8.7 If we process your Personal Data by consent basis, you will entitle the right to withdraw your consent whenever you wish. However, if we proceed the withdrawal of your consent in accordance with your request, such withdrawal of your consent will not effected the processing of your personal data that we have already processed before your send a request to us. *(Right to withdraw the consent)*

9. Period for keeping of the Personal Data

We will keep your Personal Data at least 10 years from the date that we receive your Personal Data from you. After the end of the aforementioned period, we will delete your Personal Data. Additionally, you have rights to request the proof of the deletion of, all or part of, your Personal Data before the end of such period in accordance with the procedures and conditions required by the Company.

10. Responsibility of the person who control the data

The Company will issue the rules or orders to ensure that the person who control the Personal Data will comply with the rules or orders specified to ensure that the proceeding under the personal data policy will be in accordance with the standard set out in this Notice.

11. Contact

If you have any queries related to this Notice or the exercising of the rights related to your Personal Data, you can contact us through the contact channel below and the details of each company will be stated in the attached Annex.

*Data Protection Officer*

518/5, 16<sup>th</sup> Floor, Maneeya Center Building, Ploenchit, Lumpinee, Pathumwan, Bangkok

Tel: 02-6805800 Email: [dpo@starkcorporation.com](mailto:dpo@starkcorporation.com)



Annex

The list of the company and its contact details

Company Name	Contact detail
STARK CORPORATION PUBLIC COMPANY LIMITED	STARK CORPORATION PUBLIC COMPANY LIMITED 518/5, Maneeya Center Building, 16 <sup>th</sup> Floor, Ploenchit Road, Lumpinee, Pathumwan, Bangkok
PHELPS DODGE INTERNATIONAL (THAILAND) LIMITED	PHELPS DODGE INTERNATIONAL (THAILAND) LIMITED 159 Moo 10, Thepharak Road, Bang Pla, Bang Phli, Samut Prakan
THAI CABLE INTERNATIONAL COMPANY LIMITED	THAI CABLE INTERNATIONAL COMPANY LIMITED 227 Moo 4, Om Noi, Krathum Baen, Samut Sakhon
THAI COPPER ROD COMPANY LIMITED	THAI COPPER ROD COMPANY LIMITED 518/5, Maneeya Center Building, 16 <sup>th</sup> Floor, Ploenchit Road, Lumpinee, Pathumwan, Bangkok
ADISORN SONGKHLA COMPANY LIMITED	ADISORN SONGKHLA COMPANY LIMITED 39/15 Moo 10, Kanchanavanich Road, Khao Rup Chang, Mueang Songkhla, Songkhla
ADISORN SONGKHLA INTERNATIONAL COMPANY LIMITED	ADISORN SONGKHLA INTERNATIONAL COMPANY LIMITED 39/15 Moo 10, Kanchanavanich Road, Khao Rup Chang, Mueang Songkhla, Songkhla
ADISORN SONGKHLA MARINE COMPANY LIMITED	ADISORN SONGKHLA MARINE COMPANY LIMITED 39/15 Moo 10, Kanchanavanich Road, Khao Rup Chang, Mueang Songkhla, Songkhla
ADISORN SONGKHLA PROFESSIONAL COMPANY LIMITED	ADISORN SONGKHLA PROFESSIONAL COMPANY LIMITED 39/15 Moo 10, Kanchanavanich Road, Khao Rup Chang, Mueang Songkhla, Songkhla
ADS LOGISTICS COMPANY LIMITED	ADS LOGISTICS COMPANY LIMITED 39/15 Moo 10, Kanchanavanich Road, Khao Rup Chang, Mueang Songkhla, Songkhla