

PRIVACY POLICY

Principles and Reasons

Plan B Media Public Company Limited ("the Company") and its subsidiary companies recognize the importance of protecting personal data of data subjects, including but not limited to business partners, employees, personnel, representatives, and any individuals involved in the Company's activities and operations ("Data Owners"). Therefore, the Company has established this Personal Data Protection Policy under the Personal Data Protection Act B.E. 2562 (PDPA), related laws, and regulations to inform about the Company's practices regarding data collection, access, purposes of data usage, data transfers, disclosures to relevant individuals, and the processing of personal data of Data Owners ("Data Processing"). In addition, the Data Owners' rights as data subjects are included in the Company's Personal Data Protection Policy, which is detailed as follows:

1. Scope of Usage

1.1. This policy is applicable to all levels of the Company's management committee, employees, including customers, service users, business partners, shareholders, personnel, and any individuals providing personal data to the Company.

1.2. This policy applies to all activities related to personal data within the Company, such as data collection methods, types and formats of data to be collected, purposes of data usage by the Company, disclosure of data to third parties, and methods of protecting customers' personal data throughout the Company's operations.

2. Personal Data Collection

The Company may collect and gather personal data directly provided by Data Owners or personal data obtained through the Company's services or operations via all channels ("Personal Data"). This includes the following types of data:



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2.1. **Personal Data** refers to various information that can identify individuals, regardless of its format. It may not individually identify a person, but when combined with other data or information, it can identify an individual. Personal Data includes, but is not limited to, the following information:

- (1) Name, surname, and nickname.
- (2) Identification numbers, such as national ID card number, passport number, social security number, driver's license number, tax identification number, bank account number, and credit card number.
- (3) Address, email, and telephone number.
- (4) Device or tool-related information, such as IP address, MAC address, and cookie ID.
- (5) Personal property-related information, such as vehicle registration and land title deed.
- (6) Data that can be linked to the aforementioned data, such as date of birth, race, nationality, weight, height, address history, medical information, educational information, financial information, and employment information.
- (7) Behavioral data, such as browser type, domain, website visit history, time of website access, website addresses referring to information searched or viewed by Data Owners while using the Company's website, including behavioral data from the use of the Company's LINE OFFICIAL.

2.2. **Sensitive Data** refers to highly private personal data that is more sensitive and poses a higher risk of unfair discrimination if used improperly. It includes, but is not limited to, the following types of data:

- (1) Ethnicity
- (2) Race
- (3) Political opinions
- (4) Beliefs in religion, philosophy, or ideology
- (5) Sexual behavior
- (6) Criminal records
- (7) Health data, disabilities, or mental health information
- (8) Labor union information
- (9) Genetic data
- (10) Biometric data



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3. Source of Personal Data

3.1. Personal Data obtained directly from Data Owners, such as through contract agreements, providing information for inquiries, registration processes, questionnaires, communication, or when submitting requests for various rights.

3.2. Personal Data obtained from other sources, such as government agencies, affiliated companies within the group, or other public sources, including the Company's website, data obtained from internet searches, or various social media platforms.

4. Purposes of Data Processing

The company will process personal data of data owners only when necessary or legally required for the collection, compilation, and use of personal data.

Objectives of data processing	Legal basis for data processing	Data owners
1. To fulfill contractual obligations with Data Owners or to carry out any requests made by Data Owners prior to entering into an agreement with the Company and/or any activities related to the Company's services, ensuring complete and continuous provision of services to Data Owners.	- Contractual performance - Legitimate interests - Consent	- Employees - Customers - Business partners
2. To improve the Company's products and services, including future services or products, as well as maintaining and performing other activities related to the Company's services.	- Contractual performance - Legitimate interests - Consent	- Customers - Business partners
3. To ensure good corporate governance, such as audit oversight, management and risk analysis, detection	- Legitimate interests	- Employees - Customers - Business partners

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Objectives of data processing	Legal basis for data processing	Data owners
and prevention of fraud and misconduct, etc.		
4. To carry out business operations of the Company, such as data analysis, auditing, product development, enhancement or modification, service provision, analysis, service usage, surveys, promotional activities, sales, consideration, operations, and business expansion of the Company.	<ul style="list-style-type: none"> - Legitimate interests - Consent 	<ul style="list-style-type: none"> - Customers - Business partners
5. To handle claims and disputes, including taking corrective actions, initiating proceedings, exercising rights, or defending against legal claims.	<ul style="list-style-type: none"> - Legitimate interests 	<ul style="list-style-type: none"> - Employees - Customers - Business partners
6. To process sensitive data, such as photographing identification cards to verify and confirm the identity of individuals as Data Owners before conducting transactions.	<ul style="list-style-type: none"> - Consent 	<ul style="list-style-type: none"> - Employees - Customers - Business partners
7. To communicate notifications and/or receive various information from the Company or regarding changes occurring within the Company.	<ul style="list-style-type: none"> - Consent 	<ul style="list-style-type: none"> - Employees - Customers - Business partners
8. To comply with the Personal Data Protection Act or other relevant laws.	<ul style="list-style-type: none"> - Roles and responsibilities under the law 	<ul style="list-style-type: none"> - Employees - Customers - Business partners



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Objectives of data processing	Legal basis for data processing	Data owners
9. To comply with regulations and/or orders of authorities, such as court orders, orders from governmental agencies responsible for overseeing the Company or authorized personnel.	- Roles and responsibilities under the law	- Employees - Customers - Business partners

5. Disclosure of Personal Data

Accordance with the purposes stated in this Personal Data Protection Policy, the Company may disclose the personal data of the data subject to the following entities:

5.1 Companies within the group for efficient and proper business management.

5.2 Individuals and/or legal entities, including companies under the aforementioned legal entities, for the purposes specified under this Personal Data Protection Policy, such as:

- (1) Government agencies, regulatory bodies, or other agencies as required by law, including law enforcement authorities.
- (2) Representatives and/or service providers involved in the Company's operations, such as information technology service providers or document storage and destruction service providers.
- (3) Third parties with the consent of the data subject or as stipulated in the contractual agreements or applicable laws.

In such cases, the Company will disclose the personal data of the data subject to external parties only if they agree to maintain the confidentiality of the data to a standard no less stringent than specified in this Personal Data Protection Policy and will use the data for specific purposes as notified by the Company. Additionally, the Company may disclose the personal data of the data subject to other external parties in cases where disclosure is necessary to comply with the law or exercise the authority of regulatory bodies or is exempted under the Personal Data Protection Act.

6. Sending or Transferring Personal Data Abroad

The Company may need to send or transfer the personal data of the data subject to foreign countries to fulfill contractual obligations where the data subject is a party to the contract or to comply



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with the data subject's requests before entering into such contracts. For example, sending or transferring personal data for the processing of personal data to service providers in different countries. In such cases, the Company will make its best efforts to carry out the sending or transferring of data and the processing of personal data in compliance with appropriate and relevant personal data protection standards and in accordance with the Personal Data Protection Act or other applicable laws. This may include having confidentiality agreements in place with the recipients of the data in the respective countries or having internal personal data protection policies within the Company in cases where the recipient is a company within the group.

7. Data Retention Period and Storage Locations of Personal Data

The Company will retain personal data for as long as necessary to achieve the purposes outlined in this Personal Data Protection Policy. However, the Company may need to continue storing personal data after the purposes have been fulfilled if required by relevant laws or regulations. For example, data may be retained for the purpose of considering evidence in case of disputes within the statutory time limit of not exceeding 10 years or after the expiration of the case under legal proceedings.

The Company will store personal data in appropriate storage locations according to the nature of the personal data, utilizing security measures and enforcing strict internal policies regarding personal data protection to ensure the security of the data. This includes data encryption and measures to prevent unauthorized access to the data. The Company requires its employees and external contractors to comply with the relevant standards and policies for the protection of personal data to ensure the security of the data of the data subjects.

8. Rights of Data Subjects

Data subjects have rights under the relevant laws regarding their personal data that is collected or consented to be collected or disclosed by the Company. They have the right to exercise various rights under the provisions of the law, including this Personal Data Protection Policy or any future amendments, as well as any other criteria set by the Company, as outlined below:

8.1 Right to Access Personal Data

Data subjects have the right to access and obtain copies of their personal data held by the Company, including requesting the Company to disclose how their personal data has been obtained, unless



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the Company has the right to refuse such requests under the law or court orders, or if the request could impact the rights and freedoms of other individuals.

8.2 Right to Request Correction of Personal Data

Data subjects have the right to request the Company to correct or update their inaccurate or incomplete personal data to ensure that it is up to date, complete, and not misleading.

8.3 Right to Withdraw Consent

Data subjects have the right to withdraw their consent provided to the Company at any time (regardless of whether the consent was given before the effective date of the Personal Data Protection Act or thereafter), following the procedures and methods specified by the Company, unless it is not permissible by law or there is a contractual obligation benefiting the data subject. It should be noted that the data subject's withdrawal of consent will not affect the processing of their personal data for which consent was given prior to the withdrawal.

8.4 Right to Object to Data Processing

Data subjects have the right to object to the collection and processing of their personal data by the Company at any time if the Company is processing their personal data.

8.5 Right to Request Data Erasure

Data subjects have the right to request the Company to delete or destroy their personal data or to make their personal data unidentifiable, if the data subject believes that their personal data has been processed unlawfully or the Company no longer has a legitimate purpose to retain the data as stated in this Personal Data Protection Policy, including cases where the data subject has exercised the right to withdraw consent or the right to object as mentioned above, unless the Company has legal grounds to refuse the data subject's request.

8.6 Right to Request Data Suspension

Data subjects have the right to request the Company to suspend the use of their personal data in certain cases, such as when the Company is reviewing a request to exercise the right to correct personal data or the right to object by the data subject, or in other cases where the Company no longer has a legitimate purpose and is required by law to delete or destroy the data. However, the data subject may request data suspension instead, as they have a legitimate need to retain the data for the purpose of exercising legal claims or using legal rights or raising legal defenses.



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8.7 Right to Request Data Access or Data Transfer

Data subjects have the right to request access to their personal data in a format that is generally readable or usable by automated means and tools, as well as the right to request the Company to send or transfer their personal data to external parties or to request to receive personal data that the Company has sent or transferred to external parties, unless it is technically impossible for the Company to do so or the Company has legal grounds to refuse the data subject's request.

8.8 Right to File a Complaint

Data subjects have the right to file a complaint with the relevant legal authority if they believe that the collection, use, and/or disclosure of their personal data by the Company is in violation of or not in compliance with the relevant laws.

In cases where the data subject provides personal data that is necessary for the Company to fulfill its legal obligations or perform contractual obligations with the data subject, it may impact the rights of the data subject and the Company's ability to comply with the law and/or fulfill contractual obligations.

9. Penalties

Any person responsible for carrying out certain tasks within their role who neglects or fails to give orders, take action, or carry out any actions within their responsibilities that violate the policies and practices regarding personal data, resulting in legal violations or damages, shall be subject to disciplinary penalties according to the Company's regulations. The Company will not compromise or exempt any wrongdoing committed by the person responsible, and they shall also be subject to legal penalties for the offenses committed. If such offenses cause harm to the Company and/or any other individuals, the Company may consider pursuing additional legal action.

10. Contact Channels of the Company

In case of any inquiries, further details, or complaints regarding data protection, personal data processing, the exercise of legal rights, or any general complaints from data subjects or individuals, they can contact the Company through any of the following channels:



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Contact Address: 1700, Plan B Tower, New Petchburi Road, Makkasan, Ratchathewi, Bangkok
10310, Thailand

Human Resource Department: +66 2-530-8053-6

Email: hr@planbmedia.co.th

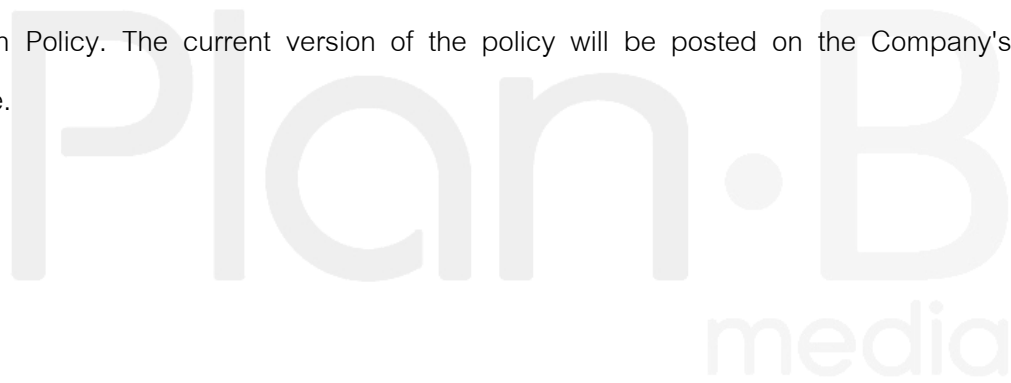
Personal Data Protection Officer

Contact Address: 1700, Plan B Tower, New Petchburi Road, Makkasan, Ratchathewi, Bangkok
10310, Thailand

Email: dpo@planbmedia.co.th

11. Amendments and Changes to Personal Data Protection

The Company may periodically amend or make additional changes to this Personal Data Protection Policy. The current version of the policy will be posted on the Company's website for reference.



Effective May, 12 2022

- *Pinijorn Luechaikajohnpan* -

(Pinijorn Luechaikajohnpan, Ph.D.)

Authorized Director