

PERSONAL & BUSINESS INFORMATION SECURITY POLICY

This policy was made and circulated by the LOGISTEED Group Thailand i.e LOGISTEED (Thailand) Ltd., T Sunrise Service Ltd., Eternity Grand Logistics Public Company Limited, Pands Group Logistics Company Limited, Eternity Consulting and Service Company Limited (hereinafter referred to be " Company") in order to announce our determination and intention to give precedence to specify any measures, procedures and actions to prevent and protect both of the personal and business information (hereinafter referred to be "information") whether being awareness of the important information, Data ownership, Collecting, Confidentiality, Disclosure, Distribution, Transferring, Destruction or Returning In accordance with the law or regulations which was announced in Thailand such as the Trade Secrets Act 2002 (B.E.2545), Personal Data Protection Act 2019 (B.E.2562) or the Agreement between Company with opposite party.

Based on our business operations is as a logistics service provider whether inland or cross border transportation service, sea or air carriage, freight forwarding, importer or exporter agent, or warehouse operation services that serves to customer or any business partner that are likely to touch or contact information whether directly or indirectly. The Company still firmly believe and be confident that the information is belonged to you is well-kept and secure as our information. Therefore the Personal and Business Information Security Policy shall cover:-

- Definition of Personal and Business information
- Acquisition, Storage, Collection Personal and/or Business information
- Time period of storage, Collection of Personal and/or Business information
- Usage, Disclosure of Personal and/or Business information
- Security of Personal and/or Business information
- Transferring of Personal and/or Business information
- Using sensitive personal information
- Legal rights of data subject or right's holder of Personal and/or Business information.
- Cookies
- Using data analyst service by the other party.
- Link to website and other services are following to the Personal and/or Business information.
- Data Protection Officer
- Company contact.
- Review, Update, Modify and Change Personal & Business Information Security Policy

1. Meaning of Personal Information and Business Information

The Company separates type of information under this policy into 2 types which are

1.1 "Personal information" means any information that is recorded in any kind of format which can be identified clearly or can be reasonably verified or when combined with other information that will be able to identify people directly i.e title, name, gender, age, occupation, qualifications, work position, nationality, birthplace, residence, date of birth, marital status, amount of family member and children, age's child, any information issued by the government (such as national identified card numbers, social security card number, passport number, tax identification card number, information of driver's license or any document can identify information of personal, etc.), details of arrival or departure, signature, audio, photos, facial features for recognition, CCTV, workplace, education, insurance, vehicle registration plates, house registration, personal income and expenses household expense, salary including to the sensitive data which consist of race, ethnicity, political aspect, creed, religious beliefs, philosophy, behavioural gender, crime history, health information, disability, trade union information, genetic information, biometric data or any other information that may affect to data subject in the same way (referred to be as "Sensitive data")

The Company will collect personal information in an appropriate manner but not limited to public interest, and/or legal benefits, Legal duty, contractual performance without needing consent but however if

personal information is required to be collected in addition to the stated objectives the Company will collect it after obtaining consent.

For personal information of minors or quasi-incompetent person or incompetent person. The Company will collect such personal information after receiving consent of the guardians of the minor or the curator or the custodian unless processed on other legal bases.

1.2 "Business information" means any information of a juristic person relating to the operation process, management or administration, services and business activity i.e. corporate profile, commercial trade or marketing information, financial information, business transaction information, administrative information, technical information, communication information, intellectual property information. Business information which is states herein not limited to the customer or business partner of the Company but including external entity that is involved with business operations of the Company as well.

For the business information, the Company shall collect and maintain business information in accordance with the purpose of the contractual party which is clearly stated in writing whether such information is a confidential information except the following case:-

(1.2.1) Business information is already in the public domain before the receiving party received and collected for the purposes.

(1.2.2) Business information has been legally possessed by the Company before the disclosing party delivers either directly or indirectly or through agents or any other person in obligation relation to the data subject.

(1.2.3) Business information is or about to be information which public knows in generally

(1.2.4) Business information is required to be disclosed by law, court of justice or other government agency.

2. *Acquisition, collection, Gathering of personal and business information*

Prior the Company to collect personal or business information. We shall proceed as the following as below:-

- The Company shall consider obtained information to receive directly and indirectly that what kind of information, who is a data subject and will such information be under the law or contractual party's purpose and also shall the receiving information be requesting consent or not prior to collection.

In case of the said information is a personal information, shall request consent from the data subject prior to collection and gather.

In case of the said information is a business information, the Company shall collect and gather by the business rules & regulations controlling procedure.

- The Company shall use the cloud operation system or other storage systems that are generally accepted security manner to collect or gather or evaluate whether information is a personal or business information including information transferring across country which is under the practice of the data controller that shall proceed safely and in accordance with law or terms and condition of mutual agreement or relevant rules & regulations.
- Personal information is obtained shall be collected or gathered into the form of text, image, sound, electronic media after receiving consent from the data subject or any party who has the right of such information. In case of business information, Collection and Gathering shall be processed and complied with law or terms and condition of mutual agreement that the data subject's permission.
- The purpose of collection or gather for development, improvement or service shall activate after customer or business partner has agreed to do the services with the Company and deems to the mutual parties has given consent or agreed to perform under their objective.

3. *Period of collection, Gather of personal or business information*

3.1 The Company shall collect information throughout the time as long as suitable and necessary with concerning to the law or rules or regulation or agreement but however LOGISTEED Group Thailand may collect personal or business information as longer if it is necessary as required by the law or according to the agreement between the parties

3.2 The Company shall collect, gather, use, and disclose information of customer, business partner even if the they has terminated with Company but the collection, gather, use, disclose shall do as is necessary in accordance with the law or agreement.

3.3 In accordance with the period of time and time-barred of the relevant law, Company shall gather the said information in an appropriate format according to the type of information.

3.4 The Company shall appropriately proceed to delete or destruct information or do information to be disable in this regard of the personal information, Company shall manage and operate in accordance with the rules & regulations or agreement's objective.

4. *Usage or Disclosure of personal or business information*

The Company shall use and/or disclose information as described into the consent or according to agreement or the law for the following purposes:

- In order to perform the operation, information processing, update or amend, service development, circulate information technology.
- Develop, promote, and improve of services for supporting to customer or business's partner.
- Receive or provide or communicate or communicate information relating to the services between the Company with customers and business partner.
- In order to perform duty in accordance with legal obligation and the competition laws.
- In order to perform duty according to the contractual obligation.
- In order to communicates and provides information to the applicants or employees for maintaining the benefits of the labor law.
- In order to manage company's services, internal management operation including to decide problem and solve problem or internal audit.
- For the purposes of collection, gather, recording, backup or destruction.
- In order to proceed any action in accordance with company's rules and regulations or the law stipulated by government agency, dispute settlement agency, regulatory agency concerning to warehouse business, logistics business, import-export business, or other agencies that had the legal right and enforcement.
- Any action that the Company deems it is necessary or appropriate: (a) investigate or prevent or detect illegal or suspected activity (B) subject to applicable law (C) comply with legal process Including the court's hearing (D) response to the requirement of government agency and foreign government (E) enforce the terms of service and announcements regarding personal and business information of the Company (F) protect the operations of the company (G) protect personal privacy or safety or property of customer, business partner, or the third party and (H) enable the Company to find the method of remedy or set limitation of damage that may occur.
- In order to information evaluation according to the purposes and legal bases which the Company may rely on (A) the agreement's basis that the parties agreed to enter to including to the parties' obligation. (B) Legal duty for the legal performance of the Company. (C) The legitimate interests of the Company and third party (D) the necessary benefit for preventing or stop the danger to life, body, or health or (E) public benefits for carrying out missions for public interest, or exercising the rights of government officials.

5. *Security of personal and/or business information*

The Company shall keep personal and/or business information to be confidential in the event that the law or contract is enforceable and disclose only if it is necessary to achieve the objectives or the agreement. However, our group company may disclose to outsiders either domestically or internationally such as within the Company, our service provider or business partner or transferee of the rights, third party, consultants, associations and other organizations upon our company's consideration. Any case by case the Company shall take steps and measures as required by law or agreement to ensure that the disclosure of information is safe and that the person who disclosed it will keep to be confidential.

The Company has a process for securing personal and/or business information in accordance with the information security policies and practices of the Company by defining security measures appropriately and conform information security to prevent loss, access, destruction, use, change, correction, disclosure, or destruction without rights or unlawful.

6. *Personal and/or Business Information transferring*

In addition, Company may transfer personal and/or business information to other service provider or third party that are located within Thailand territory or outside country when data subject agrees and accepts by written consent and make sure that the receiving party has sufficient data protection standards such as

- Processing in the Cloud operation system by organizations that have a security standards.
- Store personal and business information in encrypted form or other methods which cannot identify the owner of personal and business information and that model at international safety level

7. *Method of using sensitive data.*

In case of offering the services by the Company including the implementation of the collection purpose of personal information, the Company may need to collect, use or disclose personal information that be especially sensitive data such as race, ethnicity, political aspect, creed, religion, philosophy, sexual behaviour, disability, union information, genetic information, biological information etc. In this case, the Company will request consent from data subject in order to collect, use or disclose particularly sensitive data except without consent of the law.

8. *Legal rights of data subject of personal and /or business information*

Subject to legal provisions, legal exceptions, or relevant contractual conditions. The data subject of personal information may have rights as specified such as access to data, corrections, data transfers, objections, and requests to stop using, withdraw consent, delete or destruct information, complaints. In the point of business information, they has the rights as stipulated in the agreement or as required by law, such as collection, gather and disclosure, etc.

9. *Cookies*

"Cookies" means data are issued or generated to computer when visiting to the website and used for storing or tracking information about website usage for analysis.

The Company may use cookies to collect information about the websites that you visited or content as you view, create statistics and the number of times you visit the website. Enable the Company to develop content, advertisement, and services on the website to suit your needs. The Company will automatically collect website traffic information through cookies. You can choose not to accept cookies by changing the settings in the browser that can turn off.

10. *Other party use data to analyst services*

The Company may use the third party's service to analyst by using various technology for data analysis or monitor the logistic services of the Company for the benefit of the services or be efficient to develop the services. Therefore, the Company may have to transfer information and prepare report regarding service activities for warehousing and transportation.

11. *Link to website and other services regarding personal and business information security policy to other websites*

Personal and business information security policy shall apply to the Company. If there is a link to a third-party website or service that is not allowed or not implementing this policy that it is considered that the Company does not take part in the said action and will not be responsible for the third party websites and services including the practice of third-party data, therefore, any person involved must check the details of the information security policy of those websites or services in order to understand thoroughly.

12. *Data protection officer (DPO)*

The Company has appointed our employee to be a Data Protection Officer in order to monitor and proceed to keep, collect, use, or disclose personal information and coordinate with the Personal Data Protection Committee in accordance with the Personal Data Protection Act 2019 (B. E. 2562), and also control and comply with the intention or mutual agreement of the parties the Trade Secrets Act 2002 (B.E.2545) including the policy, rule and regulations, announcements and other instruction of the Company.

You can contact the detail as below.

LOGISTEED (Thailand), Ltd.

Corporate Group Compliance Department

Address 11 / 8-11 / 9 Village No. 9, Bangchalong Sub-district, Bangplee District, Samutprakan 10540

Phone number: +662 337 2086-99 Ext. 3111

E-mail: LTH-CORPORATE-COMPLIANCE@logisteed.com

13. *Company contact*

If you need to use any rights relating to personal and business information or having enquiry or question regarding personal and business information which describes under this Policy. Would you please contact.

- By telephone to Compliance Department at +662 337-2086-99 Ext. 3111
- By E-mail: LTH-CORPORATE-COMPLIANCE@logisteed.com
- By sending via Registered Mail or Express Mail Service to
LOGISTEED (Thailand), Ltd.

No. 11/8-11/9, Moo 9, Bangchalong Subdistrict, Bangplee District, Samutprakan 10540, indicating the recipient as Corporate Group Compliance Department.

14. *Review, Amendment or Changes of personal and/or business information*

- The Company reserves the right to amend or change context of this Policy from time to time or the next law change without prior notice. You can visit to the website at
<https://th.logisteed.com/en/privacypolicy>
If there is a change in the policy of the Company, it shall announce such changes on the website of the Company.
- In the event that there is a correction or deprivation of the rights in the sensitive data according to this policy, the Company shall process to request the consent first unless otherwise specified by the law
- In addition, after changes or amendments to this policy, If you use the service from the Company continuously that will consider about you agree and accept the changes
- This policy is distributed in both English and Thai versions. In the event of inconsistencies or differences between the English version and the Thai version. To avoidance of doubt the English version shall be the main and Thai version is a translation.

Policy Announcement is on 17th July 2023