



Announcement HO-01-012/2565 Re: Personal Data Protection Policy

Sabina Public Company Limited and Sabina Fareast Company Limited (collectively referred to as “Company”) recognize the importance of personal data and other related personal data (“Data”) for the confidence that the company is responsible for data collection, use, or disclosure of personal data under the Personal Data Protection Act B.E. 2562, including other related laws. This Personal Data Protection Policy (“Policy”) is to clarified the data collection, use, or disclosure of personal data by the Company as the following:

Scope of Policy

This Policy is applied to personal data of internal person currently related to the company and may occur later, which processed by the Company, officers, contractual employees, business entities or other forms of entities operated by the company and including contracting parties. Or the third parties who process the personal data on behalf of the company (“Data Processor”) under products and services such as websites, systems, applications, documents, and other forms of services controlled by the company (collectively referred to as “Services”).

Persons who related to the company in accordance with the provisions of the first paragraph, articles 1-6 as detailed below collectively referred to as “Service User”

1. Individual Customers
2. Officer, workers, or employees
3. Partners and service providers
4. Directors, attorneys, representatives, shareholders, employees, or other persons having a similar relationship of legal entities that are related to the company
5. Users of the company's products or services
6. Visitors or users of www.sabina.co.th; including system, applications, devices, or other communication channels operated by the Company
7. Other persons that the Company collect personal data such as job applicants, family member of employees, guarantors, and beneficiaries, etc.



In additional, the company may announce the policy of privacy (“Announcement”) for products or services of the company in order to inform the Data Subject to acknowledge the personal data that been processing regarding to the objective of Laws. The period of personal data retention and the right of personal data which the Data Subject have over the products or services. In case of conflict of the importance between the term of this policy and the privacy, subject to the term of this policy of such services.

This Privacy policy is effective with services provided by the company only. Not effective with other applications or websites which the company has no authorize to control, and is responsibility of the service users to agree and study the Privacy Policy for the use of applications, services, or websites

In case of the users disagree with this Privacy Policy or other revised editions, the company reserves the right to prohibit or not allow such users to use the Company's services. Due to the processing of personal data under this policy, has a direct effect on the performance provided by the company. However, the users still use the company's services, such users will always be deemed to accept this policy.

The company may update this Policy at any period to comply with relevant practices and laws, also the services of the company. The company shall notify the users for any changes by announcing the revised edition. The revised edition is deemed to be effective since the company make announcement.

Data Collected by the Company

The company will collect and processing personal data from the service users as follows:

1. Personal information, such as name, surname, age, dated of birth, nationality
2. Contact information, such as accommodation, telephone number, e-mail
3. Financial information, such as credit card, saving account number
4. Transaction data, such as username, password, transaction history, including the interest of users
5. Information of equipment or tools, such as IP Address, data usage, configure and connection to the browser of the device the user uses to use the company's services
6. Other information, such as sound, image, animated image, CCTV



Data Processing Purposes

1. The company has a necessity to collect and use of personal data for the provision of services specified. For company's terms of service including verification and follow up on transactions of service users to check payment terms, service fees, and for communication with service users, etc.
2. The company has a necessity to collect and use of personal data for analysis the users interest in order to offer the right privilege and services, and to improve relationship with the service users.
3. The company has a necessity to collect and use of personal data for purpose of providing services and supports such as feedback or comment after services.
4. The company has a necessity to collect and use of personal data to comply the laws and regulations such as withholding tax document or other operations determined by law.
5. The company has a necessity to collect and use of animated image and photographs in order to maintain security for employees, service users, and other persons in building or surrounding; or to use as evidence for crime and accident occur in area of the company.

The Company will keep and collect personal data of the service users throughout the period and the company reserves the right to keep the information for a period not less than 3 years after the user cancels the service. For benefits of protecting and defending the rights of the company including the relevant laws that require the company to have a duty to keep personal data for other periods. The Company may be required to retain information for a period longer than 3 years.

Disclosure of personal data

According to the specified conditions of service, the company may need to disclose the personal data of services users in the following cases:

1. The Company may need to disclose to the other service providers appointed by the company to assist in supporting the Company's services such as consultants, service contractors, transport contractors, including those providing evaluation services such as Google Analytics. However,



the Company shall disclose information as necessary only.

2. The company may disclose by keeping personal data in the computer system, including: setting up your own server, Amazon AWS, Microsoft Azure, etc.
3. The company may disclose information with the necessity of the benefit to protect and defend the rights of the company or to prevent and investigate the nature of wrongdoing related to the use of the Company's services by the service users.
4. In case that the company is legally obligated or subject to judgment or the order of Government, the company may need to disclose information to such agencies in order to perform their duties under the law.

Cookie Policy

Cookies are text files storing on user's computer device for storing data or entering websites or behavior of users. In order to guarantee efficiency in providing the Company's services to users, it is necessary to use different types of cookies for different purposes, as listed below.

1. Functionality Cookies: Used to remember what users choose or set on the platform such as username, language, fonts, and platform formats to present information that meets the needs of individuals according to the selected settings.
2. Advertising Cookies: To memorize what you have visited and the uses of service to present products or services that relevant to the interests of the users and for assessment the effectiveness of using the various functions of the system.
3. Strictly Necessary Cookies are the type of cookies that are necessary for the functioning of company's service. Also, necessary to make use of the users thoroughly and safely.

Although the use of cookies is useful in enhancing the performance of the service, and services of the company. In case the users request to delete cookies settings on their own browser, they have the right to do. However, the users should acknowledge that the action may affect the Company's services according to the stated purpose of the cookies function.



Direction of Personal Data Protection

The Company ensures that appropriate security is applied to prevent the unauthorized access, use, alteration, or disclosure of personal data without permission. The Company has established internal guidelines to determine the right to access or use of personal data subject to keep such data confidentially and secure. The company manage to review such measures periodically for appropriateness according to the relevant laws.

Rights of Data Subject

The company acknowledges and respect the legal rights of users that related to personal data as followings.

- 1.Right to access and request access to and obtain a copy of the Personal Data related, including to request the changes of the Personal Data.
2. Right to apply for personal data in case the Company has made the personal data in a form that is readable and usable by automatic tools or devices and usable or revealable personal data by automated method, including the right to request the Company to submit or transfer personal data in such format to other personal data controllers.
3. Right to restriction of data processing
4. Right to request for erasure or destroy, or make the personal anonymous. If such data is unnecessary or when the Data Subject exercise the right to withdraw consent or exercise the right to objection.
5. Right to request for suspension of the use of personal data in case that the personal data needed to be erased or unnecessary.
6. Right to withdraw consent in the processing of information provided by the service users.

The service users can contact the Company in order to make the request to exercise any defined rights through the defined channel without any charge and the Company will consider and notify the service users determination within 30 days after the receipt of the User's valid request.



บริษัท ซาบีน่า จำกัด (มหาชน)
Sabina Public Company Limited

Contact Information

Sabina Fareast Company Limited is authorized to be the coordinator regarding the protection of personal information of the Company. In case you have any questions or would like to exercise your rights as defined on this announcement, please contact us:

Data Protection Officer

12 Arun-Amarin Rd., Arun-Amarin, Bangkok Noi, Bangkok, 10700

pdpa@sabina.co.th

02-422-9430

Announced On 13 May 2022

Duangdao Mahanavanont

Chief Executive Officer