

## Personal Data Protection Policy

### 1. Principles and Rationale

At present, personal data is of great importance to society, particularly in terms of privacy and data security in the digital environment. Ornsirin Holding Public Company Limited and its subsidiaries (collectively referred to as the “Ornsirin Group”) recognize the importance of customer privacy. In order to ensure that personnel, customers, and all related parties are informed of the Company’s personal data protection policies and practices, the Company has established this Personal Data Protection Policy as a guideline for all relevant parties to follow.

### 2. Reference Document

Personal Data Protection Act B.E. 2562 (2019)

### 3. Definitions

3.1 Personal Data means any information relating to a person that enables the identification of such person, whether directly or indirectly, excluding information of deceased persons in particular.

3.2 Personal Data means information relating to a person that enables the identification of such person, whether directly or indirectly.

3.3 Sensitive Personal Data means personal data specifically defined by the personal data protection law, including race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any other data as prescribed by the Personal Data Protection Committee.

3.4 Data Controller means a person or juristic person having the authority to make decisions regarding the collection, use, or disclosure of personal data (i.e., decides on the collection, use, or disclosure).

3.5 Data Processor means a person or juristic person who processes personal data on behalf of or under the instructions of the data controller (i.e., collects, uses, or discloses data under the controller’s instructions).

3.6 Data Subject means a person who owns the personal data and has full rights over such data as prescribed by law, such as customers, business partners, contractual parties, and individuals who disclose their personal data on internet platforms.

### 4. Personal Data Protection Policy

#### 4.1 Objectives and Collection of Personal Data

This policy applies to the collection of personal data arising from contractual relationships where the Company is a contracting party, including data obtained from various online platforms. The Company shall collect personal data by lawful means and shall collect and retain such data in accordance with its purposes, such as using data for contractual performance and for offering products and services to data subjects. The Company shall collect, use, and retain personal data in a transparent and fair manner. The collection, retention, or disclosure of personal data shall be carried out under the consent of the data subject and only to the extent necessary for the Company’s purposes, as detailed below:

4.1.1 For real estate transactions and/or the provision of services of the Company, such as offering for sale, identity verification, entering into juristic acts or agreements, transfer of ownership, after-sales services (e.g., maintenance requests), debt collection, coordination with partners for the provision of products or services to customers (e.g., coordination with banks for loan arrangements), and facilitating after-sales services (e.g., repair assessments).

4.1.2 For communication purposes, such as scheduling project visits, coordination, notifications, marketing, public relations, and advertising through various channels, offering privileges and benefits to customers, delivery of souvenirs and rewards, organizing events, press conferences, and exhibitions.

4.1.3 For customer relationship management, such as updating customer information, maintaining financial records, assessing customer satisfaction, handling complaints, and resolving issues.

4.1.4 For project management, such as organizing meetings for the establishment of juristic persons, managing juristic persons prior to project transfer, and managing projects (e.g., collection of common fees, access control systems, issuing parking permits).

4.1.5 For internal management and data analysis within the Group, such as performance analysis, preparation of operational reports, sales evaluation, customer data analysis, data analysis for investment consideration in new businesses, investment and expansion into related businesses, disbursement, internal audit, fraud reporting, strategic planning, risk management planning and presentation, supervision, investigation and evidence gathering, establishment, exercise, or defense of legal claims or legal proceedings.

4.1.6 For compliance with laws and internal policies of the Group, such as compliance with policies, announcements, or orders of the Ornsirin Group, compliance with legal obligations, conducting KYC processes with customers, cooperating with government agencies or other authorized entities, and submitting reports as required by law.

4.1.7 For prevention or suppression of danger, such as preventing or mitigating threats to life, body, or health of individuals.

4.1.8 For information system management of the Group, such as system management and troubleshooting, development of accounting systems and transaction systems (purchase/payment/receipt), system security, and development and maintenance of customer databases.

4.1.9 Religious information as indicated on national identification cards, which the Group will collect upon obtaining consent through the collection of copies of such identification cards, without having a specific purpose to use such data.

4.1.10 Biometric data, which the Group will collect upon obtaining consent, such as fingerprint scans and facial recognition data, solely for identity verification and authentication purposes.

4.1.11 For certain types of marketing communications where the Group cannot rely on other legal bases, the Group will obtain consent to collect such data, such as providing information, privileges, and public relations regarding products and services of the Ornsirin Group and/or its business partners.

#### 4.2 Personal Data Protection Measures

The Ornsirin Group shall implement personal data security measures covering administrative measures, technical measures, and physical measures to prevent loss, destruction, alteration, modification, unauthorized use, disclosure, or access to personal data, in accordance with applicable laws. Such measures may include, but are not limited to, access control over personal data and devices used for storage and processing, user

authorization and access rights management, assignment of user responsibilities to prevent unauthorized access, disclosure, awareness, duplication, or theft of personal data or storage devices, implementation of audit trails to track access, modification, deletion, or transfer of personal data, and identity verification of persons accessing or using personal data, in accordance with the information security policies of the Ornsirin Group.

In the event of a personal data breach, the Company shall promptly notify the data subject and inform them of remediation measures for damages resulting from such breach or disclosure caused by the Company's fault. In cases where there is a violation of the Company's security measures resulting in a personal data breach or disclosure to the public, the Company shall proceed accordingly. However, the Company shall not be liable for any damages arising from the use or disclosure of personal data to third parties, including negligence or failure to log out of databases or social media systems of the Ornsirin Group by the data subject or any other person authorized by the data subject.

## **5. Amendments to the Personal Data Protection Policy**

The Ornsirin Group may change, revise, or amend this Policy from time to time. The updated Policy will be published on [www.ornsirin.com](http://www.ornsirin.com) and shall replace all previous versions. If you wish to be informed of any changes, the Ornsirin Group recommends that you regularly review the Policy through the aforementioned channel. However, the Ornsirin Group will notify you of any material changes and obtain your consent again where necessary and as required by law.

## **6. Cookie Policy**

The Ornsirin Group uses cookies to store or remember user information until the browser is closed or until the user deletes or refuses the use of cookies. However, if you choose to allow cookie tracking, you will find that the use of the website becomes more convenient, as cookies help store information about websites you have previously visited or accessed. In addition, the website will use the collected cookie data for statistical analysis and/or for other activities of the Ornsirin Group to improve its products and services.

## **7. Rights of Data Subjects**

Under the personal data protection law, you have the following rights as a data subject:

7.1 Right to Withdraw Consent, you have the right to withdraw your consent previously given to the Ornsirin Group for the collection, use, or disclosure of your personal data at any time. However, if you do not provide or withdraw consent, the Ornsirin Group may not be able to offer or provide certain products or services to you, or may not be able to carry out certain actions related to such data as requested, which may result in inconvenience or inability to fulfill your requests.

7.2 Right of Access and Copy, you may have the right to request access to and obtain a copy of your personal data under the responsibility of the Ornsirin Group, and to request disclosure of how your personal data was obtained. For data security purposes, the Ornsirin Group may verify your identity before providing such data.

7.3 Right to Rectification, you may have the right to request correction of your personal data in cases where such data is incomplete, inaccurate, misleading, or not up to date.

7.4 Right to Data Portability, you may have the right to receive your personal data in electronic format and to request the Ornsirin Group to transmit or transfer such data to another data controller, subject to the conditions prescribed by law.

7.5 Right to Object, you may have the right to object to the collection, use, or disclosure of your personal data in certain cases, such as direct marketing.

7.6 Right to Erasure, you may have the right to request the Company to delete or destroy your personal data, or to anonymize such data so that it can no longer identify you, subject to the conditions prescribed by law.

7.7 Right to Restrict Processing, you may have the right to request the Company to restrict the use of your personal data in certain cases.

7.8 Right to Lodge a Complaint, you have the right to lodge a complaint with the competent authority if you believe that the collection, use, and/or disclosure of your personal data is unlawful or not in compliance with the personal data protection law. However, the Company would appreciate the opportunity to address your concerns or complaints for clarification and resolution before you contact the relevant authority.

In cases where the exercise of your rights is restricted by law or other applicable exemptions, and the Company is unable to comply with your request, the Company will inform you of the reasons for such refusal.

## **8. Retention Period of Personal Data**

The Company shall retain personal data for an appropriate and necessary period in accordance with the purposes for which such data was collected, as specified in this Policy and in compliance with applicable laws. However, the Company may retain personal data for a longer period as required to comply with applicable laws and regulations, as well as internal policies or operational requirements of the Company and the Ornsirin Group.

## **9. Categories of Personal Data Collected by the Company**

9.1 General personal data, such as title, first name, last name, gender, nationality, date of birth, photograph, signature, marital status, lifestyle information, and/or any other information that you choose to share with the Ornsirin Group which may be considered personal data.

9.2 Contact information, such as registered address, current address, type of residence, mobile phone number, email, social media accounts (e.g., Facebook, Instagram, YouTube, LINE, or WeChat), records of interactions and communications, and preferred communication channels.

9.3 Information from official documents issued by authorities, such as national identification card, passport, house registration, name-surname change documents, marriage certificate, government officer/state enterprise identification card, alien identification documents, work permit, vehicle registration, and driver's license.

9.4 Employment information, such as occupation, position, workplace, affiliated company, and directorship in a company/juristic person.

9.5 Information related to interests and purchases of the Group, such as real estate interests (e.g., preferred house/unit type, reasons for purchasing real estate, appointment date and time for project visits), benefits usage data, real estate transaction data, and information related to purchased properties (e.g., property location), reasons for unsuccessful sales closure (e.g., loan rejection, inability to transfer ownership), resale information, inspection data, insurance/warranty information related to real estate, and data for after-sales services.

9.6 Financial information, such as financial status, salary, income, bank account, payment information and methods for real estate (e.g., loan, cash), foreign remittance certification documents, loan application information submitted to banks (e.g., eligibility data, bank forms), default information, credit data, bankruptcy, and receivership data.

9.7 Technical data, including device-related information, such as data automatically collected from website visits, identifiable cookies, IT-related data about devices and browsers used to access the website, and IP address.

9.8 Other information, such as CCTV data, complaint details, marketing data, information from contractual documents, status as a contracting party or litigant, and survey data.

9.9 Sensitive personal data, such as sensitive information appearing on identification documents (e.g., religion).

## **10. General Principles of the Company**

10.1 Personal data obtained by the Company from online platforms or from contractual arrangements, such as name, age, address, telephone number, identification number, financial information, and any other information that can identify an individual, will be used in accordance with the purposes agreed with the Company. The Company shall implement appropriate measures to protect the rights of data subjects, except where the Company is required to retain such data in compliance with applicable laws.

10.2 If the Company changes the purposes of personal data collection, the Company will notify the data subject and obtain consent in all cases through electronic means or by announcement on the Company's website at least 30 days in advance. The Company will also establish measures to record such changes as evidence, unless otherwise required by law.

10.3 The Company will retain personal data within its database solely for the purpose of performing contractual obligations and for use in accordance with the Company's objectives. Once the personal data is no longer required or the retention period has expired, the Company will delete and destroy such data in accordance with its established measures and practices.

10.4 In cases where external entities or individuals are able to access the Company's database containing personal data, the Company will strictly control the operations of such entities or individuals and implement measures to strictly prevent any disclosure of personal data.

## **11. Contact Channels**

For inquiries regarding personal data, submission of suggestions, or requests to exercise data subject rights, please contact:

Ornsirin Group:

79 Moo 8, San Pu Loei Subdistrict, Doi Saket District, Chiang Mai

Tel: 053-295-709 or visit [www.ornsirin.co.th](http://www.ornsirin.co.th)

You may find further details regarding the personal data protection policy for customers and business partners on the Company's website. You may also contact the Data Protection Officer of the Ornsirin Group as follows:

Data Protection Officer: Ms. Nongnuch Kasorn Tel: 053-295709 ext. 102

Effective from 15 November 2024 onwards