

Privacy Notice for Directors, Version [2]

The Erawan Group Public Company Limited and its affiliates (as listed in the annex) ("**Erawan**" "**we**," "**us**," or "**our**") respects the importance of protecting the personal data protection rights of our directors. We understand you would like to receive the highest level of protection for how information about you is collected, used, disclosed, and/or cross-border transferred outside of Thailand. The information you share with us is necessary, in order to appoint you as an Director to the Annual General Meeting, this includes, but does not limited to, general business operation, paying you or providing you with benefits.

This Director Privacy Notice (this "**Notice**") applies to our directors ("**you**" or "**your**") and their Personal Data. However, this Notice does not form a part of appointment you as an Director of our company.

We may amend this Notice from time to time. Where applicable, we may notify you when material changes have been made to this Notice by means we deem appropriate. We recommend that you periodically revisit or keep track of this Notice to learn of any changes.

1. The types of Personal Data we process

The term "**Personal Data**" means any information that identifies or is capable of identifying you as an individual as listed below, provided voluntarily when you connect with us by any means, whether oral, written or electronic. In other instances, we process information that we are able to infer about you based on other information you provide to us or during our interactions with you, or Personal Data that we receive from authorised third parties or is permitted to disclose to the publics such as the Stock Exchange of Thailand, the Securities and Exchange Commission, Thailand and other listed companies.

"**Sensitive Data**" means Personal Data classified by law as sensitive data. We will only collect, use, disclose and/or cross-border transfer Sensitive Data if we have received your explicit consent or as permitted by law.

As applicable to you depending on your roles and responsibilities, Erawan will collect, process and use the following categories and types of Personal Data about you:

- **Personal details**, such as title, full name, gender, age, nationality, date of birth, signature, information on government-issued cards (e.g. national identification card, passport, VISA, work permits, alien card, house registration, driver's license details, or other similar identifiers), marital status, videos, CCTV records, photographs, vehicle details (e.g. copy of vehicle registration book, license plate number, brand and color).
- **Contact details**, such as your domicile, home address, email address, telephone number.
- **Work related details**, such as form for proposing nominee to be elected as director, minute of appointment director, form to report on names of members and scope of work of the audit committee, the certificate and biography of the audit committee (F24-2), form to report list of director or management (F35-E1) , form to report of change in securities holdings, form to report their change of interest of director or management, work record, recruitment history, evaluation record, performance review, business card, commencement date, leave related information and records, reasons for termination and/or resignation of director contract.
- **Information regarding remuneration fee, attendance fee, bonus or other benefits as directors**, such as bank account information, tax payer ID number, tax reduction information.
- **Personal data permitted disclosure to public**, information disclosure to the Stock Exchange of Thailand, the Securities and Exchange Commission, Thailand or other companies
- **Other personal information**, such as your parent's name, your spouse, your marital certificate, number of your dependents, dependent birth certificate(s), emergency contact person, and beneficiary. Their Personal Data collected may include, but is not limited to the following: title, full name, national identification number, telephone number, personal relationship with the director, court order appointing such person as an estate manager, book account information and others).

- **Sensitive data.** Health information; biometric information (e.g. facial recognition, fingerprint and eye iris scan); criminal records; Sensitive Data from official identification documents (e.g. religion, race, and ethnicity).

If you have provided Personal Data of any third party to us, (e.g. their full name, telephone number, you relationship with them, etc.) please provide this Notice for their acknowledgement and/or obtaining consents where applicable.

2. Why we collect, use and/or disclose your Personal Data

Except in limited instances when we indicate that certain information is based on your consent, we collect use, and/or disclose your Personal Data on the legal basis of (1) contractual basis, for performance of activity in relation to the our business relationship; (2) legal obligation, for fulfilment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties, proportionate to your interest and fundamental rights and freedoms to the protection of your Personal Data; (4) vital interest, for the prevention or suppression of danger to a person's life, body, or health; (5) public interest, for the performance of task carried out in the public interest or for exercising of official authorities or duties; and/or (6) the reason for an establishment and defenses of legal claims in the future.

2.1 *The purpose of which you have given your consent:*

We may collect, use, and disclose the following Sensitive Data in order to:

- **Biometric information:** for granting access to restricted area, verification and authentication;
- **Criminal records:** to accompany directorship decision making, internal management of Company's image, blacklist record maintenance, security purposes;
- **Sensitive data from official identification documents** such as religious, race, and ethnicity, which are found on the copies of identification documents when we collect for authentication and verification purposes, and for welfare allocation.

We will only collect, use, and/or disclose your Sensitive Data if we have received your explicit consent or as permitted by law.

Where legal basis is consent, you have the right to withdraw consent at any time. This can be done so, by contacting dpo@theerawan.com. The withdrawal of consent will not affect the lawfulness of the collection, use and disclosure of your Personal Data and sensitive data based on your consent before it was withdrawn.

2.2 *The purpose we may rely on and other legal grounds for processing your Personal Data*

We may collect, use, and/or disclose your Personal Data for purposes, including, but is not limited to:

- **Appointment of directorship and directorship management**, such as identity verification, selection of director, appointment process and director welcoming;
- **Work related purposes**, such as issuing a power of attorney letter, appointing a representative, enter into a contract or sign an agreement with our customers, suppliers, vendors, and/or other third parties.
- **Assisting you in performing your duties**, such as issue parking ticket/card, provision of tools and equipment necessary in order to carry on your responsibilities, maintenance of work performance records.
- **Relationship management**, such as provision of assistance as you may request and conduct satisfactory survey.

- **Provision of compensation and benefits**, such as remuneration fee, attendance fee, bonus and other benefits payment for directors
- **To contact and communicate**, such as business/work related communication, directors meeting appointment, emergency contact.
- **Operational purpose**, such as monitor director's performance, allocate and manage company resources, monitor director's responsibilities, our business with third parties, disciplinary monitoring, internal investigation and interrogation in case of complaint, and impose disciplinary sanction where necessary.
- **Prevention and investigation of frauds**, including illegal activities, omission of duties or misconduct which may or may not be related to your directorship; to prevent and detect crime; to manage and protect our properties, the properties of our affiliates and subsidiaries under The Erawan Group or of our staffs, guests and other visitors; and for quality assurance purposes, to the extent permitted by applicable law;
- **Protection of data, trade secrets and assets**, including protecting customers, employees and other individuals, safety of systems and premises of Erawan and our affiliates and subsidiaries under The Erawan Group;
- **For sales or acquisitions of business**, including business divisions, companies or parts of companies and other corporate transactions, re-organization, disposal, or public offering, making available the necessary information to the purchaser or subscriber for our shares or any entities which are affiliates or subsidiaries under The Erawan Group;
- **For security and safety purposes** within the premises of Erawan or our affiliates and subsidiaries under The Erawan Group;
- **For other purposes as are reasonably required by us in connection with your directorship** such as to proceed with the activities or operation for us or on behalf of us and as set out in your directorship agreement, the work rules, or any documents related to HR management and development, as applicable to you;
- **For protection of your vital interests or that of another individual.**
- **For compliance with regulatory and compliance obligation:** to comply with legal obligations, legal proceedings, or government authorities' orders; to cooperate with courts, regulators, government authorities, and law enforcement bodies when we reasonably believe we are legally required to do so, and when disclosing your Personal Data is strictly necessary to comply with the said legal obligations, proceedings, or government orders; to comply with international organization standard of compliance (e.g. ISO); to handle tax payment.

Where we need to collect, use, and disclose your Personal Data as required by law, or for performance of a contract with you and you fail to provide that Personal Data to us, we may not be able to perform the contract we have with you, or we may not be able to provide you with certain services or benefits.

Where consent is required for certain activities of collection, use or disclosure of your personal data, we will request and obtain your consent for such activities separately.

3. Sensitive data

In the event that you provided Erawan the copy of your identification card or official identification documents which contains sensitive personal data such as religious, race, ethnicity and blood type, in general, Erawan has no intention to collect and use religious, race, ethnicity and blood type data specified in your identification card or official identification documents for any specific purpose. In the event that you provided Erawan the copy of your identification card or official identification documents, it is requested that you conceal such data. If you did not conceal such data, it shall be deemed that you authorized Erawan to conceal those data and such document with concealed data shall be deemed valid and legally enforceable in all respects. In case that Erawan is unable to conceal those data due to some technical limitation, Erawan shall collect and use such data as a part of your identification documents only.

4. Disclosures of your Personal Data

In order to carry out the purposes outlined above, the Erawan entity with which you have an directorship relationship may transfer your Personal Data to third parties. When we disclose your Personal Data, it is our policy to limit the categories of recipients who have access to that Personal Data.

Your Personal Data may be disclosed to the following:

- **Other entities within the Erawan.** Your Personal Data may be accessible to or shared with other entities within the Erawan (as listed in the annex) for the purposes set out in this Notice.
- **Other third parties.** We may use other companies, agents or contractors to perform services on behalf or to assist with the provision of products and services to you. We may share your Personal Data to our service providers or third-party suppliers including, but not limited to (1) infrastructure, internet, infrastructure technical, software, website developer and IT service providers; (2) data storage and cloud service providers; (3) telecommunications and communication service providers; (4) storage and logistics service providers; (5) payment service providers; (6) research agencies; (7) analytics service providers; (8) survey agencies; (9) auditors; (10) marketing, advertising media, and communications agencies; (11) call centers; (12) campaign and event organizers; (13) sale representative agencies; (14) travel agencies and reservations agencies; (15) insurance company; (16) banks, financial institutions, payment, payment system, and authentication service providers and agents; (17) outsourced administrative service providers; (18) healthcare providers or hospitals; (19) training and coaching service provider.
- **Our business partners.** Your Personal Data may be shared with our business partners in the process of contract signing and/or service engagement. Your Personal Data may as well be disclosed along with other required document in order to fulfil a contract signing requirements.
- **Professional advisors.** This includes lawyers, technicians and auditors who assist in running our business, and defending or bringing any legal claims.
- **Acquiring entities.** Third parties as our assignee, in the event of any reorganization, merger, business transfer, whether in whole or in part, sale, purchase, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock or similar transaction; will comply with this Notice to respect your Personal Data.
- **Government authorities.** In certain circumstances, we may be required to disclose or share your Personal Data in order to comply with a legal or regulatory obligations. This includes any law enforcement agency, court, regulator, government authority or other third party where we believe it is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise

address fraud, security, or safety issues (e.g. Department Of Skill Development, the Social Security Office, Department of Empowerment of Persons with Disabilities, the Revenue Department and the Stock Exchange of Thailand).

5. International data transfer

Some of the recipients we may share your Personal Data with may be located in countries outside of Thailand which the destination countries may or may not have the same equivalent level of protection for Personal Data protection standards. We take steps and measures to ensure that your Personal Data is securely transferred and that the receiving parties have in place an appropriate level of data protection standards or other derogations as allowed by laws. We will request your consent where consent to cross-border transfer is required by law.

6. Retention of your Personal Data

Your Personal Data will not be kept in a form that allows you to be identified for any longer than is reasonably considered necessary by the Erawan for achieving the purposes for which the data was collected or processed, as established in the applicable law related to data retention periods. In any case, we may have to retain your Personal Data for a longer duration, as required by applicable law.

7. Your data protection rights

Subject to the applicable conditions under the Thai Personal Data Protection Act B.E. 2562, you have the right to:

- **Request to access** to your Personal Data. This also enables you to receive a copy of the Personal Data we hold about you and to check on how we acquire certain Personal Data without your consent;
- **Request to port**, meaning to receive copies of your Personal Data in an electronic format and, or to ask us to transfer it to another party;
- **Request to object** to the collection, use and disclosure of your Personal Data for certain cases, including when we use your Personal Data for direct marketing purposes;
- **Request to delete**, destroy or anonymize your Personal Data. This enables you to ask us to delete, destroy or anonymize Personal Data where there is no valid ground for us to continue the collection, use and disclosure of such Personal Data;
- **Request to restrict**, meaning to suspend the collection, use and disclosure of your Personal Data;
- **Request to rectify** the Personal Data we hold about you. This enables you to have any inaccurate, outdated, incomplete, and misleading Personal Data we hold about you rectified;
- **Make a complaint** to a competent authority under the applicable data protection law; and
- **Request to withdraw your consent** at any time where we collect, use and disclose your Personal Data based on your consent. This will not affect the lawfulness of the processing based on consent before the withdrawal.

In the event that Erawan Group and its affiliates collected your personal data before 1 June 2022, We will continue processing such Personal data in accordance with the Personal Data Protection Act. Please be informed that you have the right to withdraw your consent for the collection of personal data by us before the Personal Data Protection Act B.E.2562 comes into effect by submitting a request for withdrawal of consent via dpo@theerawan.com.

8. Information about third parties

If you provide us with Personal Data about members of your family and/or other dependents ("**dependents**") and/or any third parties (e.g. reference person, emergency contacts) for the purposes set forth in the Notice (e.g. their full name, telephone number, your relationship with them, etc.), it is your responsibility to inform them of their rights with respect to the contents of this Notice as applicable to them. You are also responsible for obtaining any required consent of these dependents, and ensuring that you have the right to provide their Personal Data to us.

9. Changes to this Notice

We may amend this Notice from time to time. Where applicable, we may notify you when material changes have been made to this Notice by means we deem appropriate. We recommend that you periodically revisit or keep track of this Notice to learn of any changes.

10. Contact details for concerns / questions

If you have concerns or questions regarding this Notice or if you would like to exercise your rights as a data subject, please contact:

THE ERAWAN GROUP PUBLIC COMPANY LIMITED

6th Floor, Ploenchit Center, 2 Sukhumvit Road,
Kwang Klongtoey, Khet Klongtoey, Bangkok 10110 Thailand
Telephone: 66 (0) 2257 4588
Fax: 66 (0) 2257 4577
www.TheErawan.com

For affiliated companies, please see annex.

The contact details of our data protection officer are as follows:

Email : dpo@theerawan.com

May 2022

**Annex
Lists of Affiliated Companies**

Company	Address and Contact
The Erawan Group Public Company Limited	6 th Floor, Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Hotel Public Company Limited	494 Ploenchit Road, Kwang Lumpini, Khet Pathumwan, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Hop Inn Co., Ltd.	1 st Floor, Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2659 -2899
Taveesapanan Co., Ltd.	1 st Floor, Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2659 -2899
Erawan Phuket Co., Ltd.	Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Rajdamri Co., Ltd.	Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Chaophraya Co., Ltd.	Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Growth Management Co., Ltd.	Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Commercial Management	Ploenchit Center , 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Naka Co., Ltd.	494 Ploenchit Road, Kwang Lumpini, Khet Pathumwan, Bangkok Thailand Telephone : 66 (0) 2257-4588
The Reserve Co., Ltd.	494 Ploenchit Road, Kwang Lumpini, Khet Pathumwan, Bangkok Thailand Telephone : 66 (0) 2257-4588