

# Data Protection Policy

Betagro Public Company Limited and Affiliates recognize the importance of the protection of personal data and need to act in accordance with the laws concerning the data protection and other related regulations.

Therefore, we have established and disclose this Data Protection Policy (“Policy”) as its approach to explain how we collect, use or disclose personal information and how we protect personal information and properly handle such information according to the Personal Data Protection Act B.E. 2562 (“PDPA”).

## 1. Definition

“**Company**” means Betagro Public Company Limited and Affiliates (details as shown in website)

“**Personal Data**” means any information relating to an individual, which enables the identification of such individual, whether directly or indirectly, but not including the information of the deceased persons in particular.

“**Sensitive Personal Data**” means any information relating to a particular person which is sensitive and presents significant risks to the person’s fundamental rights and freedoms, which includes data regarding racial or ethnic origin, political opinions, cults, religious or philosophical beliefs, sexual behavior, criminal records, health data, disabilities, trade union information, genetic data, biometric data, or any data which may affect the Data Subject in the same manner, as prescribed by the Personal Data Protection Committee.

“**Data controller**” means any person having the power and duties to make decisions regarding the collection, use, or disclosure of the personal data

“**Data processor**” means any person who operates in relation to the collection, use, or disclosure of the personal data pursuant to the orders given by or on behalf of a data controller

“**Data processing**” means any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## 2. Personal Data that company collect

We collect several types of personal information, including:

- Identity Data (for example, name, surname, identification card number, passport number, birthdate, gender, age, nationality, marital status, photos, and in some cases we may process sensitive data such as health data, disability data, race, religion only with your explicit consent or when permitted by law)
- Contact Data (for example, address, telephone number, e-mail)
- Social Media Contact Data (for example, LINE ID, Facebook account)
- Financial or Transaction Data (for example, bank account number, credit card number, transactions related to our products or services, customer code)

- Communication Data (for example, images or voice recordings when communicating with us)
- Information on participating in activities held by us (for example, static images or videos)
- Technical Information (for example the information of devices you use to access the Website, Computer Traffic Data (Log), contact information and communication between you and other users, and the information from the use of Website such as device identifier, IP address of the computer, device identification number, device type, mobile network information, connection information, type of browser, information recorded from your access to the Website, information of the Website entered by you before and after access to our Website (Referring Website), Website historical record, login log, transaction log, customer behavior, statistic of Website usage, access time, information on your search, use of Website functions, and the information we collect through cookies or other similar technologies).
- Geolocation Data (for example, IP address or GPS Location)
- Other data concerning the additional data collection in accordance with the purpose

### **3. Sources of information**

We may collect your personal information from various sources as follows:

- (a) Collect information directly from you, for example:
  - When you contact us to inquire our products or services information
  - Procedures for applications for purchasing our products or using our services, taking steps as per your request prior to entering into a contract, contract signing, form filling, questionnaires, registrations or submission of claims or requests for exercising your rights
  - Your communication with us via our contact channels, for example, telephone, e-mail, LINE, Facebook Messenger, etc.
  - Information on participating in activities held by us, for example, static images or videos
  - Automatic data storage system, for example, when you use our website or application, etc.
- (b) Collect information from other sources, for example:
  - Our customers, employee, agents or service providers
  - Our group companies
  - Government authorities or other publicly available sources such as company website, information made available on the internet or social media platforms, for example, Facebook, etc.

### **4. Purposes of Collection, Use or Disclosure of Personal Information**

We collect, use or disclose your personal information for various purposes depending on relationship between you and the Company as follows:

- 4.1 To consider entering into an agreement or to take steps as per an application in relation to our products or services or to enter into an agreement with you
- 4.2 To use products, benefits or services of the Company, to perform contractual obligations, to

register for providing services in relation to products and services, payment, to receive or deliver the information or documents between you and the Company including to comply with our internal procedures

- 4.3 To manage our relationship with customers, for example to communicate with you on any information about our products and services, to manage your complaint, etc.
- 4.4 To inform any information or notifications to you about products or services that you have with us including other products or services of the Company, to inform benefits, sales promotion, marketing activities, any activity and project invitation of the Company and to communicate about such activity and project including to offer our products or services
- 4.5 To register activity registrations, campaigns, offers, sales promotions, reward or gift registrations or any benefits which are operated by the Company, affiliates or third parties, for example, lucky draw, prize trivia quizzes, trainings, seminars, or tours, etc., including any procedures relating to the aforesaid activities.
- 4.6 To survey your satisfaction with our products and services and to analyze your interests including your spending or service using records in order to evaluate, manage, improve, research, conduct planning, and develop our products, services and sales promotions to better suit your needs
- 4.7 To conduct business planning, reporting and forecasting
- 4.8 To manage risks and undertake internal audit and administration, for example, to prevent fraud or undertake detection, to investigate requests for use of our internal information systems
- 4.9 To comply with laws, regulations, orders, legal requirements and obligations of the Company, or to report or disclose information to government authorities as required by laws, for example, Department of Livestock Development, Department of Fisheries, Revenue Department, or upon receiving an order or a writ of attachment from police officers, government authorities, courts, or other competent authorities, to undertake detection and investigation under legal procedures and other regulations including to establish, comply or exercise the rights to legal claims or defend against the rights to legal claims
- 4.10 To assign rights, obligations and any benefits under a contract between you and the Company which have been done legally, for example, merger or transfer of the contract

## **5. Data Retention Period**

We retain your personal information for as long as is considered necessary for the purpose for which it was collected, used or disclosed as set out in this Policy. The criteria used to determine our retention periods include: we retain the personal information for the duration we have an ongoing relationship with you; or we may retain the personal information for a longer period as necessary to comply with applicable laws, or to be in accordance with legal prescription, or to establish, comply with or exercise the rights to legal claims or defend against the rights to legal claims, or to comply with, for any other cause, our internal policies and regulations.

## **6. Data Disclosure**

We may disclose your personal information in certain circumstances, for the purposes set out in this Policy, to

- 6.1 Subsidiaries, affiliates and any related companies for business purposes, internal management,

offering for sale of products and services which you may be interested in, including undertaking any other activity as set out in this Policy.

6.2 Agencies, contractors/sub-contractors and/or service providers for their implementation and procedures, for example, carriers, document storage and destruction service providers, printing house, marketing agency, IT development and maintenance service providers, travel agencies, travel and accommodation service providers, payment and payment system service providers, call center service providers, auditors, lawyers, tax and legal advisors, and any consultants.

6.3 Government authorities, supervisory authorities or other authorities as stipulated by laws, including competent officials.

6.4 Our business partners or other third parties as per your consent or contractual requirements or legal requirements, as the case may be.

6.5 The assignee of the rights, duties, and any benefits from the Company, including any persons who are assigned by the aforesaid assignee to act on its behalf, for example, in the case of organizational restructuring, merger or acquisition, etc.

## **7. International Transfer of Personal Data**

In some cases, we may transmit or transfer your personal information to the Company databases which are operated and managed on Cloud Servers in foreign countries. In such case, the Company shall provide adequate protection and security measures and comply with the PDPA.

## **8. Lawful Basis for Processing of Personal Data**

The Company only processes your personal information as it is necessary for the scope set out in this Policy, as follows:

- Where we obtain your consent (as required by law)
- To take steps at your request prior to entering into a contract and to perform contractual obligations between you and the Company;
- Where it is necessary for legitimate interests of the Company or any other persons or juristic persons, except where such interests are overridden by fundamental rights of your personal information;
- To comply with laws to which the Company is subjected;
- Where it is necessary for preventing or suppressing a danger to a person's life, body or health;
- To perform the Company's duties for a task carried out in public interest or to perform duties for the exercising of official authority vested in the Company (if any).

In the case where the Company processes your sensitive personal information, the Company shall duly obtain your explicit consent, unless the explicit consent is not required by law.

In the case where the personal information collected by the Company as stated above is necessary for the Company's compliance with applicable laws or performance of contract. If you do not provide us with such necessary personal information, the Company may be subject to legal

liabilities; and/or may not be able to provide you with our products and services; and/or may not be able to manage or administer the contract or give any convenience for you.

## **9. Your Rights as a Data Subject**

According to the PDPA, you have certain rights relating to your personal information as follows:

- Right to Withdraw Consent
- Right to Access
- Right to Data Portability
- Right to Object
- Right to Erasure
- Right to Restriction of Processing
- Right to Rectification
- Right to File a Complaint

Data Subject may request these rights by sending an official notice to company or through [www.betagro.com](http://www.betagro.com) or to the channel following the Contact Information of this policy.

Company shall consider the right request received and inform the Data Subject not exceeding 30 days from the date of receiving such request. However, the Company may deny such a right subject to exception by applicable laws.

## **10. Personal Data Protection Security Measures**

The Company implements appropriate and strict security measures for preventing unauthorized or unlawful loss, access to, use, alteration, correction or disclosure of personal information.

In the case where the Company assigns any third party to process your personal information pursuant to the instructions given by or on behalf of the Company, the Company shall appropriately supervise such third party to ensure your personal information protection in accordance with the PDPA.

## **11. Contact information**

If you have any questions or inquiries about the protection of your personal information, collection, use or disclosure of your personal information, or exercise of your rights, or have any claims, please contact us at:

### **Betagro Public Company Limited**

Address: Betagro Tower (North Park), 323, Moo 6, Vibhavadi Rangsit Road, Thung Song Hong, Lak Si District, Bangkok 10210

Tel: 0-2833-8333

E-mail: [DPOoffice@Betagro.com](mailto:DPOoffice@Betagro.com)

## **12. Link to Third Party Websites via our Website**

This Policy applies to the sales of products or provision of services and use of our Website only. When you link to third party websites via our Website, the personal information protection shall be in accordance with the Privacy Policy of such third party websites which are not related to the Company.