



BOUND&BEYOND

Personal Data Protection Policy

Bound and Beyond Public Company Limited
and Affiliates





Personal Data Protection Policy

It is the strong commitment of Bound and Beyond Public Company Limited and its affiliates (collectively referred to as the “**Company**”) to conduct the business under good corporate governance and strictly in compliance with the laws. The Company realizes the importance of the announcement of the Personal Data Protection Act B.E. 2562 and related regulations, the Company thus provides this Personal Data Protection Policy in order to be a standard of personal data protection i.e. collection, use, transfer or disclosure of the personal data of natural persons, including to the vendors, producers, customers, contractual parties, service providers, applicants, employees, contact persons or any persons directly or indirectly contacting with the Company (collectively referred to as “**Data Subject**”) via any channel including Company’s website.

Under this Personal Data Protection Policy, the Company, directors, management levels, employees, officers, agents or any person appointed by the Company (“**Company’s Personnel**”) must strictly comply with the terms and conditions of this Personal Data Protection Policy.

OBJECTIVES

This Personal Data Protection Policy has the following objectives:

1. To maintain the standard protection of the Data Subject’s personal data to be in compliance with the Personal Data Protection Act B.E. 2562 and related regulations (including any amended laws or promulgated laws in the future) (“**Personal Data Protection Law**”).
2. Any business conduction in relation to the personal data of the Company and Company’s Personnel shall be strictly in compliance with this Personal Data Protection Policy and Personal Data Protection Law.
3. The Company appoints the Data Controller to have the power and duties to make decisions regarding the collection, use, or disclosure of the personal data to act on behalf of the Company (“**Data Controller**”).
4. The Company appoints the person who provides advice to the Data Controller in relation to the compliance of the Personal Data Protection Law, including to inspect the operation of the Data Controller (“**Data Protection Officer**”).

Data Controller

To facilitate any operation and in compliance with the Personal Data Protection Law, the Company appoints Head of Human Resources Department, together with Head of Company Secretary and Compliance to be a Data Controller, who has a power and duties to make decisions regarding the collection, use, or disclosure of the personal data in accordance with the terms and conditions of this Personal Data Protection Policy.



Data Protection Officer

The Company appoints Head of Information Technology to be a Data Protection Officer, who has the following powers and duties:

1. To provide advice to the Data Controller and the Company's Personnel to comply with the Personal Data Protection Law.
2. To inspect the operation of the Data Controller and the Company's Personnel in order to collect, use or disclose the personal data.
3. To coordinate and participate with the Office of the Personal Data Protection Committee in case of any issues in relation to collect, use or disclose of the Data Controller.
4. To keep confidential of the personal data in compliance with the Personal Data Protection Law.

ENFORCEMENT OF THE PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy shall be enforceable to the transactions or normal activities of the Company's business which are related to the personal data, and shall be enforceable to Data Controller, Data Protection Officer and Company's Personnel who obtains, collects, uses, transfers and/or discloses the personal data of the Data Subject. In addition, the Data Controller shall inspect and arrange the Company's Personnel to be thoroughly trained, studied, read and understood this Personal Data Protection Policy, including to strictly comply with the terms and conditions of this Personal Data Protection Policy.

In addition, in order to protect the personal data of the Data Subject, the Data Controller shall arrange the advisor, or any third parties coordinating with the Company who obtain, collect, use, transfer and/or disclose the personal data of the Data Subject to be thoroughly trained, studied, read and understood this Personal Data Protection Policy, including to strictly comply with the terms and conditions of this Personal Data Protection Policy as well.

In the event that the Company's Personnel or any person has any suspicious or any questions to this Personal Data Protection Policy, or detects any illegal acts or any transactions violated to the Personal Data Protection Law or this Personal Data Protection Policy, the Data Controller shall be promptly notified.

PRINCIPLES OF PERSONAL DATA PROTECTION POLICY

1. Apart from this Personal Data Protection Policy, the Data Controller may announce the internal rules, regulations, and procedures to govern any transactions or activities which relating to personal data, including to the transfer of personal data in order to be in compliance with this Personal Data Protection Policy and Personal Data Law.



2. The Data Controller shall inspect and control the Company's Personnel to strictly comply with the Personal Data Policy and any internal rules in relation to the personal data.
3. The Data Controller shall arrange the training to the Company's Personnel Re: the Compliance with the Personal Data, including to arrange the proper equipment, instruments, and electronic systems to protect the personal data to be safely stored, appropriately used, and limit the number of Company's Personnel to access to the personal data.
4. The Data Controller shall arrange the management level of each department to be responsible and regularly inspects their own department that the personnel in their department strictly complies with this Personal Data Protection Policy and shall further arrange the personnel in their own department to be regularly trained for the compliance of the Personal Data Protection Policy and related Personal Data Protection Law.
5. The Data Controller shall annually review and inspect the Personal Data Protection Policy in order to update the content of the Personal Data Protection Policy to be in compliance with the Personal Data Protection Law. If any amendment to Personal Data Protection Law resulting to the change to the Personal Data Protection Policy, the Data Controller shall propose the new version of the Personal Data Protection Policy to the board of directors of the Company to consider and approve such new version of the Personal Protection Policy without delay.



GUIDELINE TO THE COMPLIANCE TO THE PERSONAL DATA PROTECTION (“GUIDELINE”)

The guideline for any actions or performances of the Company’s Personnel shall be in compliance with the Personal Data Protection Policy as follows:

The Personal Data which is Permitted by the Provisions of Laws

In the event of the obviously specified by the provision of laws, the Data Controller shall be entitled to obtain, use and collect the personal data without requiring the consent from the Data Subject.

Nevertheless, by obtaining such personal data, the Data Controller and the Company’s Personnel shall notify the Data Protection Officer, and in case that such personal data is no longer use, the Data Controller shall promptly notify the Data Protection Officer to destroy such personal data.

The Consent from Data Subject and Notification to Data Subject

The guideline for obtaining the personal data is as follows:

1. The Data Controller and the Company’s Personnel who obtains the personal data shall ensure that:
 - 1.1 The Data Subject explicitly gives the consent to the Company to be able to obtain such personal data in writing or by way of electronic system. In requesting consent from the Data Subject, the request for consent shall be presented in a manner which is clearly distinguishable from the other matters, in an easily accessible and intelligible form and statements, using clear and plain language, and upon the consent is obtained, the Data Controller and the Company’s Personnel shall have the evidence of such obtained consent for the record of the Company.
 - 1.2 In request of the Data Subject’s consent, the request shall specify:
 - The details of the personal data to be obtained from the Data Subject;
 - The purposes of the personal data to be obtained;
 - The period for the personal data to be stored;
 - The details of the Data Protection Officer in case that the Data Subject would like to contact the Data Protection Officer in relation to the use, collect, transfer and/or disclose of personal data of Data Subject.
 - 1.3 The Data Controller and the Company’s Personnel shall notify the Data Subject that the Data Subject may withdraw his or her consent at any time (unless there is a restriction of the withdrawal of consent by law, or the contract which gives benefits to the data subject). The withdrawal can be done via written



or electronic system. In the event that the withdrawal of consent effects to the Data Subject, the Data Controller and Company's Personnel shall notify the Data Subject for such effects prior to the withdrawal of such consent.

- 1.4 In the event that the Data Subject is a minor who is not sui juris, the Data Controller and the Company's Personnel shall seek a consent and/or a withdrawal of consent from the holder of parental responsibility over the child, or in the event that the Data Subject is incompetent or quasi-incompetent, the consent must be obtained from the custodian who has the power to act on behalf of the incompetent person, or from the curator who has the power to act on behalf of the quasi-incompetent person (as the case may be).
- 1.5 In the event of obtaining any personal data of the Data Subject, the Data Controller and the Company's Personnel shall promptly notify the Data Protection Officer.
- 1.6 In the event that the personal data is no longer required, the Data Controller shall promptly notify the Data Protection Officer for destroying of such personal data.
2. In the event that the Data Controller or the Company's Personnel collect any personal data from other source which is not directly receiving from Data Subject, the Data Controller and the Company's Personnel shall notify the Data Subject without delay (not exceeding 30 days), including to requiring the consent from the Data Subject as mentioned in Clause 1 above.

In addition, the Data Controller and the Company's Personnel shall promptly notify the Data Protection Officer for obtaining such personal data, and in the event that the personal data is no longer required, the Data Controller shall promptly notify the Data Protection Officer for destroying of such personal data.

Use or Disclosure of Personal Data in accordance with the Purpose

1. The Data Controller shall have duties to specify the purposes of obtain, use and collect personal data, including to inform the Company's Personnel for obtaining the consent and inform the Data Subject, accordingly.
2. In the event that the Data Controller and the Company's Personnel receives or has any relation to the personal data of the Data Subject, the Company's Personnel shall ensure that such personal data is used only for the purposes specified by the Data Controller, and the Data Subject already grants consent for the use of such personal data.
3. In the event that the Company's Personnel intends to use, collect or disclose personal data, other than the purposes consented by the Data Subject, the Company's Personnel shall require additional consent from the Data Subject as above mentioned in the clause of "The Consent from Data Subject and Notification to Data Subject". In addition, the Company's Personal shall inform the Data Controller and the Data Protection Officer for the additional purposes of the use, collect or disclose the personal data without delay.
4. In the event of transfer or deliver personal data to overseas, the Data Controller and the Company's Personnel



shall ensure that the destination countries or international organizations have appropriated standard in data protection.

For such transfer or delivery to overseas, the Data Controller and the Company's Personnel shall promptly notify the Data Protection Officer prior to any proceeding.

The Collection of Personal Data

1. The Data Controller and the Company's Personnel shall collect the personal data in accordance with the period consented by the Data Subject, providing that the Data Protection Officer shall regularly review whether the personal data is collected in the period consent by the Data Subject.
2. In the event of the completion of the period for personal data collection as consented by the Data Subject, the Data Controller and the Company's Personnel shall consider whether such personal data shall be further collected. In the event that the personal data shall continuously be collected, the Data Controller and the Company's Personnel shall require the consent from the Data Subject by way of written consent or electronic system. The Data Controller and the Company's Personnel shall have evidence of such consent as a record.
3. Upon the consent of the Data Subject is obtained, the Data Controller and the Company's Personnel shall inform the Data Protection Officer for the period of the personal data to be continuously collected.
4. By collecting the personal data, the Data Controller shall ensure that the personal data is stored in the company database, and there is a limit of the persons accessing to such personal data, providing that the persons accessing to the personal data shall be eligible persons. The Data Controller shall inform the Data Protection Officer to arrange the appropriated system to protect and not allow the Company's Personnel to copy, save or collect the personal data. In addition, the Data Protection Officer shall arrange warning system in case of any breach of the security system in order to avoid of any damages.

Rights of the Data Subject

The Data Controller shall arrange the Data Subject to be able to proceed as follows:

1. Access to Personal Data

The Data Subject is entitled to access to its personal data related to him or her by contacting the Data Controller, and is entitled to obtain the copy of his or her personal data, or ask the Data Controller for the source of personal data acquisition. In this respect, the Data Controller shall coordinate with the Data Protection Officer to proceed as requested by the Data Subject.

2. Request for the Transfer of Personal Data



The Data Subject is entitled to request the Data Protection Officer to transfer or deliver his or her personal data to any person as consented and notified to the Data Controller and the Company's Personnel. The Data Subject shall be entitled to request to receive his or her personal data which is sent to required person. In the case of any requirements from the Data Subject, the Data Controller shall inform the Data Protection Officer without delay.

3. Object and Amend the Personal Data

The Data Subject shall be entitled to change, amend, object or cancel his or her personal data given to the Data Controller at any time. Upon the acknowledgment of such request from the Data Subject, the Data Controller shall inform the Data Protection Officer and proceed with such request without delay.

4. Request the Personal Data to be Destroyed

The Data Subject shall be entitled to request the Data Controller and the Company's Personnel to suspend or destroy his or her personal data by notifying the Data Controller. The Data Controller shall inform the Data Protection Officer and proceed with such request without delay.

Destroy of the Personal Data

1. Unless the explicit consent is obtained from the Data Subject or there is a requirement of the provisions of law, the Data Controller shall not collect the personal data over the period consenting by the Data Subject.
2. The Data Controller and the Data Protection Officer shall periodically consider whether the personal data is collected over the period consenting by the Data Subject. In the event that the personal data is collected as the period consenting by the Data Subject, the Data Controller shall coordinate with the Data Protection Officer to destroy such personal data without delay.
3. In the event that the personal data is completely used in accordance with the purpose of obtaining such personal data, the Data Controller shall coordinate with the Data Protection Officer to destroy such personal data without delay. In the event that the Company's Personnel finds out that the personal data is no longer necessary to be collected or used, the Company's Personnel shall notify the Data Controller in order that the Data Controller to coordinate with the Data Protection Officer to destroy such personal information without delay.

Disclosure of the Personal Information to Third Party

The Data Controller shall not disclose any personal data of Data Subject to any third party, except for:

1. There is a requirement under the laws;



2. There is an explicit consent from the Data Subject by way of writing or electronic system;

In this respect to the disclosure of the personal data to the third party, the Data Controller shall ensure that such third party shall strictly comply with the personal data protection as mentioned in this Personal Data Protection Policy and provisions of laws.

Confidentiality of the Personal Data

1. The personal data shall be collected as confidential information and shall not disclose to any third party, unless there is a consent from the Data Subject or any requirement under the provisions of law.
2. For the confidentiality of the personal data, the Data Controller shall arrange the appropriated security system for collect the personal data, including to limit the numbers and level of the Company's Personnel to access to such personal information, and the computer system to protect the personal data to be taken from the Company's database by having warning system if there a breach of security system.

Compliance to the Personal Data Protection Policy and Related Laws

1. The Data Controller shall inspect the Company's Personnel to regularly comply with the Personal Data Protection Policy, and related laws, including to arrange the channel for questioning, appealing or proceeding in any disputed cases.
2. The Data Controller shall annually review and inspect this Personal Data Protection Policy in order to update the content of the Personal Data Protection Policy to be appropriated and in compliance with all related law. In the event of any change in personal data protection law resulting to the change, or amendment of the Personal Data Protection Policy, the Data Controller shall propose the new version of the Personal Data Protection Policy to the board of directors of the Company to consider and approve such new version of Personal Data Protection Policy without delay.
3. The Data Controller shall arrange all new employees of the Company to be trained, acknowledged, and strictly complied with this Personal Data Protection Policy.

Notification to the Data Protection Officer for the Collection of Personal Data

Upon the Data Controller or the Company's Personnel obtain the personal data, the Data Controller and the Company's Personnel shall promptly inform the Data Protection Officer for the followings:

1. The collection of the personal data;
2. The consent of the Data Subject;
3. Purpose of personal data collection; and



4. Period for personal data collection

The Data Protection Officer shall consider the personal data which is obtained by controlling and limiting the Company's Personnel to be eligible to access to such personal data, including to review the purpose of the use of the personal data in order to avoidance of misuse of the personal data other than the purpose consented by the Data Subject. The Data Controller shall also inspect the period for personal data collection, and in case of the completion of the period consented by the Data Subject, the Data Protection Officer shall destroy such personal data without delay.



Principal in Personal Data Processing for General Data Subject

The Data Controller is entitled to collect, use, transfer and/or disclose the personal data of the Data Subject only as stated in the consent provided by the Data Subject or as required by the provisions of law.

In the event that the Data Controller would like to collect, use, transfer and/or disclose the personal data apart from the details stated in the consent provided by the Data Subject or as required by the provisions of law, the Data Controller shall require the additional consent from the Data Subject, providing that such consent shall be explicit and being recorded.

Personal Data for Contracting

Prior to enter into any agreements with vendors, contracting parties, or any person contacting with the company, the Data Controller shall only access, or obtain the personal data of the Data Subject only for the purposes of entering into such agreements, and any attachment to the agreements.

Personal Data for the Company's Benefits

In the event that the Data Subject contacts the Data Controller for questioning any Company's information, including without limitation to Company's structure, services, business policy resulting to the Data Controller to obtain the personal data of the Data Subject, the Data Controller shall inform the Data Subject for the collection of the personal data and require consent from the Data Subject in case that Data Controller would like to collect, use, disclose or transfer such personal data.

In the event that the Data Subject consents to the Data Controller to deliver the details of marketing campaigns or any products of the Company to the Data Subject, the Data Controller shall be entitled to proceed such tasks as required and consented by the Data Subject. The consent of the Data Subject shall be done via letter, email or telephone. Nevertheless, in the event that the Data Subject does not want to receive any Company's information regarding the marketing campaigns or any products of the Company, the Data Controller shall promptly suspend the use of such personal data.

In this respect, any performance of the Data Controller shall be notified to the Data Protection Officer as well.

Data Processing as Required by Provisions of Laws

Data Processing as Required by Provisions of Laws means that the Data Protection Officer is entitled to collect, use,



transfer and/or disclose the personal data of the Data Subject in accordance with or as required by the provisions of laws.

Sensitive Personal Data

Sensitive Personal Data means the personal data regarding racial, ethnic, origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any information which may affect the data subject in the same manner. The Data Controller cannot collect sensitive personal data, except for the explicit consent is obtained from the Data Subject or as required by the provisions of laws.

In this respect, any performance of the Data Controller regarding the sensitive personal data shall be prior notified to the Data Protection Officer.

Personal Data of the Minor, Incompetent Persons or Quasi-Incompetent Persons

1. In the event that the Data Subject is a minor and the Data Controller would like to collect, use, transfer and/or disclose the personal data of such minor, the Data Controller shall proceed as follows:
 - 1.1 the consent regarding the collection, use, transfer and/or disclosure of the personal data must be obtained where the minor may be entitled to grant consent as specified by the provisions of laws.
 - 1.2 the consent regarding the collection, use, transfer and/or disclosure of the personal data of the minor from the holder of parental responsibility over the child must be obtained where the minor cannot grant the consent by him or herself.
2. In the event that the Data Subject is incompetent person or quasi-incompetent persons and the Data Controller would like to collect, use, transfer and/or disclose the personal data of such persons, the Data Controller shall obtain the consent from the curator who has the power to act on behalf of the quasi-incompetent persons or the incompetent persons as the case maybe.

Use of Company's Website

In the event that the Data Controller collects, the personal data of the Data Subject via Company's website, the Data Controller shall explicitly inform the Data Subject for the purposes of collection. In addition, the Data Controller shall ensure that the personal data obtained from the website is secured and will not be disclosed to any third party, except the explicit consent of the Data Subject is obtained.



Copy of the Documents containing Personal Data

In the event that there is a copy of the documents containing personal data e.g. identification card, passport, or house registration of the Data Subject whether will be by photocopy, scanning, email, download, printing or taking photo by mobile or electronic device, it can be proceeded only if there is for the database of the Company in accordance with the purposes of the consent of the Data Subject. The Company's Personnel cannot collect the personal data in his or her own laptop or devices. In the event that the Company's Personnel collect the personal in the laptop or computer of the Company, the Company's Personnel shall inform the Data Protection Officer.

Delivery of the Documents containing Personal Data

In the event that the Company's Personnel delivers the documents containing the personal data, whether by way of internal delivery or external delivery, the Company's Personnel shall proceed as follows:

1. The envelope of the documents containing personal data shall be sealed, named and detailed the recipient. In the event that there is no recipient, the documents containing personal data shall be returned to the sender.
2. The delivery of the documents containing personal data shall only be delivered by hand or delivered by the persons assigned by the Company.
3. In the event of delivery is proceeded by external service providers, such external service providers shall only be selected by the Company.
4. In the event of deliver is proceeded by post, there shall be in a sealed envelope, named the recipient and having the security preventing the leak of information e.g., containing in hard envelope or hiding some personal data information.
5. There shall be a tracking status of the delivery to ensure that the document containing personal data is successfully delivered to the recipient.
6. In any case, Line, WhatsApp or personal email is prohibited for performance of work which including personal data.

In the event that the delivery of personal data containing in files, or electronic information, the Company's Personnel shall proceed as follows:

1. The delivery shall be proceeded via link, and only the recipient shall access to such link.
2. In the event that the delivery cannot be proceeded via link and shall be delivered via file, the Company's Personnel shall encrypt the file before delivery, and the file shall only be delivered to related persons. The recipient is not entitled to copy or record such documents containing personal data, except for the explicit consent is obtained and the Data Protection Officer is acknowledged.

Record of the Personal Data in Company's Database

The Data Controller and the Data Protection Officer shall proceed with the record of the personal in the Company's database as follows:



1. The level of confidentiality of the documents shall be stated. The documents containing personal data shall be stored at in the locked room or locked shelf which is not regularly accessed by unauthorized persons.
2. In the event that the documents are in electronic files, the storage of such files shall be in the Company's database, including to limit the level of the Company's Personal who can access to such information.

Destroy of Personal Data in the Company's Database

The Data Controller and the Data Protection Officer shall destroy the personal data in the Company's database as follows:

1. In the event that the personal data is in the document, a destroy of personal data shall be proceeded by a paper shredder or tear the documents before trashing such documents.
The documents containing personal data cannot be used as reused paper, or placed on the table or anywhere where the general Company's Personnel can access to such information.
2. In the event that the personal data is in the electronic file, a destroy of personal data shall be proceeded in the appropriated way for such electronic file which the personal data cannot be recovered.



Personal Data of the Employees and Applicants of the Company

The Data Controller shall obtain the personal data from the applicant applying a job at the Company. In this respect, the Data Controller shall obtain the consent from the applicant authorizing the Company to collect the personal data of the applicant. In the event that the applicant is not offered the job from the Company, the Data Controller shall destroy the personal data of the applicant without delay, except for the case where the applicant grants consent to the Data Controller to collect the personal data for the period of time for the purpose of job application in the future.

In the event that the applicant is offered a job at the Company, the Data Controller shall require the personal data from the application for proceeding the employment agreement with the applicant. The Data Controller shall ensure that the applicant grants consent to collect his or her personal data for the purposes of employment and benefits of employment. In the event that the Data Controller would like to use the personal data apart from the purposes consenting by the applicant, the Data Controller shall require the consent from the applicant case by case.

During the selection of the applicant, if the Data Controller requires personal data of the applicant from any third party, the Data Controller shall ensure that the applicant allows the Data Controller to obtain his or her personal data from such third party, and the Data Controller shall collect and use such personal data only for the employment purposes, and strictly comply with this Personal Data Protection Policy.

This shall apply to the job application via Company's website.

Collection of the Personal Data of the Company's Employees

The Data Controller is entitled collect the personal data of the employees only for the purpose of employment. Nevertheless, the Data Controller shall ensure that the employee already grants consent to collect his or her personal data, and in the event that the Data Controller would like to use, transfer and/or disclose the personal data apart from the purposes of employment, the Data Controller shall require the consent from the applicant case by case.

Collect of the Personal Data of Ex-employees

In the event that the employees are no longer the employees of the Company, the Data Controller is not entitled to collect the personal data of ex-employees, except for there is a requirement of provisions of law or in case of previous consent from the ex-employee is obtained. In such case, the Data Controller shall only be entitled to collect the personal data as the period specified by the provisions of laws or as consented by the ex-employee.



Penalties

As the Company focuses on the importance of the compliance with the Personal Data Protection Policy and any violation of the Personal Data Protection Policy shall be punished as follows:

The Company shall be entitled to issue the warning letter to the violated Company's Personnel.

In the event that such violation comes from the intention or gross negligence of the Company's Personnel, resulting to the damages to the Company, the Company reserves the right to terminate the employment of such Company's Personnel, including that the Company shall have the rights to claim damages to the Company's Personnel.

This Personal Data Protection Policy is announced on 23 February 2022.