

Privacy Policy Notice

Workpoint Entertainment Public Company Limited
and its subsidiaries

Content

	Page
1. Message from Group Chief Executive Officer	3
2. Scope of Application	4
3. Definition	4
4. Personal data collected by the Company	5
5. Collection of Personal Data of Minors, Incompetent Persons and Quasi-incompetent Persons	7
6. Sources of personal data collected by the Company	8
7. Data Quality	9
8. Purposes of Data Processing	9
9. Processing of Personal Data	11
10. Limitations on the Use and/or Disclosure of Personal Data	13
11. Services by Third Parties or Subcontractors	14
12. Transfer of Personal Data Abroad	14
13. Storage and Retention Period of Personal Data	15
14. Security Measures for Personal Data	15
15. Rights of Data Subjects	16
16. Use of Cookies	17
17. Changes to the Privacy Notice	17
18. Right to Connect to Third-Party Websites	17
19. Contact Information	18
20. Governing Law	18

1. Message from Group Chief Executive Officer

Dear Stakeholders,

Workpoint Entertainment Public Company Limited and its subsidiaries (hereinafter referred to as the "Company") recognize the importance of protecting the personal data of its stakeholders, which may arise from the production or receipt of Company's products and services. In the course of its operations, the Company is required to process the personal data of its users. Therefore, the Company has prepared and issued this Privacy Policy Notice to inform all stakeholders of the Company about their rights and obligations, as well as the terms and conditions related to the collection, use, and disclosure of personal data that the Company will undertake for all stakeholders as service users.

The Company assures all stakeholders that your personal data is of utmost importance to us. We guarantee to protect and process personal data with the most appropriate security measures and all your data will be kept confidential.

On behalf of the Board of Directors and management, we encourage all stakeholders to please read and understand this Privacy Policy Notice to be informed about the purposes for which the Company collects, uses or discloses your personal data, as well as the rights of the data subject in relation to you, as detailed in this Privacy Policy Notice.



Mr. Phanich Sodsee
Group Chief Executive Officer

2. Scope of Application

This Privacy Notice, issued in accordance with the Personal Data Protection Act B.E. 2562 (2019), encompasses the processing of all personal data conducted by the Company, including any individuals who have access to personal data due to their involvement in the Company's operations. Such individuals must comply with the terms of this Privacy Notice and the legal framework in place.

For personal data collected prior to the effective date of the Personal Data Protection Act B.E. 2562, the Company may continue to collect and use such personal data for the original purpose. However, any disclosure or other actions beyond the collection and use of personal data as mentioned above must adhere to the Personal Data Protection Act B.E. 2562 (2019).

3. Definition

"Company" refers to Workpoint Entertainment Public Company Limited and its subsidiaries.

"Subsidiaries" shall include:

- (1) Companies affiliated with the business operator with a shareholding structure between them, directly or indirectly, exceeding fifty percent of the total number of issued and outstanding shares of such company.
- (2) Companies affiliated with the business operator through control relationships.
- (3) Companies where the controlling persons of the business are the same as the controlling persons of the business operator.

"Control over a company" means control over a company as defined in the Securities and Exchange Act B.E. 2535 (1992).

"Stakeholder" means shareholders, directors, executives, employees, creditors, customers, business partners, competitors, communities, and society.

"Privacy Policy Notice" means the policy prepared by the Company to inform data subjects about the Company's data processing activities and the details required by the Personal Data Protection Act B.E. 2562.

"Personal data" means any information about an individual that identifies such individual, directly or indirectly, but does not include information about a deceased person.

However, the following information is not considered personal data: Business contact information that does not identify an individual, such as company name, company address, company registration number, office telephone number, and work email addresses (e.g., info@company.co.th). Additionally, anonymous data and pseudonymous data that has been technically processed to prevent re-identification of individuals are not considered personal data. Information about deceased persons is also excluded from the definition of personal data.

"Sensitive data" means personal data about race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal history, health information, disability, trade union membership, genetic information, biometric information, or any other information that affects the data subject in a similar manner as determined by the Personal Data Protection Committee.

Unless otherwise specified, the terms "personal data" and "sensitive data" as used in this notice in relation to the users of services shall be collectively referred to as "personal data."

"Processing" means any operation performed on personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, use, disclosure, transmission, dissemination, transfer, combination, erasure, or destruction.

"Data Subject" means an individual who is the owner of the personal data.

"Data Controller" means a person or legal entity having the power and duties to make decisions regarding the collection, use, or disclosure of personal data.

"Data Processor" means a person or entity that processes personal data on behalf of or at the direction of the data controller. This includes individuals or entities that collect, use, or disclose personal data on behalf of the data controller, but does not include the data controller itself.

"Cookies" means small computer files that store necessary temporary personal data on the data subject's computer for convenience and speed in communication, which will only take effect while accessing the website system.

4. Personal data collected by the Company

4.1 The Company may collect the following personal data:

4.1.1 **Personal data** includes title, full name, gender, age, occupation, qualifications, job position, status, business type, nationality, country of residence, date of birth, marital status, information on government-issued cards (e.g., national ID number, social security number, passport number, tax ID number, driver's license information, or similar identification documents), house registration, signature, voice, voice recordings, images, photographs, video recordings, video clips, identity verification data (KYC/e-KYC), immigration details including arrival and departure dates, bankruptcy check information, household income, salary, personal income, and other personal data you provide to the Company.

4.1.2 **Contact details** include address, delivery details, billing details, invoice address, telephone number, mobile number, fax number, work phone number, email, LINE ID, Facebook ID, Google ID, Twitter ID, and other social media user accounts.

4.1.3 **Financial information** includes credit/debit card or bank information, credit/debit card number, credit card type, card issue/expiry date, billing cycle, account details, payment details and history, your information related to risk details for business partners, credit rating and solvency, information in accordance with the declaration of suitability, and other financial information.

4.1.4 **Marketing and communication data:** Such as your preferences for receiving marketing information from the Company, business partners, or other companies, preferred communication methods, product interests, records of notifications about product or service promotions, and other marketing and communication data. This also includes website usage data, platforms, products, and services used by employees, and Q&A records.

4.1.5 **Profile Details:** Such as username and password, profile, spending details, product or service details (order history, past orders, purchase history, customer order cancellations, website orders, order codes), financial records, personal identification number (PIN), information about interests, preferences, feedback and survey results, satisfaction survey results, social media usage, details of event participation, use of customer discounts and promotions, customer order details, customer service, etc.

4.2 The Company has no policy to collect sensitive data from you. However, if there is a case where the Company needs to collect such personal data, the Company will explicitly request your consent before collecting such personal data, unless there is a legal reason to collect such data without consent.

In cases where the Company receives a copy of your national ID card, or the Company extracts your information from the national ID card electronically for the purpose of identity verification in establishing legal relationships and/or conducting any transactions with the Company, the received information will include religious data, which is considered sensitive data. The Company has no policy to store sensitive data from you, except in cases where the Company has received your consent. The Company will determine management methods in accordance with practical guidelines and as permitted by law.

4.3 You agree not to provide any incorrect and/or misleading information to the Company, and you agree to notify the Company of any inaccuracies or changes to that information. the Company reserves the right to request additional documents to verify the information you have provided to the Company as the Company deems appropriate.

4.4 If you have provided personal data of third parties to the Company (such as property owners, beneficiaries, emergency contacts, references, and referrers), such as name, surname, address, phone number, family income, and other personal data and contact information for emergency contact, application filling, or conducting transactions with the Company, you certify that such information is legally correct. Please inform those individuals about this Privacy Policy Notice and/or obtain consent from those individuals.

5. Collection of personal data of minors, incompetent persons, and quasi-incompetent persons

The Company will collect data of minors, incompetent persons, and quasi-incompetent persons only when consent is obtained from the person with parental authority acting on behalf of the minor, guardian, or curator. The Company will not collect data from customers who are clearly known to be under twenty years of age, or from quasi-incompetent and incompetent persons without consent from the person with parental authority acting on behalf of the minor, guardian, or curator in cases where consent is required. In cases where the Company becomes aware that it has unintentionally collected personal data from any person under twenty years of age, quasi-incompetent, or incompetent person without consent from the person with parental authority acting on behalf of the minor, guardian, or curator, the Company will immediately delete such data or process only the portion of data that the Company can process on other legal bases apart from consent.

6. Sources of personal data collected by the Company

The Company collects or obtains various types of personal data from the following sources:

6.1 Collection of personal data directly from you

Personal data that the Company collects directly from the data subject through various service channels, such as:

- (1) When you access and/or use the Company's services or platforms, or register for a user account with the Company.
- (2) When you submit forms, including but not limited to application forms or other forms related to the Company's products and services, whether online forms or paper documents.
- (3) When you make any agreements or provide any documents or other information related to your contact with the Company or when you use the Company's products and services.
- (4) When you contact the Company, such as via telephone (which will be recorded), letter, fax, face-to-face meetings, social media platforms, and email addresses, including when you contact customer service agents.
- (5) When you use electronic services or contact the Company through platforms, websites, applications, or use services, including but not limited to use through cookies, which the Company may apply when you use or access applications or websites.
- (6) When you have authorized, through your device, to disclose any information to the Company's applications or platforms.
- (7) When you link your user account through the Company's platform with your social media account or other user accounts, or use other social media features under the service policy of that feature provider.
- (8) When you conduct transactions through the Company's services.
- (9) When you provide feedback or complaints to the Company.
- (10) Data that the Company collects from the data subject's use of websites, products, or other services according to contracts or missions, such as tracking website usage behavior, products, or services of the Company using cookies or from software on the data subject's device.
- (11) When you submit your personal data to the Company for any reason.

6.2 Collection of personal data from other sources

6.2.1 Collection of personal data from other sources, such as public information and/or parent companies and subsidiaries (e.g., receiving information from service providers hired by the Company to collect personal data on its behalf), the Company's business partners, agencies that the Company serves (including websites and social network usernames of such agencies), official data sources, government agencies with reliable databases about individuals, government agencies (such as the Bank of Thailand, Revenue Department, Anti-Money Laundering Office, Office of Insurance Commission, Legal Execution Department, Ministry of Commerce, Securities and Exchange Commission, Land Department, courts), and any other third parties (such as customer referrers, your representatives, traders, or any other person authorized by you).

6.2.2 The Company's platform uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies, which are text files stored on your computer to help the web platform analyze how users use the site. The information generated by the cookie about your use of the web platform (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information to evaluate your use of the web platform, compile reports on website activity for website operators, and provide other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

7. Data Quality

The Company stores your personal data for use in operations according to the Company's objectives and mission between you and the Company. For the data that has been stored, the Company has considered the accuracy, completeness, and currency of the data.

8. Purposes of Data Processing

The Company may collect, use, and disclose your personal data:

8.1 For selling goods or providing services, improving the Company's products and services, including other future services or products, as well as care, maintenance, and operations related to such services.

8.2 To process transactions according to your desired purposes, whether visiting the Company's website and/or mobile application.

8.3 For conducting various transactions related to the Company's products or services, such as membership registration, payment, or participation in related activities.

8.4 For public relations and the Company's marketing activities, as well as communication and relationship management between the Company and you.

8.5 To confirm and/or identify you when accessing services through various channels or contacting the Company.

8.6 For communication, notification, and/or receiving various information from the Company, or changes occurring in the Company.

8.7 To carry out the wishes of the data owner as notified to the Company.

8.8 To present various benefits and/or other services of the Company, such as providing advice and/or offers about products and services, including promotions for marketing activities, as well as transactions related to the use of company services.

8.9 For the Company's business operations, such as data analysis, auditing, new product development, improvement or modification of services, usage analysis, surveys for promotional activities, consideration of operations and business expansion of the Company.

8.10 For any necessary and appropriate actions to inspect and prevent actions that violate or may violate the law, respond to requests from state agencies or governments, including foreign state agencies or governments where you reside, enforce service terms and the Company's privacy notice, protect the Company's business operations, protect privacy rights, security or property of the Company, personnel, and personal data owners, or others, remedy, prevent, or limit potential damages.

8.11 To comply with the law, investigations by officials or regulatory agencies, or to comply with rules, regulations, or obligations set by law or government.

8.12 So that you will be informed of statistics on website visits and to improve, modify, and develop the website, as well as formulate marketing policies and improve and develop products and services for maximum efficiency, to provide you with a good user experience, convenient use, and maximum benefit.

8.13 For the purpose of establishing legal rights, legal compliance, or exercising legal claims, or raising defenses against the Company's claims in various legal procedures.

8.14 For monitoring peace and order and maintaining the security of persons and property of the Company.

8.15 For registration to open customer accounts or any other person with similar characteristics.

8.16 For entering into contracts and/or placing collateral.

8.17 In case the personal data is sensitive data, the Company will collect, use, or disclose your sensitive data under the following purposes:

(a) To prevent or suppress danger to your life, body, or health when you are in a condition that cannot give consent for any reason.

(b) It is information disclosed to the public with your explicit consent.

(c) It is necessary for the establishment of legal claims, compliance with or exercise of legal claims, or defense against legal claims.

(d) It is necessary to comply with the law to achieve the purposes prescribed by law.

For other purposes not specified above, you will be notified when the Company requests to collect personal data.

9. Processing of Personal Data

The Company will process your personal data in a lawful, transparent, and fair manner, with specific purposes, limited scope, and using appropriate methods, in accordance with the following processing grounds:

9.1 Collection of Personal Data

The collection of personal data shall be done under the purposes and only as necessary within the framework of objectives or for benefits directly related to the collection purposes. The personal data owner must be informed before or at the time of collection about the following details:

(1) Purpose of collection

(2) Personal data being collected

(3) Cases where the personal data owner must provide personal data to comply with the law or contract, or to enter into a contract, informing of possible impacts from not providing personal data

(4) Types of persons or agencies to which the collected personal data may be disclosed

(5) Rights of the personal data owner

9.2 Use of Personal Data

The Company will use personal data in cases considered beneficial to you and/or the Company's business operations, and/or to provide you with good service from the Company's business operations. The Company will use personal data in compliance with relevant laws and regulations or to improve service efficiency, including in accordance with the purposes notified to you in this Privacy Policy Notice. This is to develop information security standards in risk management, detect and prevent activities that tend to violate laws, relevant usage regulations, or agreements, terms of use of the Company's website or application. It also includes contacting you via telephone, message (SMS), email address, or mail, or through any channel to inquire or inform you, or verify and confirm information, or survey opinions, or notify any other information related to the Company's products and services as necessary.

9.3 Disclosure of Personal Data

9.3.1 The Company will disclose your personal data to third parties to improve service efficiency in various aspects, or to provide you with other conveniences accurately and continuously, allowing you to complete your desired transactions successfully and maximize benefits. The disclosure of personal data shall be in accordance with the purposes or as necessary for purposes directly related to the collection objectives, and must receive consent from the data owner given before or at that time, except in the following cases where consent is not required:

- (1) For the benefit of planning, statistics, or various censuses of government agencies
- (2) To prevent or suppress danger to life, body, or health of individuals
- (3) For data that is legally disclosed to the public
- (4) For the benefit of investigation by authorized officials under the law, or in court proceedings
- (5) To comply with legal requirements or court orders

9.3.2 The Company may disclose your personal data to third parties, whether legal entities or individuals, within the scope necessary for the purposes specified in this Privacy Notice, which may include:

(1) Affiliated companies, partners, business allies, subsidiaries, and/or external service providers to provide services in presenting benefits and other services of the Company to personal data owners, including development and improvement of the Company's products or services, such as data analysis, data processing, credit card operations, information technology services and related infrastructure preparation, customer service platform development, email/SMS sending, website development, mobile application development, and reinsurance, satisfaction surveys and research, customer relationship management, with agreements to keep personal data confidential. In the case of legal entities, they must have acceptable standards for personal data protection.

(2) Government agencies, governments, or other organizations as required by law, to comply with laws, orders, requests, for coordination with various agencies on matters related to legal compliance.

The Company will require recipients of the information to have appropriate measures to protect your data and process such personal data only as necessary, and take steps to prevent unauthorized use or disclosure of personal data .

10. Limitations on the use and/or disclosure of personal data

10.1 The Company will use and disclose your personal data with your consent and only for the purposes of the Company's collection and storage of data. the Company will supervise employees, officers, or operators of the Company not to use and/or disclose your personal data beyond the purposes of personal data collection or disclose to external parties, except:

10.1.1 To comply with laws such as the Personal Data Protection Act, Electronic Transactions Act, Telecommunications Business Act, Anti-Money Laundering Act, Civil and Criminal Codes, Civil and Criminal Procedure Codes, etc.

10.1.2 For the benefit of investigation by inquiry officials or court proceedings

10.1.3 For your benefit, and consent cannot be obtained at that time

10.1.4 When necessary for the legitimate interests of the Company or other individuals or legal entities that are not the Company

10.1.5 When necessary to prevent or suppress danger to life, body, or health of individuals

10.1.6 When necessary for the performance of a contract to which the personal data owner is a party or to take steps at the request of the personal data owner before entering into a contract

10.1.7 To achieve purposes related to the preparation of historical documents or archives, for public interest, or for education, research, statistics compilation, with appropriate protective measures in place

10.2 The Company may use information services of external service providers to store personal data. Such service providers must have security measures and are prohibited from collecting, using, or disclosing personal data beyond what the Company specifies.

11. Services by third parties or sub-contractors

The Company may assign or procure third parties (personal data processors) to process personal data on behalf of or in the name of the Company. These third parties may offer various services such as hosting, outsourcing, cloud computing services/providers, or other forms of contracted work.

When assigning third parties to process personal data as personal data processors, the Company will establish agreements specifying the rights and duties of the Company as the personal data controller and of the assigned parties as personal data processors. This includes details of the types of personal data the Company assigns for processing, as well as the purposes, scope of personal data processing, and other related agreements. The personal data processor is obligated to process personal data only within the scope specified in the agreement and according to the Company's instructions, and cannot process for other purposes.

In cases where the personal data processor assigns subcontractors (sub-processors) to process personal data on behalf of or in the name of the personal data processor, the Company will ensure that the personal data processor establishes agreement documents between the personal data processor and the sub-processor in a form and standard not lower than the agreement between the Company and the personal data processor.

12. Transfer of personal data abroad

The Company may need to transfer your personal data to subsidiaries or other persons abroad, or to other recipients as part of the Company's normal business operations. For example, transferring personal data to be stored on servers/clouds in various countries when necessary for the performance of a contract to which

you are a party, or to fulfill a contract between the Company and another person or legal entity for your benefit, or to take steps at your request before entering into a contract, or to prevent or suppress danger to life, body, or health of you or others, to comply with the law, or when necessary to carry out missions for important public interests.

In cases where the destination country does not have adequate personal data protection standards, the Company will oversee the transfer of personal data in compliance with legal requirements and will implement necessary and appropriate personal data protection measures consistent with confidentiality standards. This may include confidentiality agreements with recipients in such countries, or in cases where the recipient is subsidiary/company within the same business group, the Company may choose to implement a personal data protection policy that has been audited and certified by legally authorized persons and will ensure that the transfer of personal data to subsidiary/company within the same business group abroad complies with such personal data protection policy instead of following the procedures specified by law.

13. Storage and retention period of personal data

The Company will retain your personal data for as long as necessary while you are a customer or continue to use the Company's services, or for as long as necessary to achieve the relevant purposes in this notice. It may be necessary to retain it further if required or permitted by law, such as retention under anti-money laundering laws, or retention for the purpose of verification in case of potential disputes within the statute of limitations prescribed by law for a period not exceeding 10 years.

The Company will delete or destroy personal data, or make it unidentifiable when it is no longer necessary or at the end of the aforementioned period.

14. Security measures for personal data

The security of your personal data is important to the Company. We have implemented appropriate technical and administrative security measures to protect personal data from loss, unauthorized access, use or disclosure, misuse, alteration, and destruction. We use technologies and security procedures such as encryption and access restrictions to ensure that only authorized persons can access your personal data, and these individuals are trained on the importance of protecting personal data.

The Company provides appropriate security measures to prevent loss, access, use, alteration, modification, or disclosure of personal data by unauthorized persons. We will review these measures when necessary or when technology changes to maintain appropriate security efficiency. However, the Company will not be responsible for any damages resulting from the use or disclosure of personal data to third parties, including neglect or failure to log out of systems that the data owner has accessed, whether by the data owner's actions or those of others authorized by the data owner.

15. Rights of data subjects

You have the following rights: (1) Right to withdraw consent for the Company to process your personal data; (2) Right to access and obtain a copy of your personal data collected, used, and disclosed by the Company; (3) Right to request the transfer of your personal data; (4) Right to object to the processing of your personal data; (5) Right to request deletion, destruction, or de-identification of your personal data; (6) Right to restrict the use of your personal data; (7) Right to request correction of your personal data to be accurate, up-to-date, complete, and not misleading; (8) Right to complain if you believe the Company, its officers, or representatives have violated your rights under the Personal Data Protection Act B.E. 2562 (2019).

Any request to exercise your rights as mentioned above must be made in writing. the Company will make best efforts to process such requests within a reasonable time and not exceeding the period specified by law. The Company will comply with legal requirements regarding your rights as a personal data owner.

The exercise of your rights under Section 14 may be limited under relevant laws, and there may be cases where the Company necessarily refuses or cannot comply with your rights request, such as having to comply with laws or court orders, for public interest, or where exercising the right may violate the rights or freedoms of others. If the Company refuses your request, we will inform you of the reasons for such refusal.

The Company reserves the right to charge any fees related to and necessary for processing personal data as per your request.

16. Use of cookies

"Cookies" are data that the Company sends to the computer or device through the web browser of the personal data owner when they access the Company's website or other online channels. This data is installed in

the personal data owner's system. The use of cookies allows the Company's website to record or remember the personal data owner's information until they exit the web browser or delete the cookies or disallow the cookies to function further.

The use of cookies provides more convenience to personal data owners when using services through the Company's website, as cookies help remember the websites visited by the personal data owner. The Company may request your consent to use the information recorded or collected by cookies in the following cases:

- (1) To enable the system to display information or allow personal data owners to access certain services, such as notifying or sending orders to the Company, inquiring about policy information, or changing personal details like passwords, email addresses, mobile phone numbers, etc.
- (2) To allow the Company to present news or publicize information about the Company and services that are beneficial to each personal data owner as appropriate.
- (3) To use as preliminary information in improving the content and services of the website to best meet the needs of personal data owners.
- (4) To use in statistical analysis or other activities of the Company.

17. Changes to the Privacy Policy Notice

The Company will regularly review the Privacy Policy Notice to ensure compliance with practices and relevant laws and regulations. If there are changes to the Privacy Policy Notice, the Company will notify you of any significant amendments to the Privacy Policy Notice along with the updated version through appropriate channels. We recommend that you periodically check for changes to this notice.

In case there are differences between the previous Privacy Policy Notice and the amended version, the differences shall be governed by the amended Privacy Notice.

18. Right to connect to third-party websites

When using the Company's application or website services, there may be links to social network platforms and other websites operated by third parties. The Company attempts to connect only to websites with personal data protection standards. However, the Company cannot be responsible for the content or personal data protection standards of those other websites. Unless otherwise specified, any personal data you provide to third-party websites will be collected by those parties and subject to their privacy notices/policies (if any). In

such cases, the Company cannot control and is not responsible for the use of your personal data by such third parties.

19. Contact Information

If you have any questions or suggestions regarding the Privacy Policy Notice or compliance with this Privacy Policy Notice, the Company is happy to answer your questions and listen to your suggestions. You can contact through the complaint channel on the website or the following contact location. If you believe that the processing of your personal data does not comply with the Personal Data Protection Act B.E. 2562, you have the right to complain to the Data Protection Officer.

Details of the Data Protection Officer

Contact location: 99 Moo 2, Bang Phun Sub-district, Mueang Pathum Thani District, Pathum Thani Province

Contact Information: Tel. 02-833-2000
Email: DPO@workpoint.co.th

20. Governing Law

You acknowledge and agree that this Privacy Notice shall be governed by and interpreted in accordance with Thai law, and Thai courts shall have jurisdiction to consider any disputes that may arise.