Approved by:

Resolution of the Board of Directors Meeting No. 8

Dated 12 November 2025 (Agenda 7)

Privacy Policy

Sermsang Power Corporation PLC.

Section 1 Principle and Rationale

The Personal Data Protection Act B.E. 2019 is designed to provide effective protection of personal data and remedial measures for owners of personal data from rights violations. The enactment of this Act is consistent with the conditions provided in section 26 of the Constitution of the Kingdom of Thailand.

Adhering to ethical business operations, respecting and complying with applicable laws, Sermsang Power Corporation PLC. is aware of data privacy related to personal data and committed to protecting the privacy of the data. Therefore, the Company issues this policy as a principle of personal data protection, acknowledging the need for security in transactions and the personal data retention. The Company also pays attention to respecting the privacy rights of individuals and the security of the data. The policies, rules and regulations have been set for the operation with strict measures to maintain the security to ensure that the data the Company was granted will be used in accordance with individual needs.

Section 2 Personal Data

2.1 Data collected by the Company

The Company may collect personal data through a number of channels. For example:

(1) When the data owner applies for a job with us via website or telephone, including being an employee of the Company. The Company requests the information necessary for job application as follows: name, surname, telephone number, e-mail address, address, educational background, etc.

(2) When the data owner asks for information or is interested in the Company's services. The Company may request information about the data owner such as name, e-mail address, telephone number, etc.

(3) The Company may store log files of the data owner. It will store information as follows: IP Address (IP Address) or access time, etc.

2.2 Personal Data

is information that identifies a person whether directly or indirectly, including:

(1) Personal data that the person provides to the Company directly or that is received through other channels-, from the use of services, contact, visit, search through digital channels, websites, call center, designated persons, or any other channels

(2) Personal data that the Company received or accessed from sources other than you directly such as parents, children, spouses, siblings, government agencies, companies in the financial business group, financial institutions, financial service providers, business partners, credit information

companies and data service providers. The Company will collect information from other sources only with your consent as required by laws unless necessary as permitted by law.

Personal data that the Company collects, uses and/or discloses, such as

(1) Personal information: name, surname, age, date of birth, marital status, national identification number, passport number.

(2) Contact information such as residence, workplace, telephone number, e-mail address, Line ID.

(3) Financial information such as deposit account numbers, financial history, list of securities transactions of one's own and related persons (father, mother, son, daughter, spouse, siblings).

(4) Transaction information such as bank statements, payments, borrowing, securities investment of one's own and related persons (father, mother, son, daughter, spouse, siblings).

(5) Information on devices such as IP Address, MAC Address, Cookie ID.

(6) Other information such as the use of the website, sound, images, motion and any other information that is considered personal information under the Personal Data Protection Law.

(7) Cookies of the Company's website may be used in some cases. Cookies are small data files that store information exchanged between the owner's computer and our website. The Company uses cookies only to store information that may be useful. Next time, when the data owner comes back to visit the Company's website and accesses the web browser, the data owner can set to accept, reject all cookies or notify the data owner when cookies have been sent. The data owner can go into the settings in the menu "Help" menu in the browser to learn how to change the data owner's use of cookies. Please note that disabling cookies may affect the data owner's use of certain services.

2.3 Sensitive Data

is personal data specifically required by law such as gender identity, health, political opinion, and religious belief, which the Company will collect, use and/or disclose the sensitive data once the Company obtains clear consent from the person or in the event that the Company deems necessary permitted by laws. The Company may be required to collect, use and/or disclose personal biometric data such as fingerprints for the purpose of identity verification of the person requesting to enter the Company's area (in this policy, if not specifically stated, personal and sensitive personal data related to the above person shall hereinafter be collectively referred to as "personal data").

Section 3 Purposes and Details of Collection, Use and/or Disclosure of Personal Data

The Company will collect personal data for the benefit of business operation in accordance with objectives, as well as compliance with any laws the Company or a person must follow and for any other purposes as specified in this policy as follows:

3.1 For the Company to be able to operate the business in accordance with the objectives

3.2 Legal Obligation, such as

(1) Compliance with the order of the legal authority

(2) Compliance with financial institution business, securities and exchange, life insurance, non-life insurance, tax, anti-money laundering, laws on the prevention and suppression of terrorism financing and the proliferation of weapons of mass destruction, computer, bankruptcy, and other laws that the Company has to comply with both in Thailand and abroad including announcements and regulations issued under such laws.

3.3 To proceed legitimate interest without exceeding the extent which a person can rationally expects, such as

(1) Recording CCTV footage, exchanging tickets before entering the Company's area.

(2) Maintaining relationship with customers such as handling complaints, satisfaction assessment and customer care by the Company's employees.

(3) Risk Management, supervision and internal management.

(4) Anonymous data.

(5) Prevention, coping, and reduction of risks that may occur in fraudulent acts, cyber threat, default or breach of contract (e.g., bankruptcy information), violations (e.g., money laundering, terrorism financing and proliferation of weapons of mass destruction, offenses relating to property, life, body, liberty or reputation) which include sharing personal information to raise the standard of office work in preventing, countering, and mitigating the above risks.

(6) Collection, use and/or disclosure of personal data of directors and persons with authority to act on behalf of a corporate customer.

(7) Contact, video recording, audio recording related to meetings, training, recreation or booths.

(8) Collection, use and/or disclosure of personal data of persons who have been granted receivership by the court.

(9) Pick-up and delivery of parcels.

3.4 Personal information that the Company processes and is categorized by the legal basis as follows:

(1) Contract

(2) Vital Interest

(3) Legal Obligation

(4) Public Administration

(5) Legitimate Interest

(6) Consent

In case of a change in the purpose of the use of personal data (with legitimacy), the Company will notify within 30 days.

3.5 Personal Information that the Company makes a log of the use and each department should record the usage as follows:

(1) In case of general purposes of the Company, do not keep a log of personal data usage.

(2) In case of the use beyond the purposes, the use of personal data must be recorded by adding the purpose of use and requesting consent from the data owner.

(3) In case of occasional use of sensitive personal data, consider the usage log to store user data and record the details of use.

(4) There must be an Access Log to check the users and usage log in order to make it possible to inspect when there are data leaks.

(5) There must be an Access Control to limit access to personal data.

Section 4 Data Processing by Third Parties

The Company may need to send or transfer personal data to third parties for processing. The Company will supervise the transmission or transfer of personal data in accordance with the law and will apply measures to protect personal data that are deemed necessary and appropriate in accordance with confidentiality standards such as separating the data before sending, taking a confidentiality agreement with the recipient of such information, or choosing to implement a personal data protection policy that has been reviewed and certified by the relevant legal authority. The Company will also send or transfer personal data to third parties for processing in accordance with the said personal data protection policy instead of taking action as required by law.

Section 5 Disclosure of Personal Data

The Company may disclose personal information to others with the consent of the person by giving the Consent Form or under the rules permitted by laws for disclosure.

Section 6 Sending or Transferring Personal Data Overseas

The Company may need to transmit or transfer personal data to companies in its network abroad or to other recipients as part of the Company's usual business operations such as sending or transferring personal data to a server/cloud in different countries.

In the event that the destination country has insufficient standards, the Company will supervise the transmission or transfer of personal data in accordance with the law and will apply measures to protect personal data that are deemed necessary and appropriate in accordance with confidentiality standards such as taking confidentiality agreements with recipients in such countries. In case the recipient is a Company in the Company's network abroad, the Company may choose to implement a personal data protection policy that has been reviewed and approved by the relevant legal authority and will proceed with the transmission or transfer

of personal data to the Company's network abroad in accordance with the said personal data protection policy instead of taking action as required by law.

Section 7 Cookie Policy

Once you access our website, information related to your visit to the website will be stored in the form of cookies. This cookie policy explains meanings, functions, purposes, including deletion and objection to storing cookies for your privacy. By accessing this website, you have given us permission to use cookies in accordance with the Cookie Policy with the following details below.

7.1 What are cookies?

Cookies are small files to store information saved on your computer and/or communication device such as a tablet or smartphone via a web browser while you are browsing our website. The Company website cookies may be used in some cases. Cookies are small data files that store information exchanged between the owner's computer and our website. The Company uses cookies only to store information that may be useful to the data owner. Next time, when the data owner comes back to visit the Company's website and accesses the web browser, the data owner can set to accept, reject all cookies or notifies the data owner when cookies have been sent. The data owner can go into the settings at the "Help" menu in the browser to learn how to change the data owner's use of cookies. Please note that disabling cookies may affect the data owner's use of certain services.

7.2 How are cookies used?

We use cookies to enhance your experience and satisfaction. This will allow us to understand the nature of your use of the website quickly and make our website easily accessible and more convenient. In some cases, we need a third party to do so which may require Internet Protocol Addresses (IP Addresses) and statistical analysis cookies as well as information linking and process for marketing purposes.

7.3 The type of cookies used

Type of cookies	Detail	Example
Persistent Cookies	These cookies help to maintain your experience of using the website such as remembering your login and information provided on the website.	• JSESSIONID • dc_gtm_UA-15158362-1 • cfduid • CSRFToken • accessToken

Type of cookies	Detail	Example
Performance and analytics cookies	These types of cookies allow us to measure performance such as processing the number of pages you have accessed and the number of characteristics of a particular user group. This information will be used to analyze user behavior patterns.	• Google Analytics • Adobe • CloudFlare
Advertising cookies	These types of cookies are stored on your device to collect access information and the links you have visited and tracked. In addition, cookies from third parties may use information that is transmitted in online media and content collected from the service in order to understand the needs of users for the purpose of website and advertising campaigns customization to suit your interests.	• Adnuntius • Adobe Audience Manager • Adobe Target • Cxense • Google Analytics • Relay42
Functionality cookies	These types of cookies will facilitate when you return to the website again. We will use the information to customize the website according to your usage habits.	• Google Analytics

7.4 Cookie Management

You can delete and reject the collection of cookies by studying the methods specified in each web browser you use.

7.5 Cookie Policy Changes

This cookie policy may be revised from time to time to comply with regulations. Therefore, we encourage you to ensure that you understand the changes to these Terms.

Section 8 Duration of Collection of Personal Data

The Company will retain personal data for the period necessary to carry out the business operation or the period necessary to achieve the objectives involved in this policy. The data may need to be retained thereafter if required or permitted by law; it will be stored under the law on anti-money laundering or for the purpose of proving the case of a dispute for a period of not more than 10 years. The Company will delete or destroy personal data or create non-personally identifiable information when it is no longer necessary or at the end of such period.

Section 9 Protection of Personal Data and Risk and impact Assessment

The Company will keep personal information in accordance with the Technical Measures and administrative measures (Organizational Measures) to maintain appropriate security in personal data processing to prevent the personal information infringement. The Company has established rules and regulations related to personal data protection and has an assessment of the risks and impacts of personal data protection such as security standards of information technology systems, measures to prevent data from being used or disclosed by recipients beyond purpose or without authorization. The Company regularly updates the rules, regulations, and assessment of risks and impacts of personal data protection as necessary and appropriate with risk assessment and impacts of personal data protection, including loss of trust, confidence, customer trust, disadvantages in market and trade competition and prosecution. In addition, directors, personnel, contractors, agents, consultants and recipients of information from the Company have a duty to maintain the confidentiality of personal information in accordance with the confidentiality measures established by the Company. The Company is required to notify the data owner of the personal data breach within 72 hours when the breach occurs.

Section 10 Rights of Individuals Relating to Personal Data

The rights of a person with respect to personal data are statutory rights or as amended in the future, as well as the criteria determined by the Company. In the case that a person is not of legal age or lack the capacity to make a legal act, the person can apply for the rights to exercise by allowing his/her father and mother, patron or authorized person to act on behalf of the person requesting.

10.1 Rights to be Informed

In case a person wishes to give consent to the Company to collect, use and/or disclose personal information, the person has the right to know in detail the purposes of collecting, using and/or disclosing personal data. A request for information is a case where the data owner may or may not provide information or in the case where the laws require.

10.2 Right to Withdraw Consent

In case a person has given consent to the Company to collect, use and/or disclose personal information (whether the consent given by the person prior to the date on which the Personal Data Protection Law

comes into effect or thereafter), the person has the right to withdraw the consent at any time during the period the personal data is stored at the Company unless there is limitation on such right by laws or there exists a contract that benefits the person.

However, withdrawing the consent may affect the person from executing the contract. For the benefit of the person, it is advisable to study and inquire about the impact before consent withdrawal.

10.3 Right to Request Access to Information

A person has the right to request access to their own personal information that is under the Company's responsibility and request the Company to make a copy of such information for the person, including asking the Company to disclose how the Company obtain the information.

10.4 Right to Request Data Transfer

A person has the right to request personal information in the event that the Company has made personal data in a format that can be read or used by tools or devices working automatically and able to use or disclose by automatic means. This includes the right to request the Company to send or transfer personal data in such form to another personal data controller where automated means is possible. The person also has the right to request to directly obtain the personal information that the Company sends or transfers in such form to another personal data controller unless it cannot be proceeded due to technical reasons.

However, the personal information of the person above must be with consent given to the Company for collection, use and/or disclosure or deemed necessary for the Company to collect, use and/or disclose in order to execute the contract as requested, or as other personal data required by law enforcement.

10.5 Right to Object the Collection, Use and Disclosure of Personal Data

A person has the right to object to the collection, use and/or disclosure of personal data at any time if the collection, use and/or disclosure of personal data is made for the purpose of necessary operations under the legitimate interests of the Company or as required by laws without exceeding the extent which a person can reasonably expect, or to carry out for the public benefit. In case a person submits an objection, the Company will be able to continue collection, use and/or disclosure only in the part where the Company is able to justify that it is more important than your fundamental rights. Otherwise, it is legal rights assertion, compliance with the laws, or lawsuit on a case-by-case basis.

10.6 Right to Request Deletion or Destruction of Data

A person has the rights to request deletion or destruction of personal data, or make personal data non-identifiable in case the person believes that personal data was collected, used and/or disclosed illegally

against the relevant laws or the Company has no need for retention for the purposes involved in this policy, or when a person has exercised the rights to withdraw his consent or object as stated above.

10.7 Right to Request to Suspend the Use of Data

A person has the right to request to temporarily suspend the use of personal data in the event that the Company is in the process of reviewing the request to exercise the rights to correct personal data or the objection, or any other cases that the Company has no need to store and must delete or destroy the personal data in accordance with applicable laws.

10.8 Right to Request Correction of Data

A person has the right to request that their personal data be corrected, current, complete and without causing misunderstandings.

10.9 Right to Complain

A person has the right to file a complaint with an authorized person under the relevant laws in case the person believes that the collection, use and/or disclosure of your personal data is in a manner that violates or fails to comply with applicable laws.

10.10 Restrictions on the Exercise of Rights

The exercise of rights of the above person may be limited under applicable laws and there are some cases where there is a necessity where the Company may refuse or not be able to proceed with the above rights such as being required to comply with the laws or a court order, public benefit, or infringement upon the right or freedom of other people that may be caused by the exercise of such rights. In case the Company rejects the above request, the Company will inform the person of the reason for the refusal. The Company will proceed according to the request for the exercise of rights within 30 days from the date the person submits the request and supporting documents to the Managing Director of the Company.

Section 11 Person Responsible for Personal Data Protection

The Company appoints a person responsible for personal data protection and assigns the roles of the personal data protection supervisor as follows;

11.1 **Data Controller** means a person or juristic person who has the power to make a decision regarding the collection, use or disclosure of personal data.

11.2 **Data Processor** means a person or a juristic person who performs the collection, use or disclosure of personal data by the order or on behalf of the personal data controller.

Section 12 Penalties

If a person responsible for carrying out any matter in accordance with their duties was found to have neglected or omitted to give an order, failed to direct or perform any one of its duties which is a violation of the policy and guidelines on personal data leading to an offense under the laws and/or damage, such person shall be subject to disciplinary actions according to the Company's regulations, and the Company will not compromise on any offense which the responsible person has committed. The person must be punished by laws according to the offense occurred. In any case, if such offense causes the damage to the Company and/or any other person, the Company may consider further legal proceedings.

Section 13 Policy Review

The Company will review this policy at least once a year or in the event that the law has been changed.

Section 14 Contact

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(Mr. Varut Tummavaranukub)

Chief Executive Officer

Sermsang Power Corporation Public Company Limited

Record of Revision History – Resolution of the Board of Directors Meeting No. 3, February 27, 2025 (Agenda 9)