

## Privacy Notice for Shareholders, Debenture Holders, and Directors

Univentures Public Company Limited (“the Company”) respect the rights to privacy of our shareholders, debenture holders, and directors (hereinafter referred to as "you"). To ensure that your personal data is protected, we have created this privacy notice to inform you of the details regarding the collection, use and/or disclosure (collectively, the "processing"), including deletion and destruction of your personal data, both online and other channels, in accordance with the Personal Data Protection Law as follows:

### 1. Purpose of processing personal data

- 1.1 To comply with a legal obligation to which we are subject, e.g., company management (for example, setting up, capital increase, capital reduction, business restructuring, change of registration), shareholders' meeting, identity verification, nomination of a director of a company, board of directors meetings, management of rights and duties of shareholders or debenture holders, dividend payment, interest payment of debentures, accounting and legal inspection reports, deliveries of documents or books, including duties under the laws governing a limited company, public company limited, or companies listed on the Stock Exchange of Thailand (whichever applies).
- 1.2 For the purposes of the legitimate interests pursued by the Company or by a third party, such as to manage companies, to record video or audio in meetings, to protect security, to organize events, to send news or offers for the benefit of shareholders, debenture holders or directors, including to exercise legal claims.
- 1.3 To respond to communications that you contact with the Company, such as answering questions, handling complaints, exercising shareholder rights, or providing opinions.
- 1.4 To prevent and suppress harm to the life, body or health of you or other people, such as making contact in an emergency and controlling communicable diseases.
- 1.5 For the purposes for which you have given your express consent and/or for any other purpose that was notified to you at the time of collecting personal data or for other purposes related to any of the aforementioned purposes.

### 2. Types of personal data processed

- 2.1 The Company collects personal data of a shareholder, bondholder, including attorney, or proxy when you subscribe or become a shareholder or become a bondholder. The Company will collect personal data from you directly and indirectly, including through a broker or a securities registrar, such as name, surname, address, telephone number, email, contact channels, nationality, occupation, date of birth, tax identification, identification number, juristic person registration number, bank account, number of shares.
- 2.2 The Company collects personal data of directors and those who are nominated as directors, both directly and indirectly, including from government authorities, regulatory agencies, and public sources. Examples of the personal data we collect in this regard are as follows:
  - (1) In the selection process, the Company collect personal data from identification card or government-issued documents that can be used to verify identity such as name, surname, gender, identification number, passport number, photo, date of birth, nationality, place of birth; and

(2) When you are appointed and when you are holding office as a director, the Company collect additional personal data such as remuneration, training, activities, marital status, information about your spouse/people living together as husband and wife, children, parents, siblings, bank account number, email, educational background, occupation, work history, previous directorship or position in other companies or other businesses, attendance at meetings of the board of directors or sub-committee or shareholders, directors' remuneration, securities holding information, securities company name, director performance, and other information as required by laws or good corporate governance principles.

In the event that you have provided personal data of another person to the Company, you certify that you have the right and/or obtaining consent from the personal data subject to disclose that personal data and has fully complied with the Personal Data Protection Law.

2.3 When you participate in any of the Company's activities, the Company may collect additional personal data by requesting your consent on a case-by-case basis.

2.4 When you use any service on the Company's website, such as registering for electronic news, whistleblowing or complaints, the Company will retain data about the use of the service, computer equipment, connectivity data using the website's connection such as the IP address, Web pages you visit.

2.5 The Company may be required to collect and process special categories of personal data in accordance with Article 26 of the Personal Data Protection Act B.E., such as health information, food allergies, and drug allergy information, or any other similar information in order to proceed with any activity you attend. The Company will process such personal data with care to the extent required by law and inform you of the details of the collection, use or disclosure of such special categories of personal data to you first or while the Company processes the personal data under the conditions required by law.

### **3. Security measures of personal data**

The Company has created safety and security measures as required by law in order to prevent loss, access to, use of, change, amendment or disclosure of personal data without authorization or permission. The Company improves and tests the technology system on a regular basis to ensure that the personal data is secured in accordance with the standards required by law.

### **4. Disclosure and/or transfer of personal data to third parties**

The Company may, at its sole discretion, disclose and/or transfer the personal data to a third party that is identifiable and has a personal data protection policy and security protection measures as may be required by law, subject to the consent of you or subject to the scope permitted by law, including affiliates<sup>1</sup>, contract parties of the Company, government authorities and any other agencies as required by law.

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<sup>1</sup> Affiliate means any other company in which the Company owns 50.00% or more of the total issued shares (first-tier subsidiary), including any other company in which the first-tier subsidiary and/or subsidiaries in the next hierarchy own 50.00% or more of the total issued shares.

## 5. Personal data subject's rights

5.1 You can exercise your rights under the Personal Data Protection Law as follows:

- The right to access your personal data that the Company has data retained, including the right to request correction of inaccurate or incomplete data.
- The right to request electronic copies of personal data that you may provide to third parties or ask the Company to send it directly to a third party.
- The right to object to the processing of your personal data for marketing purposes and any other purposes.
- The right to request erasure of your personal data when such data is not required to be retained, including the right to limit the scope of personal data processing, in the event that such data cannot be deleted.
- The right to request the suspension of the use of personal data only in the part that is not necessary in the operation of the Company.
- The right to request the Company to provide personal data that is accurate, current, complete and does not cause misunderstandings.
- The right to file a complaint with government authorities if you believe your rights have been violated.

Your exercise of rights shall be subject to the terms, notices, regulations set by the Company, which will be in accordance with the Personal Data Protection Law, including the Company's privacy policy and other criteria specified by the Company. You must submit a written request for exercise of rights to the Company by means of contact in clause 9. of this privacy notice. The consideration of the request is at the Company's sole discretion, and the Company's decision regarding your request is final.

Withdrawing your consent may affect certain services. As a result, the Company may not be able to provide services to the fullest potential or you may not be able to use the services or benefits of the Company. However, withdrawing your consent will not affect the collection, use, disclosure or processing of personal data for which you have given your consent.

5.2 If you are under 20 years old, you must obtain consent from your parental authority for the Company to collect, use and/or disclose your personal data.

## 6. Exceptions to the protection of personal data

Processing of personal data as follows does not constitute a violation of the privacy notice.

- An action towards personal data that has been disclosed in public at the time or before you disclose your personal data to the Company, or personal data that is publicly disclosed which is not caused by the Company.
- Disclosure of personal data with your written consent or permission by other means.
- Disclosure of personal data as necessary by laws, orders, rules, regulations, court order, government authorities, or other necessity.

## **7. Retention period of personal data**

- 7.1 The Company will retain the personal data for the period necessary to complete the purposes provided above or until the Company has been notified to withdraw consent to the collection of personal data from you or to protect the interests of the Company, unless the law permits longer retention periods.
- 7.2 The Company provides an auditing system to delete or destroy your personal data when the retention period expires or when it becomes irrelevant or unnecessary for the purposes of collecting that personal data.

## **8. Amendments to the privacy notice**

The Company may amend, change or update this privacy notice in whole or in part to comply with the changing use of your personal data and to comply with applicable law. The Company will notify you of the changed privacy notice through the Company's website, [www.univentures.co.th](http://www.univentures.co.th) and/or other communication channels. The changes will take effect immediately after the privacy notice is disclosed on the Company's website and the Company will assume that you are aware of the privacy notice that has been revised, changed or updated in its entirety. The Company will use the latest version of the privacy notice for reference on methods for collecting, using and disclosing your personal data.

## **9. Contact us**

In the event that you have questions or want to exercise your rights under this privacy notice. You can contact the Company by email at [dp@univentures.co.th](mailto:dp@univentures.co.th)

This Privacy Notice for Shareholders, Debenture Holders, and Directors effective from 11 May 2022 onwards.