

## Privacy Notice (For Shareholders)

N.C. Housing Public Company Limited and affiliated companies (collectively referred to as “the Company”, “we”, “us” or “our”) are aware of the importance of Personal Data (defined below) protection of our shareholders (“you” or “Data Subject”). The collection, use and/or disclosure (collectively referred to as “Processing” or “Data Processing”) of Personal Data shall act in accordance with the Personal Data Protection Act BE 2562 as Personal Data protection is a social responsibility so as to build trust and strong business relations between us and you. We hereby announce this Privacy Notice in order to inform you of your rights and legal duties, as well as terms and conditions concerning the collection, use, or disclosure of your Personal Data.

### Personal Data

The term “Personal Data” means any information relating to a data subject which enables the identification of such person, whether directly or indirectly, but not including the information of deceased persons in particular.

### Types of Data Subjects the Company Processes

The term "Shareholders" refers to individuals who are shareholders of the Company in accordance with the meaning under securities and exchange laws, as well as any other relevant laws.

### Types of Personal Data collected and Personal Data Protection

We shall collect Personal Data within the purpose, scope, and lawful and fair methods as is necessary which is defined in the scope of our corporate objectives. The Personal Data that we collect shall include:

1. **Personal Data**, including but not limited to given name, family name, age, date of birth, gender, nationality, identification number, taxpayer identification number, passport number, driving license number, signature, marriage status, position, occupation, interest, educational background and work experience;
2. **Contact information**, including but not limited to home address, phone number, email address and company secretary;
3. **Government documents**, including but not limited to copy of national identification card, copy of civil registration from the Government registration database, and copy of travel document;
4. **Financial information**, including but not limited to copy of bank account passbook, bank account information, number of shares;

5. **Data on participating in activities organized by the company**, such as still images, motion pictures, opinions, suggestions, complaints, sound recordings during your attendance at meetings, or any other activities with the Company;
6. **Data obtained by us or automated methods from other devices**, including but not limited to IP Address, cookies, user behavior, sound, photo, audio file, video, Social Media Account, Chat, and geolocation data.

In the event that the personal data collected by us for the above purposes is necessary for the performance of a contract or compliance with applicable laws, if you do not provide such necessary personal data, we may not be able to consider entering into the transaction or manage according to the contract with you (as the case may be)

In this regard, we shall obtain consent from you before such collecting, except in the following cases:

1. It is necessary for the performance of a contract where the collection, use, or disclosure of Personal Data is required to provide service or for performance of a contract between you and us;
2. It is to prevent or suppress a danger to a Person's life, body or health;
3. It is necessary for compliance with the law;
4. It is necessary for legitimate interests of us so as to fulfill its operational objectives in which suitable measures to safeguard your rights and freedoms are put in place, including but not limited to fraud prevention, network security and safeguards for your rights and freedoms;
5. It is for the achievement of the purpose relating to the preparation of the historical documents or the archives for public interest, or for other purposes relating to research or statistics, in which suitable measures to safeguard your rights and freedoms are put in place; and
6. It is necessary for the performance of a task carried out in the public interest, or it is necessary for the exercising of official authority.

#### **Sensitive Personal Data**

We may be required to collect Sensitive Personal Data from Data Subject, including but not limited to race, medical information, disability information, religion, biological information. By doing so, we shall request for explicit consent from Data Subject upon each collecting, using and/or disclosing of such Sensitive Personal Data accordingly, except in the following cases:

1. It is to prevent or suppress a danger to a person's life, body or health;
2. It is carried out in the course of legitimate activities with appropriate safeguards by the foundations, associations or any other not-for-profit bodies with a political, religious, philosophical, or trade union purposes for their members, former members of the bodies, or persons having regular contact with

such foundations, associations or not-for-profit bodies in connection with their purposes, without disclosing the Personal Data outside of such foundations, associations or not-for-profit bodies;

3. It is information that is disclosed to the public with the explicit consent;
4. It is necessary for the establishment, compliance, exercise or defense of legal claims; and
5. It is necessary for compliance with the law so as to achieve the purposes with respect to:
  - 5.1. Preventive medicine or occupational medicine, the assessment of working capacity of Employee, medical diagnosis, the provision of health or social care, medical treatment, the management of health or social care systems and services
  - 5.2. Public interest in public health, such as protecting against cross-border dangerous contagious disease or epidemics which may be contagious or pestilent;
  - 5.3. Employment protection, social security, national health security, social health welfare of the entitled person by law;
  - 5.4. The scientific, historical, or statistic research purposes, or other public interests; and
  - 5.5. The substantial public interest.

The Company does not intend to collect, use, and disclose sensitive data contained in your identity verification documents. Therefore, the Company kindly requests that you redact or delete sensitive data (if any) on your identity verification documents before submission.

However, if you do not redact the information yourself, you are considered to have expressly authorized the Company to redact or delete such information for you. The data you submit to the Company, which the Company has redacted the sensitive data, is considered a complete document that is legally enforceable in all respects and may be processed by the Company under the Personal Data Protection Act B.E. 2562. If the Company is unable to redact the sensitive data for you due to technical or other problems, the Company will only store the sensitive data as part of your identity verification documents.

#### **Source of Personal Data**

1. Personal Data can be directly obtained from you through any activities, including but not limited to membership sign-up, newsletter sign-up, marketing activities, website, application or other channels of the company, entering and exiting our building, training, procurement, responding via e-mail or filling out/providing information from other communication channels between us and you; and
2. Personal data from relevant third parties such as relatives, family members; and
3. Data can be obtained from automated system, including but not limited to recordings from CCTV; and
4. Personal Data can be obtained from other sources, including but not limited to public data and partners of us.

### Purposes of Processing of your Personal Data

We may use Personal Data for the following purposes or for other purposes notified at the time of collecting Personal Data or for which you have given consent after we have collected such Personal Data.

Reasons for collecting, using or disclosing are provided below:

1. It is to enter into a contract or for the performance of a contract between us and data subject or third party for your interests.
2. It is for considering and selecting company directors, including the assessment, selection, and appointment processes, as well as other internal administrative procedures related to director consideration, selection, and appointment.
3. It is to use the data to verify identity, delegation, authorization verification, delegation and power of attorney, establishment of legal claims, and as evidence of relevant transactions.
4. It is to distribute dividends, repay capital, and/or pay interest to shareholders..
5. It is to serve as documentation, providing evidence of shareholder meeting attendance, management, and proceedings. This includes registration, vote recording, document dissemination, and adherence to the agenda.
6. It is to capture, video record or audio and visual content from the Company preparing minutes of meetings and submit to relevant agencies. This includes facilitating post-meeting viewing for participants and promoting company-related information for the benefit of the Company.
7. It is to provide you with information about investor relations activities organized by the Company, shareholder meetings or other activities related to you.
8. It is to analyze, plan, and organize company events and facilitate preparation for participants, including venue arrangements, catering, and providing transportation and souvenirs.
9. It is to comply with the laws or legal procedures, and orders from government authorities under the Public Limited Company Act or the Securities and Exchange Act. This includes procedures for appointments, registrations, changes, and other applicable laws.
10. It is to audit the interests of directors and related persons, involving the collection and reporting of relevant information, such as securities holdings and the provision of reports on strategic shareholders to supervisory authorities.
11. It is to comply with laws related to public health and safety, preventing the spread of infectious diseases within the kingdom.
12. It is for our corporate operations, to evaluate and improve business to improve the quality of products and services.
13. It is to carry out any accounting and financial activities; including but not limited to auditing, debt notification and collection, tax operations and transactions as prescribed by law.

14. It is for our legitimate interests, including but not limited to recordings obtained from CCTV. It is to disclose your information, such as personal background, full name, securities holdings, age, education, employment history, and board positions, through various media channels, including print, advertisements, electronic media, and websites, for external parties to access. This is for use in electronic system registration or to grant access and usage rights for various electronic systems.
15. It is to strategize, report and forecast business operations, conduct surveys, manage risks, and oversee audits within company departments.
16. It is for compliance with our rules.
17. It is to gather data for the Company's stakeholder database.
18. It is for various communication purposes related to the Company.
19. It is for compliance with the law, investigation process, relevant regulations and our legal duties;
20. It is for other purposes upon explicit consent from you.

#### **Transferring and Disclosing of Personal Data**

We shall not disclose and transfer Personal Data to third party unless explicit consent is given, or except for where:

1. We are subject to disclosing or sharing Personal Data to fulfill and achieve the purposes contemplated in this Privacy Notice with the following parties;
  - 1.1 Business partners and business alliance;
  - 1.2 Agency or service providers who provide services to the Company or process data on behalf of the Company, such as transportation service providers, document storage and document destruction service providers, marketing and media agencies, security and information technology development and maintenance service providers, financial auditors, lawyer and tax consultant;
  - 1.3 Government agencies, regulatory bodies, and other state agencies with legal authorities and/or other agencies related to the Company's business such as the Bank of Thailand, and the Stock Exchange of Thailand;
  - 1.4 Shareholder Registrar
  - 1.5 Partnership
  - 1.6 Banks and payment service providers, such as credit card or debit card companies.by doing so, We shall establish a Data Processing Agreement in accordance with the law;
2. We may disclose or share Personal Data with our affiliates; in this regard, the Processing of Personal Data shall merely be in keeping with the purposes contemplated in this Privacy Notice; and
3. It is required to disclose Personal Data by law or legal procedures or to disclose Personal Data to officers, authorities or authorized organizations in order to comply with lawful order or request.

### **International Transfers of Personal Data**

We may send or transfer Personal Data to a foreign country. In this regard, we shall ascertain that the destination country or international organization that receives such Personal Data shall have adequate data protection standards and measures, under any circumstances of such data transfer, the Company will comply with the Personal Data Protection Act B.E. 2562.

### **Personal Data Protection**

We have provided and adopted Personal Data storage system equipped with appropriate mechanism and technical features by encrypting the transferring of Personal Data via internet network, as well as safeguard measures in accordance with the law concerning the protection of Personal Data and relevant delegations. We also restricts its employees, contractors and representatives from accessing to the use, disclosure, destroying or unauthorized access of Personal Data.

### **Retention Period of Personal Data**

We shall retain and use Personal Data as long as necessary for the purposes of Processing Personal Data contemplated in this Privacy Notice or as prescribed by law, except for where it is necessary to retain such Personal Data for other reasons, including but not limited to acting in accordance with the law, to fulfilling our legal duties and obligations or to inspecting in case where any disputes arise. Under such circumstances, we may retain Personal Data longer than the abovementioned period.

### **Disposal of Personal Data**

After the expiration of the period for storing personal data according to the privacy policy or when requesting to exercise the rights of the data subject under the Personal Data Protection Law, we shall delete/destroy personal data or make personal data no longer identifiable according to the format and standard for erasing personal data as required by the Personal Data Protection Law or in accordance with international standards. However, in the event of a dispute, exercise of rights, or lawsuit related to your personal data, the company reserves the right to keep the personal data until the dispute has a final order or judgment.

The Personal Data Destruction methods

(1) In case where personal data exists in document form, the Company will conduct appropriate data destruction methods, including one or more of the following;

- 1.1 Shredding/pulverizing paper
- 1.2 Incineration
- 1.3 Shredding with chemical dissolution
- 1.4 Outsourcing document destruction services

(2) In cases where personal data exists in digital format, the company will conduct Secured Data Deletion methods to ensure that the deleted data cannot be recovered.

### Changes to Privacy Notice

We may amend this Privacy Notice or parts of it and will inform you of the respective amendments or changes to this Privacy Notice as well as the recent date of such amending on [www.ncgroup.co.th](http://www.ncgroup.co.th). We suggest you regularly check this Privacy Notice. By using products or services on our website after the amendments of this Privacy Notice, you are deemed to acknowledge such amendments or changes.

### Data Subject Rights

You may exercise Data Subject Rights with respect to the law and as contemplated in this Privacy Notice, details as specified below:

1. Right to withdraw consent given by you: you have the right to withdraw your consent at any time, unless there is a limitation of your rights by law or contract. However, withdrawal of consent has no effect on prior processing of personal data for which you have lawfully given consent to us;
2. Right to access and obtain copy of your Personal Data unless we have the right to refuse your request by law or court order. or where your request will have an impact on the rights and freedoms of others;
3. Right to have inaccurate Personal Data rectified, or completed if it is incomplete: However, we can rectify without your request.;
4. Right to erase, destroy or anonymize Personal Data In the following cases;
  - 4.1 When the personal data is no longer needed to be retained according to the purpose of collecting, using or disclosing the personal data.
  - 4.2 When you withdraw your consent to the collection, use, or disclosure of personal data and we have no legal authority to collect, use, or disclose personal data,
  - 4.3 When you object to the collection, use, or disclosure of your personal data and we have no legal authority to refuse.  
Unless we have a legitimate reason to deny your request.

5. Right to Data Portability in case where we have made such Personal Data publicly accessible in the format readable or commonly used by ways of automatic tools or equipment, and can be used or disclosed by automated methods unless by technical conditions it cannot be done or there are restrictions on performing duties in the public interest or in accordance with the law or an exercise of a right that has an impact on another person's rights or freedom.
6. Right to object to the collection, use or disclosure of personal information at any time in the following cases
  - 6.1 In the case of personal data, which we process on a legitimate interest basis, unless we demonstrate a more significant legitimate cause or to establish legal claims or to comply with or exercising legal claims or raising up against legal claims,

- 6.2 For direct marketing purposes
- 6.3 For research studies in science or history or statistics, unless it is necessary to carry out a mission in the public interest.
- 7. Right to restrict the use of Personal Data under circumstances where Personal Data is subject to erasure or is no longer necessary;
  - 7.1 In the process of rectifying upon your request to correct your personal data to be accurate, complete.
  - 7.2 When it is personal data that must be deleted or destroyed.
  - 7.3 When such personal data is no longer necessary. In the event that you were required to retain your personal data for the establishment of legal claims, to comply with or exercising legal claims or raising up against legal claims
  - 7.4 When we are in the process of proving the right to refuse a request to object to the collection, use or disclosure of personal data.
- 8. Right to complain to the Personal Data Protection Committee, in the event that we violate or fail to comply with the Personal Data Protection Act B.E. 2562.

Should you have any questions or wish to rectify or erase your Personal Data or to exercise the aforementioned rights or contact us regarding Personal Data issues or our Personal Data protection practices, please contact us using the information provided below.

**Contact Details**

Data Controller

N.C. Housing Public Company Limited

No. 70, Moo 5, Bungkhumphroi Subdistrict, Lam Luk Ka District, Pathum Thani Province 12130, Thailand

Phone number: 02-9935080-81

Email address: [dpo@ncgroup.co.th](mailto:dpo@ncgroup.co.th)

**Data Protection Committee**

N.C. Housing Public Company Limited

No. 70, Moo 5, Bungkhumphroi Subdistrict, Lam Luk Ka District, Pathum Thani Province 12130, Thailand

Phone number: 02-9935080-81

Email address: [dpo@ncgroup.co.th](mailto:dpo@ncgroup.co.th)

**Please provide the following information in addition to the exercise of the rights of the personal data subject.**

- Name-surname, ID card number/passport number.
- Inquiries about personal data or legal rights.
- Phone number, address and e-mail address.