

ALLIED METALS (THAILAND) CO., LTD.

Re: Vendor Privacy Policy

Allied Metals (Thailand) Company Limited (“the Company”) recognizes the importance of our obligation under the Personal Data Protection Act, B.E. 2562 (2019), in respecting the privacy of our current and future vendors, business partners including suppliers (hereinafter referred to as the “Vendor”) and is determined to protect your personal data in order to ensure that vendor’s personal data will be protected in accordance with the Personal Data Protection Act and other related laws. Therefore, the Company has developed this Vendor Privacy Policy to inform you of details related to collection, use, disclosure (collectively referred to as “Processing”) of your personal data as well as your legitimate rights as a data subject as follows:

Section 1. To Whom This Policy Applies

This Vendor Privacy Policy involves personal data of our current and future vendors, business partners and suppliers, both as an individual, and individuals operating under the name of juristic person who are data subjects, such as directors, consultants, executives, employees, representatives and any person related to the Company’s personnel.

“Vendor” means an individual, or juristic person engaging in transactions or dealing with the Company, and is approved to execute a sale/ purchase/ employment/ rental/ lease agreement with the Company. The vendors may be current, or future vendors, or business partners, which shall include suppliers who provide the Company with goods and services.

Section 2. Definition of Personal Data

2.1 “Personal data” means any information relating to a person, which enables the identification of such person, whether directly or indirectly, such as first name, last name, nickname, address, telephone number, national ID number, passport number, social security number, driver’s license number, taxpayer identification number, bank account number, credit card number, email address, vehicle registration, land title deed, IP address, cookie ID, and log file, but not including the information of the deceased persons in particular and anonymous data.

2.2 “Sensitive data” means the personal data regarding racial, or ethnic origin, political opinion, religious, or philosophical belief, sexual behavior, criminal record, health record, disabilities, labor union membership, genetic or biometric data, or any other information having similar impacts on the data subject as determined by the Personal Data Protection Committee, which the Company has to treat with

extra care. The Company will collect, use and/or disclose your sensitive data only after explicit consent is granted from you, or when it is necessary for the Company to comply with our legal obligations.

In this Policy, unless specifically identified, the “Personal Data” and the “Sensitive Data” about customers shall be collectively referred to as the “Personal Data”.

In the case where the Company receives a copy of your national ID card or takes the information from your national ID card electronically for the purpose of authentication before starting any legal relationship and/or conducting any transaction with the Company, the data obtained will include that of religion, which is considered sensitive data. The Company has no policy to keep your sensitive data except in the case where the company has obtained your consent. Hence, The Company will determine the procedures to manage such data as permitted by laws.

Section 3. Personal Data Collected by the Company

The Company collects your personal data only as required to achieve the objectives of use of the data that the Company will subsequently inform you. The personal data to be collected by the Company can be classified as follows:-

Types of personal data: basic personal data

Description: such as title, first name, last name, gender, photo, date of birth, age, nationality, national ID number, current address, and permanent address.

Section 4. Sources of the Personal Data

The Company collects your personal data and sensitive data via the following processes:

4.1 Data given directly by you to the Company

For example, data that appears in the steps of procuring services from a third party, signatures on service/lease agreements, sale and purchase agreements, or any business contracts, filling out on various forms, questionnaires or registrations, or filing any requests, or applications to exercise any rights, as well as data used to apply for creating a user account, or profile with the Company, or to contact the Company, both via offline and online platforms.

4.2 Data automatically collected by the Company

Whenever you uses services via the Company’s system, or visit the Company’s website via electronic devices, such as mobile phones, computers, or laptops, your data will be collected by cookies, or other similar technologies.

4.3 Data from reliable external sources, or public information

Such as The Department of Provincial Administration, the Department of Business Development, commercial data sources, websites, applications, social media data sources, data providers,

agencies, companies, associations, or federations relating to the execution of legal transactions and contracts, and/or business operations of the vendors.

4.4 Information that you contact the Company

Information that you contact the Company, staff, employees, representatives, vendors or business partners of the Company, attorneys, or persons acting on behalf of the Company, or other persons, or organizations assigned by the Company, via websites, applications, social media, telephone, email, meetings, interviews, Short Message Service (SMS), facsimile, post, VDO call service, or any other methods that may be collected by the Company in the text, visual and audio forms.

Section 5. Objectives of Collection, Use, and Disclosure of the Personal Data

The Company collects, uses, or discloses your personal data for the following objectives:-

5.1 Contractual Basis: In complying to a contract to which you are a part of, such as an employment, or any other contract, or to fulfill your requests/applications before executing a contract, as the case may be.

Objectives of collection, use, and disclosure of the Personal Data

The Company collects, uses, or discloses your personal data for the following objectives:-

1. Objective in operation: To consider and sign commercial contracts

Description: To consider and execute commercial contracts, to perform obligations under the contracts, to carry out transactions related to the Company's business, to implement the employment contracts, service contracts, confidentiality agreements, memorandum of understanding (MOU), other commercial contracts and related arrangements, or cooperation between the Company and the other party to the contracts, to prepare data before the purchase and procurement processes, such as preparation of requisitions, details, conditions and requirements for the Terms of Reference (TOR).

Information Processing basis: Compliance of contracts

2. Objective in operation: To consider the qualifications of registered vendors

Description: In considering the qualifications of registrants, and registration of the vendors shall be as determined by each section as well as registration of vendors in the Company's online system.

Information Processing basis: Compliance of contracts

Section 6. Disclosure of Your Personal Data

To achieve the objectives indicated herein, your personal data may be disclosed, or transferred to different units within the Company, and external persons or organizations as follows:-

6.1 Within the Company

Your personal data may be disclosed, or transferred to various units within the Company only those that are related to and having certain roles to achieve the objectives. Such individuals, or teams of the Company will be authorized to access your Personal Data only as necessary and appropriate.

- Procurement officers, or the officers of other related departments whose right to access to personal data shall be determined by their roles and responsibilities
- Executives, or immediate supervisors responsible for managing or making a decisions, or when required to get involved in purchase and procurement processes
- Supporting departments, or teams

6.2 Outside the Company

Your Personal Data may be disclosed, or transferred to external organizations as follows:-

6.2.1 Governmental agencies, regulatory organizations, or other agencies determined by laws, such as the Royal Thai Police, the Government, Courts, the Department of Legal Execution, or any other agencies with powers vested by the laws.

6.2.2 External organizations or individuals: The Company may disclose your personal data to external organizations, or individuals making inquiries for the purpose of inspection of your transactions, and provision of services, or products that meet your needs.

Section 7. Request for Consent and Potential Impacts of Consent Withdrawal

7.1 In the case where the Company collects, uses, or discloses your personal data based on your consent, you shall have the right to withdraw your consent previously granted to the Company at any time. Such consent withdrawal will not affect the collection, use or disclosure of personal data for which your consent was granted.

7.2 If you are a minor under the Civil and Commercial Code, before giving consent, please provide the Company with details of your guardian so that the Company is able to obtain consent from your guardian.

You may withdraw your consent for collection, use, or disclosure of your personal data, either in whole or in part, as specified herein by giving the Company a notice of such withdrawal.

Withdrawal of your consent for collection, use, or disclosure of your personal data may result in your loss of benefit to use the Company's services at the same level that you would have enjoyed if consent for collection, use, or disclosure of your personal data is given to the Company.

Section 8. International Transfer of Personal Data

8.1 The Company may send, or transfer your personal data to another person, either in or outside the country, if it is necessary for the purpose of compliance of a contract to which you are a part of, or in complying to a contract between the Company and another individual, or juristic person for your interest,

or fulfilment of your request before entering the contract, or prevention or suppression of harm to life, body, or health of yourself or any other person, or compliance with legal obligations, or significant public interest.

8.2 The Company may keep your personal data on computers, servers, or Cloud of a third-party service provider, or use third-party programs, applications, software packages, and computer platforms to process your personal data. In this regard, the Company will not permit any unauthorized person to have access to the personal data. Moreover, the Company will determine proper data security measures for those unauthorized persons.

8.3 If it is necessary to send or transfer your personal data overseas, the Company will comply with The Personal Data Protection Law and use appropriate measures to ensure that your personal data will be properly protected and that you can exercise your rights in relation to your personal data as prescribed by the law. Moreover, the Company will require the recipient of your personal data to have proper measures to protect your personal data, process such personal data only as necessary, and prevent any other person from using or disclosing your personal data without the legitimate power.

Section 9. Retention Period of Your Personal Data

9.1 The Company will retain your personal data for no longer than necessary in light of the purposes for which the data was collected, used, and disclosed, including compliance with provisions of applicable laws. Criteria used to determine the retention period include the period of time that the Company has a relationship with you as our vendor, business partner, director, representative, attorney, or a person acting on behalf of an individual, or juristic person who is registered as a vendor, or business partner of the Company. Your personal data may be retained for as long as it is necessary to be in conformity with legal obligations, or prescription period, for the purpose of establishment, compliance, exercise, or defense of legal claims, or for other reasons in accordance with the Company's internal policies, and requirements.

9.2 The Company will continue to collect, use, and disclose your personal data even though you have ended your relationship with the Company for as long as it is required by the law, or for legitimate interests, or the personal data may be retained in the form that is unidentifiable, such as by means of data anonymization, or pseudonymization.

9.3 The Company may retain your personal data for as long as reasonably necessary to fulfill our duties to achieve the purposes of processing your personal data as prescribed in this Privacy Policy. The Company will keep your personal data for no longer than 10 years after your termination of the relationship, or your last contact with the Company. However, your personal data may be kept longer if the law permits.

9.4 To be in line with relevant period and prescription, the Company will retain your personal data in the form appropriate for the specific types of personal data. However, the Company may continue to retain your personal data after the expiry of prescription period for legitimate interests of the data controller, unless such interests are less important than the fundamental rights in your personal data.

9.5 The Company will carry out an inspection to delete, or destroy the personal data, make it permanently unidentifiable, or otherwise eliminate all personal data upon expiry of the retention period, irrelevant personal data, or those personal data not necessary to achieve the objective of personal data collection, or when the Company is required to comply with your request to delete your personal data.

Section 10. Disclosure of Your Personal Data

The safety of your personal data is the Company's first priority, hence processes such as encryption, and restriction of right to access the personal data are utilized to assure you that the Company's personnel, and third parties working on behalf of the Company complies with proper data protection standards as well as obligations to prevent data leakage, and that the Company uses security measures appropriate for the personal data processing.

The Company will use appropriate Technical, and Organizational measures to keep your personal data safe, and prevent violation of the personal data. The Company has determined policies, regulations, and procedures for protection of personal data, as well as measures to prevent those receiving personal data from the Company from using, or disclosing the same in a manner irrelevant to the objectives, or without power, or permission to do so, and the Company will amend such policies, regulations and procedures from time to time as it is deemed necessary and appropriate. Furthermore, executives, employees, contractors, representatives, recipients of data from the Company shall have a duty to keep the personal data confidential in accordance with measures determined by the Company.

The Company will review and update its data security procedures and measures from time to time to obtain the level of security that is proportional to the risk, and to maintain confidentiality of personal data, integrity, availability, and agility in processing the personal data. The Company will protect the personal data against loss and unauthorized collection, access, use, modification, alteration, or disclosure. Different measures will be taken by the Company to process all types of personal data, whether in the electronic, or printed form.

Section 11. Your Rights as a Data Subject

11.1 As a data subject, you shall have the following rights:-

(1) Right to Withdraw Consent

If you have given a consent for the Company to collect, use, and/or disclose your personal data (whether the consent was given before or after the effective date of the personal data protection law), you

shall have the right to withdraw such consent at any time during the period of time the Company holds your personal data, unless such right is restricted by the law, or there is a contract that benefits you.

However, withdrawal of your consent may impact your use of products, and/or services. For example, you will not receive new benefits, promotions, or offers, and may not receive better products, or services that meet your needs. Moreover, you may not receive information that is beneficial to you. Thus, for your interest, please study and ask us about the impacts before withdrawing your consent.

(2) Right to Access

You are entitled to request access to, and obtain copy of your personal data under responsibility of the Company, and to request the disclosure of the acquisition of personal data in the Company's possession. In this regard, the Company may refuse your request if such access and obtainment of the copy of personal data will impact the rights, and liberties of any other person, or the Company has to follow the law, or court's order that forbid the Company to disclose such personal data.

(3) Right to Data Portability

You have the right to obtain your personal data in the case where the Company has turned such personal data into a format that can be read, or used by an automatic tool, or equipment and can be used or disclosed by an automatic method. You also have the right to ask the Company to send, or transfer your personal data in such format to another data controller when the transfer can be made by an automatic method, and to obtain such personal data that the Company directly sent or transferred to another data controller, unless it cannot be done due to a technical reason.

The abovementioned personal data shall be the one for which you have given the Company the consent to collect, use and/or disclose, or the personal data that the Company needs to collect, use and/or disclose, so that you can use the Company's products and/or services as you desire as the counter party to a contract with the Company, or to fulfill your request before using the Company's products and/or services, or other personal data as determined by the authorities.

(4) Right to Object to Data Processing

You have the right to object to certain collection, use, and disclosure of your personal data at any time if such collection, use, and disclosure is performed for necessary tasks under legitimate interests of the Company, or another individual, or juristic person, not exceeding the scope that you are able to reasonably anticipate, or in order to carry out a mission for public interest. If you make an objection, the Company will continue to collect, use, and/or disclose your personal data only in the case where we can demonstrate a legitimate cause that is more significant than your fundamental rights, or as necessary for the establishment, compliance, exercise, or defense of legal claims, as the case may be.

Moreover, you have the right to object to the collection, use, or disclosure of your personal data if it is performed for the purpose of direct marketing, or scientific, historic, or statistic research.

(5) Right to Data Deletion

You may ask the Company to delete or destroy your personal data, or make it unidentifiable if you believe that your personal data are unlawfully collected, used, and/or disclosed against the relevant laws; or that your personal data are no longer required for the purposes indicated in this Privacy Policy; or when you exercise the right to withdraw your consent or make an objection as mentioned above, except in the case where the Company has to comply with the law, or exercises the legal rights to retain such data.

(6) Right to Request Suspension of the Use of Personal Data

You have the right to ask the Company to temporarily suspend the use of personal data in the case where the Company is in the process of examining your request to exercise the right to rectification or objection. Moreover, if the Company no longer needs your personal data and has to delete or destroy them according to related laws, you may instead ask the Company to suspend the use of such personal data.

(7) Right to Rectification:

You have the right to ask the Company to rectify your personal data to be accurate, updated, complete, and not misleading.

(8) Right to Lodge a Complaint

You may lodge your complaint to competent authorities if you believe that the collection, use, and/or disclosure of your personal data is made against the relevant laws.

If you have any concern or doubt regarding the way the Company treats your personal data, please contact the Company using the contact details provided under Section 13 of this Privacy Policy. If there is a reason to believe that the Company has violated The Personal Data Protection Law, you may lodge a complaint to the Expert Committee appointed by the Personal Data Protection Committee in accordance with rules and procedures prescribed as by The Personal Data Protection Law.

In the case where you, as the data subject, submitted a request to exercise your rights under The Personal Data Protection Law, upon receipt of such request, the Company will proceed to complete your request within the period designated by the law. However, the Company reserves the right to reject, or refuse to fulfil such request if required by the law.

11.2 It is at the sole discretion of the Company to accept, or reject your request. Your exercise of rights under 11.1 may be limited by applicable laws. In some cases, it may be necessary for the Company to reject your request or it may be impossible to proceed in accordance with your request for example, the Company is required to comply with the law or a court order, or your request is against the public interest, or in violation of another person's rights or liberties. If the Company rejects your request, we will notify you of the reason for such rejection.

Section 12. Change to the Vendor Privacy Policy

The Company will review and amend this Vendor Privacy Policy on a regular basis to ensure that it is in line with relevant guidelines, laws and regulations. We will notify you of any significant changes made to this Vendor Privacy Policy and publish the amended Vendor Privacy Policy through appropriate channels. In this regard, you are recommended to check for amendment of the Vendor Privacy Policy from time to time.

Section 13. Communication Channels

If you view that the processing of your personal data is not in compliance with the Personal Data Protection Act, B.E. 2562 (2019), you may submit a complaint to the Data Controller at the e-mail address: **dc-pdpa@alliedmetals.com**.

Section 14. Governing Law

You acknowledge and agree that this Vendor Privacy Policy shall be governed by and construed in accordance with the laws of Thailand. Any and all disputes which may arise shall be settled by Thai Court.

This Privacy Policy is published on 1st June 2022.
