PERSONAL DATA PROTECTION POLICY

MR. D.I.Y. HOLDING (THAILAND) CO., LTD. AND ITS SUBSIDIARIES

15 August 2023

Version: 01
Approved by the Board: 15 August 2023

PERSONAL DATA PROTECTION POLICY

MR. D.I.Y. Holding (Thailand) Co., Ltd. (the "**Company**"), together with its subsidiaries (the "**Group**"), respect the privacy rights of customers, shareholders, employees of the Group and related persons. To ensure that such persons are fully protected according to the PDPA, the Company has established this Policy in writing for the Group to set out clear and appropriate criteria, mechanism, and measures to supervise and manage personal information in compliance with the PDPA.

1. APPLICABILITY OF POLICY

This Policy shall apply to the Group, the directors, executives, employees of the Group and those involved in the controlling and processing of personal data as directed or on behalf of the Group.

2. DEFINITIONS

Under this Policy, the following expressions have the following meanings unless stated or explained otherwise.

"PDPA" means the Personal Data Protection Act, B.E. 2562 (2019) as amended (if any) including its delegated legislation.

"processing" means any action with personal data such as collecting, recording, organizing, structuring, keeping, improving, changing, recovering, using, disclosing, transmitting, publishing, transferring, merging and destroying.

"personal data" means any information in relation to a natural person, which enables the identification of such person, whether directly or indirectly, such as name, surname, email address, telephone number, IP address, picture, race, religion, political opinion, genetic data, biometric data, but not including the information of a deceased person.

"sensitive data" means personal data that is personal by nature to a person, which is sensitive and exposed to be used in unfair discrimination, under the PDPA, for instance, race, ethnicity, political opinion, cult, religious or philosophical belief, sexual behaviour, criminal records, health data, disability, labor union information, genetic data, biometric data or any other data that affects the data subject in the similar manner as prescribed by the Personal Data Protection Committee.

"data subject" means a natural person whose personal data can be identified or identifiable to that person, either directly or indirectly.

"data controller" means a natural person or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the personal data.

"data processor" means a natural person or a juristic person who operates in relation to processing personal data pursuant to the order given by or on behalf of a data controller.

3. ROLES, DUTIES AND RESPONSIBILITIES

3.1 The Board of Directors (the "**Board**") shall have the roles, duties and responsibilities as follows:

(1) putting in place policies, governance structures and internal control of the Group in relation to the personal data protection in order to ensure the Group's compliance with applicable laws and personal data protection policies of the Group;

(2) ensuring that the Group implement its personal data protection practices to be effective and compliant with applicable laws;

(3) ensuring that risks in relation to personal data be addressed and managed in an appropriate manner; and

(4) appointing a personal data protection officer to the extent required by the PDPA.

3.2 The management shall have the roles, duties and responsibilities to determine measures, guidelines or procedures in relation to personal data protection to be in accordance with relevant laws and the Company's policies, and to supervise all responsible departments or units to be in compliance with applicable laws and the Group's personal data protection policies, as well as promoting, supporting and creating awareness among the Group's employees.

3.3 The personal data protection officer shall have roles, duties and responsibilities as prescribed by law, which includes the following:

(1) giving advice to data controllers or data processors, as well as their employees or contractors regarding compliance with the PDPA and this Policy;

(2) examining the operations of data controllers and data processors, including their employees or contractors the collection, use or disclosure of personal data in accordance with the PDPA;

(3) coordinating and cooperating with the Office of the Personal Data Protection Committee in case of having difficulties or issues in relation to the collection, use or disclosure of personal data of data controllers or data processors, including their employees or contractors in complying with the PDPA;

(4) maintaining the confidentiality of personal data known or obtained from the performance of duties in accordance with the PDPA; and

(5) reporting incidents in relation to violation of personal data to the Office of the Personal Data Protection Committee within 72 hours from the time of knowledge of the cause as far as practicable unless such violation poses no risk of affecting the rights and freedom of individuals; where violations

have a high risk of affecting the rights and freedom of individuals, the notification of the personal data breach, together with the remedies, shall be made to the relevant data subject without delay.

3.4 Employees of the Group shall have the roles, duties and responsibilities as follows:

(1) acknowledging, understanding and strictly adhering to the PDPA, the Group's personal data protection policies, standards, guidelines, procedures and other documents in relation to personal data protection;

(2) reporting to their supervisors on abnormal incidents in relation to personal data protection, personal data breach, leakage of personal data and non-compliances with the PDPA or the Group's personal data protection policies; and

(3) employees who have known personal data as a result of performing their duties shall not disclose such personal data or unlawfully seek benefits for themselves or others.

4. PERSONAL DATA PROTECTION POLICY: PERSONAL DATA PROTECTION GOVERNANCE

4.1 The Group shall provide a governance structure for personal data to determine methods and appropriate measures which are in compliance with applicable laws as follows:

(1) establishing an organizational structure including clearly specifying the roles, missions and responsibilities of relevant agencies and operators for the purpose of establishing mechanisms for governance, control, accountability, operation, enforcement and monitoring of personal data protection measures in accordance with the PDPA and this Policy; and

(2) appointing a personal data protection officer of the Company (if required by law) with roles and responsibilities as defined in the PDPA and this Policy.

4.2 The Company shall establish policies, standards, guidelines, procedures and other documents in relation to personal data protection in accordance with the PDPA law and the Company's personal data protection policies.

4.3 The Company shall, on a regular basis, conduct training sessions for employees of the Group to raise awareness of the importance of personal data protection and to ensure that all related employees of the Group are trained and have knowledge and understanding of personal data protection and comply with the PDPA and personal data protection policies of the Group.

5. PERSONAL DATA PROTECTION POLICY: PERSONAL DATA PROCESSING

5.1 The Group shall process personal data, both as a data controller and a data processor, legally, fairly, transparently as well as considering the accuracy of personal data. In this regard, the determination of scopes and objectives of

processing and periods of storing personal data will only be done as necessary within the lawful objectives and business practices of the Group. In addition, the Group shall continue to maintain confidentiality, completeness and adequate security of personal data.

5.2 The Group shall establish processes and controls to manage personal data in every step in accordance with the PDPA and the Group's personal data protection policies.

5.3 The Group shall establish and maintain records of processing activities (RoPA) for records of transactions and activities in relation to the processing of personal data in accordance with the PDPA, as well as updating the records of processing activities (RoPA) when there is a change in relevant transactions or activities, provided that at least the following items shall be recorded:

(1) the personal data collected;

(2) objective of collecting each type of personal data;

(3) information of a data controller;

(4) period of retention of personal data;

(5) rights and means to access personal data including conditions in relation to individuals who have access to personal data and conditions for accessing such personal data;

(6) use and disclosure of personal data that is exempted from requiring consent as prescribed by the PDPA;

(7) rejection of a request or objection by the data subject in accordance with the PDPA; and

(8) description of personal data security measures in accordance with the PDPA.

5.4 The Group shall provide clear procedures to ensure that the provision of privacy notices and obtaining consent from data subjects comply with the PDPA, including providing measures to monitor and examine such matters.

5.5 The Group shall provide a mechanism to verify the accuracy of personal data for the purpose of ensuring that the personal data is accurate, up-to-date, complete and not misleading.

5.6 In the event that the Group has to send, transfer, disclose, or allow other natural person or juristic person to use or disclose personal data, the Group shall establish an agreement with those who receive or use such personal data for the purpose of preventing such person from using or disclosing personal data without authorization or legitimate purpose.

5.7 In the event that the Group has assigned a data processor to carry out the collection, use or disclosure of personal data, the Group shall arrange an agreement to control the operation of the data processor's duties in accordance with the PDPA and personal data protection policies of the Group.

5.8 In the event that the Group send or transfer personal data overseas, the Group shall comply with the PDPA.

5.9 The Group shall have in place inspection systems, procedures and methods for deleting and destroying personal data after the expiration of the retention period; or that is irrelevant or beyond the necessity of the objective of the personal data collection, or upon the request of data subjects, or where data subjects have withdrawn the consent.

5.10 The Company shall assess the risks and develop measures to mitigate risks and reduce the impact that may occur with the processing of personal data.

6. PERSONAL DATA PROTECTION PROLICY: DATA SUBJECT RIGHTS

The Group shall provide measures, channels and methods for data subjects to exercise their rights as provided by the law, including recording and assessing the response to requests for exercise of rights of data subjects.

7. PERSONAL DATA PROTECTION POLICY: PERSONAL DATA SECURITY

7.1 The Group shall provide adequate security measures for personal data in accordance with the PDPA for the purpose of preventing loss, access, use, alter, amend or unauthorized or unlawful disclosure of personal data.

7.2 The Group shall, on a regular basis, review the security measures of personal data in order to maintain the appropriate security efficiency and keep up with the developing technology.

7.3 The Group shall put in place procedures for notifying data subjects including governmental officials who are data controllers (in case that the Group is a data processor or a co-data controller) and other persons, to be in accordance with the PDPA.

8. PERSONAL DATA PROTECTION POLICY: COLLECTION, USE OR DISCLOSURE OF PERSONAL DATA

In collecting, using or disclosing personal data at any time, the Group shall operate in accordance with the following principles and guidelines:

8.1 The collection of personal data shall be done to the extent necessary under the legitimate purpose of the Group.

8.2 The Group shall collect, use or disclose personal data only when, before or at the time, consent has been provided by data subjects. In case where it is a sensitive data, explicit consent is required. In this regard, this shall be in accordance with

the rules prescribed by the law, unless the personal data can be collected, used or disclosed without consent as specified by the law.

8.3 In collecting personal data from a data subject, the Group shall notify the data subject before or during the collection of personal data as follows:

(1) objective of personal data collection for use or disclosure;

(2) notify the data subject in the case where the personal data is required to comply with the law, an agreement or its necessity to provide personal data for the purpose of entering into an agreement, as well as possible consequences of not providing such personal data;

(3) personal data to be collected, the period of collection or period that may be expected in accordance with the standards of collection;

(4) the categories of persons or entities to which the collected personal data may be disclosed;

(5) information about the data controller, address and contact method; in the event that there is an agent or personal data protection officer, information, address and contact method of the agent or the personal data protection officer shall be informed as well; and

(6) rights of data subjects under the PDPA.

8.4 The Group shall collect, use or disclose personal data only according to the objectives that have been notified to data subjects, prior to or at the time of collecting such personal data. If the Group has to use the personal data of the data subjects for other objectives apart from those that have been informed to the data subjects, the Group shall always notify the data subjects of the new objectives and obtain their consent before collecting such data, unless permitted by law to do so without notifying the new objectives.

8.5 It is forbidden to collect personal data from sources other than directly from the data subjects, unless notified to the data subjects without delay, but it shall not be later than 30 days from the date of collection and obtaining consent from the data subjects, or unless the collection of personal data is exempted from obtaining consent in accordance with the PDPA.

8.6 In the event that the collection, use, or disclosure of personal data is required to obtain consent from the data subjects, the Group shall proceed as follows:

(1) the consent request shall be made explicitly, in writing or made via electronic means unless the condition does not allow the consent to be obtained by such means;

(2) informing the objective of collection, use, or disclosure of the personal data along with the consent request from the data subjects;

(3) the consent request shall be clearly separated from other statement;

(4) having forms or statements that are easily accessible and understandable as well as using a language that is easy to read and does not deceive or mislead the data subjects of the objective of collection, use or disclosure of personal data;

(5) ensuring that the data subjects be independent in giving consent to the collection, use, or disclosure of personal data; in case of entering into any agreement or providing services, the Group shall not impose any condition with respect to the collection, use, or disclosure of personal data, which is not necessary nor relevant to the agreements to be entered into or the provision of the services.

9. PERSONAL DATA PROTECTION POLICY: PERSONAL DATA PROTECTION COMPLIANCE

9.1 The Group shall put in place arrange a monitoring mechanism in the event that there is any change in the PDPA and improve the personal data protection measures to be up-to-date and in compliance with the PDPA on a regular basis.

9.2 The Group shall, on a regular basis, review and improve its policies, standards, guidelines and procedures and other documents in relation to personal data protection to be in compliance with the PDPA and suitable for the circumstances.

10. SANCTIONS FOR NON-COMPLIANCES WITH THIS POLICY

A person who fails to comply with this Policy may be guilty of a misconduct and subject to disciplinary actions and damages to the extent that such conduct causes damage to the Group and/or any other persons, as well as sanctions imposed by the PDPA. In addition, the Group reserves its right to take legal action against such person.

11. REVIEW OF POLICY

This Policy shall be reviewed at least once a year. If there is any proposed modification required to be made to this Policy, it shall escalate to the Board for consideration.

This Policy shall be effective from 15 August 2023 by approval of the Company's Board of Directors meeting No. 6/2023.

(Mr. Ong Chu Jin Adrian)

Chairman of the Board of Directors

MR. D.I.Y. Holding (Thailand) Co., Ltd.