

Privacy Notice for Directors and Shareholders

We, **Double A (1991) Public Company Limited** (hereinafter referred to as “**the company**”, “**we**”, “**us**”, “**our**” or “**ours**”, depending on the context) take the privacy and protection of Personal Data of our shareholders, directors, any other individuals acting on their behalf (such as, proxies of shareholders), transferees of shares and other relevant individuals with whom we interact or we collect personal data via our shareholders, directors, any other individuals acting on their behalf and whose personal data we handle in the course of our businesses operation (together, “**you**”, “**your**” or “**yours**”, depending on the context) seriously.

We have prepared this Privacy Notice for Director, Executive and Shareholder (“Privacy Notice”) to explain how your Personal Data will be collected, used, disclosed, and/or transferred to other countries by us. We and our affiliated companies will use the information you disclose to us for operational purposes in accordance with the relationship between you and the company appropriately.

We may change this Privacy Policy from time to time by updating our Privacy Policy page on our website. We encourage you to check our Privacy Policy from time to time. Any changes to this policy will be effective immediately upon the company’s posting of the updated version on <http://corp.doublepaper.com/th/index.asp>

1. Personal Data we collect.

1.1 Where we get your Personal Data

We may collect various types of Personal Data directly from you or indirectly from other sources based on your communication with the Company and your relationship with the Company in the following cases:

- (1) **In cases where the Company collects Personal Data directly from you**, such as documents you have filled out or provided to us, direct communication with the Company's personnel, recording of images and sounds through programs, recording of images and sounds through CCTV, emails, websites, internal work system, and online social media.
- (2) **In cases where the Company collects Personal Data indirectly from affiliated companies within the Company's group.**
- (3) **In cases where the Company collects Personal Data indirectly from third parties or other sources**, such as shareholders, business partners, consultants, government agencies, private agencies, other parties, bond registrar, and public sources.

You are aware that the Company has established appropriate standards for the protection of Personal Data and has implemented measures to safeguard the rights, freedoms, and benefits of the data subject, as specified in the Privacy Notice.

1.2 Type of Personal Data we collect

The Company may collect various types of your Personal Data, including but not limited to, the following information, depending on the relationship between you and the Company.

- (1) **Personal Data:** such as title, first name, surname, change of first name or last name, gender, signature, phone number, email, Line ID, social media user account name, date of birth, age, weight, height, blood type, photograph, occupation, nationality, marital status, military status, national ID number, passport number, social security number, driver’s license number, taxpayer ID number, car registration numbers, CV or Resume, certificate, academic degree, visas, copy of national ID card, copy of driver's license, copy of house registration, copy of passport, work permit, employment certificate, professional license, information on your relationship with the Company's business partners, address on ID card, address as per household registration, current address, workplace address, copy of id card, copy of household registration, copy of passport;
- (2) **Contact information:** such as current address, current address as per ID card, address as per household registration, house map, workplace address, email, phone number, website, social media accounts (e.g. Facebook, Line, Instagram, Twitter), and similar information;

- (3) **Directors' qualification Data:** such as education background (e.g., education level, education institution, education qualification, field of study, length of study, academic results), work history (e.g., company name, position job, length of time worked, salary, benefits and compensation received), bankruptcy history, language proficiency, certificate (e.g. training institution, training period, course), personality information, and interview results;
- (4) **Information relating to shareholding:** such as shareholder registration number, number of shares, amount of dividends, information declared in the documents, copy of list of shareholders (Bor Or Jor. 5), securities account, meetings, photograph, motion pictures, voice recordings, computer information from the meeting registration and/or meeting minutes in accordance with the documents;
- (5) **Information relating to Bond holding:** such as type of shareholder, type of bonds, number of bonds, value of bonds, status of bonds;
- (6) **Information relating to Issuance of Securities business management:** such as ID cards, education profile, training history, employment history, information about securities holding, underwriter;
- (7) **Information relating to work:** such as director status, start and end dates of director status, working criteria and conditions, compensation rates, director meeting allowances, rights and welfare information, details of compliance with or breach of contracts with the company, work performance results, work history, leave history, performance evaluations, adjustments of job position, meetings information, details of complaints, lawsuit information, information according to a copy of a power of attorney.
- (8) **Financial details:** such as bank account and payment information;
- (9) **Technical Information:** such as account and password information, IP Address, MAC Address, GPS information, types of browser, electronic device information, settings, location, online identifiers and other similar technologies, preferences, web browsing history, duration of visit, and any other computer traffic data;
- (10) **Information relating to the meeting:** such as photograph, motion picture, voice recording, computer information from the meeting registration and/or meeting minute;
- (11) **Information from CCTV:** please see the details of Personal Data collection, processing and/or disclosure from the our CCTV at the Privacy Notice for CCTV at <https://vendor.doublepaper.com/Manual/AnnouncementCCTV Notice 2024.pdf>
- (12) **Other Information:** such as electronic communications sent through the company's accounts, networks and equipment.
- (13) **Sensitive Data:** such as sensitive data contained in government records for identification (e.g., religion from ID card).

In case you provided third party Personal Data as specified in the above of other persons such as details of your family member, spouse, dependents, witness, and other person referred by you or other person in the course of directorship and shareholder.

If you provide Personal Data of others to us, you represent and warrant that you have the authority to do so by informing such other person about this Privacy Policy and/or obtaining consents where applicable or rely on other legal basis necessary to permit us to use such Personal Data in accordance to this Privacy Policy.

We will not collect Personal Data of Minors (those who have not reached the legal age, meaning under 20 years of age or have not reached legal age through marriage as stipulated by law), quasi-incompetent persons, or incompetent persons. Furthermore, we do not permit individuals mentioned above to enter into legal contracts with the company without obtaining consent or if they are unable to establish a legal basis in any other way. If the company becomes aware that it has unintentionally collected personal information from such individuals without consent or without relying on any other legal basis, the company will promptly delete the said personal information. In such cases, it may be necessary for the company to terminate its relationship with these individuals unless the company can rely on criteria or legal basis other than consent.

2. Objectives and Legal Basis to collect, use and/or disclose the Personal Data

2.1 Objectives which the Company collects, use and/or disclose of your Personal Data by explicit Consent

We do not engage in the collection, use, and/or disclosure of Sensitive Personal Data for any purposes that require your current explicit consent.

2.2 Other objectives which the Company collects, use and/or disclose of your Personal Data by Legal Basis

We collect, use, and/or disclose your Personal Data on the legal basis of (1) contractual basis, for our initiation or fulfilment of a contractual performance with you or requested by you prior to engaging into a contractual performance with us; (2) legal obligation, for fulfilment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and those of third parties, proportionate to your interest and fundamental rights and freedoms to the protection of your Personal Data; (4) vital interest, for the prevention or suppression of danger to a person's life, body, or health; (5) public interest, for the performance of task carried out in the public interest or for exercising of official authorities or duties; (6) establishment compliance, utilization, or assertion basis, or any other legal basis as permitted by law regarding the protection of Personal Data and/or (7) consent basis in case of where other legal basis cannot be invoked, as appropriate, for the collection, use, and/or disclosure of your Personal Data for the following purposes:

In this regard, some types of purposes may not be applicable to you. Please consider the relevant purposes based on your relationship with the Company.

- (1) **Identity verification:** such as registration and identity verification;
- (2) **Directorship:** to select and appoint a director;
- (3) **Registration and meeting according to the legal requirements:** such as managing the registry related to shareholders or directors, conducting activities related to delegation of authority or power of attorney, organizing meetings and preparing meeting agendas, registering attendance at meetings, verifying and confirming Personal Data for meeting attendance, dispatching meeting-related documents, recording and processing resolutions or votes, preparing meeting records or reports (including board meetings, annual general meetings (AGM), extraordinary general meetings (EGM), and meetings for capital increase or reduction);
- (4) **For actions related to remuneration, welfare, and benefits:** such as operations related to salary processing, payment of salary and remuneration, personal income tax, social security, for submitting information to the law enforcement bodies, providing welfare and benefits to directors and their families;
- (5) **The protection of health and safety at work:** such as to process leave, to evaluate work performance, for the return-to-work process, for assistance in the event of work-related injury or illness, for the management of the health and safety of directors, for the provision of support as required and requested by directors, for the contact of emergency contact persons;
- (6) **Operational support:** such as to support data for company's internal and external process, to support human resource management, to provide directors' facilitation, to determine rights of system usage, to support tools and equipment, to facilitate work, for preparation of food and beverages, for arrangement of travel or accommodation, for disbursement of expenses relating to work, to test knowledge and understanding or survey opinions of directors, to communicate, coordinate, announce or publicize company's activities both internally and externally, to organize training, seminars and off-site activities;
- (7) **Compliance verification of Company's laws, regulations, and policies:** such as laws, regulations and policies regarding the acceptance of gifts, gratuities or rewards, anti-bribery, corruption, business ethics and code of conduct, working hours, occupational health and safety, taxes, social security, legal execution, student loan funds, labour protection, monitoring and reviewing electronic communications sent using the Company's accounts, networks and devices;

- (8) **Complying with any regulatory or other legal requirements:** to comply with our legal obligations, undergoing legal processes, or complying with the orders or decisions of government agencies, and/or cooperating with courts, regulatory authorities, and governmental agencies when the company has a credible reason to believe it is required to comply with the law, orders, or cooperate as mentioned. In such cases, the company may be required to disclose Personal Data of employees to comply strictly with legal provisions, legal processes, or orders of the mentioned governmental entities, including actions related to internal investigations, complaints, claims, inquiries, or the prevention of crimes, fraud, and/or for establishing legal claims;
- (9) **Complaints investigation and management:** such as to investigate and manage complaints, grievances, appeals, disputes, including conducting formal and informal investigations and related considerations.
- (10) **Other internal business administration and/or its affiliated companies:** such as verifying and confirming personal identity, conducting business operations and internal management, analyzing data, risk management, supervision, auditing, collecting and referencing evidence, including internal verification and management within the organization, communication and coordination activities, facilitating collaborative operations, receiving and handling complaints, inquiring further about requests or complaints, or the information provided, including considering and processing requests, transmitting information, verifying facts, recording for follow-up, fulfilling the company's regulatory and legal obligations, delivering documents to relevant government agencies, management, budget planning and accounting management, business planning, business operations and reports, tax operations, audit supervision;
- (11) **Protection of our and/or affiliated companies interests and emergencies:** such as maintaining the security and integrity of the Company's business and/or affiliated companies, conducting analysis, assessment, management, and risk management, creating or considering legal review documents, exercising the rights of the company and protecting the interests of the company and/or affiliated companies when necessary and legally permissible, verifying and preventing conflicts of interest, creating and retaining documents related to the management of the company's business, undertaking operations related to approvals, permits, or legal registrations, ensuring compliance with agreements, investigating and preventing internal misconduct within the premises of the company and/or affiliated companies, reporting misconduct for management action, creating reports, implementing organizational policies within the scope of the company's operations, reconciling or limiting damages that may occur to the company and/or affiliated companies, initiating, using, or defending legal claims on behalf of the company and/or affiliated companies, and/or any other operations for the protection of customers, employees, other individuals, trade secrets, rights, and properties of the company and/or affiliated companies;
- (12) **For management of information technology, websites, applications, or other systems:** such as for the management of the business of the Company and/or our affiliates; for the management of operating systems related to information technology; for the management of communication systems, and security systems regarding the information technology of the organization; to track the usage of the internet and work systems of the Company and/or our affiliates; to provide the service of the websites, applications, or other systems of the Company and our affiliates; to connect to the websites or other systems of the Company or our affiliates, or other third-party agencies; to analyse users' usage for the development of the communication strategies of the Company and/or our affiliates; to solve issues arising from, and to maintain, create, and improve systems for system users; to control access to information and systems; and to update information on websites, applications, or other systems.
- (13) **For transactions of the organization:** such as where there is any sale; transfer; merger; reorganization; or other similar transactions, the Company may transfer personal data to one or several third parties as part of making any of the transactions.
- (14) **For the prevention or suppression dangers to a person's life, body, health or property:** such as for the control of communicable diseases or epidemics, to consider and provide access to premises, or the right to participate in any activity; to supervise and monitor operations in risk areas, and ensure occupational safety; for theft detection; and to respond to emergencies;

- (15) **System development and marketing purposes:** such as analyzing proposals for services, products, or investments, and/or improving services for service offerings;
- (16) **Sending news, organizing activities, or any offers for the benefit of shareholders and bondholders.**

In case if you do not provide your Personal Data to the company, refuse to give consent, or withdraw your consent, it may impact the company's ability to process your requests and may affect the performance of contracts that the company has with you. It could also result in the company being unable to provide certain benefits or affect the performance of obligations under agreements between you and the company in some aspects. In some cases, the failure to provide such information may have legal consequences for both the company and you, as there may be legal obligations that the company or you are required to comply with, and there may be penalties associated with non-compliance based on the consent you refuse to give or withdraw.

3. Who we share your Personal Data

We may disclose or transfer your Personal Data to the following third parties, who collect, use, and/or disclose Personal Data for the purposes specified in this Privacy Notice. Additionally, you may be subject to the Privacy Policies of these third parties. The company recommends that you read the Privacy Notices of these third parties for further information on how they collect, use, and disclose your Personal Data.

3.1 Group Companies

The Company may need to disclose or transfer your Personal Data to companies within the group, or authorize such companies to access your personal information for the purposes as specified in this Privacy Notice;

3.2 Governmental Authorities and Third Parties involved by the legal requirements

The Company may be required to disclose and/or transfer your Personal Data to government agencies or law enforcement agencies such as the court, the Office of the Attorney General, the Royal Thai Police, the Ministry of Digital Economy and Society, the Revenue Department, the Department of Intellectual Property, the Department of Business Development, the Department of Local Administration, the Customs Department, the Anti-Money Laundering Office, Embassies and Consulates in Thailand, the Board of Investment under the Office of the Prime Minister, the Office of the Consumer Protection Commission, the Securities and Exchange Commission (SEC), the Stock Exchange of Thailand, the Office of the National Anti-Corruption Commission, the Office of the Anti-Money Laundering Committee, as well as officers working in these organizations and other external individuals. This is in cases where the Company has reason to believe that it is necessary to fulfill legal obligations or legal regulations, or for any other necessary reasons, to protect the rights of the Company, the rights of other individuals, or for the safety of individuals, or for investigating, preventing, or managing issues related to corruption or security;

3.3 Our Business Partners

We may disclose and/or transfer your Personal Data to the Business Partners including but not limited to contractual parties of the Company, for the purposes stated in this Privacy Notice;

3.4 Our Service Providers

The Company may engage other companies, agents, or contractors to provide services related to its business operations. The Company may disclose your personal information to external service providers, including but not limited to (1) developers of infrastructure, internet, websites, and information technology service providers such as cloud system service providers and electronic signature system providers, (2) insurance companies, and (3) internal audit service providers.

However, in providing such services, the Service Providers may have access to your Personal Data. Nevertheless, the Company will only provide Personal Data to its service providers to the extent necessary for the provision of such services and will request that the service providers do not use your Personal Data for any other purposes;

3.5 Consultants and/or expert advisors

The Company may need to disclose Personal Data to consultants or experts hired by the Company, including but not limited to (1) independent consultants, such as project consultants, financial consultants, and accounting consultants; (2) legal consultants who provide assistance in the company's business operations and legal services, including litigation and legal proceedings; and (3) accountants who provide accounting services or conduct audits for the company;

3.6 Assignee of Rights and/or Obligations

In the event of organizational restructuring, business consolidation, sale, purchase, joint ventures, rights transfer, change of ownership, or similar transactions, whether in part or in whole, the transferee and/or assignee of rights and/or duties of the company will adhere to this Privacy Notice respecting your Personal Data;

3.7 Other Third Parties

The Company may disclose your Personal Data to individuals or legal entities for the purposes stated in this Privacy Notice. The recipients of such Personal Data may include, but are not limited to, individuals or legal entities as requested, and individuals requesting access to records from CCTV.

4. International transfer of Personal Data

The Company may disclose or transfer your Personal Data to external parties such as business partners, service providers, consultants, and experts located in other countries. The destination country may have data protection standards that are not equivalent to those in Thailand. In such cases, when it is necessary to transfer Personal Data to a country with lower data protection standards, the company will follow procedures and measures to ensure that the transferred Personal Data is adequately protected. Additionally, the company may seek your consent for the transfer of Personal Data to another country if required by law.

5. We keep your Personal Data for a set amount of time

Your Personal Data will be stored for the period necessary to allow us to fulfil, satisfy or achieve the purposes specified in this Privacy Notice and to comply with contractual, legal, and regulatory obligations. The Company may extend the retention period if required or permissible by applicable laws, such as keeping Personal Data for the duration of the contract with you or for the specific period mandated by law.

6. You're in control

Subject to the provisions of data protection law, you may have a number of rights regarding the collection, use, disclosure and/or transfer of your Personal Data, including:

- (1) **Access:** you can request a copy of your Personal Data which we collect, use and/or disclose;
- (2) **Rectify:** you can request that we correct anything that's wrong, or complete any incomplete Personal Data;
- (3) **Data Portability:** You may have the right to request Personal Data that the company holds about you in an organized, readable electronic format and to transmit this data to another Data Controller. This right applies to Personal Data you have provided to the Company and cases where the Company has

obtained your consent to collect, use, and/or disclose your Personal Data or to fulfill the contract the Company has with you. However, the Company reserves the right to reject your request if it believes that fulfilling the request would violate the rights or freedoms of others, or if it needs to use your Personal Data for the public interest or to comply with legal;

- (4) **Objection:** you can object to the collect, use and/or disclose of your Personal Data based on legitimate interests;
- (5) **Restriction:** you can limit how we use your Personal Data in certain circumstances;
- (6) **Withdraw Consent;** for the purposes for which you have given consent to collect, use, and/or disclose your Personal data to the Company, you may have the right to withdraw your consent in some cases.

Nevertheless, withdrawing consent may impact the Company's ability to perform certain aspects of the contract it has with you or, in some cases, may have legal consequences for the Company or you, as it may relate to legal obligations that either the Company or you are required to fulfill. If you wish to gain a better understanding of the implications of withdrawing your consent or if you wish to exercise your right to withdraw consent, you can use the Company's Data Subject Rights Request Form. Please contact the Data Protection Officer (DPO) using the contact details provided below.

- (7) **Deletion or Destroy:** you may have the right to request that the company delete, destroy, or render your Personal Data held by the Company as non-identifiable, unless the retention of such Personal Data by the Company is necessary for legal compliance, establishment of legal claims, or for the exercise or defense of legal rights.
- (8) **Lodge a complaint:** you can complain to a data protection authority or the competent authority where you believe our collection, use and disclosure of your Personal Data is unlawful or noncompliant with applicable data protection law where applicable.

Before the Company proceeds with your rights request, it may be necessary for the Company to verify and confirm the identity of the rights holder. This is done for privacy and security reasons regarding your Personal Data. Therefore, the Company may request you to provide or disclose information for identity verification (e.g., a copy of your ID card, excluding any Sensitive Personal Data). Once the Company successfully verifies your identity, it will promptly proceed with your request. In cases where the Company deems the request to be manifestly unfounded or excessive, the Company may charge a fee for processing the request.

7. Data Security Measure

The Company has implemented appropriate security measures in accordance with applicable laws, including Data Protection laws, to safeguard the security of Personal Data. These measures encompass organizational, technical, and physical safeguards covering various components of information systems related to the processing of Personal Data. The Company considers factors such as risk levels and the nature and purposes of Personal Data processing to ensure that Personal Data remains confidential, accurate, complete, and available for use.

The security measures include controls over access to Personal Data and components of information systems, suitable user access management, assignment of user responsibilities, establishment of audit trails for retrospective examination of access, changes, modifications, or deletions of Personal Data, monitoring and surveillance of threats and Personal Data breaches, and maintenance and recovery of damages resulting from threats or Personal Ddata breaches.

Additionally, the Company has implemented efforts to enhance knowledge and understanding related to Data Protection and security for personnel involved. These measures aim to prevent loss, unauthorized access, use, alteration, modification, or disclosure of Personal Data without authorization and in compliance with the law.

8. Contact us

If you wish to exercise your rights related to your Personal Data or if you have any concerns regarding your Personal Data under this Privacy Notice, please contact the Company or the Data Protection Officer (DPO) of the Company at the following address:

Double A (1991) Public Company Limited

Address: Double A Business Park No. 187/3 Moo.1 Bangna-trad Km.42 Rd, Bangwua sub-district, Bangpakong district, Chachoengsao 24180

Tel: Call Center 1759 or 02-6591234

Data Protection Officer: DPO

Tel: 085-835-4869

Email: dpo@doublea1991.com