# Privacy Policy in relation to the Shareholders' Meeting Vichitbhan Palmoil Public Company Limited

#### **Definition**

- "Company" means Vichitbhan Palmoil Public Company Limited.
- "You" means an owner of the Personal Data such as a shareholder and a proxy.
- "Personal Data Protection Laws" means Personal Data Protection Act B.E. 2562 (2019) and the relevant laws and shall also mean to include any future amendments thereof.
- "Personal Data" means any information relating to a person, which enables the identification of such person, whether directly or indirectly, but not including the information of the deceased persons in particular under Personal Data Protection Laws.

### **General agreement**

The Company recognizes and gives great importance to the protection of your Personal Data in accordance with the Personal Data Protection Laws. This Privacy Policy explains how the Company collects, processes, uses, and discloses Personal Data of persons related to attendance of the Company's shareholders' meetings.

## **Collection of Personal Data**

The Company will collect or receive information directly from you through the registration to attend the meeting, proxy form (if any), copy of card or personal identification documents submitted for registration of meeting attendance and from Thailand Securities Depository Company Limited which may contain your Personal Data as follows:

- 1. General personal information including name, surname, nationality, gender, date of birth, address, telephone number, email, national ID card number, passport no., bank account number, shareholder registration number, number of shares, voice, photos or videos from the video recording at the meeting venue.
- 2. Sensitive personal information, including health information, travel history related to disease screening of the person attending the meeting (only if necessary, for situation of the coronavirus disease or COVID-19 outbreak).
- 3. Information related to electronic systems access and usage such as IP Address (in case of online access to the meeting), etc.
- 4. For shareholders and proxies who have queries during the meeting, the Company may record your name and surname in the minutes of the meeting in which such minutes will be disclosed on the Company's website and submitted to the Stock Exchange of Thailand and the Department of Business Development, Ministry of Commerce and any relevant agencies prescribed by law.

#### Purposes for collecting, storing, using, disclosing, and processing Personal Data

1. For calling, arranging and conducting the shareholders' meeting of the Company, including confirming your identity, delivery of documents to shareholders as has been informed and for carrying out any actions in accordance with the resolutions of the shareholders' meeting, as well as any other acts in compliance with the law, and to comply with orders from competent government agencies in accordance with the Public Limited Companies Act B.E. 2535 (1992) (as amended) and any other laws.

- 2. The Company may disclose the Personal Data to parties or agencies related to the above proceedings e.g., Department of Business Development, Ministry of Commerce, Stock Exchange of Thailand or electronic platform provider, etc. within the scope as provided by the Public Limited Companies Act B.E. 2535 (1992) (as amended) and any other laws.
- 3. For the preparation of minutes of the shareholders' meeting of the Company and as reference evidence for your attendance as well as other matters as necessary for the legitimate interests of the Company.
- 4. For recording of sound/voice, photos and motion pictures of the shareholders' meeting for use in reporting and publicity of the shareholders' meeting via electronic media and publications, which may contain your voice and pictures of your attendance at the meeting but without identifying details on those who has attended the event.
- 5. For public relations or setting up activities of the Company. In this regard, the collection of Personal Data shall be in accordance with legitimate purpose and shall be in the scope of the Personal Data owner's anticipation.

#### How long will the Personal Data be kept

The Company will retain your Personal Data as described in this document for the period of not more than 10 years as from the date of each shareholder's meeting. Once such period has lapsed, the Company will destroy or cause such information to be unable to be used for any identification purposes. Nevertheless, the Company may retain your Personal Data for a longer period if it is necessary for the Company to comply with applicable laws.

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

- 1. Receive directly from you, as shareholder or proxy, through the channels which the Company provides.
- 2. Receive from third party such as shareholder (in case you are a proxy), proxy (in case you are a shareholder) or Thailand Securities Depository Company Limited (TSD) as the Company's securities Registrar as of the latest Record Date.
- 3. Receive from the photos, video and voice records during the shareholders' meeting through electronic meeting (E-AGM). If you do not wish for the Company to publish your pictures/photos, you may inform the Company to request for the suspension of the part related to you.
- 4. Receive automatically upon your giving of orders or use of electronic system of the Company in case of electronic meeting.

In this regard, before you disclose any Personal Data of any third person to the Company, you must inform the owner of such Personal Data to be aware of such disclosure and permit the Company to use such Personal Data under the Privacy Policy in relation to the shareholders' meeting.

## Your rights as the owner of Personal Data

Subject to the applicable laws and notifications in relation to the Personal Data protection, you are entitled to the following rights as the owner of the Personal Data:

- 1. To withdraw consent that was given to the Company for the collection, use, processing or disclosure of your Personal Data;
- 2. To access or request a copy of your Personal Data that is under the Company's responsibility as well as to request for the disclosure of the acquisition of the Personal Data that you have not consented to;
- 3. To request for your Personal Data from the Company as well as to request for the Company to send or transfer your Personal Data to other Personal Data controller;
- 4. To object the collection, use, processing or disclosure of your Personal Data;
- 5. To request the Company to erase, destroy, or cause the Personal Data to become data that cannot be used to identify its owner;
- 6. To request the Company to suspend the use of your Personal Data;
- 7. To request the Company to amend the Personal Data to be accurate, up-to-date, complete, and not misleading.

### **Contacting the Company**

If you have any questions, concerns or wish to exercise your rights, or wish to lodge any complaints in relation to your Personal Data under this Privacy Policy in relation to the shareholders' meeting, please contact the Company or the Company's Data Protection Officer at:

Company Secretary Department
Vichitbhan Palmoil Public Company Limited
No. 2044 Chavananan Building, Petchburi Extension Road,
Bang Kapi Sub-district, Huai Khwang District,
Bangkok 10310
Tel. 02-314-4101-5 ext. 418
E-mail: patinya@vcbpalmoil.com

#### **Security Measures**

The Company has adopted the Personal Data protection system according to "Personal Data Protection Policy" of the Company to prevent the access, change, and destruction without the Company's permission by using the standard security system to protect your Personal Data as well as for the collection, use and/or disclosure of the Personal Data, whether in whole or in part. The Company agrees to operate in accordance with the rights and obligations under the Personal Data Protection Laws.

**Remark:** In the identification documents which you send to the Company such as copy of national identification card or other official documents, you can conceal the sensitive information before sending to the Company, such as information about race, blood type, religion, which is not information necessary for the meeting of shareholders. If you do not conceal such information, the Company will reserve the right to conceal such information on the documents without being regarded as the collection of your sensitive information.