



Personal Data Protection Act Policy

**NR Instant Produce Public Company
Limited**

1. Introduction

NR Instant Produce Public Company Limited, its subsidiaries, and all personnel involved in processing personal data on behalf of NR Instant Produce Public Company Limited, hereinafter collectively referred to as “the company”, recognizes the importance of personal data and information (collectively known as “information”). Individuals can be confident that the company is transparent and responsible in collecting, managing, using, or disclosing information in accordance with the Personal Data Protection Act 2019 and other related laws (collectively known as “personal data protection laws”). Policies that protect personal data (“policies”) were created to clarify details related to data collection, use, or disclosure (collectively, “process”) personal data that is operated by the company including officials and related persons who act on behalf of the company as follows.

2. Scope of Policy Enforcement

This policy applies to personal information of individuals that are related to the company currently and in the future that will be processed by the company, related officials, employees, business units, or any other entity operated by the company, including licensors or other third parties that process personal information on behalf of the company (known as “personal information processors”) for products and services such as websites, systems, documents, or services in other forms that are supervised by the Company, (collectively, “the services”).

Individuals that are related to the company as specified in the first clause includes:

- 1) Individual customers.
- 2) Officers, workers, or employees.
- 3) Partners and service providers.
- 4) Directors, powers of attorney, representatives, shareholders, employees, or other persons with the jurisdiction in the same form as a legal entity in relation to the company.
- 5) Users of the company’s products or services.
- 6) Visitors or users of the website www.nrinstant.com including systems, applications, devices, or other communication channels supervised by the company.
- 7) Other persons with whom the Company collects personal information such as job applicants, employees’ families, guarantor, beneficiary of the insurance policy, etc.

The persons in paragraphs 1) to 6) are collectively referred to as “the person.”

In addition to this policy, the Company may require a notice of the Privacy Policy (“Notice”) for the products or services of the Company to clarify to the subject of personal data, who is a service user, the purpose and legitimate grounds for processing and retaining their personal information, including their rights regarding personal information that is product or service specific.

If there is a conflict between the content of the Privacy Policy of a service and this document, the Privacy Policy of the service will be upheld.

3. Definition

- Personal data means information about an individual by which an individual can be identified whether directly or indirectly but does not include information of the deceased.
- Processing of personal data means any processing of personal data, such as collecting, saving, copying, organizing, preserving, improving, changing, restoring, disclosing, forwarding, publishing, transferring, combining, deleting, destroying, etc.
- Personal data subject means the individual who owns the personal data collected by the company for collection, use, or disclosure.
- Personal data controller means a person or jurisdictions with the authority to make decisions about the collection, use, or disclosure of personal information.
- Personal data processor means a person or a juristic person that collects, uses, discloses personal information in accordance with the orders or on behalf of the data controller but is not the controller of the personal data.

4. The source of personal information collected by the company

The company collects or obtains various types of personal information from the following sources:

- 1) Personal data that the company collects from the personal data subject directly in the service channels such as the process of registering, applying for a job, signing contracts, documents, completing surveys or using service products or other service channels controlled by the Company or when the subject of personal data communicates with the Company at the office or through other communication channels supervised by the Company, etc.
- 2) Information that the Company collects from the personal data subject when they access the website, product or other contractual or mission-based services, such as behavioral tracking of websites, products or the company's services through the use of cookies (Cookies) or from the software on the personal data subject's device etc.
- 3) Personal data that the Company collects from sources other than the Personal Data Subject, where such sources of information have authority, legitimate grounds, or have obtained the consent of the personal data subject in disclosing personal information to the company such as from links to digital services of government agencies to provide comprehensive public benefit services to the subject of personal data and other sources

such as other government agencies. Companies are obligated by their missions to establish an information exchange center to support operations of government agencies in providing services to people through digital systems, including required contractual services where personal data may be exchanged with contracting parties.

This also includes cases where the person is providing personal information of a third party to the Company. As such, the person is responsible for providing details under this privacy policy or the privacy policy of a specific product or service. In this case, it may be required that the said person must obtain consent from the third party if it is a case that requires Consent to Disclosure to the Company.

5. Personal information collection

The company will collect personal information with the consent of personal data subjects in all cases except the following:

1. In the case of a contract where collecting, using, or disclosing personal information is necessary for providing services or performing a contract between both parties.
2. To prevent or suppress danger to life, body, or health.
3. To comply with the law.
4. In a case that is necessary to the Company operations and is legitimate whilst still highly upholding the rights of the personal data subject, for example: fraud prevention, network security protection of rights and freedoms, etc.
5. For research studies or statistics to produce historical documents or archives for the benefit of the public or in connection with research studies or statistics that have provided appropriate safeguards to protect rights and freedoms of information owners.
6. To perform a government mission if it is necessary to perform a mission for the public interest; or perform duties as assigned to the company by government authorities.

In the event that the Company has a necessity to collect personal data for the performance of a contract, the company will perform duties according to the law. If the personal data subject refuses to provide certain services in whole or in part, the company may not be able to provide the desired products and services.

6. Types of Personal Information that the Company Collects

In collecting and storing personal information, the company only uses legitimate methods and only collects necessary information for the objectives of the company such as:

Type of Personal Information	Details and Examples
Personally Identifiable Information	Personally identifiable information includes information on name, surname, date of birth, age, nationality, identification number, signature, position, etc.
Contact information	Contact information such as address, phone number, email, username, etc.
Official document information	Official document information such as copy of identification cards, house registration, passport copy, etc.
Financial information	Financial information such as bank account information or credit card number, etc.
Information collected by the company or other automated services of the company	Information collected by the company or other automated services of the company such as IP Address, Cookie, Service behavior, order history, photos, etc.
Sensitive information	Sensitive personal information, such as race, religious information, disability information, criminal record, biometrics information, health information, etc.

7. Cookies

The Company collects and uses cookies and other similar technologies on websites that are subject to the care of the company such as www.nrintstant.com as well as from devices following the services provided. The purpose of this is to carry out the company’s services securely, conveniently, with better user experience, and to improve the overall user experience. The personal data subject can change their preferences for cookies on their own personal web browsers.

8. Purpose of collecting personal information

The company collects and stores personal information for many purposes that depend on many factors that are dependent on the type of product, service, activity, the relationship between the persons and the company, and the specific context. The purposes that are outlined are the general frameworks for use of personal information of the company but only the purposes of the specific product and service will be enforced.

1. For the entry into a contract or performance of obligations following a contract between the company and the personal information owner or for performance of obligations of a contract with a third party for the benefit of the personal information owner.
2. To answer questions and provide help to information owners.
3. To develop and improve products and services to respond better to the information owners’ preferences.

4. To give information and recommend products, services, or public relations for marketing or benefits through contact channels received from the data owner following the given consent of the data owner in giving information to the company.
5. To survey viewpoints, perform analysis, research, and establish statistics for marketing, product development, and organizational development following given consent to the company.
6. For the benefit of organizational management and internal proceedings of the company in matters that are necessary and legitimate.
7. For investigating and taking care of safety around the grounds and buildings of the company.
8. For proceeding with legal issues related to taxation of the company.
9. To give information to government agencies with the authority to request information such as the National Police Agency, Office of Money Laundering, Revenue Department, the Judicial System, etc.
10. To carry out any accounting and financial activities, such as auditing accounts, reporting and collecting debt for exercising rights, benefits, taxes, and evidence of action to carry out various transactions as required by law.
11. For the legitimate interests of the company such as recording complaints via the call system center or recordings through CCTV cameras.
12. For investigations and proceedings required by law such as regulations and legal duties of the company.
13. For confirmation in client identification.
14. Other purposes that are consented by the personal information holder.

9. Forwarding and Disclosure of Personal Information

The company will not disclose or forward personal information to other parties without the consent of the personal information holder except under these conditions:

1. In order to achieve the purposes stated in this Privacy Policy, the Company may need to disclose or share specific information as needed to business partners, service providers or external agencies, whereby the Company will establish a personal data processing agreement as required by law.
2. The company may disclose or share personal information with its affiliates where the data will be processed only for the purposed stated in this privacy policy.
3. Laws or regulations that require the disclosure of information or the disclosure to government officials or agencies that have the power to instigate a lawful order or request.

10. Transferring or forwarding information to foreign countries

The Company may transfer personal information to foreign countries only when it ensures that the destination country or endpoint has adequate privacy standards and policies.

11. Length of storage of personal information

The company will only store personal information in the timeframe where the information is required for the purposes detailed in this privacy policy, other notices, or following related laws. When the time period of the information stores is over or it is not required for the purposes of the company, the company will delete and destroy personal information and make the information unidentifiable following standards of deletion and destruction of personal information. However, in the event of a dispute, exercise of rights, or lawsuits related to personal information, the company reserves the right to retain that information until the dispute is resolved.

12. Protection of personal information

The company will take technical measures and proper management to protect and maintain security of personal information with encryption for the transmission of information over the Internet and controlled access to personal information only for those involved. This applies to both documentation and electronics.

13. Connections to websites and external services

The company's services may contain links to third party websites or services that have a privacy policy with content that is different to the company's policies. The company recommends that the personal information holder study the privacy policy of that specific website and service to know the details before usage. The company is not related and unable to regulate the privacy policy of the website or the service and is not responsible for the content, policy, damages, or other actions from the website or third-party service.

14. Personal data protection officer

The Company has appointed a Personal Data Protection Officer to be responsible for inspecting, supervising, and giving advice on collecting, using, or disclosing personal information including coordinating and cooperating with the Personal Data Protection Committee to comply with the 2019 Personal Data Protection Act.

15. Protected Rights Under The 2019 Personal Data Protection Act

The following rights are protected under the 2019 Personal Data Protection Act:

1. The right to request access and obtain a copy of personal data.
2. The right to modify information so it is relevant and correct.
3. The right to obtain personal information in the event that the company has made the personal data be in a form that can be read or used in general with tools or equipment that can use or disclose personal information through automated means.
4. The right to request deletion or destruction or make personal data non-personally identifiable when the information is unnecessary or when the subject of personal data withdraws consent.
5. The right to request the suspension of the use of personal data in the cases where the personal data has to be deleted or is no longer necessary.
6. The right to withdraw consent to the processing of information previously provided by the service user.
7. The owner of the personal data has the right to object to the collection, use, disclosure of the personal data provided at any time.

16. Penalties for non-compliance with the personal information protection policy

For company officers or operators, failure to comply with the policy may result in an offense and disciplinary action in accordance with the Company's rules or in accordance with the Personal Data Processing Agreement (for processing personal data) and may be subject to penalties as stipulated by the Personal Data Protection Act B.E. 2562, including relevant secondary laws, rules, regulations, ordinances.

17. Complaints to the Regulatory Authority

In the event that you find that the company has not complied with the law on protection of personal information you have the right to complain to the Personal Data Protection Committee or a supervisory authority appointed by Personal Data Protection Committee or through legal means. However, before making such complaints, the company requests that you please contact the company so that the company has the opportunity to get to know the facts and clarify various issues, including addressing your concerns at the first opportunity.

18. Updates to the Personal Information

The company may consider improving, amending, or changing this policy as it deems appropriate and will notify the personal information subject through the website www.nrinstant.com on the effective date of each amendment.

When using the products and services of the company after the effective date of the amendment, it will be considered that the personal information subject recognizes the new terms of the amendment. But if the personal information subject disagrees with the amendment, the company recommends contacting the company for further clarification.

19. Contacting for enquiries or exercising rights

If you have any questions, improvements, or concerns about data collection and disclosure of personal information by the company or about this policy or if you desire to exercise rights following the law for personal data protection you can contact the following:

1) Data Controller

Name: NR Instant Produce Public Company Limited

99/1, Moo 3, Kaerai, Kratumban, Samut Sakhon, 74110

Phone Number: 034-849576-80

Fax: 034-849586

2) Data Protection Officer: DPO

Contact Location: 99/1, Moo 4, Kaerai, Kratumban, Samut Sakhon, 74110

Email: dpo@nrinstant.com

To exercise your right as personal information holder, the following information should be notified to the DPO:

- Name, Surname, Identification Number/Passport Number
- Question about personal information and rights following the law
- Telephone, address, email that can be contacted

This privacy policy has been approved by the Board of Directors of NR Instant Produce Public Company Limited, effective from August 13, 2021, onwards.