



## General Data Protection Policy

To direct and support the data protection of the company to the clients, shareholders, employees and other related personnel and to be in accordance with business regulation, law and other related regulation, Chotiwat Manufacturing Public Company Limited, hereinafter refer to as “The Company”, has approved the policy for data protection in order to provide rules, supervising measure and data control in a correct, clear and proper manner.

The company has stipulated the Data protection policy for practice as follows.

### 1. Jurisdiction of application

This data protection Policy applies to Chotiwat Manufacturing Public Company Limited and its employees, officers, clients, partners and other agencies or personnel who are responsible for collection, utilization and processing data according to or in the name of the company.

### 2. Definition

Word	Definition
Company	Chotiwat Manufacturing Public Company Limited and its subsidiary
Director	Director of Chotiwat Manufacturing Public Company Limited
Board of directive	Board of directive of Chotiwat Manufacturing Public Company Limited
Shareholder	Shareholder of Chotiwat Manufacturing Public Company Limited
Data controller Committee	Data controller Committee of Chotiwat Manufacturing Public Company Limited (CMC DCC)
Data	Any related or may related data which are general data that contain personal data, directly or indirectly, for example Company registration, examination certificate, information of an individual that could identify said individual directly or indirectly such as name I.D. number geolocation or one or several specific factors in regard to physical appearance, genetic trait, mind, economic , culture and social of that individual and also includes any information related to the individual that can be used to identify aforementioned individuals (personnel data and general data). Data that exempt from this definition are data that does not contain personnel information such as temperature of a freezer, number of needles in the infirmary etc.
Data owner	An individual whose identity can be identified which is a person who can be identified whether directly or indirectly especially by referencing from a source that can specifically identify an identity such as name I.D. number location online identity or one or more factors that can be specified in regard of physical appearance, genetic identity, thought, economic, culture and social of that individual

<b>Word</b>	<b>Definition</b>
Data Controller	An individual or juristic person who has the authority to decide on data collecting, utilization and processing
Data Processor	An individual or Juristic person who operate the task of Data collection, Data Utilization and Data Processing with authorization from or act on behalf of Data Controller
Data Protection officer	Data Protection officer of Chotiwat Manufacturing Public Company Limited (CMC DPO) who act as Data Protection person of The Company to ensure the conformity with and non-violation of Personal Data Protection Act
Data Processing	Any operation or set of operation which process personal data or set of personal data whether with automatic means or not for example collection, recording, organising, infrastructure planning, safe-keeping, alteration, back-tracing, researching, Utilization, disclosing by forwarding, spreading or other means which made accessible to collection or compilation, access restriction to deleting or destroying
Data Processing restriction	The process of marking that specifies personal data with the purpose of restricting the extent of Data Processing in the future.
Profiling	Any form of personal data processing which consist of utilizing the personal data for certain aspect of individual evaluation which relate to the individual specifically in term of analytic or forecasting work efficiency, economic status, health, personal preference, interest, beliefs, location or movement of that individual
Pseudonymization	Data processing in which the personal data of an individual cannot be used to identify an individual without extra information under the condition that the extra information will be kept separately and remain under the control of technical measure and organisational management ensuring that the extra information will not be used to specify an individual who has been identified or can be identified
Consent	An indication of the will of the individual whose information is being processed, has announced or clearly stated, on free-will, has been specifically chosen, has been informed in clear-manner, showing that the individual agrees to the data processing of its personal data
Health Data	Personal Data relating to physical health or mental health of an individual, including procurement for public health service which disclose the health status of the individual

Word	Definition
Genetic Data	Personal Data relating to inherited or non-inherited genetic attribute which provide especially specific data about physical attributes or health of the individual and specifically the result from analysis of bio-organic sample of the individual
Biometric Data	Personal Data which is a result from specific technical processing procedure relating to physical attribute, anatomy or personal trait of an individual which can identify or confirm identity of the individual such as picture

### 3. Personal and General Data Protection Governance

3.1 The Company shall provide proper structure and mechanic for governing personal data protection and general data according to law as follows

3.1.1 Clearly assign organizational structure including role, mission organisation and its operator’s responsibility to provide governing measure, regulation, responsibilities, operation, enforcement and keep track of conformity of the data protection measure with the law and data protection policy of the company

3.1.2 Appoint Data Controller committee (DCC) and Data Protection officer (DPO) with role and responsibility as according to data protection policy of the Company

3.2 The Company shall provide policy, standards, guidelines, procedures and other related data protection document in conformity with the law and data protection policy

3.3 The company shall provide policy-enforcement management procedure for governing the constant conformity with the law and data protection policy

3.4 The Company shall provide constant training for employees of the Company so that the employee of the Company is aware of the importance of data protection and ensure that the employee is well informed in data protection and able to follow data protection policy of the Company.

### 4. Personal and General Data Keeping, Collecting, Using and Processing

4.1 The Company will keep, collect, use and process data as Data Controller and Data Processor in accordance with law with fair, transparent, legitimate and take Data Owner’s rights into account. Moreover, the Company will assign the extent and purpose of data keeping data collection and data Processing and data processing duration as necessary or according to the Company’s mandate or according to the standard or as according to the law and under the rightful purpose of the law and operation guideline of the company for Data that the company keep collect use and process by sufficiently and properly preserving secret, authenticity and security of the data

4.2 The company shall provide procedure, regulation and data management in every procedure in conformity with the law and data protection policy of the Company

4.3 The Company shall keep and record all related Data keeping, collection and processing in conformity with the law, including improving the data keeping, collection processing when changes are made in related activities

4.4 The Company shall assign a measure that ensure a clear procedure for informing the purpose of keeping, collection, processing and consent from data owner is conform with the law and provide keeping, safe-guarding and examination of aforementioned procedures

4.5 The Company shall arrange a mechanism for inspection the validity of the data as well as mechanism for rectification the validity of data

4.6 The company shall arrange for a contract or agreement for receivers for data keeping, collection and processing to dictate the rights, duties and responsibilities in case that the data needed to be sent or transferred in conformity with the law.

4.7 If the need to send the data to foreign country had arisen, the company shall proceed in conformity with the law and every measure relating to data of the end-receiver's country. The Company shall destroy the data or proceed with pseudonymization when the determined period for data keeping had been reached and keep in conformity with the law and Business conduct of the Company

#### 5. The Data protection policy in term of Data Subject Right authentication

The Company shall provide measure, guideline and manual for the data owner to access their data and obtaining copy of personal data under the responsibilities of the Company or upon request of the owner to disclose the mean of obtaining the data which the owner have provided consent and also including keeping collect and assess the response to the request of the data owner.

The Company must proceed upon the request of the owner no later than 30 days from the request date. The Company can deny the aforementioned request but only under the terms and conditions of law and court's order or the request could jeopardize the rights and freedom of other individual

#### 6. The Data protection Policy in term of personal data security

6.1 The Company shall provide proper and sufficient security measure including data leak protection and infringement from unauthorized access to the data

6.2 The Company shall provide Personal Data incident management and response to abnormal situation to ensure the identification and handling abnormal situation as the law stipulated

6.3 The Company shall arrange for measure to inform Data owner as well as government official Data Controller (in case that the Company act as Data Processor) and other related personnel in conformity with the law

#### 7. The Data protection policy in term of General Data Protection compliance

7.1 The Company shall set up governing measure in case that there are changes in the law or application of other related law and constantly improve the measure for data protection to conform with the law and up to date

7.2 The Company shall constantly revise and improve the policy, standards, guidelines, procedure, work practice and other data protection related document data to be up-to-date, in conformity with the law and changing circumstances

#### 8. Roles Duties and Responsibilities

8.1 Director have roles, duties and responsibilities as follow

8.1.1 Overseeing the arrangements of data governing structure and interior control policy in conformity with the law and Data protection policy of the Company

8.1.2 Governing and supporting the agency in accordance with data protection policy of the Company and proceed to, efficiently and in conformity with the law, protect Data and to promote awareness among the employees

8.2 The data control committee of the Company (CMC DCC)

The data control committee is tasked with Data risk management with Roles duties and responsibilities as follows.

8.2.1 Provide governing structure and internal control including abnormal situation management and response to ensure the identification, assessment and handling of the abnormal situation regarding to data within the time frame as according to the law

8.2.2 Assess the efficiency of Data protection policy of the Company's enforcement and constantly report on the directive including governing risk management regarding the data which will be received and assign proper risk management measure.

8.2.3 Assign and revise standards and guidelines so that the Company's proceeding to be in conformity with the law and data protection policy of the Company

8.2.4 Appoint Data protection officer of the Company

8.3 The Data Protection officer is tasked with following roles, duties and responsibilities

8.3.1 Constantly report to the situation of data protection to the committee and provide suggestion for improving data protection policy to be up-to-date and in conformity with the law

8.3.2 Provide advice for employees of the Company about abiding to the law and data protection policy of the Company

8.3.3 Monitor the proceeding of the Company to be in conformity with the law and data protection policy of the Company

8.3.4 Attend risk assessment along with data control committee of the Company

8.3.5 Act as communication hub between the government official such as the office of Personal Data Protection Committee Office of the Personal Data Protection Commission – PDPC Office of the Information Audit Committee, Office of the Public Sector Personal Protection Commission relating to data protection

8.3.6 Contact with external organisation institute and entity relating to data protection

8.4 Employee of the Company is tasked with following Roles Duties and responsibilities

8.4.1 Conduct in accordance with data protection policy of the Company work conduct standard, workplace conduct, workplace procedure and other documents relating to the data protection

8.4.2 Report any abnormal incident about data protection and failure to abide by the law and data protection policy of the Company to authoritative figures.

9. Penalty for failure to comply with data protection policy of the Company are as follows

Failure to comply with data protection policy of the Company may result legal liability and disciplinary action from the Company as well as penalty of law.