

Translation Version

Private Policy

NFORCE-PL-MGT-034

On June 1, 2022

1. Introduction

nForce Secure Public Company Limited (hereinafter referred to as the “**Company**”) recognizes the importance of Personal Data and other information relating to You (collectively referred to as the “**Information**”). The Company has prepared this privacy policy (this “**Policy**”) to ensure that the Company is transparent and has the responsibility in collecting, using or disclosing Your Information according to the Personal Data Protection Act B.E. 2562 (“**PDPA**”) including other related laws. This Policy has been prepared to inform you of the details relating to the collection, use or disclosure (collectively referred to as the “**Processing**” or “**Processed**”) of personal data by the Company including officers, related parties, representatives, or authorized persons of the Company.

2. Scope of this Policy

This Policy shall be used for Personal Data, of a person having present and potential future associations with the Company, which has been Processed by the Company, officers, contracted employees, business units of the Company or other units operated by the Company, including contracting parties or third parties Processing the Personal Data for or on behalf of the Company (the “**Processor**”) under the goods and services monitored by the Company, such as the Company’s websites, systems, applications, documents or other forms of services (the “**Services**”).

A person having associations with the Company in the first paragraph, includes:

- 1) Clients who are natural persons;
- 2) Officers or operators, employees;
- 3) Business partners and service providers who are natural persons;
- 4) Directors, authorized persons, representatives, agents, shareholders, employees or other persons who have the same form of associations that juristic persons have with the Company;
- 5) Users of the goods or services of the Company;
- 6) Visitors or users of www.nforcesecure.com, including systems, applications, tools, or other communications channels controlled by the Company; and
- 7) Other persons’ Personal Data collected by the Company, such as job applicants, family members of officers, guarantors, beneficiaries in insurance policies, etc.

Items 1) to 6), collectively as “**You**” or “**Your**”.

In addition to this Policy, the Company may publish privacy policy notification(s) (the “**Notification**”) for the goods or services of the Company to specifically inform the Data Subjects who are users of their Personal Data being Processed, the purposes and legal grounds for the Processing, duration of storage of Personal Data, including rights to the Personal Data that the Data Subjects may have in such goods or services.

In this regard, in the event of inconsistency between the provisions of the Notification and this Policy, the provisions of the Notification shall prevail.

3. Definitions

- **Company** means NForce Secure Public Company Limited;
- **Personal Data** means the information relating to natural persons which are able to, directly or indirectly identify such natural persons, but excluding information of deceased persons;
- **Sensitive Data** means the Personal Data as specified in Section 26 of the PDPA which are information on the ethnicity, race, political opinion, cult, religion or philosophy, sexual behavior, criminal record, health, disability, labor union, genetic, biology, or any other information which affects the Data Subject in the same manner as specified in the notification of the Personal Data Protection Committee;
- **Processing of Personal Data** means any proceedings with Personal Data, such as collecting, recording, copying, structuring, storage, adaptation, alteration, use, retrieval, disclosure, transmitting, disseminating, transfer, combining, erasing or destructing, etc;
- **Data Subject** means a natural person who is the owner of the Personal Data collected, used, or disclosed by the Company;
- **Controller** means a person or juristic person authorized to make decisions on the collection, use or disclosure of the Personal Data; and
- **Processor** means a person or juristic person proceeded with the collection, use or disclosure of the Personal Data on the instruction or on behalf of the Controller. Such person or juristic person is not a Controller.

4. Sources of Personal Data collected by the Company

The Company collects or obtains types of Personal Data from the following sources:

- 1) Personal Data collected by the Company from the Data Subjects directly through various service channels, such as through application procedures, registrations, job applications, document signings, surveys, or use of goods or services, or other service channels monitored by the Company, or when the Data Subject contacts or communicates with the Company at operating place or other contact channels monitored by the Company, etc.;

2) Information collected by the Company from the Data Subjects who use other websites, goods or services pursuant to the contracts or obligations. Such as behavior monitoring of use of websites, goods or services of the Company through the use of cookies or software on devices of the Data Subjects, etc.; and

3) Personal Data collected by the Company from sources other than from the Data Subjects, and such sources are authorized with legitimate reasons or consents of the Personal Data to disclose the Information to the Company.

Moreover, this includes an event where You provides the Personal Data of a third party to the Company. In this case, You are responsible for notifying such third party of the details relating to this Policy or Notification of the goods or services (as the case may be), as well as to obtain consents from such third party where consent is required for the disclosure of Information to the Company.

In the case that the Data Subject refuses to provide any Information which are necessary for the Company to perform the Services, this may entirely or partly prevent the Company from providing Services to such Data Subjects.

5. Legal grounds for the collection of Personal Data

The Company establishes legal grounds for the collection of Your Personal Data in accordance with the appropriateness and context of provisions of the Services, which may consist of information on Your nationality, religion or philosophy, health, biology, handicap, disability, identity, or any other information beneficial to the provisions of Services. To proceed the collection of the aforementioned information, the Company will request for Your consent before proceeding with any collection, unless:

5.1 it is necessary to prevent or suppress harm to a person's life, body or health;

5.2 it is necessary to perform obligations under the contracts to which the Data Subject is the party or to perform as requested by the Data Subject before entry into such entry;

5.3 it is necessary to perform obligations for the public interest of the Controller;

5.4 it is necessary for legitimate interests of the Company or other persons or juristic persons other than the Company;

5.5 it is for legal compliance, such as the PDPA, the Electronic Transactions Act B.E. 2544 (and its amendments), the Social Security Act B.E. 2533 (and its amendments), the Anti-Money Laundering Act B.E. 2542 (and its amendments), Civil and Commercial Code, Criminal Code, and the Civil and the Criminal Procedure Codes, etc.; and

5.6 it is for Your interests and the consent cannot be obtained during that time.

In the case that the Company is required to collect Your Personal Data to perform duties under the contracts or the laws, or as necessary to enter into contracts, if You refuse to provide the Personal Data or object the Processing pursuant to the purposes of such collection, this may result in the Company being unable to proceed or provide Services as requested by You in whole or in part.

6. Types of Personal Data collected by the Company

The Company may collect or obtain the following Information, which may include Your Personal Data depending on the Services that You use or the context of associations You have with the Company including other considerations that apply to the collection of Personal Data. The types of Information listed below are merely the general framework for collecting Personal Data of the Company and is specifically applicable to the Information relating to the goods or services that You use or associate with only.

6.1 personal information, such as Information that identifies You or Information from official documents that identify You personally, such as Your title, name, middle name, nickname, signature, national identification number, nationality, driving license number, passport number, house registration details, license number, professional license number (for each profession), identification number, insured social security number as an insured person, social security number, etc.;

6.2 information regarding the characteristics of a person, Information and details relating to You, such as Your date of birth, gender, height, weight, age, marital status, military service status, picture, spoken language, behavioral data, preferences, bankruptcy information, information on being incompetent or quasi-incompetent, etc.;

6.3 contact information, such as home phone number, mobile phone number, fax number, e-mail address, home postal address, username in social networks (Line ID, MS Teams), location map of the accommodation, etc.;

6.4 information relating to work and education, such as employment history including work experiences and educational records, such as type of employment, profession, title, position, responsibility, expertise, work permit status, referral information, tax payer identification number, tenure history work history, salary information, start date, leave date, assessment results, welfares and benefits, items in the possession of the workers, work, bank account number, educational institutions, educational qualifications, educational results, graduation date, etc.;

6.5 information relating to insurance policies, details about operator of the insurance policies, such as the insurer person, beneficiary, insurance policy number, policy type, insured amount, Information about claims, etc.; and

6.6 sensitive Personal Data, Your Personal Data which are sensitive, such as race, religion, disability information, political opinion information, criminal records, biological data (photographic data), health information, etc.

7. Cookies

The Company collects and uses cookies including other similar technologies on the websites under the supervision of the Company, such as www.nforcesecure.com or on Your devices depending on the type of Services You use. The cookies are used for the safety in provision of Services of the Company, and for You, as the user, to have a convenient and good experiences in using the Company's Services. The collected Information will be used to improve the Company's website to better meet Your needs and You can manually set or delete the use of cookies from the settings in Your web browser.

8. Personal Data of a minor, and incompetent and quasi-incompetent person

In the case that the Company becomes aware that the Personal Data to which consent is required to be obtained belongs to the Personal Data of a minor, incompetent or quasi-incompetent person, the Company will not collect such Personal Data until the consent has been obtained from the guardian, custodian or curator, as the case may be and as prescribed by laws.

In the case that the Company did not know beforehand that the Personal Data belongs to the minor, or incompetent or quasi-incompetent person, and later found that the Company has collected the Information of such Data Subject without the consent of the guardian, custodian or curator, as the case may be, the Company will delete and destroy the Personal Data as soon as possible if the Company does not have any other legal grounds other than consent for the collection, use or disclose such Information.

9. Purpose for the collection of Personal Data

The Company collects Your Personal Data for various purposes depending on the type of goods or services, or activities You use, as well as your association with the Company or consideration to be considered in each context. The following purposes are merely the general framework for the use of Personal Data of the Company only the purposes related to the goods or services that You use or are associated with:

9.1 to carry out the necessary actions for the public interest that the Company has been entrusted to or is necessary to exercise the legal powers that the Company has the authority to perform;

9.2 to provided services and management of the Company, including Services under this Agreement owe to You or obligations of the Company;

9.3 to carry out the business of the Company;

9.4 to monitor, use, follow-up and inspect, and manage the Services to facilitate and meet Your needs;

9.5 to store and improve Information relating to You, including documents with references to You;

- 9.6 to record Processing report as required by laws;
 - 9.7 to analyze Information, including to resolve problems relating to the Company's Services;
 - 9.8 to carry out the necessary actions in the management within the organization, including job applications, nomination of directors or persons holding various positions, and assessment of qualifications;
 - 9.9 to prevent, detect, avoid and identify fraud, security breach, prohibited or illegal actions which may cause damage to both the Company and the Data Subject;
 - 9.10 to verify Your identity and Information when You apply for the Company's Services or contact the Service or use Your legal rights;
 - 9.11 to improve and develop the quality of the goods and services to be up-to-date;
 - 9.12 to assess and manage risks;
 - 9.13 to send notifications, order confirmations, communications, and to communicate and notify news to You;
 - 9.14 to prepare and deliver related and necessary documents or Information;
 - 9.15 to verify Your identity, or to prevent spam or unauthorized or illegal actions;
 - 9.16 to examine how the Data Subjects access and use the Company's Services, both collectively and individually for research-related purposes and analysis;
 - 9.17 to take the necessary actions to perform the obligations that the Company has with the regulatory authorities, tax authorities, law enforcements, or legal obligations of the Company;
 - 9.18 to take any necessary actions for the legitimate interests of the Company, others, or other juristic persons related to the operation of Digital Government Development Agency. (Public Organization) (DGA);
 - 9.19 to prevent or stop harm to life, body or health of persons, including epidemic surveillance;
 - 9.20 to prepare historical documents for the public benefit, researching or producing statistics that the Company has been assigned to conduct; and
 - 9.21 to comply with the applicable laws, notifications, ordinances, or proceedings relating to litigations, subpoenas, including the exercise of rights relating to Your Information.
10. Type of persons to whom the Company discloses your Personal Data to

Subject to the purposes as specified in Clause 9 above, the Company may disclose Your Personal Data to the following persons. In this regard, the type of the following recipients of such Information are

just the disclosure framework of the Company's Personal Data and applicable only to the recipient of Information which relates the goods or services that You use or are associated with.

10.1 Government agencies or authorized persons to whom the Company is required to disclose Information for the purpose of legal proceedings or other important purposes (such as public interest purposes), law enforcement agencies or agencies with the power to control and supervise or other important objectives, such as the cabinet, the acting minister, the department of provincial administration, the revenue department, the police office, the court, the public prosecutor's office, the disease control department, the ministry of digital economy and society, the office of the permanent secretary, the office of the prime minister, department of consular affairs, student loan fund, etc.

10.2 Various committees relating to the Company's legal proceedings. The Company may disclose your Information to persons holding director positions in various committees, such as the Nomination Sub-Committee, and the Personal Data Protection Committee, etc.

10.3 Contracting parties that deal with the welfare of the Company's workers, third parties that the Company has procured to operate on welfare, such as insurance companies, hospitals, payroll companies, banks, telephone service providers, etc.

10.4 Business partners, whereby the Company may disclose Your Information to persons working with the Company for the benefit in providing Services to You, such as service providers that You contact through the Company's Services, vendors, partners, service providers in marketing, advertising media, financial institutions, platform provider, and telecommunication service providers, etc.

10.5 Service providers, whereby the Company may assign another person to be a service provider instead or to support the Company's operations, such as storage service providers (e.g. cloud and document warehouses), system developers, software applications, websites, document delivery service providers, payment service providers, internet service providers, telephone operator, digital ID service provider, social media service provider, risk management service provider, external consultant, transport service providers, etc.

10.6 Other recipients of Information whereby the Company may disclose Your Information to other recipients of Information, such as the Company contacts, family members, non-profit foundations, temples, hospitals, educational institutions, or other agencies, etc., for the purposes of the Company's Services, training, awarding, making merit, donating, etc.

10.7 Public disclosure whereby the Company may disclose Your Information to the public where necessary, for example, to make announcement on the Investor Portal as required.

11. Transmission or transfer of Information to third countries

In some cases, the Company may be required to transmit or transfer Your Personal Data to other countries for the purposes of providing Services to You, such as to transmit the Personal Data to cloud system with a platform or server located in other countries (such as Singapore or the United States of America, etc.) to support the telecommunication system located outside of Thailand depending on the Company's Services that You use or associated with in each activity.

When the Company is required to transmit or transfer Your Personal data to the destination country, the Company will ensure that the transmitted or transferred Information receive adequate personal data protection in accordance with the international standards, or carry out actions according to the following conditions in order to be able to transmit or transfer that Information in accordance with the laws:

11.1 it is in compliance with the laws that require the Company to transmit or transfer Personal Data abroad;

11.2 the Company has informed You and obtained Your consent in the event that the destination country has insufficient standards for Personal Data protection in accordance with the announcement of the list of countries announced by the Personal Data Protection Committee;

11.3 it is necessary to perform the contract which You are a party to the Company or to fulfill Your request prior to entering into that contract;

11.4 it is an act according to the Company's contract with another person or juristic person for Your benefit;

11.5 to prevent or suppress harm to Your life, body or health or that of another person if You are unable to give consent at that time; or

11.6 it is necessary to carry out actions for the benefit of the public.

12. Duration for storing Your Personal Data

The Company will store Your Personal Data only for as long as that Information is necessary for the purpose for which it was collected as detailed in this Policy, the Notification, or related laws. However, after the expiration of the period and Your Personal Data is no longer necessary for the said purpose, the Company will delete and destroy Your Personal Data or make Your Personal Data more unidentifiable in accordance with the forms and standards for the destruction of Personal Data that the Board of Directors or laws will announce or in accordance with international standards. However, in the event of a dispute in exercising rights or lawsuits related to Your Personal Data, the Company reserves the right to continue to maintain that Information until the dispute has been finalized by an order or judgment.

13. Providing services by third parties or sub-providers

The Company may assign or procure third parties (Processor) to process the Personal Data for or on behalf of the Company. Such third parties may offer services in various ways, such as hosting (hosting), sub-services (outsourcing), or as a cloud computing service/provider or as a work in other form of outsourcing.

Before assigning a third party to process the Personal Data as the Processor, the Company will provide an agreement specifying the rights and obligations of the Company as the Controller and of the person assigned by the Company as the Processor. Such agreement will include details of the types of Personal Data that the Company has assigned for the Processing, including the purposes, scope of the Processing of the Personal Data and other related agreements in which Processor is obliged to process specifically to the extent specified in the agreement and order of the Company and cannot be processed for other purposes.

In the event that the Processor assigns a sub-processor (Sub-Processor) to process Personal Data on for or on behalf of the Processor, the Company will direct the Processor to provide documented agreement between the Processor and the Sub-Processor in the form and standard that is no less favorable than the agreement between the Company and the Processor.

14. Security of Personal Data

The Company has measures to protect Personal Data by limiting the right to access to the Personal Data to specific officers or authorized or designated persons who have the need to use such Information for the purposes as notified to the Data Subject. Such persons must strictly adhere to and comply with the Company's privacy protection measures, as well as have the duties to maintain the confidentiality of Personal Data that they know from the performance of their duties. The Company has measures for Information security, both organizational and technical measures that meet international standards and in accordance with the notification of the Personal Data Protection Committee.

In addition, when the Company transmits, transfers or discloses the Personal Data to third parties whether for the provision of Services in accordance with the obligations, contracts, or other forms of agreements, the Company will determine Personal Data security and confidentiality measures that are appropriate and in accordance with the law to ensure that Personal Data collected by the Company will always be secured.

15. Connecting to external websites or services

The Company's Services may contain links to third-party websites or services. Such websites or services may have a personal data protection policy that is different from this Policy. The Company recommends that You study the privacy protection policy of those websites or services before using them. In this regard, the Company is not associated and has no control over the privacy protection measures of such websites or services, and cannot be held responsible for the content, policies, damage or actions caused by third party websites or services.

16. Your rights under the PDPA

The PDPA provides for a number of rights of the Data Subject. These rights will come into effect when the laws on this right come into force. The details of various rights are as follows:

16.1 Right to request for access to Personal Data. You have the right to request access, receive a copy and request for disclosure of the origin of the Personal Data that has been collected by the Company without Your consent, unless the Company has the right to refuse Your request on grounds of law or court order, or in the event that the exercise of your rights will have an effect that may cause damage to the rights and freedoms of others;

16.2 Right to request for correction of Personal Data for completion and up-to-date. If You find that Your Personal Data is inaccurate, incomplete or not up-to-date, You have the right to request amendments to make them accurate, current, complete and not misleading;

16.3 Right to delete or destroy Personal Data. You have the right to request the Company to delete or destroy Your Personal Data, or to make Your Personal Data unidentifiable as to who is the Data Subject of such Personal Data. However, the exercise of the right to delete or destroy this Personal Data shall be subject to the conditions as prescribed by law.

16.4 Right to request for suspension of the use of Personal Data. You have the right to request for suspension of the use of your Personal Data in the following cases:

16.4.1 during the period of time that the Company conducts an investigation at the request of the Data Subject to correct, complete and update the Personal Data;

16.4.2 the collected Personal Data of the Data Subject is unlawfully collected, used or disclosure;

16.4.3 when the Personal Data of the Data Subject no longer needs to be kept in accordance with the purposes for which the Company has informed for the collection, but the Data Subject wishes the Company to keep that Information for the purposes of exercising legal rights; and

16.4.4 during the period of time which the Company is proving the lawful grounds for the collection of Personal Data or investigate of the need to collect, use or disclose the Personal Data for the public interest due to the Data Subject has exercised the right to object to the collection, use or disclosure of Personal Data;

16.5 Right to object to the Processing of Personal Data. You have the right to object to the collection, use or disclosure of Personal Data about You, unless the Company has the lawful grounds for refusing such request (for example, the Company can demonstrate that the collection, use or disclosure of Your Personal Data is a more legitimate ground, or is for the establishment of legal claims, for legal compliance, or exercise of legal claims, or for the public benefit of the Company);

16.6 Right to withdraw consent in the event that You have given consent to the Company in collecting, using or disclosing Personal Data (regardless of whether that consent was given before or after the PDPA). You have the right to withdraw Your consent at any time throughout the period Your Personal Data is kept by the Company, unless there is a legal limitation requiring Company to keep the Information, or there are still contracts between You and the Company which are beneficial to You; and

16.7 Right to request for receipt, transmission or transfer of Personal Data. You have the right to receive your Personal Data from the Company in a form that can be read or generally used by means of automated tools or devices, and that Personal Data can be used or disclosed by automated means. In addition, You may request the Company to transmit or transfer the Information in such form to other Controllers. However, the exercise of this right must be under the conditions as prescribed by law.

17. Penalties for non-compliance with this Policy

Failure to comply with this Policy may result in an offense and subject to disciplinary action in accordance with the Company's rules (for officers or operators of the Company) or pursuant to personal data processing agreements (for Processors), depending on the case and relationship you have with the Company and may be subject to penalties as prescribed by the PDPA including secondary laws, rules, regulations, and relevant orders.

18. Complaints to supervisory authorities

In the event that You find that the Company does not comply with the laws on personal data protection, You have the right to complain to the Personal Data Protection Committee or a supervisory authority appointed by the Personal Data Protection Committee or by law. In this regard, before making such complaints, the Company would like you to contact the Company so that the Company will have an opportunity to know the facts and clarify various issues, as well as to resolve your concerns at the first opportunity.

19. Amendments to this Policy

The Company may consider improving, amending or change this Policy at its discretion, and the Company will notify you through the website www.nforcesecure.com with the effective date of each revised version. However, the Company encourages You to check regularly for new policies through specific channels for activities carried out by the Company, especially before You disclose Personal Data to the Company.

Access to the Company's goods or services after the enforcement of the new policy shall be deemed to be an acknowledgment of the terms in the new policy. Please stop using the goods or services if You do not agree with the details in this Policy and please contact the Company for further clarification.

20. Contact for inquiries or use of rights

If You have any questions, suggestions or concerns about the Company's collection, use and disclosure of Personal Data, about this Policy, or if You want to exercise your rights under the personal data protection laws, You can contact:

- 1) by email to the Company at: pdpa@nforcesecure.com
- 2) by telephone to the Company at: 02-274-0984 ext 558
working hours: Monday to Friday from 9.00 a.m. to 6.00 p.m.