

# **Personal Data Protection Policy (PDPA)**



**THAI AUTO TOOLS AND DIE PUBLIC COMPANY LIMITED**

**("The Company") and Subsidiaries ("Group")**



## Personal Data Protection Policy (PDPA)

Thai Auto Tools and Die Public Company Limited (“**the Company**”) recognizes the importance of personal data and other information relating to data subjects (collectively referred to as “data”) so that data subjects can have confidence that the Company is transparent and responsible in collecting, using, or disclosing data in accordance with the Personal Data Protection Act, B.E. 2562 (2019) (“Personal Data Protection Act”), as well as other relevant laws, with the following key points:

### 1. Definitions

Personal data	means	information concerning individuals that makes it possible to identify them, whether directly or indirectly, but excluding information specifically about deceased persons.
Sensitive personal data	means	personal data as defined in Section 26 of the Personal Data Protection Act, B.E. 2562 (2019), consisting of information on race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal history, health information, disability, trade union information, genetic information, biometric information, or any other information that similarly affects the data subject as determined by the Personal Data Protection Committee.
Personal data processing	means	any operation involving personal data, including collection, storage, copying, organization, storage, updating, modification, use, recovery, disclosure, transmission, publication, transfer, merging, deletion, and destruction, etc. of data.
Personal data subject	means	a natural person who owns the personal data that the company collects, uses, or discloses.
Data controller	means	a person or legal entity with the authority to make decisions regarding the collection, use, or disclosure of personal data.
Personal data processor	means	an individual or legal entity that carries out activities related to the collection, use, or disclosure of personal data pursuant to the instructions of or on behalf of the data controller and is not a data controller.



## 2. Personal data is collected as follows:

General personal data:

- Personal data includes first and last name, information stated on national identity cards and passports, copies of identity cards, or national identity card numbers.
- Contact information, including addresses, phone numbers, emails, and workplace information.
- Job titles, departments, or organizations.
- Information regarding electronic system usage, including email addresses, IP addresses, browser information, and conversation history across various applications.
- Information provided by the data subject when they contact or participate in any activity with the Company, etc.

## 3. Personal data is obtained from data subjects via two channels as follows:

3.1 The Company receives personal data directly from data subjects, by which the Company collects personal data from data subjects through the following service processes:

- The process of contacting the Company to receive services, including in the submission of requests to exercise various rights with the Company, as well as in the procedures for applications, registrations, job applications, price quotations, contract signing, survey forms or use of products, services or other service channels under the control and supervision of the Company, or whenever the data subject contacts and communicates with the Company at the place of business or via other contact channels controlled by the Company, etc.
- Through the voluntary consent of the data subject in completing a survey or interacting via email or other communication channels between the Company and the data subject .
- Information that the Company collects from data subjects when they access the website, products, or other services pursuant to contracts or missions, e.g., behavior tracking in the use of websites, products or services by the use of cookies or software installed on the data subjects' devices.



**3.2** The Company also collects personal data from other sources other than the data subjects, provided such data sources have legal justification or consent from the data subjects for the collection of such data, which are disclosed to the Company. This includes publicly available information disclosed by the data subject themselves on platforms. (In cases where the data subject provides the Company with the personal data of third parties, the data subject has the duty and responsibility to explain the details in this policy or product or service announcements, depending on the case, to the affected persons for acknowledgement and to seek consent from such individuals in cases that require consent for disclosure to the Company.).

#### **4. Data Processing Purposes**

- 4.1 For supplying or selling products, or providing or receiving services in various forms.
- 4.2 For financial and tax transactions related to the Company's compliance with contract terms.
- 4.3 For the purpose of creating a database for the analysis and presentation of any services or products of the Company and the Group, or individuals who are distributors, agents, or related to the Company.
- 4.4 For improving the quality of operations, services, and business-related activities of the Company.
- 4.5 For analyzing and monitoring website usage, and for retrospective investigation in case of usage problems.
- 4.6 For participation in various Company activities.
- 4.7 For the purpose of controlling access, preventing and mitigating harm to the life, body, or health of data subjects or other individuals, including controlling and preventing infectious diseases, and for the benefit of maintaining security of Company buildings, building interiors and premises.
- 4.8 For the purpose of complying with all laws and regulations applicable to the Company, both now and in the future.

The personal data that the Company collects for the purposes mentioned above are crucial and necessary to fulfill contractual obligations or to comply with applicable laws. Failure to provide the necessary personal data by the data subject may constitute a violation of the law, or may cause the Company to be unable to manage contracts or facilitate necessary procedures for the data subject.



If there are any subsequent changes to the personal data collection purposes, the Company will notify data subjects and take any other actions as required by law, including maintaining a record of any amendments as evidence.

## **5. Personal Data Processing**

Upon receiving personal data from a data source, the Company will proceed as follows with the personal data of the data subjects:

- Compile contact information to offer products and services on servers, as well as necessary data for making sales contracts, to store on the Company's database servers.
- Use such data to contact and offer interesting products and services to the data subjects.
- Disclose relevant data to data processors, including INET and subcontractors involved in activities under data processing contracts with the Company, individuals, or government agencies as required for disclosure by law, such as the Revenue Department, auditors, and the Social Security Office. Furthermore, the Company may need to share the personal data of data subjects to credit reporting agencies for verification, and may use the results of such verification for fraud prevention purposes.

## **6. Personal Data Retention**

The data controller stores the personal data of data subjects as follows:

1. Storage method: file and paper formats.
2. Storage location: stored on the Company's servers.
3. Retention period: in accordance with the Personal Data Processing Period section.
4. Once the storage period has expired, the Company no longer have the right to or be able to claim any basis to process the personal data of data subjects, in which case the Company will completely destroy said personal data through deletion and destruction within a timeframe of 10 days after the expiration of the aforementioned period.

## **7. Personal Data Retention Period**

The Company will retain the personal data of data subjects for as long as necessary for the purposes of collecting, using, and disclosing personal data as specified in this policy, in accordance with the criteria used to determine the retention period, such as the period for which the Company has a relationship with the data subject as a customer of the Company, and data may be further retained for an additional period as necessary for compliance with the law or according to the statute of limitations in order to establish legal claims or to comply with the law, or to exercise legal rights to raise demands or engage in legal defense, or for other purposes according to the Company's policies and internal regulations.



In cases where a clear retention period for personal data cannot be specified, the Company will retain the data for a period that can be reasonably expected, in accordance with data collection standards (e.g., the general statute of limitations is a maximum of 10 years).

## 8. **Rights of Data Subjects**

Data subjects have the right to take the following actions:

1. Right to withdraw consent: Data subjects have the right to withdraw their consent to the processing of their personal data at any time while the personal data is held by the Company .
2. Right of access: Data subjects have the right to access their personal data and to request the Company to provide them with a copy of such data. They also have the right to request the Company to disclose how the Company obtained personal data without the data subjects' consent.
3. Right to rectification: Data subjects have the right to request the company to correct inaccurate data or add incomplete information.
4. Right to erasure: Data subjects have the right to request the company to delete their data for certain reasons.
5. Right to restriction of processing of personal data: Data subjects have the right to restrict the use of their personal data for various reasons.
6. Right to data portability: Data subjects have the right to have their personal data transferred. The personal data of the data subjects, which they provide to the company, may be transferred to other data controllers or to the data subjects themselves for various reasons.
7. Right to object to the processing of personal data: Data subjects have the right to object to the processing of their personal data for various reasons. Data subjects can contact the DPO/ Company staff to submit a request to exercise this right (contact details are provided in the “Contact Channels” section below ) or download and complete a form, attach proof of identity, and submit the request via the Data Subject Rights Request Form.

Cookie Policy: A link to the Group's cookie policy is as follows:

(<https://www.thaiautotools.co.th/privacy/>)

Data subjects are not required to pay any expenses in exercising their rights mentioned above, and the Company will review and notify data subjects of the decision outcomes within 30 days of receiving such requests.



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[www.thaiautotools.co.th](http://www.thaiautotools.co.th)

THAI AUTO TOOLS AND DIE PUBLIC COMPANY LIMITED

45/6, 45/9 หมู่ 11 ตำบลคูบางหลวง อำเภอลาดหลุมแก้ว จังหวัดปทุมธานี 12140 โทร.02-598-3876-9 แฟกซ์. 02-598-3874

45/6, 45/9 MOO11 KUBANGLUANG, LATLUMKAE0, PATHUMTHANI 12140 TEL.02-598-3876-9 FAX. 02-598-3874

## 9. Contact Channels

Data Controller Details

### 1. Data Controller

Contact Information: Thai Auto Tools and Die Public Company Limited

Address: No. 45/6, 45/9, Village No. 11, Khu Bang Luang Sub-district, Lat Lum Kaeo District, Pathum Thani Province 12140

### 2. Data Protection Officer (DPO)

Name: Mr. Akegaphong Sutangkun

Contact Information: Thai Auto Tools and Die Public Company Limited

Address: No. 45/6, 45/9, Village No. 11, Khu Bang Luang Sub-district, Lat Lum Kaeo District, Pathum Thani Province 12140

Contact Channel: 02-598-3876 #220

Email: [akegaphong@thaiautotools.co.th](mailto:akegaphong@thaiautotools.co.th)

## 10. Regulatory Agency Details

In the event that the Company, its employees, or its staff violates or fails to comply with laws regarding personal data protection, data subjects can file a complaint with the regulatory authority, as detailed below.

Office of the Permanent Secretary, Ministry of Digital Economy and Society

Functioning as the Office of the Personal Data Protection Commission

120 Village No. 3, 6th-9th Floor, Ratthaprasasanabhakdi Building

Government Center in Commemoration of His Majesty the King's 80th Birthday Anniversary, 5 December 2007

Chaengwattana Road, Thung Song Hong Sub-district, Lak Si District, Bangkok 10210

E-mail: [pdpc@mdes.go.th](mailto:pdpc@mdes.go.th)

Tel: 02-142-1033 and 02-141-6993



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## 11. Changes to Personal Data Protection Policy and Practices

The Company will review the terms of this Company policy from time to time to ensure compliance with applicable practices and laws. Any amendments will be announced through appropriate Company notices.

This policy was approved by the Board of Directors Meeting No. 4/2025 on 14 November 2025, effective from 14 November 2025 onwards.

- Dr. Damri Sukhotanang -

Dr. Damri Sukhotanang  
Chairman of the Board of Directors