#### Notice

### "Privacy Policy"

International Research Associates (INRA) Ltd. (the "INRA" or "Company"), with more than four decades of business presence, is a specialized business information provider focusing on evaluating business potential. Not only on legal entities in Thailand, INRA also offers worldwide business reports with the assistance of our international partners, who have been carefully chosen based on our standard especially in terms of reliability and professionalism enabling the trading activities to be done with more confidence among business parties.

#### Clause 1. Sources of Personal Data

Information collected and stored in INRA's database is mainly the data related to business and legal entities, part of which may be Personal Data according to the Personal Data Protection Act B.E. 2562 (2019). INRA has procedures to collect and protect the Personal Data ensuring the process to be in line with the law and regulation. The company may collect Personal Data from the following sources:

- (1) Personal Data collected directly from the business or data subject that was given from interviewing companies/business owners or representatives, including information provided by the data subject through website, email, social media etc.
- (2) Personal Data collected from other sources such as the Department of Business Development, the Ministry of Commerce, the Stock Exchange of Thailand, the Securities and Exchange Commission, the Bank of Thailand, courts, the Revenue Department, the Legal Execution Department or other government organizations, related companies, business partners, data providers, platforms or social media, third-party websites, or by interviewing a third-party who has legitimate right to process the data subject's Personal Data, and/or partners, other public sources, etc. In case the Company collect Personal Data from other sources to display the data for a legitimate interest of the data subject, the Company will process the Personal Data under the scope of laws and regulations regarding the Personal Data protection.

#### **Clause 2. Personal Data Processing Purpose**

INRA will process Personal Data as per necessary and legitimate. The Company will process the Personal Data on following purposes:

(1) for the legitimate interests pursued by the Company or other Person/Juristic person; excepting that the interests are outweighed by the fundamental right in Personal Data of the data owner. For example, the Personal Data is a significant part of business information or a legal entity in terms of management, operation, ownership, shareholders, authorized signatories, etc. or the Personal Data is an important part of government announcements or as announced in the Government Gazette, etc.

- (2) for serving and facilitating the usage of services of the data subject via both online and /or offline channels, as well as for entering into a contract or legal bounding between the Company and the data subject as a partner, client, user, or service receiver.
- (3) for complying with relevant laws, regulations, rules, guidelines, including orders of courts, or government organizations with which the company is required to comply, or in other cases specified by laws.
- (4) for security and legitimate interest of the Company such as recording via CCTV of photos, images, motion pictures, videos, voices to safeguard the venue, property, employees, and visitors, and/or for legitimate interest of the Company in other cases such as telephone recording during contact with the Company, collecting business cards, name cards, and/or photocopy of identification card of a person visiting, attending meetings, training, seminars, applying as candidate for job application, and other activities of the company for the purpose of identifying the person or serving as a supporting document that benefits the person him/herself, visitors, users, and/or service receivers.

## **Clause 3. Personal Data Usage and Disclosure Policy**

The Company shall use and disclose Personal Data for the purposes specified in this Announcement and would disclose the Personal Data only as necessary. The company will process to notice the data recipients to acknowledge and protect the Personal Data as according to specified purposes and not to use and process the Personal Data for any purposes other than the ones specified in this Announcement. The recipients may be persons and/or entities as follows:

- (1) employees and contractors who necessarily require accessing the data to provide and/or support services, business operations, and company's obligations, including service providers who process the Personal Data on behalf of the Company or support the Company's operations either in Thailand or overseas.
- (2) customers, business partners or users of the service who have legitimate right to access the Personal Data because the data is a significant part of legal entities/business information, or that the data subject has given a consent or in other cases permitted by laws.
- (3) lawyers and/or the Company's consultants, jurisdictional courts, government organization or other entities who have legitimate authority to ask for the Personal Data disclosure.
- (4) third parties to whom the data subject requests the Company to disclose the Personal Data.

### Clause 4. Disclosure or Transfer of Personal Data to Foreign Recipients

INRA's core business relates to analyzing and processing business information of legal entities/companies which is occasionally disclosed or transferred to foreign recipients. The Personal Data which the data subject or any representative has declared to the Department of Business Development, or any Personal Data directly provided to the Company via interviewing or collected by the Company from any other source that is considered as a significant part of business information for the legal entities/companies, may be disclosed or transferred to foreign recipients for fulfilment of the obligation according to the contract between the Company and the recipient, or for data storage on behalf of the

Company. In such cases, the Company will comply with regulations to protect data subject's Personal Data according to the Personal Data Protection Law.

For inquiries or additional information regarding our procedure and Personal Data protection policy of the company, please contact as per the following channels:

# International Research Associates (INRA) Ltd.

To : Personal Data Protection Director, Mr. Panuwat Dongkumsri

Address : Olympia Thai Tower, 17th Floor, 444 Ratchadaphisek Road, Sam Sen Nok,

Huai Khwang, Bangkok 10310, Thailand

Email : <a href="mailto:dpo@inra.co.th">dpo@inra.co.th</a>

Telephone : 02 – 512 3998