

**Announcement of
TEAM Consulting Engineering and Management Public Company Limited
Re: Personal Data Protection Policy for Shareholders**

TEAM Consulting Engineering and Management Public Company Limited (the “Company”) and its subsidiaries realize the importance of personal data protection and have therefore announced the Personal Data Protection Policy for Shareholders so as to inform the shareholders of the rights and conditions in relation to the collection, use and disclosure of personal data related to the shareholders as follows:

1. Persons from Whom the Company Collects Personal Data

“Shareholder” means a person who legally holds shares with his/her name appearing as a shareholder in the share registration of the Company including a proxy holder or a person authorized to act on behalf of a shareholder who is a juristic person.

2. Personal Data that the Company Collects

The Company will collect the following Personal Data.

- 2.1 Personal Data of shareholders including authorized persons or proxy holders by collecting the Personal Data directly from the shareholders including through a securities broker or registrar such as name, surname, address, telephone number, email address, contact channels, nationality, occupation, date of birth, national identification number, passport number, bank account, number of shares, etc.
- 2.2 Technical information such as log files, IP Address, website login/logout records, and information that the Company collects through the use of Cookies or other technologies, etc.
- 2.3 Other information such as audio recording of conversations, photograph, video conference recording and video recording by means of CCTV, etc.
- 2.4 Sensitive Personal Data such as religion, health information or any other similar data as required by law, etc.

3. Sources of Personal Data

- 3.1 The Company will collect data of the shareholders through the following channels.
 - 3.1.1 Personal Data which the shareholders directly provide to the Company, for example, when the shareholders subscribe for shares or register to attend shareholders' meetings, etc.

- 3.1.2 Personal Data which is automatically collected by the Company from the shareholders by automated means such as the use of Cookies or other similar technologies, etc.
 - 3.1.3 Personal Data which the Company collects from third parties such as a securities broker or registrar, etc.
- 3.2 In collecting the Personal Data of shareholders, the shareholders will be informed of the details as set out in this Personal Data Protection Policy, including the purposes and legal basis for the collection, use, disclosure or processing of Personal Data, or where the Personal Data Protection Laws require consent of shareholders for any processing of Personal Data, the Company will request explicit consent of the shareholders.
- 3.3 In the event that the Company has collected the Personal Data of shareholders prior to the effective date of the Personal Data Protection Laws with regard to the collection, use or disclosure of Personal Data, the Company will continue to collect and use the Personal Data of shareholders pursuant to the original purposes which the Company has already informed the shareholders in the collection of Personal Data. The shareholders have the right to withdraw their consent by contacting the Company using the contact details set out in Clause 10 of this Personal Data Protection Policy. In this regard, the Company reserves the right to consider their request for withdrawal of consent and proceed in accordance with the Personal Data Protection Laws.

4. Purposes of Personal Data Processing

The Company processes the Personal Data of shareholders for the following purposes.

4.1 Processing on Legitimate Interest Basis in the Business Operations of the Company and Third Parties

- 4.1.1 Examination, verification of identity and proceeding with the request of shareholders, organization of shareholders' meetings, and undertaking activities with regard to voting and vote counting in the shareholders' meetings
- 4.1.2 The Company's management, video or audio recording of meetings, ensuring security, organization of activities, public relations or delivery of information or any proposal for the shareholders' benefit, any action necessary for the Company or beneficial to the shareholders or directly related to the purposes set forth.
- 4.1.3 Monitoring, protecting and ensuring the security of premises such as CCTV footages, visitor badges or taking photos for protection of a person's health and safety; prevention of damage to buildings, premises and properties; support for investigation or consideration process, dispute settlements or any legal proceedings, etc.

- 4.1.4 Establishment of legal claims, compliance or exercise of legal claims, or defense of legal claims of the Company such as investigation or inquiry by government officials, prosecution or defence of lawsuits in court, etc.

In the event that the Personal Data Protection Laws require consent of shareholders for any processing of Personal Data, the Company will request their explicit consent.

4.2 Processing on Compliance with Laws Basis

Management of the Company such as capital increase, capital decrease, business restructuring, changes to registered transactions, shareholders' meetings, management in relation to shareholders' rights and duties, dividend payment, accounting and reporting, auditing, legal documents, delivery of documents or letters including legal duties of public limited companies and companies listed on the Stock Exchange of Thailand.

4.3 Processing on Consent Basis

The Sensitive Personal Data of shareholders such as nationality and health data is processed for provision of appropriate facilities for screening and controlling communicable diseases or epidemic diseases, etc.

The Company will collect, use and disclose the Sensitive Personal Data as well as send or transfer the Sensitive Personal Data of shareholders only when the Company obtains explicit consent from the shareholders or where it is necessary for the Company as permitted by law.

4.4 Processing on Prevention or Suppression of Danger to Life, Body or Health Basis

It is necessary for monitoring, prevention or suppression of any incident which may be dangerous to a person's life, body or health including monitoring, protecting and ensuring the security of persons and properties of the Company.

5. Disclosure of Personal Data

The Company may disclose the Personal Data of shareholders in accordance with the specified purposes and the rules prescribed by law to the following persons and entities.

- 5.1 The subsidiaries and associated firms of the Company, including executives, directors, staff, employees or relevant in-house staff of the said entities and as necessary for the processing of Personal Data of the shareholders
- 5.2 Data Processors assigned or engaged by the Company to manage/process the Personal Data for the Company in the provision of services such as information technology services, data recording services, payment services, mailing services, delivery services, printing services, data analysis services or any other services which may be beneficial to the shareholders

- 5.3 Advisors of the Company such as legal advisors, lawyers, auditors, experts or other internal and external service providers of the Company, etc.
- 5.4 Government agencies which have supervisory duties under the laws or which have requested the disclosure of Personal Data pursuant to their lawful powers or relevant to the legal process or which are permitted by applicable laws such as Ministry of Commerce, Revenue Department, Office of the Personal Data Protection Committee, Royal Thai Police, Office of Attorney General, courts or Legal Execution Department, etc.
- 5.5 Regulatory agencies overseeing the Company such as Office of the Securities and Exchange Commission, Stock Exchange of Thailand, etc.
- 5.6 Any persons or agencies that the shareholders have given consent to disclose their Personal Data to such persons or agencies.

In the event of the disclosure of the shareholders' Personal Data to third parties, the Company will put in place appropriate safeguards to protect the disclosed Personal Data and to comply with the standards and duties regarding the protection of Personal Data as prescribed by the Personal Data Protection Laws.

6. Retention Period

The Company will collect the Personal Data of shareholders for the period necessary for fulfilling the specified purposes of the Personal Data processing. The retention period may vary, depending on the purposes specified for the processing of Personal Data. Moreover, the Company will retain the Personal Data for the period prescribed under the applicable laws (if any) by considering the prescription under the law for any legal proceedings that may arise from or in relation to the documents or each category of Personal Data collected by the Company and with particular consideration given to business practices of the Company and relevant business sectors related to each category of Personal Data.

The Company will retain the Personal Data of shareholders for a period of not exceeding 10 years from the termination date of juristic relations or commitments between the shareholders and the Company. However, the Company may retain the Personal Data of shareholders for a longer period if the laws permit or such retention of Personal Data is necessary for establishment of legal claims of the Company.

After the expiration of the aforementioned period, the Company will erase or destroy the Personal Data of shareholders from the storage or system of the Company and other persons providing services to the Company (if any) or anonymize the Personal Data of shareholders, unless in the event that the Company can continue to retain such Personal Data as prescribed by the Personal Data Protection Laws or other applicable laws.

7. Cross-Border Transfer of Personal Data

In the case where it is necessary for the Company to transfer the Personal Data of shareholders to foreign countries and such destination countries have lower standards of

Personal Data protection than the requirements stipulated by law, the Company will take steps to ensure that adequate protection of the transferred Personal Data is provided and the Personal Data is protected under the Personal Data Protection Standards equivalent to the level afforded in Thailand.

8. Rights of Data Subjects

The shareholders have the rights to take the following actions.

- 8.1 **Right to Withdraw Consent:** In the event that the Company processes the data of shareholders on the consent basis, the Shareholders have the right to withdraw consent given to the Company for processing their Personal Data at any time as long as their Personal Data is with the Company.
- 8.2 **Right of Access:** The shareholders have the right to access their Personal Data and may request that the Company provides them with a copy of such Personal Data as well as to request the Company to disclose the acquisition of the Personal Data obtained without their consent.
- 8.3 **Right to Data Portability:** The shareholders have the right to transfer their Personal Data which they have given to the Company to other data controllers or to themselves except where it is technically unfeasible.
- 8.4 **Right to Object:** The shareholders have the right to object to the processing of their Personal Data.
- 8.5 **Right to Erasure:** The shareholders have the right to request the Company to erase, destroy or anonymize their Personal Data.
- 8.6 **Right to Restriction:** The shareholders have the right to restrict the use of their Personal Data.
- 8.7 **Right to Rectification:** The shareholders have the right to request the Company to rectify or update their Personal Data which is inaccurate or incomplete.

The shareholders may contact the Data Protection Officer of the Company to submit a request for exercising the above rights using the contact information specified in Clause 10 of this Personal Data Protection Policy.

The shareholders will not have to pay any fees for any proceedings of such rights. The Company reserves the right to consider the shareholders' request for exercising their rights and act in accordance with the Personal Data Protection Laws.

9. Changes to Personal Data Protection Policy

The Company may amend this Personal Data Protection Policy to reflect any changes to the Company's operations, recommendations and comments from the shareholders. The

Company will expressly announce the changes prior to implementation or may send a notification to directly inform the shareholders.

10. Contact Channels

Details of Data Controller: TEAM Consulting Engineering and Management Public Company Limited
Contact Address: 151 Nuan Chan Road, Nuan Chan, Bueng Kum, Bangkok 10230
Contact Channel: Corporate Planning & Communication

Data Protection Officer (DPO)

Contact Address: Office of Data Protection Officer
Contact Channel: Tel. No. 02-5099000 ext. 2017
Email: Teamgroup@team.co.th

This Personal Data Protection Policy shall be effective from 1 June 2022.