

Privacy Policy for Customers, Business Partners, and External Parties

1. Introduction

Project Planning Service Public Company Limited and its affiliates (hereinafter referred to as “PPS”) recognize the importance of personal data and other related information concerning customers, business partners, and external parties (collectively referred to as “Data”). This recognition underscores PPS’s commitment to transparency and accountability in the collection, use, and disclosure of your Data in accordance with the Personal Data Protection Act B.E. 2562 (2019) (“PDPA”) and other applicable laws. This Privacy Policy (“Policy”) has been developed to inform you of the principles and practices PPS follows in collecting, using, and disclosing (collectively referred to as “processing”) personal data. It applies to all PPS personnel and relevant individuals who act on behalf of or in the name of PPS. This Policy is intended to provide customers, business partners, and external parties with a clear understanding of PPS’s practices regarding the collection, use, disclosure, and protection of personal data, as well as to inform you of your legal rights as data subjects under the Personal Data Protection Act B.E. 2562 (2019).

The key provisions of this Policy are outlined as follows:

2. Definitions

“PPS” refers to Project Planning Service Public Company Limited and its affiliates.

“PDPA” refers to the Personal Data Protection Act B.E. 2562 (2019).

“Privacy Note” refers to this Privacy Policy.

“Person” refers to a natural person.

“Personal Data” refers to any information relating to an identified or identifiable natural person.

“Data Controller” refers to a person or juristic person with the authority to make decisions regarding the collection, use, or disclosure of personal data (in this context, PPS).

“Customer” refers to any individual who purchases goods or receives services from PPS, personnel of a juristic person who purchases goods or receives services from PPS, including individual or corporate shareholders of PPS.

“Business Partner” refers to any individual who sells goods to, is hired by, or provides services to PPS, as well as personnel of a juristic person who sells goods to or provides services to PPS.

“External Party” refers to individuals or personnel of a juristic person who contact, visit, inspect, or engage in any activity with PPS, but who are not considered customers or business partners.

3. Purposes of Collection, Use, or Disclosure of Personal Data

PPS shall collect, use, and disclose personal data of customers, business partners, or external parties only to the extent necessary for its operations and in alignment with the purposes of PPS. These purposes include, but are not limited to, procurement activities, performance of contracts to which customers, business partners, or external parties are parties, the necessity for the legitimate interests of PPS or any person or juristic person, compliance with legal obligations, prevention or suppression of danger to life, body, or health of any person, financial transactions, the conduct of PPS's business operations, communications for various purposes, academic research and product development, marketing activities, and participation in PPS-related events.

In addition, PPS may collect and record images and/or audio through closed-circuit television (CCTV) cameras within and around its premises for the purposes of ensuring the safety and security of customers, business partners, or external parties entering PPS premises, as well as for the protection of property and the overall security of PPS.

4. Personal Data Collected, Used, or Disclosed by PPS and Retention Period

Personal Data

- Personal Information: such as full name, age, date of birth, national identification number, passport number, taxpayer identification number, and bank account number.
- Contact Information: such as residential address, workplace address, telephone number, email address, LINE ID, and Facebook profile.
- Visual and/or Audio Data: When customers, business partners, or external parties enter PPS premises, their images and/or voices may be recorded via closed-circuit television (CCTV) cameras. PPS will display appropriate signage to inform individuals that CCTV surveillance is in operation.
- Other Personal Data: collected in connection with participation in PPS activities, provided such information qualifies as personal data under the PDPA.

Retention Period

- PPS will retain the personal data of customers, business partners, or external parties only for as long as necessary during the period in which the individual is engaged in a relationship with PPS. Retention may continue thereafter where required or permitted by applicable law, including for the purposes of legal compliance, dispute resolution, or verification, and in accordance with the maximum statutory limitation period (e.g., not exceeding 10 years from the end of the contractual relationship).
- CCTV images and/or audio recordings of customers, business partners, or external parties shall be retained for a period of 45 days from the date of recording. After this period, the data will be automatically deleted from the system, or PPS will delete or anonymize the personal data to prevent identification.
- PPS will delete, destroy, or anonymize personal data when it is no longer necessary or upon expiration of the applicable retention period.
- Where PPS processes personal data based on the data subject's consent, such processing will continue until consent is withdrawn and PPS has duly complied with the withdrawal request.

5. Provision of Personal Data Required by Law or Contract and Potential Consequences of Non-Disclosure

PPS may request customers, business partners, or external parties to disclose their personal data in order to fulfill contractual obligations or comply with applicable laws, such as tax regulations or anti-money laundering laws. In cases where such personal data is not provided, the customer, business partner, or external party may be unable to establish or maintain a relationship with PPS, and PPS may be unable to fulfill its contractual obligations or comply with relevant legal requirements.

6. Categories of Persons or Entities to Whom PPS May Disclose Personal Data of Customers, Business Partners, or External Parties

- PPS may need to transmit or transfer the personal data of customers, business partners, or external parties to its affiliated companies located outside of Thailand, to PPS employees, or to other data recipients as part of PPS's normal business operations. This includes storing or transferring personal data to servers or cloud services located outside of Thailand.

- PPS may also need to transmit or transfer the personal data of customers, business partners, or external parties to its affiliated companies within Thailand, to PPS employees, or to other data recipients as part of PPS's normal business operations. This includes storing or transferring personal data to servers or cloud services located within Thailand.
- PPS may disclose personal data of customers, business partners, or external parties as required by law, such as to competent government authorities with legal authority to request such data—e.g., the Royal Thai Police, the Office of the Attorney General, the courts, or other authorized government officers such as investigators or prosecutors. Disclosure may also occur to external auditors or in the course of legal proceedings.
- PPS may disclose personal data of customers, business partners, or external parties to employees and companies engaged by PPS to provide services related to CCTV operations and to personnel and companies responsible for physical security services.

7. Rights of Customers, Business Partners, or External Parties under the PDPA

Customers, business partners, and external parties, as data subjects, are entitled to the following rights under the Personal Data Protection Act (PDPA):

- **Right of Access and Data Copy:** The right to access personal data under PPS's responsibility and request a copy thereof. This includes the right to request PPS to disclose how such personal data was obtained, without the need for prior consent (if applicable).
- **Right to Object:** The right to object to the collection, use, or disclosure of personal data at any time, as permitted by the PDPA.
- **Right to Erasure or Destruction:** The right to request the deletion or destruction of personal data, or to anonymize the data so it no longer identifies the customer, business partner, or external party, where the data is no longer necessary, when consent has been withdrawn, when an objection has been exercised, or where the data has been unlawfully processed in violation of the PDPA.
- **Right to Restrict Processing:** The right to request the suspension of the use of personal data as permitted by the PDPA, such as during the verification of data accuracy or completeness, when the data has been unlawfully processed, or when PPS no longer has a legitimate need to process the data.
- **Right to Rectification:** The right to request the correction of personal data to ensure it is accurate, up-to-date, complete, and not misleading.

- **Right to Lodge a Complaint:** The right to file a complaint with the competent supervisory authority if the customer, business partner, or external party believes that the collection, use, or disclosure of their personal data is in violation of applicable laws.

8. Collection of Personal Data through Cookies

PPS uses the following types of cookies on the PPS website:

- **Strictly Necessary Cookies** These cookies are essential for the website to function properly, ensuring security and allowing you to access and use the website, such as logging in or signing up and identity verification. You cannot disable these cookies through the PPS website system.
- **Analytic Cookies** These cookies collect data on your website usage to help us measure, evaluate, improve, and develop PPS products, services, and website content to enhance your browsing experience. If you do not consent to the use of these cookies, we will not be able to measure, evaluate, or improve the website.
- **Functional Cookies** These cookies remember information about the computer or electronic device you use to access the website, such as registration or login information, language preferences, or shipping addresses. This enables easier and more convenient use of the website without requiring you to re-enter information or reset preferences each time you visit. If you do not consent to the use of these cookies, your website experience may be less convenient and less efficient.
- **Targeting Cookies** These cookies collect various information, which may include your personal data, to create a profile about you. This allows us to analyze and present content, products, services, and/or advertisements tailored to your interests. If you do not consent to the use of these cookies, you may receive general information and advertisements that are not aligned with your interests.

Use of Third-Party Cookies

The PPS website may contain links to third-party websites that may use cookies. Please review the privacy policies and cookie policies of these third-party websites before using them. You cannot manage third-party cookie settings through the PPS website.

Cookie Consent and Rejection You may refuse cookies except for Strictly Necessary Cookies by adjusting your cookie settings or browser preferences. However, this may prevent you from fully accessing or using the website.

9. Disciplinary Actions for Violations of This Policy or Infringement of Personal Data Rights

- 1) Any employee who discloses, uses, or violates the personal data of customers, business partners, or third parties without prior authorization from PPS shall be deemed to have committed a serious disciplinary offense. Such actions are considered willful misconduct causing damage to the Company and are subject to summary dismissal without compensation.
- 2) Any employee who breaches or fails to comply with this policy and related procedures, and such noncompliance results in damage, shall be personally liable for full compensation as required by applicable laws.
- 3) Any employee who misuses or discloses personal data of customers, business partners, or third parties—collected and maintained by PPS—for personal gain or allows others to do so without authorization from the Company shall be deemed to have committed a serious offense. Such misconduct will result in immediate dismissal without compensation. Furthermore, PPS reserves the right to seek damages and pursue legal action to the fullest extent permitted by law.

10. Consent

Where the collection, use, or disclosure of any personal data by PPS requires the consent of customers, business partners, or third parties under applicable laws, PPS will obtain such consent in accordance with the Personal Data Protection Act (PDPA). PPS shall also establish clear procedures for verification and access to ensure that all personal data is collected and used in good faith, remains confidential, and is securely protected.

11. Review and Updates of Personal Data Management Practices

PPS may revise and update this policy from time to time to reflect changes in the interpretation, enforcement, or amendments to the Personal Data Protection Act (PDPA) by relevant government authorities (if any). Such updates will be announced on PPS's official website and through other appropriate communication channels. We encourage all customers, business partners, and third parties to regularly review and familiarize themselves with this policy to ensure that the collection, storage, and use of their personal data remain compliant with applicable legal requirements.

12. Contact Information and Exercising Data Subject Rights

If you have any questions, suggestions, or concerns regarding PPS's collection, use, or disclosure of personal data, or this policy, or if you wish to exercise your rights under the Personal Data Protection Act (PDPA), you may contact us at:

1) Data Controller

Name: Project Planning Service Public Company Limited (PPS)
Contact Address: 381/6 Soi Rama IX 58 (Soi 7 Seri 7),
Rama IX Road, Suan Luang Sub-district,
Suan Luang District, Bangkok 10250, Thailand
Telephone: +66 (0) 2718 2785-9 ext. 108
Email: dc@pps.co.th

2) Data Protection Officer: DPO

Name: Mr. Weera Yenpreecha
Company: Project Planning Service Public Company Limited (PPS)
Contact Address: 381/6 Soi Rama IX 58 (Soi 7 Seri 7),
Rama IX Road, Suan Luang Sub-district,
Suan Luang District, Bangkok 10250, Thailand
Telephone: +66 (0) 2718 2785-9 ext. 345
Email: dpo@pps.co.th

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Revision No. 3

Issued on 12 November 2025



(Mr. Prasong Tharachai)

Chairman of the Board