



Personal Data Management Policy

Introduction

The Company recognizes the importance of protecting the personal data of customers and all stakeholders. The Company is therefore committed to collecting, using, and disclosing personal data in compliance with applicable laws and the highest security standards, in order to ensure that data subjects can be confident that their personal data will be appropriately protected.

Thailand has enacted the Personal Data Protection Act B.E. 2562 (2019) (PDPA), which has been effective since June 2022. The Act aims to protect the rights and freedoms of personal data subjects and requires data controllers to manage personal data carefully, securely, and transparently.

As the Company's operations involve the personal data of shareholders, customers, employees, and stakeholders, the Company has established this Policy to ensure that the collection, use, and disclosure of personal data are conducted in accordance with applicable laws and international standards.

Scope

This Policy covers the collection, use, disclosure, and storage of personal data of customers, shareholders, employees, suppliers, and all stakeholders.

Definitions

- 1.1 Company means Karmarts Public Company Limited.
- 1.2 Personal Data Subject means an individual who is the owner of personal data collected, used, or disclosed by the Company.
- 1.3 Data means personal data, non-personal data, system data, cookies, usage logs, and other similar information.
- 1.4 Personal Data means any information relating to an individual that enables such individual to be identified, whether directly or indirectly.
- 1.5 Sensitive Personal Data means data relating to race, religion, genetics, biometric data, or other data that may have an impact on the data subject.
- 1.6 Contact Information means information used to contact a data subject, such as telephone number, email address, postal address, social media username, and location map of the residence.

- 1.7 Employment and Education Information means information relating to employment details, employment history, and educational background, such as type of work, position, rank, level of education, and educational institution.
- 1.8 Cookie means a small piece of data sent by the Company's website to a data subject's device to store information regarding website usage and browsing behavior.

Objectives

1. To ensure that the collection, use, and disclosure of personal data comply with the PDPA

The Company is committed to managing the personal data of customers and all stakeholders in compliance with the Personal Data Protection Act B.E. 2562 (2019), in order to ensure that its operations comply with legal standards, reduce legal risks, and ensure that personal data is used lawfully and appropriately.

2. To build confidence among customers and stakeholders that their personal data will be appropriately protected

The Company recognizes the importance of privacy and personal data security and has therefore established data protection and access control measures to assure customers and stakeholders that their personal data will be appropriately managed and protected.

3. To prevent risks arising from improper management of personal data

The Company implements measures and procedures for the careful collection, use, and disclosure of personal data in order to prevent risks that may arise from improper data management, such as data breaches, unauthorized use, or errors in service provision.

4. To establish guidelines for employees to ensure consistent compliance with the same standards

The Company has established clear guidelines and policies to ensure that all employees understand their duties and responsibilities in appropriately managing personal data, thereby ensuring consistent practices in accordance with applicable laws and the Company's personal data protection standards.

Guidelines for Personal Data Protection

1. Collection of Personal Data

The Company shall collect personal data of customers, shareholders, employees, and other stakeholders, taking into account the appropriateness and necessity of such data, and shall manage such data in accordance with PDPA standards to ensure that personal data is collected properly and securely.

1.1 Collection Directly from the Data Subject

The Company collects personal data directly from data subjects through appropriate channels, such as completing forms in paper or online format, job applications, signing contracts, or communicating with the Company,

in order to ensure that the information obtained is accurate and that consent has been obtained from the data subject.

1.2 Collection through Websites/Applications

The Company collects personal data through the use of the Company's websites, software, or applications, such as by tracking usage behavior, using cookies, or using analytical tools, in order to improve services and provide an appropriate user experience, while taking into consideration the privacy of data subjects.

1.3 Collection from User Accounts with External Service Providers

The Company may collect personal data from data subjects' user accounts with external service providers, such as social media platforms, with the consent of the data subject, in order to connect information between the user account and the Company's services. Any information obtained shall be subject to the data subject's privacy settings.

1.4 Collection from Sources Other Than the Data Subject Directly

The Company may collect personal data from sources other than directly from the data subject, such as publicly available information, information from affiliated companies, or business partners. The Company shall notify the data subject within 30 days after collecting such data, unless exempted by law, such as where the information is publicly available or where consent cannot be obtained.

2. Purposes of Collecting Personal Data

2.1 To conduct the Company's operations in compliance with applicable laws, regulations, and standards

The Company collects personal data to ensure that all aspects of its operations comply with applicable laws, regulations, and standards, including requirements imposed by government authorities and applicable laws, thereby enabling the Company to properly perform its duties and reduce legal risks.

2.2 To verify or identify data subjects, enter into contracts, and provide services to customers securely

Personal data is used to verify the identity of data subjects and to ensure that entering into contracts, providing services, or accessing the Company's services is carried out properly and securely, and that information and services are not used by unauthorized persons.

2.3 To develop products and services, improve service efficiency, and facilitate the delivery of products and complimentary items

The Company uses personal data to analyze and improve its products or services to better meet customers' needs, as well as to ensure the efficient delivery of products, prizes, or complimentary items in accordance with customers' requirements.

2.4 To contact data subjects through various channels, such as social media, telephone, email, or post, for the purpose of providing information and verifying or confirming information

The Company collects personal data to communicate and contact data subjects when necessary, such as to provide information and updates, request additional information, confirm accounts, or verify the accuracy of information, in order to ensure accurate and effective communication.

2.5 To analyze data, conduct statistical processing and research, develop services, conduct marketing activities, and improve the customer experience

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3. Disclosure of Personal Data

The Company shall disclose personal data to external parties or third parties only to the extent necessary and in accordance with the purposes for which such data was collected, in compliance with the requirements of the Personal Data Protection Act B.E. 2562 (2019) (PDPA), to ensure that personal data is disclosed properly and securely.

3.1 Personal data may be disclosed where necessary to comply with legal requirements, court orders, or requirements of relevant government authorities, in order to ensure that such disclosure is lawful and to reduce legal risks.

3.2 Personal data may be disclosed to prevent or suppress danger to the life, body, or health of the data subject or another person, in accordance with Section 24(2) of the PDPA.

3.3 Personal data may be disclosed for the purpose of performing obligations under a contract to which the data subject is a party, in accordance with the PDPA requirements concerning the lawful use of personal data for contractual purposes.

3.4 Personal data may be disclosed for the legitimate interests of the Company or other persons in accordance with the PDPA, provided that such disclosure does not infringe upon the rights of the data subject.

3.5 Where consent from the data subject cannot be obtained in a timely manner, the Company may disclose personal data for the benefit of the data subject, subject to the requirements of the PDPA.

3.6 Personal data may be disclosed to investigating authorities or courts for the purposes of legal proceedings or court proceedings in accordance with the PDPA.

3.7 Personal data may be disclosed for statistical, educational, research, or public interest purposes, provided that appropriate protective and control measures are implemented to safeguard the privacy of data subjects in accordance with Section 26 of the PDPA.

4. Personal Data Protection Measures

4.1 The Company has implemented technical and organizational measures (Technical & Organizational Measures) to prevent the unauthorized loss, access, use, disclosure, alteration, or destruction of personal data, in accordance with Section 19 of the PDPA.

4.2 The Company provides training and promotes employees' knowledge and understanding of their duties, responsibilities, and personal data protection measures to ensure that employees properly comply with the PDPA and the Company's policies.

4.3 All employees shall strictly comply with the Company's personal data protection policies and guidelines, as well as the requirements of the PDPA, to ensure that personal data is managed securely and properly and to prevent risks to the Company and data subjects.

5. Rights of Data Subjects

5.1 Right to Be Informed

Data subjects have the right to be informed about the collection, use, and disclosure of their personal data, including the purposes and scope of such use, to enable them to make informed decisions with a clear understanding of how their personal data is handled.

5.2 Right to Rectification

Data subjects have the right to request the correction or updating of personal data that is inaccurate, incomplete, or outdated, in order to ensure that the personal data collected by the Company remains accurate and up to date.

5.3 Right to Withdraw Consent

Data subjects have the right to withdraw or revoke their consent to the collection, use, or disclosure of their personal data at any time, unless otherwise restricted by law or required for compliance with lawful obligations.

5.4 Right to Restrict Processing

Data subjects have the right to request that the Company restrict the use or processing of their personal data where such data is inaccurate or where the data subject has withdrawn consent, in order to prevent unauthorized use of the data.

5.5 Right of Access and Copy

Data subjects have the right to access their personal data and request a copy thereof, including information regarding how the data was obtained, collected, used, and disclosed, in order to verify the accuracy and appropriateness of the Company's handling of their personal data.

5.6 Right to Data Portability

Data subjects have the right to request their personal data in a format that can be transferred to another data controller, in order to facilitate the transfer of data and the use of other services.

5.7 Right to Object

Data subjects have the right to object to the collection, use, or disclosure of their personal data where such collection or use is unnecessary or unlawful.

5.8 Right to Erasure / Right to Be Forgotten

Data subjects have the right to request the deletion or destruction of their personal data where such data has been unlawfully collected or where its retention is no longer necessary for the original purpose.

5.9 Right to Complain

Data subjects have the right to submit a complaint to the Company if they find that the Company has improperly collected, used, or disclosed their personal data, or has failed to comply with the PDPA or the Company's personal data protection guidelines.

6. Policy Review and Revision

The Company shall review and revise this Policy regularly, once a year, or whenever there are changes in relevant laws, requirements, or circumstances.

Use of Cookies

The Company's website uses cookies or other similar technologies on your web browser or internet-connected devices, such as computers, smartphones, or tablets, to remember usage patterns and provide you with a better experience when using the Company's website. Therefore, if you continue to use this website, you shall be deemed to have consented to the Company's use of cookies.

1. Cookies are small text files stored on the web browser or hard drive of a website user's computer, smartphone, or other internet-connected device while visiting a website. Cookies are used to store or track information relating to the user's website usage, such as language preferences on the website or the user's login status, making subsequent visits to the website easier and more convenient.

The use of cookies enables the Company to collect the following information from users:

- Internet domain and IP address from which the user accesses the Company's website through an electronic device or equipment.
- Type of browser software and operating system used by the user to access the Company's website.
- Date and time when the user accesses the Company's website.
- Address of another website that directs the user to the Company's website.

- Webpages and content visited by the user, as well as the duration of the user's visit to the Company's website.

2. Types of Cookies Used by the Company

The types of cookies used by the Company are as follows:

(a) **Strictly Necessary Cookies:** These cookies are essential for the operation of the website, enabling it to function properly and securely and allowing you to access and use the website, such as for logging in and identity verification. These cookies cannot be disabled through the website's system.

(b) **Analytic Cookies:** These cookies collect information about your use of the website to enable the Company to measure, evaluate, improve, and develop its content, services, and website, thereby enhancing your website experience. If you do not consent to the use of these cookies, the Company will not be able to measure, evaluate, and further develop the website.

3. Cookie Settings and Rejection

You may choose to reject the use of cookies according to your preferences by adjusting your browser settings or privacy settings to prevent the future collection of data through cookies. However, if you configure your browser or privacy settings to reject all cookies, you may not be able to use some or all functions of our website effectively.

4. Use of Cookies by Third Parties (Third-Party Cookies)

Certain cookies on the Company's website are managed by third parties. These cookies are used for website analysis and performance measurement (Analytic Cookies) in order to improve content to better suit target audiences, such as Google Analytics. Users are unable to control the use of these cookies through the Company's website. Therefore, users should review the cookie policies of such third-party websites to understand how third parties may use their information.

5. Links to Other Websites

Our website may contain links to third-party websites or social media platforms and may also contain embedded content or videos from social media platforms, such as YouTube or Facebook. Such third-party websites or social media platforms may set and use their own cookies, over which we have no control or responsibility. We therefore recommend that you read and review the cookie policies or cookie notices of such third parties.

6. Amendments to the Cookie Policy

This Cookie Policy may be revised, amended, or changed as appropriate in order to comply with personal data protection laws or other applicable laws. We therefore recommend that you periodically review this Cookie Policy for any changes.

Approved by the resolution of the Executive Committee at its Meeting No. 2/2026 held on August 31, 2026.

– *Signed* –

Mr. Wiwat Theekhakhirikul

Chairman of the Board