



## **BG Privacy Policy**

BG respects privacy rights of customers, shareholders, employees, and all related parties. To ensure that personal data of such persons is protected and processed in accordance with applicable personal data protection laws, the Board of Directors of the Brooker Group Public Company Limited therefore approved this BG Privacy Policy (“BG Privacy Policy”) to enable BG to have clear and appropriate guidelines, mechanisms, government measures and management of personal data.

### **1. Principle Scope of application**

This privacy policy applies to BG, employees of BG and persons processing personal data by order or on behalf of BG.

### **2. Definition**

- 2.1 Processing means any operation (s) made in connection with personal data such as collection, recording, systematization, storage, maintenance, change, recovery, use, disclosure, transfer, dissemination, combination, erasure or destruction.
- 2.2 Personal data means any information relating to a natural person whose identity can be identified by reference to such data, directly or indirectly, such as name, surname, email address, telephone number, IP address, pictures, ethnicity, religion, political opinion, genetic information and biometric data.
- 2.3 Data subject means a natural person whose personal data can be used to directly or indirectly identify that person.
- 2.4 Data controller means the natural or juristic person who has authority to make decision relating to the processing of personal data.
- 2.5 Data processor means a natural or juristic person, who processes personal data by order or on behalf of the data controller.
- 2.6 BG means the Brooker Group Public Company Limited and its subsidiaries pursuant to the consolidated financial statements of the Brooker Group Public Company Limited.

### **3. Privacy Policy: Personal Data Protection Governance**

- 3.1 BG will establish a personal data protection governance structure to determine appropriate methods and measures to comply with the law as follows:
  - 3.1.1 Establish an organizational structure with clear roles, missions and responsibilities of related persons in order to establish mechanisms for governance, control, accountability, operations, enforcement and monitoring of personal data protection measures, all in accordance with the law and BG Privacy Policy, and
  - 3.1.2 Appoint BG Data Protection Officer (BG DPO) with the roles and responsibilities as specified in BG Privacy Policy.
- 3.2 BG will establish policies, standards, guidelines, procedures and other documents related to personal data protection in accordance with the law and BG Privacy Policy.



- 3.3 BG will set up a policy management process to ensure continuous compliance with BG Privacy Policy.
- 3.4 BG will continuously conduct training for BG employee to make BG employees aware of the importance of protection personal data and ensure that all relevant BG employees are trained and have knowledge and understanding in protecting personal data and comply with BG Privacy Policy.

#### **4. Privacy Policy: Personal Data Processing**

- 4.1 BG will process personal data, whether as a data controller or a data processor, lawfully, fairly and transparently and take into account the accuracy of personal data. In this regard, BG will consider necessity, lawfulness and BG's business practices when determining objectives of personal data processing and the time period for retaining personal data. In addition, BG will maintain adequate confidentiality, accuracy and security of the personal data.
- 4.2 BG will establish controlling procedures related to personal data management at every step in accordance with the law and BG Privacy Policy.
- 4.3 BG will create and maintain Records of Processing (RoP) for records of programs and activities related to personal data processing in accordance with the law and update the records when there is change to related programs or activities.
- 4.4 BG will establish a clear process to ensure that the notification of processing objectives and details of the privacy notices and requests for consent from the data subject are in accordance with the laws. BG will also provide measures to supervise and monitor compliance with such process.
- 4.5 BG will establish a mechanism for checking the accuracy of personal data and rectifying personal data.
- 4.6 In the event that BG sends, transfers or allows other persons to use personal data, BG will enter into agreements with such persons to appropriately stipulate rights and obligations of the relevant parties in accordance with the law and BG Privacy Policy.
- 4.7 BG will comply with the applicable laws when sending or transferring personal data to recipients located outside Thailand.
- 4.8 BG will destroy personal data when the time limit expires. The disposal will be made in accordance with the law and BG business operations.
- 4.9 BG will assess risks and establish measures to mitigate risks and reduce the impact that may arise as a result of the personal data processing.

#### **5. Privacy Policy: Data Subject Rights**

BG will establish measure, channels and methods allowing data subjects to exercise their rights as permitted by law and will record and process all response of data subjects.

#### **6. Privacy Policy: Personal Data Security**

- 6.1 BG will establish adequate security measures related to personal data including taing steps to prevent the leakage and the unauthorized use of personal data.



- 6.2 BG will establish a Privacy Incident Management Policy and Incident Response Program in order to identify and handle incidents related to personal data in a timely manner.
- 6.3 BG will establish notification process to data subjects, state officials, data controllers (in the case that BG is a data processor or a joint controller) and other parties in accordance with the law.

## **7. Privacy Policy : Compliance**

- 7.1 BG will establish monitoring process related to changes in laws and constantly adjusting personal data protection measures to be always consistent with the law.
- 7.2 BG will regularly review and improve policies, standards, guidelines, procedures and other documents relating to personal data protection to keep them at all times up to date and in accordance with the law in effect.

## **8. Roles and Responsibilities**

- 8.1 The Board of Directors has the following roles and responsibilities:
  - 8.1.1 Ensure the establishment of personal data protection structure and internal control structure in order to comply with the law and BG Privacy Policy and
  - 8.1.2 Supervise and support BG to take effective protection of personal data in compliance with the law.
- 8.2 Privacy Committee  
BG Risk Management Committee acts as the Privacy Committee, with the following roles and responsibilities:
  - 8.2.1 Establish personal data protection structure, internal control structure, Privacy Incident Management Policy and Incident Response Program in order to be able to identify and deal with incidents related to personal data in a timely manner:
  - 8.2.2 Assess the efficiency of compliance with BG's Privacy Policy and report the results to the Board of Directors on a regular basis at least once a year as well as controlling and ensuring that risks related to personal data are properly managed with appropriate risk management guidelines:
  - 8.2.3 Establish and review standards and guidelines to ensure that BG operations comply with the law and BG Privacy Policy and
  - 8.2.4 Appoint BG Personal Data Protection Officer (BG DPO)
- 8.3 The management has role and responsibility to follow up and control functions under their supervision to comply with BG Privacy Policy and to support the awareness promotion among BG employees.
- 8.4 BG Personal Data Protection Officer (BG DPO) has roles and responsibilities prescribed by applicable laws, including the following roles and responsibilities:
  - 8.4.1 Regularly report the status of personal data protection to the Privacy Committee and make recommendations to improve BG's personal data protection to be at all times up to date and in accordance with the law:
  - 8.4.2 Advise BG employees to comply with the law and BG Privacy Policy and
  - 8.4.3 Examine operations of BG to ensure compliance with the law and BG Privacy Policy.



8.5 BG employees have the following roles responsibilities:

8.5.1 Comply with BG Privacy Policy, standards, guidelines, procedures and other documents related to personal data protection and

8.5.2 Report personal data incidents and non-compliance with the law or BG Privacy Policy to supervisors.

## **9. Penalty for Noncompliance with BG Privacy Policy**

Failure to comply with this BG's Privacy Policy may result in an offense and disciplinary action and may also be punished as required by law.

This policy becomes effective on and from 1 May 2020 onwards in accordance with the resolution of the Board of Directors of the Brooker Group Public Company Limited.