



PPP GREEN COMPLEX

Privacy Notice

for Customers, Business Partners, and Business Relations of PPP Green Complex Co., Ltd.

PPP Green Complex Co., Ltd. (hereinafter referred to as the "Organization") places great importance on the protection of personal data of customers, business partners, persons with business relationships, and workers in the Organization's group (collectively referred to as "Data Subjects"). To assure Data Subjects that the Organization will protect and handle their personal data in accordance with personal data protection laws, the Organization has prepared this Privacy Notice to inform all relevant Data Subjects of the details of processing (collection, use, and disclosure) of personal data that may occur, as well as to inform them of their personal data rights and the Organization's contact channels.

1. Categories of Persons Whose Personal Data the Organization Collects

Under this Privacy Notice, the Organization collects personal data of the following persons:

1.1 Customers

Means persons who purchase or will purchase products and/or services from the Organization, or persons who enquire about the Organization's products and/or services, persons who receive product/service information through various media, and persons who receive advertising or promotions for the Organization's products and/or services. This also includes natural persons related to or representing a corporate customer — e.g., executives, directors, employees, agents, or representatives — and persons whose personal data appears in documents related to transactions between the Organization and that corporate entity, such as coordinators, purchasers, recipients, cheque signatories, and persons whose information has been provided by such corporate entity to the Organization.

1.2 Business Partners

Means persons who sell or will sell products and/or services to the Organization, whether or not registered as a vendor with the Organization — e.g., counterparties, service providers, consultants, etc. This also includes natural persons related to or representing a corporate business partner — e.g., executives, directors, employees, agents, or representatives — and persons whose personal data appears in documents related to transactions between the Organization and that corporate entity, such as coordinators, delivery personnel, and cheque signatories.

1.3 Persons with Business Relations

Means other persons who are not customers, business partners, or workers in the Organization's group but who have a relationship connected with business operations — e.g., personnel of regulatory agencies overseeing the Organization's business or legal compliance, interested parties or participants in business projects, interested investors or co-investors, and agents or brokers procuring products or services for the Organization. This also includes natural persons related to or representing such a corporate entity — e.g., executives, directors, employees, agents, or representatives — and persons whose personal data appears in related transaction documents.

1.4 Workers in the Organization's Group

Means directors, employees, or other personnel of companies in which the Organization holds shares, including employees of such companies seconded to work at the Organization under the Organization's policies or requirements.

2. Purposes for the Collection, Use, or Disclosure of Personal Data

2.1 General Purposes (Applicable to All Data Subjects)

Regardless of whether the data subject is a customer, business partner, person with a business relationship, or worker in the Organization's group, the Organization may process personal data for the following purposes:

No.	Purpose	Legal Basis
(1)	For communication and coordination related to the Organization's business operations.	Legitimate Interests
(2)	To collect and use data subjects' personal data — including name, surname, position, department, and photographs/videos relating to the Organization's operations and activities — for public relations and communications via various channels such as internal email, the Organization's and group companies' websites, Facebook, LINE, YouTube, and other online or offline media (TV, print, etc.).	Legitimate Interests
(3)	To use as information for registering electronic system accounts, or for granting access rights to the internet or electronic systems.	Legitimate Interests
(4)	For business planning, reporting, and forecasting; risk management; compliance oversight; internal audit by the Internal Audit Office; internal organizational management; and disbursement processes of the Finance & Accounting department.	Legitimate Interests
(5)	For maintaining the customer database related to the Organization's operations, including business status checks or other background checks for eligibility assessment or risk evaluation prior to entering into transactions; identity verification and authentication; and verification of authority, power of attorney, and authorization in signing agreements or contracts with the Organization.	Legitimate Interests
(6)	For processing the transfer of any rights, duties, and benefits — e.g., mergers, demergers, or business transfers — carried out in accordance with the law.	Legitimate Interests

No.	Purpose	Legal Basis
(7)	As a stakeholder database for the Organization and/or for relationship management and coordination related to the Organization.	Legitimate Interests
(8)	For disclosing information necessary to comply with various assessment criteria in which the Organization participates.	Legitimate Interests
(9)	For internal investigations of complaints, fraud prevention, or other legal proceedings; and to examine and manage complaints and allegations concerning the Organization's operations or related parties in a transparent and fair manner.	Legitimate Interests
(10)	For recruiting or considering participation in the Organization's activities or projects, such as field trips, study visits, factory visits, donation drives, seminars, training programmes, or other projects operated alone or jointly with external parties or government agencies — including related activities such as Q&A contests, prize delivery, and health and safety management (e.g., health insurance for field trips).	Legitimate Interests
(11)	For security within the Organization's premises and surrounding areas, including visitor card exchange before entry and CCTV recording of persons visiting the premises.	Legitimate Interests
(12)	For establishing, granting, exercising, or defending legal claims; litigation; and legal enforcement.	Legitimate Interests Legal Obligation
(13)	For compliance with laws, court orders, notices, or orders of agencies, independent organizations, or competent officials — e.g., summonses, garnishment orders, court orders, police, prosecutors, government agencies — including reporting or disclosing information to shareholders, government agencies, or independent organizations such as the Energy Regulatory Commission, Ministry of Energy, Revenue Department, Land Department, Office of the Auditor General, and NACC.	Legal Obligation
(14)	For compliance with laws relating to public health interests, such as prevention of dangerous or epidemic communicable diseases.	Legal Obligation
(15)	For health and safety management of data subjects; preventing or suppressing danger to life, body, or health.	Vital Interests
(16)	When the data subject accesses the Organization's social media (Facebook, LINE, YouTube, etc.) for the following purposes: (a) To measure operational performance and analyze market research and marketing strategies, and to carry out business planning, reporting, and forecasting. (b) To survey opinions, analyze, research, and develop products, services, and activities to suit the data subjects' needs, and to develop targeted communications. (c) For risk management, compliance oversight, and internal audit, including fraud prevention. (d) For follow-up inquiries, complaint investigation and management, and record keeping. (e) For selecting participants for activities, online Q&A, announcing results, distributing prizes, and maintaining participant records. (f) For legal compliance, investigation, legal proceedings, reporting or disclosure to government agencies or other bodies exercising legal authority or court orders, and to establish, exercise, or defend legal claims.	Legitimate Interests Legal Obligation

In addition to the above, the Organization may process personal data further in the following specific cases:

2.2 Additional Purposes — Where the Data Subject is a Customer

The Organization may additionally process the data subject's personal data for the following purposes:

No.	Purpose	Legal Basis
(1)	For considering and approving purchase or service requests, including identity verification, authority and power-of-attorney verification, risk assessment for related transactions, and internal processes for contracting, contract performance, product delivery, service provision, coordination, billing, and related document dispatch.	Contractual Basis Legitimate Interests
(2)	For evaluating, improving, and developing the Organization's products, services, and promotions, including satisfaction surveys to better meet the data subjects' needs.	Legitimate Interests
(3)	For use as information and documentation in dealings with banks, financial institutions, the Department of Business Development, Revenue Department, Excise Department, Stock Exchange of Thailand, SEC, and other relevant external bodies.	Legitimate Interests

2.3 Additional Purposes — Where the Data Subject is a Business Partner

The Organization may additionally process the data subject's personal data for the following purposes:

No.	Purpose	Legal Basis
(1)	For pre-contract processes, e.g.: • Vendor registration • Vendor qualification assessment • Pre-procurement data preparation (reference price research, entering vendor details in the Organization's systems) • Receiving/purchasing tender documents, attending briefings, presenting relevant work, price negotiation, and announcing the winner • Inviting price proposals, submission of price proposals, authority and POA verification, assessing bidder qualifications per the Organization's procurement process — including service providers, legal/accounting/business/tax advisors, auditors, financial advisors, financial institutions, and accounting/financial system development consultants • Preparation of Confidentiality Agreements	Contractual Basis Legitimate Interests
(2)	For transaction activities between business partners and the Organization, e.g.: • Identity, authority, and POA verification, and use as evidence for related transactions • Compliance with the Organization's internal rules, regulations, and processes • Reviewing, preparing, and signing commercial contracts • Performing employment contracts, service agreements, other commercial contracts, and relevant agreements between the Organization and counterparties • Receiving work per contracts, commercial asset and inventory management, and issuing completion certificates	Contractual Basis Legitimate Interests

No.	Purpose	Legal Basis
(3)	For compliance with laws relating to transactions between business partners and the Organization — e.g., public procurement law, tax law, land rights verification law, audit law, securities law, and official information law.	Legal Obligation

2.4 Additional Purposes — Where the Data Subject has a Business Relationship with the Organization

The Organization may additionally process the data subject's personal data for the following purposes:

No.	Purpose	Legal Basis
(1)	For business communications: contact, scheduling, meetings, and business discussions about the Organization's products, services, or projects — including recording details of such communications.	Legitimate Interests
(2)	For verifying qualifications or assessing suitability prior to entering into transactions; risk assessment; identity and authority verification (including POA); business status and background checks; and compliance with the Organization's internal processes.	Legitimate Interests
(3)	For reviewing, preparing, and signing relevant agreements or contracts, including contract management.	Legitimate Interests
(4)	For considering applications to participate in the Organization's projects or joint projects with external parties or government agencies, and for related activities.	Legitimate Interests

2.5 Additional Purposes — Where the Data Subject is a Worker in the Organization's Group

The Organization may additionally process the data subject's personal data for the following purposes:

No.	Purpose	Legal Basis
(1)	To verify identity as a worker in the Organization's group.	Legitimate Interests
(2)	For coordination related to collaboration between the Organization and group companies, including notifications about business, activities, or projects among group companies.	Legitimate Interests
(3)	For compliance with the Organization's and group's policies, and for use as information supporting group company oversight, operational reviews, and policy compliance monitoring.	Legitimate Interests
(4)	For coordination with external parties regarding the Organization's group business operations.	Legitimate Interests
(5)	For use in considering assignment of workers to the Organization; for contact, duties, or transactions with customers, business partners, group companies, government agencies, state enterprises, state entities, public organizations, independent organizations, or other external parties as a representative of the Organization — including contracting, contract amendments,	Contractual Basis Legitimate Interests

No.	Purpose	Legal Basis
	granting/receiving authority, briefings, providing information or testimony, attending training, seminars, or academic events on behalf of the Organization — as well as for internal processes, performance evaluation, compensation, or welfare.	
(6)	For authority verification, granting and receiving power of attorney, and for use as evidence for related transactions.	Legitimate Interests
(7)	For meeting support, collaborative operations, pre-procurement data preparation for joint sourcing among group companies per the Organization's procurement rules and processes — including preparing related working documents, meeting minutes, and reports.	Legitimate Interests
(8)	For public relations about projects and meetings between the Organization and group companies.	Legitimate Interests
(9)	For use in verifying qualifications or suitability for performing services under contracts or agreements between group companies and the Organization.	Legitimate Interests
(10)	For providing services under contracts or agreements between the Organization and group companies.	Legitimate Interests
(11)	For improving operations or services between the Organization and group companies.	Legitimate Interests

Where the personal data collected by the Organization for the above purposes is necessary for the performance of a contract or legal obligations, if the data subject does not provide such data, the Organization may be unable to consider entering into a transaction or managing the contract with the data subject (as applicable).

3. Collection of Personal Data and Types of Personal Data That May Be Collected

In general, the Organization collects personal data by requesting or asking for it directly from the data subject. However, in some cases, the Organization may collect data from other sources — e.g., the data subject's employer, the data subject's secretary or coordinator, government agencies, or other publicly available sources such as websites or internet searches.

3.1 General Personal Data

- (1) Identity Data – e.g., name, surname, national ID number, passport number, date of birth, gender, age, nationality, signature, photograph, professional licence number, employee code (for group company workers), driving licence details.
- (2) Contact Data – e.g., address, household registration, telephone, fax, email, geolocation, emergency contact, social media accounts, LINE ID, secretary information.
- (3) Financial Data – e.g., bank account number.
- (4) Communication Data – e.g., date, time, and location of contact with the Organization; recordings of images or audio during contact with the Organization.
- (5) Employment Data – e.g., employer or parent organization, workplace, job title.

- (6) Education, work history, training, expertise, and achievements.
- (7) Personal preferences and interests.
- (8) CCTV recordings.
- (9) Data on attendance at meetings between the Organization and group companies, training, seminars, activities, or other projects organized by the Organization — including still images, videos, and/or audio recordings during such events.
- (10) Other data necessary for litigation or enforcement — e.g., marital status, asset information.
- (11) Opinions, suggestions, and complaints.
- (12) History of participation in the Organization's activities or projects.
- (13) Screening data pursuant to epidemic prevention measures.
- (14) Driving behaviour data for the Organization's vehicles.

3.2 Sensitive Personal Data

In general, the Organization does not intend to collect and use religion and blood type data appearing on copies of the data subject's national ID card for any specific purpose. If the data subject provides a copy of their national ID card, please redact such information. If not redacted, the data subject is deemed to authorize the Organization to redact it; the document with such data redacted shall be fully valid and legally enforceable. If the Organization is unable to redact due to technical limitations, it will collect and use such data solely as part of identity verification documentation.

Where the Organization needs to collect sensitive personal data, it will seek explicit consent from the data subject on a case-by-case basis. The Organization may process the following sensitive personal data:

- (1) Racial or ethnic origin
- (2) Religious belief
- (3) Health data and/or disability information
- (4) Drug test results
- (5) Biometric data — e.g., facial recognition, voice recognition, and fingerprints

4. Retention Period for Personal Data

The Organization will retain personal data for as long as necessary for the purposes of collection, use, or disclosure as specified in this Notice. Retention criteria include the period during which the Organization continues to need the data for those purposes. The Organization may retain data further as required for legal compliance or statutory limitation periods, to establish, exercise, or defend legal claims, or for other reasons under the Organization's internal policies and regulations.

5. Disclosure of Data

In carrying out the purposes specified in this Notice, the Organization may disclose data subjects' data to the following external parties:

- 5.1** Group companies of the Organization.

5.2 Government agencies, regulatory bodies, state enterprises, state entities, public organizations, independent organizations established by law, or other legally mandated bodies, including competent officials — e.g., courts, police, Revenue Department, SEC, Anti-Money Laundering Office, Department of Skill Development, Department of Labour Protection and Welfare, Department of Energy Business, Ministry of Natural Resources and Environment, Ministry of Transport, Ministry of Energy, Office of the Ombudsman, Office of the Auditor General, House and Senate Committees, Legal Execution Department, Office of the Attorney General, and NACC.

5.3 Entities, organizations, or persons involved in legal claims, litigation, dispute resolution, or complaint/allegation proceedings — e.g., opposing parties and witnesses.

5.4 Agents, contractors/subcontractors, and/or service providers — e.g., professional advisors, transport providers, marketing agencies, travel and accommodation providers, event/training/seminar organizers, media production companies, PR contractors, insurers, auditors, and legal advisors.

5.5 Persons with business relations (where necessary for contract performance in joint projects or business activities).

5.6 Management system certification bodies.

5.7 Training participants.

5.8 Shareholders, bondholders, and their representatives.

5.9 Banks or financial institutions.

5.10 Assignees of the Organization's rights, duties, and benefits — including their authorized representatives — e.g., in restructuring, mergers, demergers, or business transfers.

5.11 Other external parties — e.g., disclosure via the e-GP system, announcing selected candidates through the Organization's social media, or distributing activity photographs or news to media and external parties.

6. International Transfer or Disclosure of Data

In some cases, it may be necessary to disclose the data subject's personal data to overseas recipients whose personal data protection standards may differ from Thailand's — as the Organization may have group companies located abroad or conduct business or transactions with foreign companies. The Organization may therefore need to disclose personal data to such entities, as well as to government agencies, professional advisors, and other persons who need access to such data for normal business operations. This may also include international disclosure for litigation or arbitration proceedings that may arise in the future. Additionally, the Organization may store data on overseas servers or cloud services and process data using overseas software or applications.

In any case of such transfer, the Organization will comply with the Personal Data Protection Act B.E. 2562 (2019).

7. Your Rights as a Data Subject

As a data subject, you have rights under the Personal Data Protection Act B.E. 2562 (2019). You may exercise your rights through the channels specified by the Organization in Section 9 or via the

Organization's website, once the personal data protection law becomes applicable to the Organization. Your rights are as follows:

7.1 Right to Withdraw Consent

Where the Organization requests your consent, you have the right to withdraw consent for the processing of personal data at any time, except where withdrawal is limited by law or a contract that benefits you. Withdrawal of consent does not affect personal data processing already lawfully carried out.

7.2 Right to Access

You have the right to access and receive a copy of your personal data held by the Organization, and to request that the Organization disclose how it obtained such data without your consent.

7.3 Data Portability Right

You have the right to request the Organization to transfer your personal data as permitted by law.

7.4 Right to Object

You have the right to object to the processing of personal data concerning you for the collection, use, or disclosure of personal data as permitted by law.

7.5 Erasure Right

You have the right to request the Organization to delete your personal data as permitted by law. However, the Organization may store personal data electronically and some systems may not support deletion; in such cases the Organization will arrange for destruction or anonymization of the data.

7.6 Right to Restrict Processing

You have the right to request the Organization to suspend the use of your data as permitted by law.

7.7 Rectification Right

If you believe data held by the Organization is inaccurate, or your personal data has changed, you have the right to request correction so that the data is accurate, current, complete, and does not cause misunderstanding.

7.8 Right to Lodge a Complaint

You have the right to lodge a complaint with the competent official under the Personal Data Protection Act B.E. 2562 (2019) if the Organization violates or fails to comply with the said Act.

8. Amendments to This Notice

The Organization may amend this Privacy Notice from time to time. When any amendment is made, the Organization will announce it on its website and/or notify data subjects by email. Where consent is required, the Organization will also seek additional consent.

9. Contact Information

If you have any questions or wish to inquire further about the protection of your personal data, the collection, use, or disclosure of your data, the exercise of your rights, or any complaints, you may contact the Organization through the following channels:

Name: PPP Green Complex Co., Ltd.

Address: 321 Moo 5, Chang Raek Sub-district, Bang Saphan Noi District, Prachuap Khiri Khan 77170

Tel (HQ): +66 32 909 611

Email: dpo@pppgc.co.th