

Company Policy: General Privacy Policy		Date: 27 May 2022
Title: General Privacy Policy	Rev: 0	Page: 1 of 7

General Privacy Policy (“Privacy Policy”)

Prepared by:  4677DA8BE38E49C...

Date: 2022/05/30 | 4:02 PM

(by Markus Ganterer)

Approved by:  061EDBBB0A754C8...

Date: 2022/05/31 | 12:34 PM

(by Franck Constant)

Company Policy: General Privacy Policy		Date: 27 May 2022
Title: General Privacy Policy	Rev: 0	Page: 2 of 7

Privacy Policy

Effective Date 1 June 2022

1. About this Privacy Policy

Constant Energy (Services) Company Limited and its affiliates (together called “the Company”) value and recognize the importance of privacy and the protection of your personal data. To comply with the Personal Data Protection Act, B.E. 2562 (and the relevant rules and regulations issued thereunder) (“Personal Data Protection Act”), we have issued this Privacy Policy to inform you regarding the personal data we collect, use and disclose, and your rights as data subjects. To protect your personal data, we have established information security measures and procedures to protect unauthorized access, disclosure, use or alteration of your personal data in line with applicable laws.

This Privacy Policy covers all services provided by the Company on our web sites, applications, social media, platforms and other channels to our customers, business partners and third parties who interact with the Company, excluding the Company’s employees. In order to comply with applicable laws or to improve the Company’s services, the Company may need to revise this Privacy Policy. You are advised to check our web site from time to time for any update to our Privacy Policy.

2. Types of Personal Data We Collect

“Personal Data” means any information relating to an identified or identifiable natural person (“Data Subjects”), excluding information relating to deceased individuals.

The Company will collect your Personal Data only to the extent necessary and for lawful purposes. We may obtain your Personal Data from you either directly or indirectly through various means, for example, by electronic means, documents, through our agents or enquiries with the relevant bodies or government authorities.

The types of Personal Data we collect may include :

- Personal information such as name, surname, date of birth, address, telephone number, email, age, personal identification number including a copy of ID, passport, license and permit, educational background, work experience
- Person-identifiable images or information
- Sensitive Personal Data such as race, religion, health data, biometric data, disability information or other sensitive personal data voluntarily disclosed to the Company for the purposes of entering into or performing a contract or receiving services from the Company. We will not collect, use or disclose such information, unless we have obtained express consent from the data subjects, or it is necessary to do so as permitted by law.

If we have received Sensitive Personal Data unintentionally and do not have the intention to collect such information, we will delete such information, to the extent possible, and will not use such information without express consent from you.

Company Policy: General Privacy Policy		Date: 27 May 2022
Title: General Privacy Policy	Rev: 0	Page: 3 of 7

- Technical information such as web browsing and searching on our web sites. We use cookies to collect such information.
- Information relating to marketing and communication such as registration to receive updates including communications with us via social media.

3. How we collect your Personal Data

- We collect Personal Data from the data subjects directly, including when the data subjects voluntarily provide their information in their registration or request to receive our service or job applications, membership registration, user account registration or update, or information provided by suppliers, contractors, customers, visitors or other individuals related to such persons through their communication with us, our staff or our agents, information relating to user account, use of our products and/or services through contact, visit or search on our web sites, applications, emails or other means, including information on customers' participation in various activities on our platform, surveys, assessments, seminars and roadshows.
- We use tracking technology when you visit our web sites.
- We may collect your Personal Data through our affiliates.
- We may collect your Personal Data through third parties, for example :
 - Government agencies
 - Agents, recruitment agencies and other intermediaries
 - Business partners
 - Social media, platform and advertising companies

We may collect your Personal Data through such means to update the Personal Data of our customers and to improve the quality and effectiveness of our products and services.

4. Cookies and other tracking technologies

We use cookies and other tracking technologies on our web sites, applications and other online platforms, including Google Analytics and Facebook Conversation Tracking in order to collect information such as type of browser, time spent online, pages visited, URL, language settings and other computer traffic data, for security purposes, facilitating web site usage, greater efficiency in communication, collecting statistical information, and improving web and application browsing experience in order to respond to your preferences when you are using our service online. Where we use necessary cookies for the above purposes, we are not required to obtain consent from online users. In addition, we may use optional cookies as a tool to assist us in selecting advertisements or offers that you may be most interested in to be displayed while you are using our service online or to send marketing emails. In addition, we use cookies to track response to online advertisements and marketing emails. In such cases, we will obtain consent from the data subjects before we install optional cookies on their device. Where the data subjects have consented to the installation and use of optional cookies, the data subjects can manage these cookies settings at any time.

5. How long we keep Personal Data

Company Policy: General Privacy Policy		Date: 27 May 2022
Title: General Privacy Policy	Rev: 0	Page: 4 of 7

We will retain your Personal Data as long as necessary to achieve the purposes set out in this Privacy Policy, unless we are required or permitted by law to retain such information for a longer period, for example, for the duration of the statutory period applicable to the relevant matter, or for legal process or investigation of the relevant government authorities.

6. Purposes of Collection

6.1 To enter into a contract or perform contractual obligations

- To evaluate the qualifications to enter into a contract with the Company, perform a contract such as employment contract, hire of work contracts, sales contract, or other service contracts with the Company
- To deliver our service in accordance with your needs, we will use your Personal Data to provide products and/or services which meet your objectives under the contract or as requested by you.
- To approve the procurement of products and/or services.
- To carry out any other act relating to our products and/or services, for example, processing, contact, notification, delivery of work to third parties including outsourced service providers, assignment of rights and obligations.

If you do not provide your Personal Data to us, we may not be able to enter into or perform a contract with you and may not be able to provide products and/or services to you.

6.2 To comply with legal obligations

We may collect, use and/or disclose Personal Information such as information of directors, representatives, and agents of corporate customers and information of persons who are under a court receivership order in order to comply with applicable laws, for example, securities and exchange, tax, anti-money laundering, computer crimes and bankruptcy laws. In addition, we have the duty to comply with the orders of public authorities or officials having the powers and duties under the law, and we may have to provide information to cooperate with relevant foreign authorities.

If you do not provide your Personal Data to us, we may not be able to provide products and/or services to you.

6.3 Legitimate interest of the Company, other persons or juristic persons

For example :

- For security purposes, we use CCTV at our premises including solar plants.
- To conduct inspections including energy-related inspections and surveying objects or area in the ordinary course of the Company's business, we may use drones on our premises.
- To foster the relationship with our customers, such as handling complaints, customer feedback, customer relations activities by our staff, communications and offers of

Company Policy: General Privacy Policy		Date: 27 May 2022
Title: General Privacy Policy	Rev: 0	Page: 5 of 7

products and/or services that are similar to those currently received by you for your benefit from time to time.

- To manage risks, monitor compliance, administer internal affairs, prevent and detect violation of laws such as anti-corruption, cybersecurity, anti-money laundering and other laws.
- To provide information security to Personal Data.

6.4 To conduct marketing activities and improve our service

We collect Personal Data for statistical and marketing purposes, such as taking photographs and voice recordings in meetings, seminars, recreational activities and events. If you do not provide your Personal Data to us, we may not be able to provide our services to you in an effective manner.

In addition, we collect your Personal Information to enable you to benefit from our products and/or services to which you have granted consent, for example, to enable you to receive better products and/or services which correspond to your needs, to enable you to receive offers, special benefits, advise and updates including the right to participate in special activities. If you do not provide your Personal Data to us, we may not be able to provide our services to you in an effective manner.

7. How we disclose your Personal Data

We do not sell or disclose your Personal Data without your prior consent. However, for legitimate interests of the Company or other persons, or to comply with our legal obligations, we may need to disclose your Personal Data, as necessary to comply with the law, to the following persons :

- Our affiliates
- Our business partners, shareholders, and other stakeholders
- Our data processors
- Public authorities or officials having the power and duty under applicable law

The above persons may be located in and outside of Thailand. In disclosing your Personal Data to such persons, we will ensure that such persons keep your Personal Data confidential and do not use your Personal Data for purposes other than specified by the Company.

If you believe that any person to whom the Company discloses your Personal Data uses your Personal Data for unlawful purposes, you may notify us through the contact details provided in this Privacy Policy so that we can take appropriate action.

In addition, we may need to disclose Personal Data to comply with our legal obligations. For example, we may need to disclose Personal Data to public authorities or officials, supervisory bodies for the service provider and service recipient, including where we are requested to disclose Personal Data in accordance with an official order, such as a court order in legal proceedings or legal execution process, or requests from private entities or other third parties involved in a court

Company Policy: General Privacy Policy		Date: 27 May 2022
Title: General Privacy Policy	Rev: 0	Page: 6 of 7

proceeding, including where it is necessary to enforce the terms and conditions of service of the Company, disclosure in corporate reorganization, merger and acquisition, in which case the Company may transfer all or part of customers' information to the relevant entities.

8. Rights relating to your Personal Data

- You may update or delete your Personal Data by connecting to your user account or sending a request to us. We will take appropriate actions as permitted under the Personal Data Protection Act.
- You have the right to object to the processing of your Personal Data if the collection, use and disclosure of your Personal Data is carried out for the legitimate interest of the Company as can be reasonably expected by you, except where the Company is able to show that the importance of such processing of your Personal Data outweighs your right or where such processing is required by law or where such processing is necessary for the purpose of initiating a legal claim, as the case may be.
- You have the right to access and request an electronic copy of your Personal Data, the disclosure and transfer of your Personal Data to other entities via electronic means, unless it is not technically possible to do so, by sending a request to us. We will take appropriate actions as permitted under the Personal Data Protection Act.
- Where you have granted consent to the Company to process your Personal Data or for specific activities, you have the right to withdraw your consent at any time, subject to the provisions of the Personal Data Protection Act.
- If you believe that the Company does not manage your Personal Data in accordance with the Personal Data Protection Act, you have the right to file a complaint with the relevant authority.

9. Personal Data Security Measures

We have established appropriate safeguards including technical and organization measures to prevent the loss, unauthorized access to, use, alterations, amendments or disclosure of your Personal Data.

We will ensure that third parties engaged by the Company to process Personal Data carry out such processing in accordance with the Company's instructions and have appropriate data security measures.

10. Company's contact details

If you wish to exercise your data subject rights, or have any questions or complaints, you may contact us at :

Constant Energy Services (Thailand) Company Limited

23/30 Sorachai Building 14/F, Sukhumvit Soi 63, Bangkok 10110, Thailand

Or email : compliance@constantenergy.net

Company Policy: General Privacy Policy		Date: 27 May 2022
Title: General Privacy Policy	Rev: 0	Page: 7 of 7