



As of March 7, 2024

(–Translation–)

## Privacy Policy for Shareholders' Meeting of Rabbit Holdings Public Company Limited

Rabbit Holdings Public Company Limited (the "Company") realizes the importance of the protection of personal data. The Company therefore shall comply with its safety measure for the collection, use and/or disclosure of the Personal Data (as defined below).

This Privacy Policy (the "Privacy Policy") describes how the Company collect, uses and/or discloses your Personal Data as a shareholder, proxy, custodian or the authorized person to act on behalf of a corporate shareholder for the Company's meeting of the shareholders/securities holders.

The Company may amend and/or revise this Privacy Policy from time to time which you will be notified if any material amendment has been made. The latest amendment date will be indicated on the top of page of the Privacy Policy. The Company urges you to carefully read and consistently review any amendment to the Privacy Policy made by the Company under the terms and conditions of this Privacy Policy.

### 1. Personal data collected by the Company

For the purpose of this Privacy Policy, "Personal Data" means any information relating to a person, which enables the identification of such person, whether directly or indirectly as described below.

The Company may collect your Personal Data, whether directly or indirectly from other source, i.e. the Company may collect your Personal Data directly from you (e.g. through your interaction on the Company's online platform, website or mobile application, e-mail, telephone, questionnaire, name card, post, during meetings and events, personal appointment, or from the Company's system, database or transportation software system, and/or electronic files).

Furthermore, the Company may collect your Personal Data indirectly from the companies under BTS Group (as defined in the Clause "Disclosure of your Personal Data to third parties" below) or public sources (such as online media and third parties or relevant governmental authorities' website). The Personal Data collected are subject to your relationship with the Company or BTS Group. The Company may collect your following Personal Data:

1) **Personal Data** such as name, last name, sex, nationality, occupation, date of birth, status, photograph, picture, voice recording, signature, identification number, passport number, taxpayer identification number, government official identification number, company registration certificate, business certificate (such as custodian) including information on driving license or information on any other cards issued by government authorities, details regarding shares/securities holding (such as corporate holder, number of

share/securities held, share/securities number, category, shareholding ratio), details on proxy (name, address of the proxy, name of the Company's independent director), information regarding voting at the meeting (such as your voting at each agenda whether you agree, disagree or abstain etc.) and/or dividend amount;

**2) Contact Information** such as address, phone number, mobile phone number and/or e-mail;

**3) Financial Information** such as information regarding bank account (such as account name, account number, name of the bank, swift code, account location) and/or information on the relevant contracts such as Share Purchase Agreement; and

**4) Sensitive Information** such as health information (for the purpose of screening and control of communicable or epidemic disease).

The Company will not collect, use and/or disclose sensitive Personal Data unless the Company has obtained an explicit consent from you or it is legally permissible to do so.

In the event that the Company has collected Personal Data of other person from you (such as father, mother, spouse, child or emergency contact person), e.g. name, last name, address, relationship, contact information and any relating documents, the Company shall deem that you represent and warrant to the Company that you have an authority to do so by (1) inform such person of the details of this Privacy Policy and (2) you obtained consent (as necessary or required by law) for the Company to use such Personal Data under this Privacy Policy.

*Remark: For supporting document for registration and/or proxy appointment that the shareholders and/or proxies submitted to the Company which may contain sensitive personal data, such as race, blood type, and religion, which are not required for the purpose of holding the Shareholders' Meeting, the Company would like to inform that the Company has no intention to collect such sensitive personal data. As such, the shareholders and/or proxies may redact those sensitive personal data prior to submitting the documents to the Company. In case that the shareholders and/or proxies did not redact those sensitive data contained in the documents, the Company reserves its right to redact such sensitive personal data. In such case, it shall be deemed that the Company has not collected any of the said sensitive personal data.*

## **2. Purposes of the collection, use and/or disclosure of your Personal Data**

Apart from obtaining your consent in the case that it is legally required, to collect, use and/or disclose your Personal Data for the following purposes, the Company may rely on or hold to (1) contractual basis – for entry into an agreement or execution of an agreement with data subject or performing contractual obligations to the data subject; (2) legal obligations basis – for the legal compliance of the Company; (3) basis of lawful benefit of the Company and third parties, which must be in proportion to the benefit and fundamental rights in relation to your Personal Data; (4) basis of protecting or preventing harm against the life, body, or health of a person; and/or (5) public interest basis – for the performance of duty in carrying out a task for the public interest of or the performance of duty in exercising the state's power or other legal grounds as permissible under the law on personal data protection (as the case maybe), depending on your relationship with the Company:

- 1) identity check and verification and proceeding as you requested;
- 2) holding the meeting of shareholders/securities holders and proceeding regarding voting and vote counting at the meeting of shareholders/securities holders;
- 3) preparing the register book of shareholders/securities holders or preparing title documents for holding or transferring, issuing of new share/securities certificate and/or splitting share/securities certificates for the sale and purchase and/or exchange of share/securities;
- 4) dividend payment to the shareholders/securities holders;
- 5) security and maintaining security for the Company's business;
- 6) compliance with rules, regulation and articles of association of the Company, including laws and/or legitimate orders of the courts, regulatory authorities, government agencies, and/or state organizations;
- 7) exercising of rights or protecting the legitimate interest of the Company as necessary, such as auditing and protecting fraud, crime or non-compliance with laws;
- 8) public interest for protecting third parties who are in the premises or places under the Company's supervision; and
- 9) protecting or preventing harm against your life, body, health, or properties or those of third parties (as the case may be), such as for precaution of contagious disease or epidemic.

In the case that you cannot provide your Personal Data as the Company may request, as necessary, to collect your Personal Data as legally required, or to perform contractual obligations or to enter into an agreement with you, the Company may not be able to allow you to attend the meeting convened by the Company.

### **3. Disclosure of your Personal Data to third parties**

The Company may disclose your Personal Data to BTS Group, the Company's business partners, securities depository, service providers (such as the company providing services on registration system and vote counting), consultants, law enforcing agencies, courts, state officials, state agencies and regulatory authorities. Please see the list of companies under BTS Group at <https://www.rabbitholdings.co.th/en/corporate-governance/personal-data-protection-policies>

### **4. Transfer of your Personal Data to foreign countries**

The Company may disclose or transfer your Personal Data to foreign countries with a personal data protection standard that is higher or lower than of Thailand. The Company shall proceed per the procedures required by the law.

## **5. Period for retention of personal data**

The Company shall retain your Personal Data for as long as it is reasonably necessary to fulfil the purpose for which the Company collected it and to comply with the applicable laws. The Company may retain your Personal Data longer if it is necessary for the Company's compliance with applicable laws.

## **6. Cookies and Cookies Usage**

If you visit the Company's website, the Company will automatically collect your data by using tracking tools and cookies (including but not limited to Google Tag Manager, Google Analytics, Hotjar Matomo, Zendesk, Facebook Pixel Analytics, Facebook Ad Manager and Google Cloud). Cookies are tracking technology to analyze trend, manage the Company's website, track the website's user behavior or remember users' personalization setting. Some of the cookies are necessary for appropriate operation of such website. The others are for convenience of the users, such as cookies which remember your username securely and your preferred language.

Most browsers allow you to allow or block cookies. If you block cookies, your ability to use or access a part of or all functions in the Company's website may be restricted. Please see further of Cookies Policy at <https://www.rabbitholdings.co.th/en/corporate-governance/personal-data-protection-policies>

## **7. Safety measure**

The Company has prepared adequate personal data protection safety measure which includes administrative safety measure, technical safety measure and physical safety measure in relation to the access or control of the access to Personal Data to maintain the confidentiality, accuracy, and completeness, and readiness for the use of Personal Data for the purpose of avoidance of loss, access, use, change, amendment or disclosure of personal data without authority or improperly in compliance with the applicable laws.

For further details of the Company's safety measure, please see full version of Privacy Policy of the Company at <https://www.rabbitholdings.co.th/en/corporate-governance/personal-data-protection-policies>

## **8. Your rights as a data subject**

Subject to the applicable laws and legal exemptions thereunder, you may have the rights to access, and obtain a copy of your Personal Data, to request the Company to disclose the acquisition of your Personal Data without your consent, to transfer, amend, erase, destroy, and anonymize your Personal Data, including to object and suspend the collection, use and/or disclosure of your Personal Data in certain cases. The Company may withdraw your consent in the case that the Company is relying on such consent. In addition, if you

consider that the Company violates the provisions of the law on personal data protection, you have the right to lodge a complaint to the relevant authority as prescribed by law.

**9. Company contact information**

Should you have any questions, inquiries or requests to exercise the rights in relation to your Personal Data, please kindly contact the Data Protection Officer (DPO) at:

Rabbit Holdings Public Company Limited

No. 21, TST Tower, Viphavadi-Rangsit Road, Chomphon, Chatuchak,

Bangkok, Thailand 10900

Email: [dpo@rabbitholdings.co.th](mailto:dpo@rabbitholdings.co.th)

Tel: 02-2738838

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