

SCG Privacy Policy

SCG 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 Siam Cement Public Company Limited therefore approved this SCG Privacy Policy (“SCG Privacy Policy”) to enable SCG to have clear and appropriate guidelines, mechanisms, governance measures, and management of personal data.

1. Principle Scope of application

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

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 SCG means the Siam Cement Public Company Limited and its subsidiaries pursuant to the consolidated financial statements of the Siam Cement Public Company Limited.

3. Privacy Policy: Personal Data Protection Governance

- 3.1 SCG will establish a personal data protection governance structure to determine appropriate methods and measures to comply with the law as follows:
- (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 SCG Privacy Policy, and
 - (2) Appoint SCG Data Protection Officer (SCG DPO) with the roles and responsibilities as specified in SCG Privacy Policy.
- 3.2 SCG will establish policies, standards, guidelines, procedures, and other documents related to personal data protection in accordance with the law and SCG Privacy Policy.
- 3.3 SCG will set up a policy management process to ensure continuous compliance with SCG Privacy Policy.
- 3.4 SCG will continuously conduct training for SCG employees to make SCG employees aware of the importance of protecting personal data and ensure that all relevant SCG employees are trained and have knowledge and understanding in protecting personal data and comply with SCG Privacy Policy.

4. Privacy Policy: Personal Data Processing

- 4.1 SCG 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, SCG will consider necessity, lawfulness, and SCG's business practices when determining objectives of personal data processing and the time period for retaining personal data. In addition, SCG will maintain adequate confidentiality, accuracy, and security of the personal data.
- 4.2 SCG will establish controlling procedures related to personal data management at every step in accordance with the law and SCG Privacy Policy.
- 4.3 SCG 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 a change to related programs or activities.

- 4.4 SCG 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. SCG will also provide measures to supervise and monitor compliance with such process.
- 4.5 SCG will establish a mechanism for checking the accuracy of personal data and rectifying personal data.
- 4.6 In the event that SCG sends, transfers, or allows other persons to use personal data, SCG will enter into agreements with such persons to appropriately stipulate rights and obligations of the relevant parties in accordance with the law and SCG Privacy Policy.
- 4.7 SCG will comply with the applicable laws when sending or transferring personal data to recipients located outside Thailand.
- 4.8 SCG will destroy personal data when the time limit expires. The disposal will be made in accordance with the law and SCG business operations.
- 4.9 SCG 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

SCG will establish measures, 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 SCG will establish adequate security measures related to personal data including taking steps to prevent the leakage and the unauthorized use of personal data.
- 6.2 SCG 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 SCG will establish notification process to data subjects, state officials, data controllers (in the case that SCG is a data processor or a joint controller) and other parties in accordance with the law.

7. Privacy Policy: Compliance

- 7.1 SCG 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 SCG 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:

- (1) Ensure the establishment of personal data protection structure and internal control structure in order to comply with the law and SCG Privacy Policy; and
- (2) Supervise and support SCG to take effective protection of personal data in compliance with the law.

8.2 Privacy Committee

SCG Risk Management Committee acts as the Privacy Committee, with the following roles and responsibilities:

- (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;
- (2) Assess the efficiency of compliance with SCG'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;
- (3) Establish and review standards and guidelines to ensure that SCG operations comply with the law and SCG Privacy Policy; and
- (4) Appoint SCG Personal Data Protection Officer (SCG DPO).

8.3 The management has role and responsibility to follow up and control functions under their supervision to comply with SCG Privacy Policy and to support the awareness promotion among SCG employees.

8.4 SCG Personal Data Protection Officer (SCG DPO) has roles and responsibilities prescribed by applicable laws, including the following roles and responsibilities:

- (1) Regularly report the status of personal data protection to the Privacy Committee and make recommendations to improve SCG's personal data protection to be at all times up to date and in accordance with the law;
- (2) Advise SCG employees to comply with the law and SCG Privacy Policy; and
- (3) Examine operations of SCG to ensure compliance with the law and SCG Privacy Policy.

8.5 SCG employees have the following roles responsibilities:

- (1) Comply with SCG Privacy Policy, standards, guidelines, procedures, and other documents related to personal data protection; and
- (2) Report personal data incidents and non-compliance with the law or SCG Privacy Policy to supervisors.

9. Penalty for Noncompliance with SCG Privacy Policy

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

This Privacy Policy becomes effective on and from 1 May 2020 onwards in accordance with the resolution of the Board of Directors of the Siam Cement Public Company Limited dated 29 April 2020.