

Privacy Notice

1. General provision

Suntory Beverage & Food (Thailand) Co., Ltd., Suntory Beverage & Food Trading (Thailand) Co., Ltd., Suntory Beverage & Food International (Thailand) Co., Ltd., BRAND'S (1835) Co., Ltd., Cerebos Foods (Thailand) Ltd., and Suntory Wellness (Thailand) Co., Ltd. (collectively referred to as the “**Company**”) underline the importance of protecting Personal Data in accordance with the Personal Data Protection Law, and the Company’s policies and procedures relating to the protection of Personal Data. Therefore, the Company has prepared this Privacy Notice (“**Notice**”) so that data subjects (“**you**”) become fully aware of how your Personal Data is processed before or while the Company is collecting your Personal Data.

In this regard, the Company advises that you read and gain a proper understanding of this Notice before providing your Personal Data to the Company. If you have any concerns and questions or require more information about this Notice and other related notices and policies, you can contact the Company through the channels listed at the end of this Notice.

2. Definition

2.1 “**Personal Data Protection Law**” means the Personal Data Protection Act B.E. 2562, including rules, regulations, and announcements issued under the Personal Data Protection Act B.E. 2562 by the Personal Data Protection Committee or other competent authorities, and any other laws relating to the protection of Personal Data or any other laws that must be adopted with the Personal Data Protection Act B.E. 2562.

2.2 “**Personal Data**” means any information relating to an identifiable individual, either directly or indirectly, such as name-surname, contact details, date of birth, etc., but excluding the information of a deceased person.

2.3 “**processing**” means collecting, using, or disclosing Personal Data.

2.4 “**Data Controller**” means an individual or a juristic person having a decision-making authority regarding the processing of Personal Data.

- 2.5 “**Data Processor**” means a person or a juristic person who implements procedures relating to the processing of Personal Data in accordance with an order of or on behalf of the Data Controller whereby such person or juristic person is not the Data Controller.
- 2.6 “**Sensitive Data**” means Personal Data relating to race, religion, ethnicity, political opinion, cult, religious or philosophical beliefs, sexual orientation, criminal record, health information, disability, labour union information, genetic data, biological data, or any other data which may affect the Data Subject in the same manner as stipulated in the Personal Data Protection Committee’s announcements issued under the Personal Data Protection Law.
- 2.7 “**Cookies**” means small files collecting Personal Data while gaining an access to a website on computers or other devices, such as smartphones, tablets, or web browsers, etc.
- 2.8 **Affiliates or group companies** mean:
- 1) Two or more legal entities, in which shareholders own 25% or more of the total shares of one legal entity, own 25% or more of the total shares in another legal entity; or
 - 2) Two or more legal entities, in which shareholders in one legal entity own shares of 25% or more of the total capital of one legal entity, own shares of 25% or more of the total capital in another legal entity; or
 - 3) Two or more legal entities, in which one legal entity owns shares of 25% or more of the capital of another legal entity; or
 - 4) A legal entity with shareholders in the first or subsequent tiers is the same legal entity, which owns shares of 25% or more of each legal entity; or
 - 5) Two or more legal entities having more than 25% of directors or persons with management authority of one legal entity constitute more than 25% of directors or persons with management authority of another legal entity.

3. Principles for processing Personal Data

- 3.1 Basic principles
- Lawfulness

The Company will process your Personal Data lawfully, fairly, and transparently under your acknowledgement or consent only, unless there is a law giving the power to do so without consent.

- Purpose limitation

The Company will process your Personal Data only according to the purposes specified by the Company that are consistent with the Company's lawful business operation.

- Limitation of data processing

The Company will process the Personal Data in accordance with the framework and purposes for the Company's business operations. Such Personal Data must not be used or disclosed for any purposes other than the purposes that have been notified to you, except the Company has obtained your consent or such use or disclosure is permitted by law.

- Accuracy

The Company will take reasonable step to verify the correctness of Personal Data by checking the Personal Data that fall out of the scope of the purpose for processing Personal Data. In this connection, the Company will consider erasing, destroying, or anonymizing such Personal Data by an appropriate method for managing such type of Personal Data.

- Appropriate storage period

The Company will collect your Personal Data for a reasonable period by considering the necessity of storing Personal Data.

- Security

The Company have taken basic measures to maintain the security of Personal Data against unlawful loss, access, destruction, use, alteration, adjustment, or disclosure.

- Accountability

The Company have established guidelines for Personal Data protection of the Company according to the duties and responsibilities under the framework of the Personal Data Protection Law. In addition, the Company is also responsible for any actions arising from the orders or actions of an authorized person of the Company

or the person responsible for the operation of the Company under the scope of powers and objectives set by the Company.

3.2 Guidelines for the processing of Personal Data

The Company will always seek your explicit consent before or while collecting Personal Data, except in the following cases that the Company may process your Personal Data without consent:

- **Contract:** the processing is necessary for fulfilling a duty under the contract that you are the counterparty or to process your request before entering into a contract.
- **Legal obligation:** the processing is necessary for the Company or the Data Processor to comply with the law.
- **Legitimate interests:** the processing is necessary for the Company or a third-party juristic person's legitimate interests person, unless where such interests are overridden by the fundamental rights of you as a data subject.
- **Vital interests:** the processing is necessary to protect or suppress harm to someone's life, body, or health.
- **Historical Document/Statistic/Research:** the processing is to achieve objectives relating to historical documents or archival for public interest or relating to research studies or statistics. The Company will provide appropriate preventive measures to protect your rights and freedoms as the data subject.
- **Public Interest:** the processing is necessary for performing a task in the public interest or performing duties in the exercise of state powers entrusted to the Company.

In general, the Company do not process Sensitive Data, unless it is necessary or unavoidable to process such Sensitive Data. If such an event occurs, the Company will ask for your explicit consent prior to or while collecting the Sensitive Data unless there are exceptions where the Personal Data Protection Law gives the Company the power to process without consent.

If you do not wish to provide your Personal Data, which such Personal Data is necessary or related to entering into a contract, receiving service, or taking action to comply with the law, the Company will not be able to proceed the mentioned actions for you because there is not adequate Personal Data to be able to process properly.

4. Purposes and types of Personal Data for processing

4.1 Company may collect, use, or disclose Personal Data for various purposes, as informed in the Privacy Notice. The Personal Data shall be processed differently depending on the types of the data subject, as shown below.

Customers	
Individuals who purchase products and/or receive services from the Company or may purchase products and/or receive services from the Company, or other persons such as a participant in a seminar, event, or bidding, persons requesting the Company’s news update, including representatives of customers who are legal entities or the data subjects.	
Purposes of data processing	Types of collected data
To enter into a contract and sign a contract, perform contractual duties, including a procurement, making a payment, an audit, a review, and assessment to approve a disbursement, as well as issuing relevant documents, e.g., receipts, etc.	Name, surname, gender, job position, number and copy of ID card, religion, tax identification number, address, contact information, bank account number, customer code, etc.
To keep as reference and evidence for internal control testing or to facilitate internal operations in the Company, such as customer records, etc.	Occupation, job position, passport number, mobile number, copy of ID card, religion/philosophy, photo, educational background, graduate diploma, professional licence, other educational documents, tax identification number, etc.

<p>To comply with the relevant law on document submission, audit as well as coordinate with the relevant government agencies such as Department of Consular Affairs and the Embassy, Department of Foreign Trade, Ministry of Commerce, Ministry of Finance, Department of Agriculture, Ministry of Agriculture and Cooperatives, Revenue Department, Excise Department, Customs Department, Food and Drug Administration (FDA), Ministry of Health, etc., which may include issuing relevant documents as requested by the law or the relevant authority.</p>	<p>Name, address, taxpayer information, copy of ID card, other documents as requested by the relevant law, etc.</p>
<p>To ensure that the executed transactions comply with the Anti-Bribery and Corruption (ABC) policy and to keep as evidence of a claim.</p>	<p>Prefix, first name, last name, taxpayer ID number, national ID number, gender, occupation, job position, passport number, copy of ID card, religion/philosophy, date of birth, employee ID, address, photo, etc.</p>
<p>To use Personal Data received from customers directly or Personal Data obtained from partners / third parties for offering products or services, promotional activities, awarding, advertising, and public relations of the Company, or for the purpose that the partner or third party has notified the customer.</p>	<p>Name, last name, contact information, photo, etc.</p>
<p>To disclose Personal Data received from customers or partners to organisations, entities, companies, or third parties, who are entering into various contracts with the Company, such as claims against insurance companies, etc.</p>	<p>Prefix, first name, last name, address, date of birth, signature, e-mail, gender, ID card number, health information, etc.</p>

To use for organising activities, awarding prizes, and other related matters, including collecting evidence related to the activities and awarding.	Prefix, first name, last name, bank account number, personal line, phone number, email, Facebook account, photos, videos, health information, etc.
To use for the marketing purpose, e.g., to study, research, evaluate, use for opinions, data analytics.	Social networking sites (e.g., Facebook, Instagram, Line), gender, race, ethnicity, genetic information, health information, address, educational background, photo, date of birth, height, phone number, etc.
To audit the expenses and payments between the Company and the customer.	Name, last name, copy of ID card, etc.
To use for the purpose of communication	Contact information such as name, last name, telephone number, e-mail, etc.
To manage the customer relations, proceed with the complaint processing, fraud investigation, as well as coordinating with relevant departments for complaints and/or corruption mediation prosecution.	Name, last name, address, telephone number, copy of ID card, copy of house registration, etc.

Vendor	
A natural person or juristic person who places a bid for entering into a trading business with and/or providing services to the Company or any other person with similar characteristics such as a contracting party, consultant, broker, speaker, project participant, client' representative who is a juristic person or data subject.	
Purposes of data processing	Types of collected data
To enter into and sign a contract, perform contractual duties, including a procurement, making a payment, an audit, a review, and	First name, last name, gender, job position, national ID number, copy of ID card, taxpayer ID number, address,

<p>assessment to approve a disbursement, as well as issuing relevant documents such as a receipt, etc.</p>	<p>contact information, bank account number, vendor code, etc.</p>
<p>To keep as a reference and evidence for internal control testing or to facilitate operations within the organisations, such as recording a vendor's code in the Company' SAP system, issuing cards to contractors, visitors, security guards, and nurses' information (outsourc), etc.</p>	<p>Prefix, first name, last name, gender, address, national ID number, taxpayer ID number, occupation, job position, passport number, mobile phone number, copy of ID card, religion/philosophy, photograph, date of birth, education history, graduate diploma/ professional licence, other educational documents, etc.</p>
<p>To use the Personal Data of clients received from the vendor or the Personal Data of the vendor for sales promotional activities, data analytics, advertisements, and public relation campaign of the Company.</p>	<p>First name, last name, photograph, etc.</p>
<p>To comply with the laws on the submission/delivery of documents and inspection and coordination with relevant agencies such as the Department of Consular Affairs, embassies, the Department of Foreign Trade, the Ministry of Commerce, the Ministry of Finance, the Department of Agriculture, the Ministry of Agriculture and Cooperative, the Revenue Department, the Excise Department, the Customs Department, the Food and Drug Administration (FDA), the Ministry of Public Health, as well as to issue relevant documents as requested by the laws or the relevant authorities.</p>	<p>Personal Data as stipulated in the referred law such as name, address, taxpayer information, etc.</p>

<p>To ensure that all transactions comply with the Anti-Bribery and Corruption (ABC) policy and to keep as evidence for a petition.</p>	<p>Prefix, first name, last name, taxpayer ID number, national ID number, gender, occupation, job position, passport number, copy of national ID card, religion/philosophy, date of birth, employee ID, address, photograph, etc.</p>
<p>To analyse sales and business trends, including planning sales, goods distribution, and determining promotion in Thailand and abroad.</p>	<p>First name, last name of the vendor or the vendor's contact person, etc.</p>
<p>To verify the correctness of expenses and the payments made between the Company and the vendors.</p>	<p>First name, last name of the vendor or the vendor's contact person, etc.</p>
<p>For the benefit of contacting and coordinating business or any other activities related to the Company.</p>	<p>Contact information such as first name, last name, phone number, e-mail, etc.</p>
<p>To organise activities, and awards, evaluate activities, organise travel programmes, make hotel room reservations, and other related matters for vendors, including keeping evidence related to the activities and awards.</p>	<p>First name, last name, address, photograph, date of birth, video, health information, food and drug allergy history, congenital disease, gender, national ID number, nationality, copy of house registration certificate, phone number, passport number, age, etc.</p>
<p>For liaising and consulting with specialists, consultants, lawyers, or any other person with similar capacity which may include mediation, prosecution, obtaining legal opinion.</p>	<p>Personal Data of such specialists, consultants, or lawyers, such as first name, last name, address, phone number, etc.</p>

Company's personnel

Executive, Director, Manager, Officer, Personnel, Employee, Trainee, or a person who works or performs any duties to the Company which receiving salaries, wages, welfare benefits, or other remuneration from the Company in return.

Purposes of data processing	Types of collected data
<p>To manage within an agency or organisation, including to convene Board of Directors Meetings, creating an account for the use of the Company systems to perform their tasks, system administration, user database management, making the employee card, data referral, data tracking, data report, internal approval, adding bank account number of the employees for disbursement benefits, preparing monthly payroll data, mutual interest checking, notice to entry or exit of Insurance, Life Insurance or Social Security and verifying the data accuracy through the Company's system.</p>	<p>Prefix, first name, last name, gender, employment record, employee id, date of birth, telephone number, occupation, job position, email address, bank account number, etc.</p>
<p>To comply with the law about lodging/providing the documents, Inspect and coordinate with relevant civil organisations, such as Consular Affairs, embassies, the Skilled Labour Development Centre, the Foreign Trade Department, the Ministry of Commerce, the Ministry of Finance, the Royal Forest Department, the Department of Agriculture, the Ministry of Agriculture and Cooperatives, the Revenue Department, the Excise department, the Customs Department, the Food and Drug Division (FDA) of the Ministry of Public Health, the Legal Execution office, Student loan fund, or the Board of Investment (BOI) that these purposes shall</p>	<p>Prefix, first name, last name, gender, ID card, nationality, car registration, address, photograph, date of birth, educational documents, house registration, occupation, position of authorized directors or coordinator, taxpayer ID number according to the relevant law or the public manual, etc.</p>

include documentation complying by the law or civil organisation's request.	
To organise an event, coordinate with participation in internal event of the organisation or organised by the civil organisation or private organisation, e.g., the Federation of Thai Industries, the Thai beverage industry association, Thai chamber of Commerce (AMCHAM), including sending the employee lists for medical checking up or providing a list to vaccination system with relevant organization.	Name, address, contact information, photograph or requested data in application forms of any events, etc.
To enter into and sign a contract, perform contractual duties, including making a payment.	Name, last name, job position, bank account number, etc.
To ensure any transactions comply with conflict of interest and bribery policy, the Anti-Bribery and Corruption (ABC) policy, and keep these data for such claims evidence.	Prefix, first name, last name, taxpayer ID, national ID number, gender, occupation, job position, passport ID number, bank account number, copy of ID card, religion/philosophy, date of birth, employee ID, address, and photograph, etc.
To survey satisfaction and comment on work performance and any events.	Prefix, name, last name, gender, video recording, telephone number, occupation, age, email, comment, etc.
To facilitate coordination in business or any events that involved the Company, e.g., telephone connection, call forwarding, sending letters or parcels, sending marketing media that such events shall do both inside and outside of the Company.	Contact information, e.g., name, last name, telephone number, email, etc.
To evaluate the performance of employees through the criteria and devices set up by the Company, including preparing employee's	Title of name, name, last name, employee's performance data, employee ID number, job position,

performance report, employee period of work, monthly salary payment, bonus payment, and disbursement.	email, performance of employee, employee's recording, starting date, assessment result of executive, photograph, etc.
To perform any action complying with the welfare that the Company provides to an employee, e.g., home loan, employee parking space management, coordinate with claiming the right from an insurance company, organise annual events and other events, provide locker, work uniform, staff shuttle bus, employee's reward, medical checking up, medical booking, medical history recording, infirmary service, cremation, maternity benefits, marriage benefits, dentistry benefits, optical benefits, business tools preparation, e.g., providing of leased car to eligible employees, credit cards, fleet card, mobile phone allowance, toll way easy pass, name card, virtual meeting devices to employees, etc.	Prefix, first name, last name, address, employee ID number, photograph, date of birth, video, medical information, food and drug allergy information, congenital disease, gender, ID number, credit information, nationality, copy of house registration certificate, passport number, age, spouse, and children's information, addresses of spouse, children and parents, car registration, copy of driving licence, etc.
To investigate misconducted cases.	Occupation, job position, telephone number, employee ID number, prefix, first name, last name of supervisor/division chief, etc.

Applicants	
The person who is selected or may be selected to be personnel of the Company, including the person who is referred in any documents collected by the Company or third parties.	
Purposes of data processing	Types of collected data
To enter into and sign a contract, including execution and performance of the contract.	Name, last name, address, contact information, etc.

To use for consideration of job admission in vacant position or additional employment.	Name, job position, address, telephone number, email, date of birth, insurance ID number, driving licence, fine history, the information using in the job application appeared on CV or other documents which is the part of recruiting process, etc.
To legally check the right to work, including the specific qualification of the job applicant.	Personal Data related to the right in work, Insurance ID number, Social Security number, Passport number, Nationality, Tax ID status and contact information, etc.
To analyse data for assigning the job ranking of the applicant.	Test and personality assessment
	Contact information, information for recruiting process of the applicant and interview's remark, etc.
To provide medical checking before starting work.	Prefix, first name, last name, height, welfare/benefits of employee, nationality, blood type/group, occupation, job position, etc.
To inspect for equal opportunities in recruitment process (Collection of this purpose will be done from time to time).	Gender, age, etc.

Shareholders or holders of securities	
A person who is a shareholder or holder of securities of the Company.	
Purposes of data processing	Types of collected data
To use for the benefit of contacting and coordinating any other activities related to shareholders or holders of securities of the Company.	First name, last name, telephone number, e-mail, copy of passport, copy of ID card, etc.

<p>To manage meetings of shareholders, such as sending notice of the shareholders' meeting, recording of meeting, including appointment of a proxy, as well as use or disclosure of such mentioned documents to agencies/organisations/juristic persons who intend to use such documents to enter into transactions/ juristic acts.</p>	<p>Prefix, first name, last name, video and audio recordings of the meeting attendees, number of shares, etc.</p>
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<p style="text-align: center;">General person</p>	
<p>Any other person who may include the aforementioned persons that the Company have to collect and process Personal Data both which directly processed by the Company itself and automatically collected, such as the use of Cookies, surveillance cameras or visitors of the Company's website, etc.</p>	
<p style="text-align: center;">Purposes of data processing</p>	<p style="text-align: center;">Types of collected data</p>
<p>For the benefit of contacting and coordinating regarding the business or any other activities related to the Company</p>	<p>First name, last name, phone number, e-mail, etc.</p>
<p>To prevent serious infectious diseases such as screening people infected with Covid-19, Covid-19 vaccination, etc.</p>	<p>Prefix, first name, last name, address, gender, national ID number, date of birth, phone number, etc.</p>
<p>To maintain safety and/or control the quality of the production and storage of products, including managing persons who have duties or rights to work in the designated area</p>	<p>Video footage, etc.</p>
<p>To determine consumer sentiment from different platforms.</p>	<p>Social networking sites, online media such as Facebook, Instagram, Line, etc.</p>

4.2 Cookies Policy

The Company's services on the website will record and store Cookies data to analyse and track the use of services on the website, including for retrospective review of activities in the event of a problem in use. The Company will record and store such data for different purposes as follows:

- **Necessary Cookies**

Basic Cookies that are necessary for the use of the website, such as encrypting your browsing, etc. The website will not be able to function without the use of these types of Cookies. Therefore, for the website to function properly, the Company rely on the legitimate interest in processing your Personal Data.

- **Preference Cookies**

Cookies for saving data of the user to respond to your preferences and behaviour, such as automatically modifying image, text, language, or recommendations to you. In processing your Personal Data with preference Cookies, the Company will always obtain your consent for the processing of your Personal Data.

- **Marketing Cookies**

To optimize marketing and advertising, the Company have created and/or provided this type of Cookies. This kind of Cookies may also include tracking your behaviour. In processing your Personal Data with marketing Cookies, the Company will always obtain your consent for the processing of your Personal Data.

- **Statistic Cookies**

Statistical Cookies help the Company to be able to record statistical data on the activities you have performed on the website of the Company. In this regard, the Company will always obtain your consent for the processing of your Personal Data.

- **Unclassified Cookies**

In some cases, some Cookies cannot be identified as a specific type of Cookies, and the Company still considers the type of such Cookie. Therefore, the Company will obtain your consent for the processing of your Personal Data.

Additionally, Cookies can also be classified into two types as follows:

- **First-Party Cookies**

This kind of Cookies is the Cookies that the Company prepared on the Company's own website.

- **Third-Party Cookies**

This kind of Cookies is not provided by the Company itself but is made by organisations, agencies, or third parties that the Company currently use the service; for example, the Company may use the service of analysing the usage data, displaying images and sound, or video, etc. Therefore, when you visit the website, content from other sources may appear embedded in the pages of the Company's website. The Company does not have any control over third-party Cookies in any way.

The Company will process Cookies as necessary. If a Cookie is collected as a session, the data will only be collected when the user visits the website, and the collection will end when you close the browser. These Cookies are not collected on your communication device or computing device. For other types of Cookies, the data will be collected for the period that the Company appropriately defined regardless of whether you have closed your browser or not. However, you have the right to delete this type of Cookies at any time.

Given that most browsers are set to accept Cookies by default, you can delete or deny the use of Cookies in the settings of the browser you are using. However, modifying your browser settings may result in changes in the functionality or layout of the website. You can set Cookies in the browser you are using such as Android (Chrome), Apple Safari, Blackberry, Google Chrome, iPhone or iPad (Chrome), iPhone or iPad (Safari), Microsoft Edge, Microsoft Internet Explorer, Mozilla Firefox, Opera etc.

5. How to collect Personal Data

5.1 Collection of Personal Data directly from data subjects

The Company shall collect Personal Data from you directly, e.g., from a job application form or during a recruitment process, and keep you informed of relevant procedures as

stipulated in the Personal Data Protection Law. If necessary, the Company is to expressly seek your consent for the collection of your Personal Data before or while collecting the Personal Data.

5.2 Collection of Personal Data from other sources

The Company may collect your Personal Data from other sources, not directly from you, such as searches for your Personal Data via websites or social networks (LinkedIn, Facebook, Instagram, etc.). In the event that the Company obtains your Personal Data from other sources, the Company will notify you of the data collection without delay but not later than thirty (30) days from the date on which the Company collects Personal Data from such sources and will request your consent to process your Personal Data. Unless in cases where the collection of data from other sources is under other legal bases, which is exempt from obtaining consent or providing details to the data subject in accordance with the Personal Data Protection Law.

6. Retention period

The Company shall retain your Personal Data as necessary for a reasonable period of time to carry out duties and services under the purposes set by the Company. The retention period may vary depending on the types of activity and service as follows:

- In case where the retention period is specifically required by laws, Personal Data will be retained for the periods stipulated by such laws.
- In case where the retention period is not specifically required by laws, the Company will determine the retention period based on the appropriate need for the purposes to collect, use or disclose such Personal Data and take into account the Company's and business sectors practices relating to Personal Data.
- In the event of any action to establish, comply with or exercise, or defend legal claims, the Company may retain Personal Data for a longer period than that in general cases.

However, where it is at the end of the period mentioned above, or it is unnecessary to process the Personal Data, the Company will delete or destroy the Personal Data or render it unidentifiable in an appropriate manner.

In some cases, the Company may be required to retain your Personal Data for more than the period specified above. Such cases may arise if the Company is informed or believes in good faith that you have violated any of the Company's Terms of Service, laws or disputes, and the investigations and evidence gathering for legal proceedings are required. The Company will retain your Personal Data for as long as necessary until the proceedings are completed or as required by relevant laws.

7. Storage location of Personal Data and determination of access rights to Personal Data

The Company has established guidelines and procedures to store the Personal Data appropriately to prevent damage that may be caused by the leakage, access, deletion, destruction, transmission, or unauthorized disclosure of Personal Data without the permission of the data subject or from the Company. In this regard, only those who are authorized by the Company or as prescribed by-laws are able to access to Personal Data or access to the premises in which the Personal Data is stored.

If the Company engages an entity or third party to process the Personal Data for the purpose and on behalf of the Company, the Company shall require such entity or third party to keep the Personal Data confidential and secure, including preventing Personal Data from being collected, used, or disclosed for any other purpose that does not meet the scope of hiring or violates the laws.

8. Use of Personal Data

Only persons authorized by the Company or as required by laws are able to use the Personal Data collected by the Company. The Company is to determine the access measures and the use of data in each category, situation, specific event, or related position, to prevent damage or violation of your rights.

In the case where the Company has collected the Personal Data before the Personal Data Protection Law comes into force, the Company is entitled to continue processing such Personal Data for its original purpose without obtaining any consent from the data subject.

9. Disclosure and transfer of Personal Data

In accordance with clause 4., the Company may disclose or transfer your Personal Data to an entity or a third party under your consent, unless such disclosure or transfer is made within the framework authorized by law without obtaining consent.

The Personal Data held by the Company may be disclosed or transferred between the Company and companies (as specified in clause 1. of this Notice), including disclosure or transfer to the following entities:

- Affiliates or group companies
- Newly established companies as a result of mergers or joint ventures or companies transferred from the Company
- Contract parties, vendor, service providers or business alliances of the Company such as information technology service providers, recruitment companies, etc.
- Government agencies
- The Company's professional consultants
- Any other agency or organisation that is or may be related to the Company's business operations

10. Cross border transfer and disclosure of Personal Data

In general, Personal Data under the Company's control will be processed in Thailand only. However, if necessary, the Company will disclose, transfer or forward Personal Data to the persons or parties as specified in clause 9 which located in foreign countries, subject to the legal basis set forth by the Personal Data Protection Law and in order to achieve the purpose as stated in this Notice. In such circumstance, the Company shall ensure that the destination country has adequate Personal Data protection standards, in accordance with the announcement governing the basis for the protection of Personal Data forwarded or transferred to foreign countries, unless the Company has obtained your prior consent or the Company is able to forward or transfer your Personal Data in accordance with the exceptions prescribed by the Personal Data Protection Law without considering the Personal Data protection standards of the destination country, such as, to comply with the law, to prevent or suppress a danger to the life, body or health of the data subject, to act as requested before entering

into an agreement, or to comply with an agreement to which you are a party, to enter into an agreement between the Company and other persons or juristic persons for your benefit, or to carry out an important action for the public interest, etc.

The transfer or disclosure of Personal Data to foreign countries will be processed under appropriate Personal Data protection measures. You are entitled to enforceable rights under these measures, including the right to receive legal remedies. The Company will carry out the aforementioned actions in accordance with the announcements, basis, and procedures prescribed by the Personal Data Protection Committee and relevant laws.

The Company processes your Personal Data under the systems and laws of Thailand. However, in some cases, cross-border transfer of such data for processing may be required. The Company will regularly check to ensure you that the transfer of data is safe and that the recipient of data in foreign country has preventive measures to protect data in accordance with the standards prescribed by the Personal Data Protection Law or request your consent in the event that the destination country has insufficient Personal Data protection measures, including entering into an agreement with third parties involved in the transferring, storing or processing of the data, in order to comply with the measures specified by the Company.

11. Rights of data subject

You have rights concerning your Personal Data under the Personal Data Protection Law. These rights include:

- **Right to withdraw consent**

You have the right to withdraw your consent for the processing of Personal Data provided to the Company at any time. Withdrawing consent may affect any action that may occur after the withdrawal of consent. However, the withdrawal of consent shall not affect the processing of Personal Data for which consent has lawfully been provided.

- **Right to access**

You have the right to access your Personal Data and request the Company to make a copy of such data, including the right to request the Company to disclose any acquisitions of your Personal Data that are under the Company's control.

- **Right to restriction**

You have the right to request the Company to restrict the processing of your Personal Data in the event that the Personal Data are under the pending examination process of the accuracy of Personal Data or being reviewed for the exercise of your right to object, or in the event that the Personal Data are subject to delete or destroy because the processing of such Personal Data is unlawful, or in the event that it is no longer necessary to retain the Personal Data for the purposes specified by the Company but you consider it necessary to retain such Personal Data for the purposes of the establishment, compliance, exercise of your rights or the defence of any legal claims.

- **Right to data portability**

You have the right to obtain your Personal Data under the Company's control. Such Personal Data shall be in a structured, commonly used, and machine-readable format. In addition, you have the right to request the Company to transfer your Personal Data to other Data Controllers or to receive your Personal Data from other Data Controllers to the extent that it can be done by technical means.

- **Right to object**

You have the right to object to the processing of your Personal Data under the Company's control if such processing of the Personal Data is carried out for purposes of direct marketing or if the Company applies a basis of a public task, legitimate interest, or archives/ research/ statistics for the processing.

- **Right to be forgotten**

If you consider that the Personal Data is unlawfully collected, or no longer need to be processed for the specific purposes, or you have withdrawn your consent for the data processing, and the Company no longer has the right to process such Personal Data, or you have objected to the processing of data in the event that your Personal Data is collected for direct marketing or legitimate interests or public tasks, you have the right to request the Company to delete, destroy or anonymize your Personal Data.

- **Right to rectify**

If you find your Personal Data is not accurate, not up-to-date, incomplete, or possibly misleading, you have the right to request the Company to rectify your Personal Data under the Company's control.

- **Right to lodge a complaint**

If you are of the opinion that the Company has violated the Personal Data Protection Law, you have the right to lodge a complaint to the Personal Data Protection Committee immediately.

If you wish to exercise the abovementioned rights or have any questions or concerns about the Company's practices, you may contact the Company in accordance with clause 14. of this Notice. However, in some circumstance, the Company may reject your request if there are legal grounds to reject, or it is in accordance with the purposes, or to comply with the laws or court order, or the exercise of such rights may cause an impact or damage to the rights or freedom of other data subjects.

12. Personal Data Protection

As a Data Controller, the Company has security measures and management to assure that your Personal Data shall be protected from the unlawful destruction, loss, access, use, modification or disclosure. The Company has determined the measurements and limitation of the access to Personal Data only to employees who responsible for or need to access to such Personal Data and has prevented the unauthorized access, including to the regular review of the security measures of Personal Data when necessary or when technology has been changed to ensure the efficacy of Personal Data security. In addition, the Company has provided the procedures in the event of breach or leakage of Personal Data in accordance with the Personal Data Protection Law.

It is publicly known that the processing of Personal Data via the Internet does not provide absolute security. Therefore, the Company shall upgrade and change its security system in a way that would make the system aligned with the current technology, provided that the spending on such technological advances is reasonable. However, the Company cannot

guarantee the security of your Personal Data if you have transmitted the data through a public network or a private network infected with malware that can cause data leakage.

13. Changes to this Notice

The Company may improve or amend this Notice to reflect any changes related to the processing of your Personal Data, and in accordance with the Personal Data Protection Law or other relevant laws. The Company shall notify you of any improvements or amendments and publish the amended Notice through appropriate channels.

14. Contact information of the Company

If you have any questions, suggestions, opinions, comments, or wish to exercise legal rights or make additional inquiries regarding this Notice, you may contact the Data Protection Officer (DPO) of the Company using the following contact information:

Data Protection Officer of Suntory Beverage & Food (Thailand) Co., Ltd., Suntory Beverage & Food Trading (Thailand) Co., Ltd., Suntory Beverage & Food International (Thailand) Co., Ltd., BRAND'S (1835) Co., Ltd., Cerebos Foods (Thailand) Ltd., and Suntory Wellness (Thailand) Co., Ltd.

Contact address: No.88 The PARQ Building, 15th floor, Ratchadaphisek Road, Khlong Toei, Khlong Toei, Bangkok

Phone number: (+66) 2-079-7999

Email: privacy_th@suntory.com

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Second amendment on 17th October 2022

Third Amendment on 31st March 2023