



PRIVACY POLICY FOR SHAREHOLDERS' MEETING  
ROCTEC GLOBAL PUBLIC COMPANY LIMITED

Effective Date 23 May 2022

Reviewed on 22 May 2026

## PRIVACY POLICY FOR SHAREHOLDERS' MEETING

### ROCTEC GLOBAL PUBLIC COMPANY LIMITED

**Roctec Global Public Company Limited** and the Roctec's Group Companies include Master and More Company Limited, Eye on Ads Company Limited, Green Ad Company Limited, and Gold Star Group Company Limited. (the "**Company**", "**we**", "**us**", or "**our**") recognizes the importance of the protection of personal data. We follow security procedures when collecting, using, and/ or disclosing your Personal Data (as defined below).

This privacy policy ("**Privacy Policy**") explains how we collect, use, and/or disclose Personal Data relating to you, who might be a shareholder, a proxy, a custodian, or a person authorized to act on behalf of a juristic shareholder, for the meeting of shareholders/securities holders of the Company.

From time to time, we may change and/or update this Privacy Policy. We will provide additional notice of significant changes and/or updates. We will post the date on which our Privacy Policy was last updated at the top of the Privacy Policy. We encourage you to read this Privacy Policy carefully and to check Privacy Policy regularly to review any changes and/or updates we might take in accordance with the terms of this Privacy Policy.

#### 1. WHAT PERSONAL DATA WE COLLECT

For the purposes of this Privacy Policy, "**Personal Data**" means any identifiable information, directly or indirectly, as listed below.

We may directly or indirectly collect your Personal Data from other sources. For example, we may directly collect your Personal Data (e.g., when you interact through our online platforms, our website or mobile application, communication through email, telephone, questionnaires, business cards, postage, during meetings and events, meeting with you, or from a source in the system, central drive/database of the Company or transport software and/or electronic files).

In addition, we may indirectly collect your Personal Data, e.g., from the BTS Group Companies<sup>1</sup> (as defined in "**TO WHOM WE MAY DISCLOSE PERSONAL DATA**" section below), or public sources (e.g., online social media and website of third parties or relevant governmental agencies). The specific types of Personal Data collected will depend on the relationship which you have with the Company or the BTS Group Companies. The followings are example of Personal Data that may be collected:

- 1) **Personal details**, such as name-surname, gender, nationality, occupation, date of birth, marital status, picture, photo, voice records, signature, national identification card number, passport number, tax identification number, civil servant identification number, certificate of registration of juristic person, business license letter (e.g., custodian),

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<sup>1</sup> Please see the list of BTS Group Companies at <https://www.btsgroup.co.th/en/about/subsidiaries-and-associated>

including information on driver's license or any other card issued by government agencies, details of shareholding/securities (e.g. securities issuing company, number of shares held, number, type, percentage of holding), details of proxy (name, address of the proxy, name of independent directors of the Company), information on the resolution of the meeting (e.g., the exercise of your right to vote in each agenda as agree, disagree or abstain), and/or the amount of dividends;

- 2) **Contact details**, such as address, telephone number, mobile number and/or email address;
- 3) **Financial details**, such as bank account details (e.g., account name, account number, bank name, swift number, account address), and/or details of relevant agreements, such as Share Purchase Agreement;
- 4) **Sensitive data**, such as health information (for screening and controlling communicable diseases or epidemics). We will only collect, use, and/or disclose sensitive data on the basis of your explicit consent or where permitted by law.

If you provide Personal Data of any third party (such as father, mother, spouse, children, or emergency contact) to us, e.g., name-surname, address, relationship, contact details, and related documents, you represent and warrant that you have the authority to do so by (i) informing such other persons about this Privacy Policy; and (ii) obtaining consents (where required by law or necessary) to permit us to use such Personal Data in accordance with this Privacy Policy.

## 2. WHY WE COLLECT, USE AND/OR DISCLOSE PERSONAL DATA

In addition to obtaining your consent where required by law, we may also rely on (1) contractual basis, for our initiation or fulfilment of a contract with you; (2) legal obligation, for the fulfilment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties. We will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your Personal Data; (4) vital interest, for preventing or suppressing a danger to a person's life, body or health; (5) public interest, for the performance of a task carried out in the public interest or for the exercising of official authorities; or other legal grounds permitted under applicable data protection law (as the case may be). Depending on the context of the interactions with us, we may collect, use and/ or disclose Personal Data for the following purposes:

- 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 certificates and/or splitting share/securities certificates for any 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, regulations and articles of association of the Company, including laws and/or legitimate orders of the courts, competent 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 to control communicable diseases or epidemics.

In the event that it is necessary for the Company to collect Personal Data in order to comply with a law or contract, or to enter into a contract with you, and you cannot provide the personal data as requested by the Company, the Company may not authorize your participation in the meetings held by the Company.

### **3. TO WHOM WE MAY DISCLOSE PERSONAL DATA**

We may disclose your Personal Data to ROCTEC Group Companies<sup>2</sup>, BTS Group Companies, the Company's business partners, securities depository, service providers (such as registration system and vote counting service companies), consultants, law enforcement agencies, courts, government officials, government agencies and relevant regulators.

### **4. CROSS-BORDER TRANSFERS OF PERSONAL DATA**

We may disclose or transfer your personal data to overseas countries with or without a personal data protection standard that is equivalent to that of Thailand. In such case, the Company shall ensure that the appropriate procedures required by the law shall be undertaken.

### **5. HOW LONG DO WE KEEP PERSONAL DATA**

We retains your personal data for as long as it is necessary to fulfil the purposes for which the Company collected it. The Company may retain your personal data longer if it is necessary for the Company's compliance with applicable laws.

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<sup>2</sup> Please see the list of ROCTEC Group Companies at <https://www.roctecglobal.co.th/en/about-us/structure>

## **6. COOKIES AND HOW THEY ARE USED**

If you visit our websites, we will gather certain information automatically from you 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 technologies which are used in analyzing trends, administering our websites, tracking users' movements around the websites, or to remember users' settings. Some of the cookies are necessary because otherwise the site is unable to function properly. Other cookies are convenient for the visitors and they remember your username in a secure way as well as your language preferences.

Most internet browsers allow you to control whether or not to accept cookies. If you reject cookies, your ability to use some or all of the features or areas of our websites may be limited. Please see our Cookies Policy for more details [https://www.roctecglobal.co.th/wp-content/uploads/2024/08/07-Cookie-Policy-Rev.02\\_Public\\_1092024.pdf](https://www.roctecglobal.co.th/wp-content/uploads/2024/08/07-Cookie-Policy-Rev.02_Public_1092024.pdf)

## **7. SECURITY MEASURES**

As a way to protect personal privacy of your Personal Data, we maintain appropriate security measures, which include administrative, technical and physical safeguards in relation to access control, to protect the confidentiality, integrity, and availability of Personal Data against any accidental or unlawful or unauthorized loss, alteration, correction, use, disclosure or access, in compliance with the applicable laws.

For additional details on the Company's data security, please see our full privacy policy at [https://www.roctecglobal.co.th/wp-content/uploads/2024/08/01-Privacy-Policy\\_English-Translation-Rev.00\\_Public\\_1092024.pdf](https://www.roctecglobal.co.th/wp-content/uploads/2024/08/01-Privacy-Policy_English-Translation-Rev.00_Public_1092024.pdf)

## **8. YOUR RIGHTS AS A DATA SUBJECT**

Subject to the applicable laws and legal exemptions thereunder, you may have the rights to access to, to obtain a copy of your personal data, to request the Company to disclose how your personal data is acquired 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. You 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 laws concerning personal data protection, you may lodge a complaint to the relevant authority as prescribed by law.

## 9. OUR CONTACT DETAILS

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

- (1) Roctec Global Public Company Limited
- (2) Office: 1000/9 BTS Visionary Park - South Tower, 18th Floor, Unit No. 1801 – 1807  
Phahonyothin Road, Chomphon Sub-district, Chatuchak District, Bangkok 10900
- (3) Telephone: +662-938-3388, Monday to Friday, 9.00 a.m. – 6.00 p.m.
- (4) Email: [dpo@roctecglobal.co.th](mailto:dpo@roctecglobal.co.th)

This Privacy Policy is effective as of May 23<sup>rd</sup>, 2022, and was reviewed on May 22<sup>nd</sup>, 2026.

Mr. Chaiwat Atsawintarangkun  
Chairman of the Board of Directors