Privacy Notice for Employees

1. General Information

Asia Cement Public Company Limited and its affiliated companies, namely Asia Cement Products Company Limited, Jalaprathan Cement Public Company Limited, Asia Cement Energy Conservation Company Limited, and Jalaprathan Concrete Company Limited (collectively, the "**Company**") recognize the importance of protecting the personal data of employees. While managing human resources throughout the period of your employment, the Company needs to collect, use, and/or disclose your Personal Data for personnel administration, remuneration, and benefits, and to comply with labor law and other applicable laws. This Privacy Notice has been prepared to inform you in detail of how the Company collects, uses, and/or discloses your Personal Data as an employee, the purposes of processing, the retention period, your rights under personal data protection laws, and how you may contact the Company should you have any questions or wish to exercise your rights.

2. Definition of Personal Data

"**Personal Data**" under this Privacy Notice refers to any information relating to an identified or identifiable natural person, whether directly or indirectly, including your name, surname, contact details, facial image, national identification number, employee ID number, and other information relating to your employment, stored in physical documents or electronic formats within the Company's information systems.

"**Sensitive Personal Data**" refers to data concerning race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union membership, genetic data, biometric data, or other similar data, which in the employment context may include health check results, medical records, fingerprint or facial scan data used for premises access, criminal background check results, and trade union membership data.

3. Personal Data Collected by the Company

To support the full and lawful administration of human resources, the Company may collect the following Personal Data from you, including information relating to your family members or dependents to the extent necessary to assess welfare entitlements under the Company's work rules, including but not limited to:

a. Internally disclosed information, such as your name, employee ID number, department, position, employment status, company email, and work mobile number;

b. Basic information, such as name, address as per house registration and current address, workplace address, age, date of birth, gender, phone number, personal email, front-facing photograph, ethnicity, nationality, religion, marital status, military status (for males), national identification number, social security number, and passport number;

c. Compensation information, such as annual and monthly salary structure, salary and bonus, bank account, cheque numbers, debit/credit card, financial transaction history, and withholding tax;

d. Human resources information, such as performance evaluation results, education history, certificates, degrees, and diplomas, qualifications/professional licenses, work visas and permits for foreign employees, work experience and

employment history, disciplinary actions/commendations, information relating to investigations of suspected misconduct (Speak-Up) and related processes, criminal records, training history, benefits and welfare, social security data, provident fund data, personal income tax, and behavioral information such as conduct, attitude, skills, and ability to work with others, which may be obtained through the Company's observation and assessment during your employment;

e. Family and relatives information, such as family structure, dependents, and emergency contact details;

f. Security and information technology data , such as CCTV footage recorded when you enter the Company's premises, photographs and videos taken during the Company's activities or events, biometric data (such as fingerprints or facial scans) used for premises access control, records of your access to and use of the Company's information systems, computers, email, and network, vehicle information such as chassis number and license plate number (for parking registration or access to the Company's premises), as well as driving license information (where you drive a vehicle provided by the Company);

g. Sensitive Personal Data, such as health condition, medical records, health check results, disability, religious or philosophical beliefs, ethnicity, trade union membership, biometric data used for identification, and criminal background check results. The Company collects such data only as necessary and on the lawful basis set out in Section 6 below.

4. Sources of Personal Data

The Company obtains your Personal Data from various lawful sources, including information you provide directly during recruitment and throughout your employment, when updating your Personal Data, attending training, using benefits, or coordinating with the Human Resources department, as well as information received from third parties such as health check providers, the Social Security Office, or background check service providers, to the extent necessary and with consent where required by law.

If you refuse to provide Personal Data that is necessary for the performance of your employment contract or compliance with law, the Company may be unable to fully perform the employment contract or to provide you with the relevant benefits and welfare.

5. Purposes of collecting, using and/or disclosing Personal Data

The Company collects, uses, and/or discloses your Personal Data only as necessary for the following purposes: employment administration, including calculating and paying wages, salary, bonuses, and benefits; assignment of duties, transfers, and secondment to other organizations; performance evaluation and talent development; training management; provision of employee welfare such as clinics, canteens, and sports facilities; administration of benefits, social security, and provident fund; internal and external communications and public relations, including the taking of photographs and recording of videos during the Company's activities or events and the publication of such photographs and videos through the Company's internal communication channels, such as the intranet, email, or notice boards, or through external channels, such as the Company's website, social media, annual reports, or printed materials, on the lawful basis set out

in Section 6; registration-related matters, the granting of powers of attorney, and the preparation of certification documents; maintaining information security; the creation of user accounts and access to information systems; conflict of interest checks; the handling of complaints and disciplinary investigations; compliance with labor laws, tax laws, and other applicable laws; security at the Company's premises and accident and crime prevention; emergency contact; the care of former employees after the termination of employment; and disciplinary proceedings or legal proceedings relating to employment. The Company will carry out the foregoing in a manner that is appropriate, reasonable, and within your reasonable expectations.

6. Lawful basis of collecting, using and/or disclosing Personal Data

In collecting, using, and/or disclosing your Personal Data, the Company shall act only to the extent necessary and in compliance with applicable personal data protection laws. In general, the Company will process your Personal Data where there is a lawful basis, including:

a. **Contract:** necessary for the performance of the employment contract to which you are a party, or to take steps at your request prior to entering into an employment contract;
b. **Legal Obligation:** necessary for compliance with labor law, tax law, social security law, or other applicable laws;
c. **Legitimate Interests:** necessary for the Company's legitimate interests, such as maintaining security at Company premises through CCTV, managing organizational risk, or publishing photographs and videos taken during the Company's activities or events through internal communication channels for the purpose of communicating with employees, except where such interests are overridden by your fundamental rights in your Personal Data;
d. **Vital Interests:** necessary to prevent or suppress danger to a person's life, body, or health;
e. **Consent:** where no other lawful basis above is available, the Company will obtain your consent before processing, such as using your photographs or videos for public relations or marketing purposes through the Company's external channels, such as the website, social media, or advertising materials , which such use is unrelated to your employment. You may withdraw your consent at any time; and
f. **Public Task / Official Authority:** necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company.

For Sensitive Personal Data, the Company will collect, use, and/or disclose such data only with your explicit consent, unless a legal exemption applies, such as where necessary for compliance with labor or labor protection laws, subject to appropriate safeguards.

7. Disclosure of Personal Data

The Company may disclose your Personal Data only as necessary to government agencies, regulatory authorities, and other relevant persons or entities for the purposes set out in this Privacy Notice, such as the Social Security Office, the Revenue Department, the Ministry of Labour, payroll outsourcing providers, health check providers, provident fund administrators, IT systems or cloud service providers, auditors, legal advisors, Affiliated Companies, and persons with

legal authority. The Company will ensure that such recipients collect, use, and/or disclose your Personal Data only within the scope and purposes specified in this Privacy Notice.

8. Storage and Transfer of Personal Data

The Company stores, uses, and/or processes your Personal Data primarily on systems located in Thailand. However, the Company may transfer your Personal Data to Affiliated Companies or other persons in other countries where necessary for the performance of a contract to which you are a party, or pursuant to a contract between the Company and another person or juristic person for your benefit, to prevent or suppress a danger to life, body, or health, to comply with applicable laws, or for significant public interest, including where the Company uses cloud-based information systems or servers located overseas. In such cases, the Company will ensure that the destination country has adequate personal data protection standards, or that appropriate safeguards are in place, and will require the data recipient to maintain adequate data protection measures in accordance with the standards prescribed by law and to execute appropriate agreements with relevant third parties.

For the purposes of this Privacy Notice, "**Affiliated Companies**" means the companies named in Section 1, as well as any other juristic person that controls, is controlled by, or is under common control with the Company, whether directly or indirectly. "**Control**" means (1) the holding of more than fifty percent (50%) of the total voting rights; (2) the ability to control the majority of votes at a shareholders' meeting; or (3) the power to appoint or remove at least half of all directors.

9. Duration of Personal Data Retention

The Company will retain your Personal Data throughout the period of your employment and thereafter for a period not exceeding ten (10) years from the date your employment ends, for purposes of legal compliance and the establishment of legal claims, unless a different retention period is required or permitted by law. The Company will take appropriate steps to delete, destroy, or anonymize your Personal Data when it is no longer necessary or upon expiration of the applicable retention period.

The Company also retains Personal Data of your family members or dependents for as long as necessary to consider your entitlement to benefits under the Company's work rules. Where the Company processes your Personal Data based on your consent, the Company will continue processing until you withdraw consent and the Company completes your request; however, the Company will retain minimal data necessary to record that you withdrew consent, so that the Company can respond to your future requests.

10. Your Rights Regarding Personal Data

You are entitled to rights under personal data protection laws, including the right to withdraw consent, access and obtain a copy of your data, request data portability, object to collection, use, or disclosure, request erasure or destruction, request restriction of use, request rectification, and lodge a complaint with the Expert Committee. These rights may be exercised subject to the conditions prescribed by law.

The exercise of your rights above may be limited under applicable law, and in certain cases the Company may refuse or be unable to comply with your request, such as where compliance with legal obligations or court orders is required, for public interest reasons, or where the exercise of such rights may infringe upon the rights or freedoms of others. In such cases, the Company will inform you of the reasons for any refusal.

11. Measures for the Security of Personal Data

The Company has implemented security measures in accordance with Section 37 of the Personal Data Protection Act B.E. 2562 (2019) and related notifications of the Personal Data Protection Committee, to prevent the loss, unauthorized or unlawful access, use, alteration, modification, or disclosure of Personal Data. These include both technical and organizational measures, as well as oversight of data processors and other legally required actions. Further details are set out in the Company's PDPA Policy.

12. Contact Information of the Company

If you have any questions regarding the collection, use, and/or disclosure of your Personal Data, or if you wish to exercise your rights, you may contact the Company through the following channels:

Email: LegalandCompliance@acc.co.th

Name: Miss Pannaree Piboonpanya

Telephone: 02-641-5600 Ext.1382

Address: Sathorn City Tower, 8/1 Floor, 175 South Sathorn Road, Tungmahamek, Sathorn, Bangkok 10120

13. Updates to the Privacy Notice

This Privacy Notice is subject to regular review and revision. It may therefore be updated from time to time to reflect changes in the collection, use, or disclosure of Personal Data, and to ensure fairness and transparency for data subjects. When updates are made, the Company will notify you through its internal communication channels.