Privacy Notice for Shareholders

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**") recognizes the importance of protecting personal data, particularly in relation to shareholders whose information the Company is required to maintain in accordance with applicable laws, including the Public Limited Companies Act and other relevant regulatory requirements, to ensure proper, transparent, and efficient corporate governance. This Privacy Notice has been prepared to inform you of how the Company collects, uses, and/or discloses your Personal Data, the purposes for processing such data, the applicable 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, shareholder registration number, and other legally required shareholder-related information, stored in various forms, including physical documents such as shareholder records, or in electronic formats within the Company's information systems.

3. Personal Data Collected by the Company

To comply with applicable laws and to support matters relating to your status as a shareholder, the Company may collect the following Personal Data from you, including but not limited to:

a. Identification information, such as your name and national ID or passport number;
b. Contact information, such as residential address, mailing address, telephone number, and email address, social media contact channels, and workplace;
c. Shareholding information, such as number of shares and shareholder ID number;
d. Financial information, such as bank account details for dividend payments;
e. Supporting documents, such as copies of your ID card or bankbook;
f. Photos or videos related to your interactions or participation in the Company's activities, such as:
   - Photos or videos from your participation in meetings, training sessions, seminars, or other Company events, which may be used for event management or publicity purposes;
   - CCTV footage when you enter the Company's premises, with signs notifying that recording is in operation.
g. Technical Information, such as IP Address, when you use the Company's online services.
h. Other personal information voluntarily provided by you to the Office.

The Company may request your photograph and/or a copy of your national ID card for identity verification purposes. As certain sensitive Personal Data (such as religious information) may appear on the card and the Company does not intend to collect such sensitive data, you are kindly requested to redact such information before providing the copy to the Company.

4. Sources of Personal Data

The Company obtains your Personal Data from various lawful sources, including information you provide directly to the Company when submitting or updating data, coordinating with the Company, participating in activities, or requesting any services from the Company, as well as information contained in documents or forms prepared by the Company to support activities related to your status as a shareholder.

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

The Company collects, uses, and/or discloses your Personal Data only as necessary for matters relating to your status as a shareholder, including preparing and updating the shareholder register, convening and conducting shareholders' meetings, verifying your identity, sending invitation to meetings, supporting documents, annual reports, and other required materials, as well as coordinating with relevant authorities to ensure proper operations.

The Company also processes your Personal Data to manage your rights and entitlements as a shareholder, such as dividend payments, issuing or certifying documents, recording shareholder rights or related transactions, preparing internal reports, and communicating information relevant to your shareholding, and to carry out other necessary internal administrative activities 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 the applicable personal data protection laws. Such laws prescribe various legal bases depending on different circumstances, which permit the Company, as a data controller under such laws, to collect, use, and/or disclose your Personal Data.

In general, the Company will collect, use, and/or disclose your Personal Data where there is a lawful basis, including the following:

a. **Consent**: You or your legal representative has given consent;
b. **Contract**: It is necessary for the performance of a contract to which you are a party, or to take steps at your request prior to entering into a contract with the Company;
c. **Vital Interests**: It is necessary to prevent or suppress danger to a person's life, body, or health;
d. **Public Task / Official Authority**: It is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company;
e. **Legitimate Interests**: It is necessary for the legitimate interests of the Company or of another person or juristic person, except where such interests are overridden by your fundamental rights in your Personal Data;

f. **Scientific or Research Purposes**: It is necessary for archiving purposes in the public interest, historical documentation, research, or statistical purposes, with appropriate safeguards in place to protect your rights and freedoms, as prescribed by the Personal Data Protection Committee; and

g. **Legal Obligation**: It is necessary for compliance with applicable laws.

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 Ministry of Commerce, courts, data processors, financial institutions involved in dividend payments, auditors, legal advisors, information system service providers, other external service providers, Affiliated Companies, and other authorized persons. 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 specified 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 for as long as necessary while you remain a shareholder, or for as long as required to fulfill the relevant purposes and may continue to retain such data thereafter if required or permitted by law for a period not exceeding ten (10) years. The Company will take appropriate steps to delete, destroy, or anonymize your Personal Data when it is no longer necessary or upon the expiration of the applicable retention period.

10. Your Rights Regarding Personal Data

You are entitled to various rights under applicable personal data protection laws, including the right to withdraw consent, access your data, request data portability, object to processing, request erasure, request restriction of use, request rectification, and lodge a complaint. These rights may be exercised subject to the conditions prescribed by law, any future amendments thereto, and the procedures established by the Company.

If you are under 20 years of age or otherwise lack full legal capacity, your rights may be exercised by your parent(s), legal guardian, or authorized representative.

Please note that the exercise of your rights may be limited in certain circumstances. The Company may refuse or be unable to comply with your request where there are legitimate grounds to do so, such as compliance with legal obligations, court orders, public interest, or where fulfilling the request 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 personal data security measures in accordance with Section 37 of the Personal Data Protection Act B.E. 2562 (2019). These measures are intended to prevent the loss, unauthorized access, use, alteration, modification, or disclosure of Personal Data, as well as to ensure proper supervision of data processors and compliance with other legal obligations.

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. Therefore, it may be updated from time to time to reflect any changes in the collection, use, or disclosure of Personal Data, as well as to ensure fairness and transparency for data subjects. When updates to this Privacy Notice are made, the Company will inform you through its website and official social media channels.