



Personal Data Protection Policy
Tata Steel (Thailand) Public Company Limited

Tata Steel (Thailand) Public Company Limited respects in privacy and personal data protection of our stakeholders. Thus, the Company considers appropriate to set out the "**Personal Data Protection Policy**" so that the stakeholders be informed of the policy which demonstrates the will of the Company and how the Company treats the personal data of the stakeholders regarding data collection, use, disclosure, storage, including various rights as follows;

1. Definition

- 1.1 Personal Data refers to personal information that is able to directly or indirectly identify an individual, excluding the information of a deceased person, such as name – surname, email, telephone number, facsimile number, identification number, including Sensitive Personal Data such as racial or ethnic origin, religion, political opinion, religious or philosophical beliefs, sexual orientation or preferences, criminal records, health records, disability, labour union information, genetic data, biometric data, or any other information which affects the Personal Data Subject in a similar way etc.
- 1.2 Company refers to Tata Steel (Thailand) Public Limited Company and its subsidiaries.
- 1.3 Data Subject refers to person who owns the personal information and comes in contact with or connects to information systems or any transactions with the Company.
- 1.4 Information system refers to computer system, network communication system, network system connected to the internet, data collection system, electronic mail system, all types of information communication systems, data communication equipment, computer accessories and peripherals or any devices related to the Company.

2. Objectives of the Policy

This policy is for the benefits of transactions with Data Subject including coordination and communication within the company as well as for market research and sales promotion activities or the benefits of database creation and data analysis to improve the quality of products and better services in the future. This includes the purpose of law compliance or other regulations related to the Company either existing or shall have in the future, also for the development of the Company websites and other work systems to be up-to-date.

3. Scope of Enforcement

This policy shall cover personal data protection of the Data Subject who contacts or connects to the information system or any transactions with the Company. This shall apply to the collection, use, disclosure, amendment, storage or any other actions of personal data.

4. Data Collection

Data collection and storage under this Policy will be conducted within the purpose, scope, fair and lawful methods as necessary for the related transactions, services or any other transactions within Company's objectives. In this regard, the Company shall inform the Data Subject to acknowledge and give consent through electronic means, short message (SMS) or other methods as specified by the Company before collection except;

- 4.1 For complying with law such as Personal Data Protection Act, Electronic Transaction Act, Telecommunication Business Act, Anti-Money Laundering Act, Civil and Commercial Code, Criminal Code, Civil and Commercial Procedure Code, and Criminal Procedure Code, etc.;
- 4.2 For the purpose of investigation of the inquiry authorities or adjudication of a competent court;
- 4.3 For benefits of the Data Subject and the consent cannot be made at that time;
- 4.4 For the necessity purpose of the legitimate interests pursued by the Company or personnel or other juristic person which is not related to the Company;
- 4.5 It is necessary to prevent or to avoid danger to a person's life, body or health;



- 4.6 It is necessary for compliance with a contract in which the Data Subject is a party or in order to proceed as requested by the Data Subject prior to entering into the contract;
- 4.7 For achieving the purposes in the making of historical documents or annals for public interest or for study, research, statistical purposes under appropriate protection measures.

In case there is any later change in the purpose of personal data collection, the Company shall notify the stakeholders for acknowledgement and request for consent subsequently.

5. Usage and Disclosure of Personal Data

The Company shall use and disclose the personal data in accordance with the consent of the Data Subject, and be solely used for the Company's objectives. The Company shall supervise its employees, officers or operating personnel from misusing and/or disclosing the personal data in any ways other than the objectives and consent receiving from Data Subject or disclosing to any third parties by not receiving the consent from Data Subject except hereinabove in No.4.1-4.7. Moreover, the Company commits to encourage raising awareness in performing work related to personal data strictly.

6. Data Storage and Retention

The Company shall maintain the personal data by taking with the accuracy, completeness and up-to-date of the information and keep it for as long as necessary for the purposes of collecting personal data only. If there is any change, the Company shall announce or notify the Data Subject. In this regard, such data will be destroyed when reaching the determined period in accordance with Company's procedures and Delegation of Authority.

For the data retention purpose, the Company may assign the third party to handle. The third party shall have suitable measures to protect such data by prohibiting collection, use or disclose personal information other than those specified by the Company.

7. Information Security Measures

- 7.1 The Company is aware of the importance of the security and confidentiality of personal data; therefore, the Company has established appropriate measures for securing personal information and keeping the confidentiality in order to preventing loss, access, destruction, use, change, modification or disclosure of personal data without rights or unlawful. This shall be in accordance with the Company's Cyber Security Policy such as access to password, setting of authorization access to personal data, etc.
- 7.2 Personal data that Company has received and is accurate and up-to-date will be used in accordance with the Company's operational objectives only. The Company will take appropriate and concise measures to protect the rights of Data Subject.

8. Right of Data Subject.

- 8.1 Data Subject is able to request to access to or get the copy of such personal data kept by the Company in accordance with the criteria and methods set by the Company or request to disclose the source of attaining such data. However, the Company may deny such request of Data Subject in compliance with the exception by applicable laws or court order.
- 8.2 Data Subject is able to request the Company to correct or change its personal data that is inaccurate or incomplete in order to keep such data up-to-date.
- 8.3 Data Subject is able to withdraw the given consent or request the Company to suspend the use or delete or destroy such personal data, except in the case that the Company must comply with the relevant laws for the preservation of such personal data.



9. Log Files Record

Log Files refers to computer traffic data which contains the communicating of the computer system showing origin, source, destination, route, date, time, quantity, duration or others related to computer system communication. The company has a system for storing the log of the Company's website that can connect the said information with personal identifiable information such as IP address, entering or exiting from the website and the type of browser program etc. The company shall inform the visitors to the Company's website to acknowledge and give consent to the Company to collect such personal information.

10. Personal Data Connectivity or transfer to the related agencies

The Company may connect or transfer personal data of Data Subject to other related agencies inside or outside Thailand such as access into bank account of Data Subject to make payment including any transaction with vendors, management of persons to access in and out of the Company, etc. Such personal data shall be kept confidential both in the forms of hard copies and electronics data.

11. Data Protection Officer

The Company has undertaken the Personal Data Protection Act. B.E. 2562 by appointing Mr. Kasem Teang-Eam, Senior Department Manager-Steel Plant of SISCO Plant to be Data Protection Officer (DPO) to monitor and audit the operation of the Company with respect to the collect, use and disclose personal data in accordance with the Personal Data Protection Act B.E. 2562, including relevant personal data protection laws. In addition, the Company has determined the procedures and rules to regulate the employees and related parties to undertake their duties to ensure the compliance with the Personal Data Protection Policy and in compliance with all relevant laws.

12. Contact Information

Legal Services and Regulatory Affairs Department, Tata Steel (Thailand) Public Company Limited, 555 Rasa Tower II, 20th Floor, Phaholyothin Road, Chatuchak, Bangkok 10900 or Email: PDPA@tatasteelthailand.com

This supersedes any earlier Personal Data Protection Policy of Tata Steel (Thailand) Public Company Limited.

Dated January 13, 2022

Tata Steel (Thailand) Public Company Limited

(Rajiv Mangal)

President and Chief Executive Officer