



**Personal Data Protection Policy of Stakeholders
in relation to Business Operations
of Tata Steel (Thailand) Public Company Limited Group**

Tata Steel (Thailand) Public Company Limited Group (“**TSTH Group**”) respects in privacy and protection of Personal Data of our stakeholders. Thus, TSTH Group considers appropriate to set this Personal Data Protection Policy to explain how we collect, use or disclose Personal Data of the existing and prospective customers and vendors of TSTH Group, buyers, sub-vendors, contractor, sellers or service providers, consultants, auditors, lecturers, certification bodies, mass media, including directors, representatives, attorneys, or persons acting on behalf of such persons, family members of such persons, as well as activity participants, visitors or other related third parties, so that the Data Subjects be informed of the policy which demonstrates the will of TSTH Group, including how we protect the Personal Data and properly handle such Personal Data according to the Personal Data Protection Act B.E. 2562 (2019) as follows:

1. Definition

- 1.1 Personal Data refers to any information relating to an individual, which enables the identification of such individual, whether directly or indirectly, but not including the information of the deceased persons in particular.
- 1.2 TSTH Group refers to Tata Steel (Thailand) Public Company Limited and Tata Steel Manufacturing (Thailand) Public Company Limited.
- 1.3 Data Subject or Data Subjects refers to natural persons who are data subjects whose Personal Data have been collected, used or disclosed by TSTH Group.
- 1.4 Information system refers to the 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 TSTH Group.

2. Purposes of collection, use or disclosure of Personal Data

2.1 Lawful basis for collection, use or disclosure of Personal Data

TSTH Group processes the Personal Data as it is necessary for the scope set out in this Personal Data Protection Policy as follows:

2.1.1 For General Personal Data

- Where TSTH Group obtains consent from the Data Subject as required by law;
- To prevent or suppress a danger to a person’s life, body or health;
- Where it is necessary for performing contractual obligations between the Data Subject and TSTH Group or taking steps at the Data Subject’s request prior to entering into a contract;
- Where it is necessary for legitimate interests of TSTH Group or any other persons or juristic persons, except where such interests are overridden by fundamental rights of the Data Subject’s Personal Data;
- To comply with laws to which TSTH Group is subjected.

2.1.2 For Sensitive Personal Data

During TSTH Group’s operations, TSTH Group may need to collect the Data Subject’s Sensitive Personal Data. In the case where TSTH Group collects Sensitive Personal Data, TSTH Group shall always obtain explicit consent from the Data Subjects prior to the time of such collection of Sensitive Personal Data, unless the explicit consent is not required by the Personal Data Protection Act B.E. 2562 (2019), for example;

- To prevent or suppress a danger to a person’s life, body or health, where the Data Subject is incapable of giving consent by whatever reason;
- It is information that is disclosed to the public with the explicit consent of the Data Subject;



- It is necessary for the establishment, compliance, exercise or defense of legal claims;
- It is necessary for compliance with a law to achieve the purposes with respect to public interest in public health such as protecting against cross-border dangerous contagious disease or epidemics which may be contagious or pestilent;
- It is necessary for compliance with a law to achieve the purpose with respect to the substantial public interest.

2.2 Purposes of collection for use or disclosure of Personal Data

TSTH Group collects the Data Subjects' Personal Data for various purposes depending on relationship between the Data Subjects and TSTH Group as follows:

2.2.1 Purposes of Personal Data processing for the existing customers and prospective customers of TSTH Group, buyers, including directors, representatives, attorneys, or persons acting on behalf of such persons (the "Customer")

1. For communication and coordination with the Customer for public relations and offering products to the Customer, as well as communication with the Customer regarding the meetings, seminars, exhibition booth and the Customer's office visits, which may record static images, videos and/or voice of the Customer, including other undertakings related to the meetings, such as preparing and sending meeting minutes or supporting documents, etc.;
2. For consideration of purchase orders via various channels, identity verification of the Customer, customers appointment and entering into a contract or other relevant agreement(s), including communication and coordination for product selling or development, bidding and related internal administration of TSTH Group;
3. For performance of obligations under the scope of the contract or the relevant agreement(s), for example, developing product according to such contract or relevant agreement(s), planning and coordinating for production of products, receiving or delivering information and documents between the Customer and TSTH Group, delivering or picking up products, issuing receipt and tax invoices, coordinating for credits, and following up on the payment, etc.;
4. For conducting satisfaction survey, asking for opinions and suggestions regarding products and operations of TSTH Group and analyzing and researching on such opinions for further improvement and development of TSTH Group's products;
5. For informing marketing news and conducting marketing activities at the Customer's place, including registration for TSTH Group's application;
6. For proceeding with and managing complaints or inquiries regarding products for further coordination to solve problems and answer the Customer's questions, etc.;
7. For after-sales services and maintaining relationship with the Customer, for example, sending greeting cards, souvenirs, gifts, and promotional products to the Customer on various occasions, etc.

2.2.2 Purposes of Personal Data processing for the existing vendors and prospective vendors of TSTH Group, sub-vendors, contractor, sellers or service providers, consultants, auditors, lecturer, certification bodies, including directors, representatives, attorneys, or persons acting on behalf of such persons and family members (the "Vendor")

1. For inspection of the qualifications of the Vendor and communication before entering into a contract or other relevant agreement(s), where the Data Subject is a direct contracting party or where the Data Subject is a director, representative, attorney, or personnel who acts on behalf of such Vendor, including bidding and requesting for quotation;



2. For entering into a contract or other relevant agreement(s) with the Vendor, creating purchase orders of products or services, including contract review and consideration process and obtaining approval for entering into such contract or agreement(s);
3. For performance under the scope of the contract or the relevant agreement(s) regarding purchasing of products and services from the Vendor, for example, communication and coordination with the Vendor, registration and recording of the Vendor in TSTH Group's database, facilitation and requesting for permission for operation of the Vendor in TSTH Group's premises, payment of products or services, withholding taxes, receiving or delivering information and documents between the Vendor and TSTH Group, inspection and acceptance of products, etc. as well as the relevant internal coordination and administration of TSTH Group;
4. For providing Wi-Fi services of TSTH Group to the Vendor, including the collection of computer traffic information (Log) of Wi-Fi users in accordance with the relevant law;
5. For the Vendor's office visits, holding meetings related to performance under the scope of the contract or the relevant agreement(s) or seminars for informing marketing news, which may record static images, videos and/or voice of the Vendor and participants, including other necessary undertakings related to such meetings or seminars, for example, sending meetings or seminars invitation, preparing meeting minutes, etc.;
6. For complaint management and creating a blacklist for the Vendor who violated TSTH Group's regulations or misbehaved.

2.2.3 Purposes of Personal Data processing for mass media, activity participants, visitors or other related third parties

1. For informing news regarding activities of TSTH Group, plant visit at any venues, meetings or seminars arrangement, which may record static images, videos and/or voice of the mass media, reporter and participants, including other necessary undertakings related to such meetings or seminars, for example, sending meetings or seminars invitation, and sending souvenirs to participants of the quarterly press conferences;
2. For supporting communication and verification for participating in activities of TSTH Group, including awarding, requesting support or donation or receiving a scholarship from TSTH Group, which may record static images, videos and/or voice of participants, including other undertakings related to such activities, such as conducting a survey or assessment regarding TSTH Group's activities, withholding tax, etc.;
3. For providing Wi-Fi services of TSTH Group to visitors, including the collection of computer traffic information (Log) of Wi-Fi users in accordance with the relevant law.

2.2.4 Other purposes of Personal Data processing

1. For maintaining security within TSTH Group's buildings and premises, including recording image within TSTH Group's buildings and premises via Closed-Circuit Television (CCTV), inspecting and verifying identity for entering and exiting from TSTH Group's buildings and premises;
2. For conducting planning, reporting, evaluation and data analysis for TSTH Group's operations;
3. For management of risks, prevention and undertaking of audits, reporting and undertaking of internal administration as required by laws, internal instructions or regulations of TSTH Group, including considering complaints of fraud or misconduct within TSTH Group, for example, TSTH Group's internal audit, investigating and preventing fraud or other unlawful acts, etc.;



4. For undertaking detection and investigation under legal procedures and other regulations, complying with laws, rules, orders, legal requirements and obligations under Thai and foreign laws of TSTH Group, and reporting or disclosing information to government authorities as required by laws, for example, Revenue Department, Department of Skill Development, or upon receiving summons or writ of executions from police officers, government authorities, courts, or other competent authorities, including for proceeding with the judicial process, establishment, compliance or exercise of the rights to legal claims or defending against the rights to legal claims;
5. For assignment of rights, obligations, and any benefits under a contract between any persons and TSTH Group, such as merger or transfer of the contract which has been done legally.

3. Sources of Personal Data

TSTH Group may collect the Data Subjects' Personal Data from various sources as follows:

- 3.1. Collect the Personal Data directly from the Data Subjects, for example, when the Data Subjects make inquiries with TSTH Group, doing any questionnaires or registrations, procedures for taking steps at the request prior to entering into a contract, signing contracts, attaching supporting documents to the contracts, filing any claims or request for exercising rights to TSTH Group, communication with TSTH Group via various channels (for example, telephone, e-mail, etc.), participating in meetings or carrying out activities under the authority and duty of TSTH Group or participating in any activities held by TSTH Group (for example, images, videos and/or voice recording). In addition, TSTH Group may automatically collect the Personal Data (for example, when the Data Subjects use TSTH Group's information technology or website).
- 3.2. Collect the Personal Data from other sources, for example, original affiliation or representative of the Data Subjects, government documents, government authorities, private sectors, data service providers or other publicly available sources for example, information made available on the internet, etc.

4. Personal Data that Collected, Used and Disclosed

Personal Data that TSTH Group collects, uses and discloses which is collected directly from the Data Subject, from publicly available sources, from automatic system via various channels and from other sources includes:

- 4.1 Information used for the Data Subject identification such as name, surname, date/month/year of birth, age, gender, photo, nationality, tax ID number, number and photocopy of National ID card, Passport or driving license, photocopy of house registration, signature, marital status, etc.;
- 4.2 Contact information such as the residential address, office address, telephone number, fax number, email, social media contact information, etc.;
- 4.3 Financial or transaction information such as bank account number, etc.;
- 4.4 Information about working, qualifications, competence, potential, skills and other qualifications of the Data Subject such as job title, company, certified public accountant registration number, educational background, training history, work experiences, professional qualifications, work permit and other licenses information, professional license information and training certificates, etc.;
- 4.5 Information regarding the use and access of TSTH Group's information systems, computer, work systems, website, applications, network systems, electronic devices, e-mail systems in order to comply with TSTH Group's information technology policy and related laws such as IP address, device ID, data that TSTH Group collects through cookies or similar technologies, computer traffic information (log), etc.;
- 4.6 Third party information such as spouse information, child information, parent information, etc.;
- 4.7 Other information such as hobbies, characters, opinions, voice, static image, video, including participation in both internal and external activities, meeting or seminars held by TATA, responding to any survey or assessment both online and offline channels, vehicle information, etc.



In the case where the Personal Data collected by TSTH Group as stated above is necessary for TSTH Group's compliance with applicable laws or performance of contract and if the Data Subjects do not provide TSTH Group with such necessary Personal Data, TSTH Group may be subject to legal liabilities and/or may not be able to manage or administer contract or facilitate the Data Subjects.

In some cases, TSTH Group may collect Sensitive Personal Data, for example, religion and/or blood type information as appeared on the copy of my identification, health data, upon obtaining explicit consent from the Data Subjects or when permitted by law. TSTH Group shall do its best to provide adequate security measures to protect this Sensitive Personal Data.

5. Personal Data of minors, incompetent persons and quasi-incompetent persons

In some cases, TSTH Group may collect the Personal Data of minors, incompetent persons or quasi-incompetent persons. In the case where the Data Subjects are minors, incompetent persons or quasi-incompetent persons, TSTH Group shall comply with the laws relating to collection, use or disclosure of Personal Data of minors, incompetent persons and quasi-incompetent persons, which include obtaining consent from the legal representative, the curator or the custodian as required by law where TSTH Group has no legitimate grounds other than obtaining consent for the collection, use or disclosure of such information.

6. Disclosure of Personal Data to Others

TSTH Group may disclose the Data Subjects' Personal Data in certain circumstances for the purposes set out in this Personal Data Protection Policy to:

- 6.1 Subsidiaries, group companies and affiliated companies, both in Thailand and foreign countries for the purpose of Personal Data processing as specified in this Personal Data Protection Policy.
- 6.2 Agencies, service providers, contractors and/or sub-contractors for conducting any undertakings for TSTH Group such as logistics service providers, auditors, lawyers, legal and tax advisors, other consultants, data or document storage service providers, printing houses, IT development and maintenance service providers, seminar organizer company and other contracting companies, opinion survey and market research service providers, hotels, airlines, etc.
- 6.3 Customers, suppliers and vendors of TSTH Group.
- 6.4 Banks or financial institutions for receiving payment or payment of expenses for the relevant processes, such as receiving payment of products from customers, paying for products and services to vendors, etc.
- 6.5 Government authorities, supervisory authorities, independent authorities or other authorities as stipulated by laws, including competent officials exercising power or performing duties according to the laws, e.g. courts, police officers, the Revenue Department, Thailand Securities Depository Co., Ltd., The Stock Exchange of Thailand, Securities and Exchange Commission, any certification bodies, the Department of Skill Development, the Ministry of Labor, the Department of Industrial Works, the Department of Alternative Energy Development and Efficiency, Office of Atoms for Peace, National Institute of Nuclear Technology, the Department of Primary Industries and Mines, etc.
- 6.6 Public, through various channels such as annual reports, online media or website of TSTH Group, research papers or academic books, etc.

TSTH Group shall require the person receiving Personal Data to take appropriate measures to protect Personal Data of the Data Subjects and process such Personal Data only as necessary as well as take steps to prevent others from using or disclosing Personal Data without the consent of the Data Subjects.

7. Transfer of Personal Data Abroad

- 7.1 TSTH Group may send or transfer Personal Data of the Data Subjects to its affiliates or other persons abroad if necessary for the performance of a contract/agreement in which the Data Subjects is a party to the contract or for necessary undertakings of TSTH Group.



- 7.2 TSTH Group may collect Personal Data of the Data Subjects on the computer, server or cloud provided by third party abroad and may use third-party programs or applications in the form of package software services and ready-made platform services to process the Data Subjects' Personal Data. But TSTH Group shall not allow unrelated persons access Personal Data and shall require those others to take appropriate security protection measures.
- 7.3 In the case of transfer of Personal Data to foreign countries, TSTH Group shall ensure that the destination country or international organization that receives such Personal Data shall have adequate data protection standard, and TSTH Group shall provide appropriate protection and security measures and comply with the Personal Data Protection Act B.E. 2562 (2019) including obtaining consent from the Data Subjects for the transmission or transfer of Personal Data to foreign countries as required by law.

8. Personal Data retention period

- 8.1 TSTH Group shall maintain Personal Data of the Data Subjects in accordance with Technical Measure and Organizational Measure by taking into account the accuracy, completeness, and up-to-date of Personal Data and keeping it as long as necessary for the purposes of collecting, using and disclosing Personal Data set out in this Personal Data Protection Policy. The criteria used to determine TSTH Group's retention period include: TSTH Group retains the Personal Data for the duration TSTH Group has an ongoing relationship with the Data Subjects; and TSTH Group may retain the Personal Data for a longer period as necessary to comply with applicable laws, or to be in accordance with legal prescription, or to establish, comply with or exercise the rights to legal claims or defend against the rights to legal claims, or to comply with, for any other cause, TSTH Group's internal policies and regulations. If there is a subsequent change in the purpose of data collection, TSTH Group shall announce or notify the Data Subjects.
- 8.2 In case that TSTH Group collects or uses the Data Subjects' Personal Data with the consent of the Data Subjects, TSTH Group shall process such Personal Data until the Data Subjects withdraw consent and TSTH Group has completed the Data Subjects' request. However, TSTH Group shall still keep Personal Data of the Data Subjects as necessary to record that the Data Subject has previously withdraw his/her consent so that TSTH Group can respond to the requests of the Data Subject in the future.
- 8.3 TSTH Group has set up an inspection system to delete or destroy Personal Data after the expiration of the retention period or which is not related or exceeds necessary according to the purpose of collecting that Personal Data.
- 8.4 TSTH Group may use the information service from a third-party service provider in order to maintain Personal Data which the service provider must have security measures by prohibiting to collect, use or disclose Personal Data other than those specified by TSTH Group.

9. Personal Data Security Measures

- 9.1 TSTH Group is aware of the importance of the security and confidentiality of Personal Data of the Data Subjects, therefore, TSTH Group has established measures for securing Personal Data appropriately and in accordance with the Personal Data Protection Act B.E. 2562 (2019) in order to prevent unauthorized or unlawful loss, access to, destruction, use, alteration, correction or disclosure of Personal Data as well as prevent the use of Personal Data without permission. This shall be in accordance with TSTH Group's Cyber Security Policy such as access to password, setting of authorization access to Personal Data, etc. This includes providing training to TSTH Group's relevant persons on the importance and actions of protecting Personal Data.
- 9.2 Personal Data that TSTH Group has received and is accurate and up-to-date will be used in accordance with TSTH Group's operational purposes set out in this Personal Data Protection Policy only. TSTH Group shall take appropriate and concise measures to protect the rights of Data Subjects as well as review of such measures when necessary or when technology changes in order to ensure that it is always effective in securing appropriate Personal Data security.



- 9.3 In the case where TSTH Group assigns third parties to process the Personal Data pursuant to the orders given by or on behalf of TSTH Group, TSTH Group shall appropriately supervise such third parties to ensure that they will maintain the security of the Data Subjects' Personal Data according to the Personal Data Protection Act B.E. 2562 (2019).

10. Rights of Data Subjects

The Data Subjects have certain rights according to the Personal Data Protection Act B.E. 2562 (2019) including the following rights:

10.1 Right to withdraw consent

The Data Subjects have the right to withdraw consent given to TSTH Group for collecting, using or disclosing the Data Subjects' Personal Data at any time, unless there is a restriction of the withdrawal of consent by law or the contract which gives benefits to the Data Subjects.

However, the withdrawal of consent shall not affect the collection, use or disclosure of Personal Data that the Data Subjects have already given consent legally.

10.2 Right of access

The Data Subjects have the right to request access to and obtain copy of the Data Subjects' Personal Data, which is under TSTH Group's responsibility, or to request the disclosure of the acquisition of the Personal Data obtained without the Data Subjects' consent.

10.3 Right to data portability

Where TSTH Group arranges the Data Subjects' Personal Data to be in the format which is readable or commonly used by ways of automatic tools or equipment, and can be used or disclosed by automated means, the Data Subjects have the right to receive the Data Subjects' Personal Data from TSTH Group and request TSTH Group to send or transfer the Data Subjects' Personal Data in such formats to other data controllers as provided by the law.

10.4 Right to object

The Data Subjects have the right to object to the collection, use or disclosure of the Data Subjects' Personal Data on grounds stipulated by law.

10.5 Right to erasure

The Data Subjects have the right to request TSTH Group to erase, destroy or make the Data Subjects' Personal Data become unidentifiable data under certain circumstances as provided by law.

10.6 Right to restriction of use

The Data Subjects have the right to request TSTH Group to restrict the use of the Data Subjects' Personal Data under certain circumstances as provided by law.

10.7 Right to rectification

The Data Subjects have the right to request TSTH Group to modify the Data Subjects' Personal Data to be accurate, up-to-date, complete, and not misleading.

10.8 Right to complaint

The Data Subjects have the right to file a complaint to an authorized officer appointed by the Personal Data Protection Act B.E. 2562 (2019) when TSTH Group or the Data Processor includes their employees or contractors of TSTH Group or the Data Processor violate or do not comply with such law.

TSTH Group shall consider and notify the results of the consideration of the request of the Data Subject within 30 days since receiving the request. In which the Data Subject can request for the rights through TSTH Group's website <https://www.tatasteelthailand.com> in the form specified by TSTH Group (The rights can be exercised whenever the Personal Data Protection Act B.E. 2562 (2019) is effective). In this regard, TSTH Group reserves the right to refuse or not process the request under certain circumstances as stipulated by law.



In case TSTH Group has collected Personal Data before the date on which the Personal Data Protection Act B.E. 2562 (2019) takes effect, TSTH Group shall continue to collect and use Personal Data for the original purpose. However, if the Data Subject does not wish TSTH Group to collect and use such Personal Data, withdrawal of consent can be done as specified in Article 10.1

11. Log Files Record

Log Files refers to computer traffic data which contains the communication of the computer system showing origin, source, destination, route, date, time, quantity, duration or others related to computer system. TSTH Group has a system for storing the log of TSTH Group'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. TSTH Group shall inform the visitors to TSTH Group's website to acknowledge and give consent to TSTH Group to collect such Personal Data as required by laws.

12. Data Protection Officer

TSTH Group has undertaken the Personal Data Protection Act B.E. 2562 (2019) by appointing Data Protection Officer (DPO) to monitor and audit the operation of TSTH Group with respect to the collect, use and disclose Personal Data in accordance with the Personal Data Protection Act B.E. 2562 (2019), including relevant Personal Data protection laws. In addition, TSTH Group has determined the policies, regulations or instructions to regulate the employees and related parties to undertake their duties to ensure the compliance with this Personal Data Protection Policy and in compliance with all relevant laws.

13. Contact Information

If the Data Subjects have any questions or inquiries about the Personal Data protection, collection, use or disclosure of the Data Subjects' Personal Data, or exercise of the Data Subjects' rights as a data subject, or have any complaints, please contact us at:

- 13.1 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
- 13.2 Data Protection Officer (DPO)
 - Mr. Kasem Teang-Eam
Email: PDPA@tatasteelthailand.com

14. Notices regarding this Personal Data Protection Policy

Legal Services and Regulatory Affairs Department of Tata Steel (Thailand) Public Company Limited and Tata Steel Manufacturing (Thailand) Public Company Limited are responsible for ensuring that this approved Personal Data Protection Policy and any amendments if there are any changes in the future, will be communicated on TSTH Group's website for further information to the Data Subjects.

Dated May 30, 2022

Tata Steel (Thailand) Public Company Limited

(Rajiv Mangal)

President and Chief Executive Officer