



**External Personal Data Protection Policy**

**of**

**CK Power Public Company Limited and Subsidiary**



**CK Power Public Company Limited and Subsidiary**  
**External Personal Data Protection Policy**

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**Revision No. 02**

**Effective Date**  
**November 29, 2022**

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**CK Power Public Company Limited and Subsidiary**  
**External Personal Data Protection Policy****Objective:**

CK Power Public Company Limited (“**Company**”) recognizes the importance of respecting each individual’s privacy and the need to treat Personal Data (as defined below) in an appropriate and lawful manner. Accordingly, the Company has adopted this External Personal Data Protection Policy (the “**Policy**”) to protect your rights in relation to the processing (as defined below) and management of Personal Data by the Company, and will take all reasonable and necessary measures to safeguard Personal Data in accordance with the Personal Data Protection Act B.E. 2562 and other applicable Personal Data protection laws and regulations (collectively, the “**Law**”), and to uphold good data protection practices.

For the purpose of this Policy, the Company will, for you, act as the Data Controller and/or the Data Processor (as defined under the Law) for processing of your Personal Data. The Company will mainly act as the Data Processor to process Personal Data for its Subsidiaries, namely 1) South East Asia Energy Company Limited (“**SEAN**”), 2) Nam Ngum 2 Power Company Limited (“**NN2**”), 3) Xayaburi Power Company Limited (“**XPCL**”), 4) Bangpa-In Cogeneration Company Limited (“**BIC**”), and 5) Bangkhenchai Company Limited (“**BKC**”) 6) Luang Prabang Power Company Limited (“**LPCL**”) (altogether “**Subsidiaries**”).

**Scope:**

- (1) This Policy shall be effective as of November 29, 2022 and is subject to further changes or revisions (which shall be notified to you.) The Company shall continue to review the effectiveness of this Policy from time to time.
- (2) This Policy applies to the processing of Personal Data by the Company within Thailand or processed in the context of our affiliated companies in Thailand. Any breach of the Law or this Policy will be taken very seriously, and disciplinary action may be taken.
- (3) This Policy shall supersede all prior Personal Data protection policies and protocols belonging to the Company which apply to external parties, if any, unless specified otherwise by the Company.
- (4) This Policy works in tandem with the applicable External Consent Form which you have signed. Please study such External Consent Form carefully to understand how we use your Personal Data under consent basis.

**Definition Use Revision/Amendment Transfer Deposition for Internal Personal Data (External Personal Data)****Personal Data and Uses**

“**Personal Data**” means any data about an individual which can be used to trace back to any such individual, whether by such data alone or in combination or in conjunction with other data available for any particular processing.

“**Processing**” and all of its derivatives mean any type of treatment of Personal Data, including collection, transfer, disclosure, use, etc.

List of Personal Data that the Company is using and/or will use and their purposes and other details are described in the table below. Please study them carefully to understand how we process your Personal Data. Please note that the list below is not exhaustive, although we have afforded our utmost ability to provide as complete a list as possible.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
<b>Engineering</b>				
Meeting attendees	<b>Meeting arrangement:</b> To arrange a meeting for parties to sign a preliminary Memorandum of Understanding with certain government.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Position</li> <li>• Contact information</li> <li>• Minutes</li> </ul>	Retain for ten years after collection.
Meeting attendees	<b>Meeting arrangement:</b> To arrange a meeting on environment feasibility study.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Position</li> <li>• Contact information</li> <li>• Minutes</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees	<b>Accommodation arrangement:</b> To arrange for an accommodation and travel booking such as flight and train tickets for on-site visit for social feasibility study.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact number</li> <li>• National ID Card</li> <li>• Traveling details</li> </ul>	During the employment and for ten years after.
Villagers	<b>Creating report:</b> To create a report summarizing the social feasibility study.	Legitimate interest	<ul style="list-style-type: none"> <li>• Gender</li> <li>• Household composition</li> <li>• List of immovable assets</li> <li>• Occupation</li> <li>• Income</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees	<b>Meeting registration:</b> To complete the registration to attend the Mekong River Commission's meeting.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Organization's name</li> <li>• Position</li> <li>• Minutes</li> </ul>	During the employment and for ten years after.
External parties (potential business partners)	<b>Identifying business partners:</b> To identify buyers and technical supports for a particular project.	Legitimate interest	<ul style="list-style-type: none"> <li>• Organization's name</li> <li>• Contact person's name</li> <li>• Contact number</li> <li>• Email address</li> <li>• Address</li> </ul>	Retain for ten years after collection.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
			<ul style="list-style-type: none"> <li>Portfolio</li> <li>Other facts pertaining to business partner's capacities</li> </ul>	
External parties (potential contractors and sub-contractors)	<b>Assisting the project owner:</b> To facilitate and assist the project owner to choose the main contractor in charge of Engineering, Procurement, and Construction (EPC), and sub-contractors.	Legitimate interest	<ul style="list-style-type: none"> <li>Organization's name</li> <li>Contact person's name</li> <li>Contact number</li> <li>Email address</li> <li>Address</li> <li>Portfolio</li> </ul>	Retain for ten years after collection.
Villagers	<b>Obtainment of villager information:</b> To obtain and store information regarding the eventual relocation and compensation of villagers.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Contact number</li> <li>Location</li> <li>Compensation</li> <li>Family details</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees and External parties (contractors' employees)	<b>Providing advices to project owner:</b> To provide advices to the project owner on operation and maintenance.	Contract for the contractors' employees and legitimate interest for Subs.' employees	<ul style="list-style-type: none"> <li>Name</li> <li>Phone number</li> <li>Email</li> <li>General performance</li> </ul>	During the employment or service contract period and for ten years after.
<b>Procurement</b>				
Subsidiaries' employees	<b>Employee specification:</b> To inquire about employees' specifications for the products to be procured.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Contact number</li> <li>Email address</li> <li>Personal problems and preferences</li> </ul>	During the employment and for ten years after.
External parties (contractors' employees)	<b>Price and condition negotiation:</b> To negotiate on price and conditions of products to be procured.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Contact number</li> <li>Email address</li> <li>Portfolio and specifications</li> </ul>	Retain for ten years after collection.
External parties (contractors' employees)	<b>Capability verification:</b> To run corporate and personal check to verify capability of such company or person as an approved vendor.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Contact number</li> <li>Email address</li> </ul>	During the service agreement period and for

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
			<ul style="list-style-type: none"> <li>Personal certificates</li> <li>Portfolio and specifications</li> </ul>	ten years after.
External parties (contractors' employees)	<b>Outsourcing logistics work:</b> To outsource the work regarding logistics of domestic trips and cross-border trips.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Contact number</li> <li>Email address</li> <li>Traveling details and locations</li> </ul>	During the service agreement period and for ten years after.
External parties (contractors' employees)	<b>Outsourcing work on custom clearance:</b> To outsource the work regarding custom clearance procedures.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Contact number</li> <li>Email address</li> <li>General performance</li> </ul>	During the service agreement period and for ten years after.
Government officials (BOI personnel)	<b>Meal preparation for BOI personnel:</b> To prepare meals for a team of auditors from the Thai Board of Investment (BOI) during their visit to check on the BOI-related assets.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Contact number</li> <li>Email address</li> <li>Non-sensitive preferences</li> </ul>	Retain for ten years after collection.
Government officials (Laotian Board of Investment (Master List))	<b>Facilitating Laotian personnel:</b> To facilitate Laotian government officials with tasks including transportation, accommodation, and pocket money allowance.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>Contact number</li> <li>Passport</li> <li>Routine purchases</li> <li>Traveling details and hotels</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees	<b>Warehouse management:</b> To manage the warehouses in relation to the records of personnel handling the operation of the warehouses such as receiving, sending, transferring, borrowing, and returning products.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Position</li> <li>Delivered/sent products</li> <li>Information of the involved borrowers/users</li> <li>General performance</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Operating gas station:</b> To operate gas stations at different worksites.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Contact number</li> <li>Email address</li> </ul>	During the employment and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
			<ul style="list-style-type: none"> <li>• General performance</li> </ul>	
Subsidiaries' employees	<b>Security access management:</b> To manage security access to certain areas in the worksites by utilizing physical locks.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact number</li> <li>• Email address</li> <li>• Areas allowed to access</li> <li>• Lock designation</li> <li>• General performance</li> </ul>	During the employment and for ten years after.
<b>MD Office</b>				
Subsidiaries' employees and executives	<b>Corporate events:</b> To host corporate events, such as signing ceremonies.	Contract and legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Non-specific videos and pictures</li> <li>• Specific videos and pictures of the executives</li> </ul>	Retain indefinitely.
External parties (guests or government officials)	<b>Corporate events:</b> To host corporate events, such as signing ceremonies.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Non-specific videos and pictures</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Site visit tasks:</b> To deal with tasks and issues to enable employees to undertake site visits and other ordinary traveling, such as flight and accommodation booking.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• National ID Card</li> <li>• Contact Number</li> <li>• Passport</li> <li>• Traveling details and hotels</li> </ul>	During the employment and for ten years after.
External parties (guests, family members, government officials)	<b>Site visit tasks:</b> To deal with tasks and issues to enable certain personnel to undertake site visits and other ordinary traveling, such as flight and accommodation booking.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• National ID Card</li> <li>• Contact Number</li> <li>• Passport</li> <li>• Traveling details and hotels</li> </ul>	Retain for ten years after collection.

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Subsidiaries' employees	<b>Obtainment of visa:</b> To assist to obtain visa for executives and employees.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Contact number</li> <li>• Address</li> <li>• Passport</li> <li>• Traveling necessity</li> </ul>	During the employment and for ten years after.
External parties (shareholders and shareholders' meeting attendees)	<b>Annual shareholders' meetings:</b> To arrange annual shareholders' meetings.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• National ID Card (no religious specification)</li> <li>• Contact number</li> <li>• Address</li> </ul>	Retain for ten years after collection.
Subsidiaries' directors	<b>Training for directors:</b> To arrange training sessions for directors.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Contact number</li> <li>• Training details</li> </ul>	During the employment and for ten years after.
External parties (relevant personnel)	<b>Assistance on medical arrangement:</b> To provide assistance on medical arrangement including travel and accommodation.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Contact number</li> <li>• Passport</li> <li>• Sales receipt (with no information related to health condition)</li> <li>• Traveling details and hotels</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees and external parties (such as family members or public figures)	<b>Courtesy visit arrangement:</b> To arrange courtesy visit in an event of hospitalization or child birth of significant personnel.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Information about hospital</li> <li>• Pictures taken during such visit</li> <li>• Reimbursement receipt for a gift</li> </ul>	Retain for ten years after collection.



Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
External parties (models)	<b>Special events:</b> To organize and host special events.	Contract	<ul style="list-style-type: none"> <li>• Pictures and videos</li> <li>• Name</li> <li>• Contact number</li> </ul>	During the service agreement period and for ten years after.
Subsidiaries' employees and external parties (such as guests, government officials, or villagers)	<b>CSR events:</b> To undertake CSR events such as disaster relief efforts, pest elimination, community services, cash and product donation to different communities and organizations.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Position</li> <li>• Passport</li> <li>• Non-specific pictures or videos</li> </ul>	Retain indefinitely.
Subsidiaries' executives	<b>CRM contents:</b> To create articles with CRM contents.	Contract and legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Specific pictures or videos of the executives</li> </ul>	Retain indefinitely.
External parties (such as villagers)	<b>Advertisement materials:</b> To undertake advertisement for the Company and Subsidiaries through online channel, newspapers, and magazine with contents, such as CSR, editorial, and important days.	Legitimate interest	<ul style="list-style-type: none"> <li>• Non-specific pictures or videos</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Press release:</b> To undertake press release to provide the public with information surrounding business plans, expansion plans, specific business undertaking, CSR events, internal structural changes, etc.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Specific content from the interview of employees</li> </ul>	Retain indefinitely.
<b>Finance and Accounting</b>				
Subsidiaries' employees	<b>Payment to employees:</b> To arrange other payment to employees.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Identification information such as National ID Card</li> <li>• Bank account numbers</li> </ul>	During the employment and for ten years after.
External parties (individual vendors)	<b>Payment to vendors:</b> To arrange the payment to individual vendors.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Identification information such as National ID Card</li> </ul>	During the service agreement period and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
			<ul style="list-style-type: none"> <li>Bank account numbers</li> </ul>	
External parties (corporate vendors' employees)	<b>Payment to vendors:</b> To arrange the payment to corporate vendors.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Organization's name</li> <li>Organization's bank account number</li> <li>Contact number</li> <li>Address</li> </ul>	During the service agreement period and for ten years after.
External parties (relevant personnel)	<b>Reimbursement for hospital visit:</b> To arrange for the reimbursement for hospital visits of certain personnel.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>Passport</li> <li>Product sales and service receipts</li> </ul>	Retain for ten years after collection.
External parties (individual purchasers)	<b>Account receivables from purchasers:</b> To manage account receivables from individual purchasers in relation to sale of waste and unused products.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Identification information such as National ID Card</li> <li>Bank account numbers</li> </ul>	During the purchase agreement period and for ten years after.
External parties (corporate purchasers' employees)	<b>Account receivables from purchasers:</b> To manage account receivables from individual purchasers in relation to sale of waste and unused products.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Organization's name</li> <li>Organization's bank account number</li> <li>Contact number</li> <li>Address</li> </ul>	During the purchase agreement period and for ten years after.
Subsidiaries' employees	<b>Fixed assets:</b> To keep record of fixed assets regarding employees and their responsibilities over certain assets, also, purchase orders by certain employees.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Position</li> <li>Lists of responsible assets</li> <li>Purchase orders</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>General ledgers:</b> To create general ledgers.	Contract	<ul style="list-style-type: none"> <li>Numbers of users</li> <li>General description of each user</li> </ul>	During the employment and for ten years after.
External parties (individual investors or	<b>Ad hoc assistance:</b> To provide support as requested by investors.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Corporate information</li> <li>Business card</li> </ul>	Retain for ten years after collection.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
corporate investors' employees)			<ul style="list-style-type: none"> <li>Summaries of the requests/ inquiries</li> </ul>	
External parties (individual investors, their family members, and corporate investors' employees)	<b>Shareholders support:</b> To provide various functions to shareholders.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Amount of shares each shareholder holds</li> <li>Summaries of complaints from shareholders</li> </ul>	Retain for ten years after collection.
External parties (potential business partners)	<b>Partner identification:</b> To identify partners for financing.	Legitimate interest	<ul style="list-style-type: none"> <li>Organization's name</li> <li>Contact person's name</li> <li>Contact number</li> <li>Email address</li> <li>Address</li> <li>Portfolio and general performance</li> </ul>	Retain for ten years after last transaction.
<b>Corporate Administration</b>				
Subsidiaries' employees	<b>Space management:</b> To manage administrative function concerning space management, rental, and parking, including vehicle registration.	Contract	<ul style="list-style-type: none"> <li>Basic identification information of drivers responsible for vehicles</li> <li>Information of vehicles</li> <li>General performance</li> </ul>	During the employment and for ten years after.
External parties (outsource service providers' employees)	<b>Facility maintenance:</b> To outsource some part of maintenance services to outsource service providers. The information of such service providers might be passed to the relevant third party, such as the building owner as a requirement of renting the building space.	Legitimate interest	<ul style="list-style-type: none"> <li>Names</li> <li>National ID Card</li> <li>Gender</li> <li>Email address</li> <li>General performance</li> </ul>	During the service agreement period and for ten years after.
External parties (outsource	<b>Housekeeping services:</b> To outsource some part of	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>National ID Card</li> </ul>	During the service agreement

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service providers' employees)	housekeeping services to outsource service providers.		<ul style="list-style-type: none"> <li>• Banking information</li> <li>• Work-related documents</li> <li>• General performance</li> </ul>	period and for ten years after.
Subsidiaries' employees	<b>Management of utilities:</b> To manage the procurement of assigned utilities, such as company-issued cell phones.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact numbers</li> <li>• Call activities</li> <li>• Telephone bills</li> </ul>	During the employment and for ten years after.
External parties (storage service providers' employees)	<b>Document delivery:</b> To manage storage of unused documents by boxing the documents and shipping to a storage service provider.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Organization name</li> <li>• Contact numbers</li> <li>• Email</li> <li>• General performance</li> </ul>	During the service agreement period and for ten years after.
Subsidiaries' employees and external parties (visitors)	<b>CCTV:</b> To monitor and access to CCTV systems if needed.	Legitimate interest	<ul style="list-style-type: none"> <li>• CCTV footage</li> </ul>	Until footage is overwritten.
Subsidiaries' employees	<b>Providing administrative services:</b> To organize and provide administration services for internal competitions such as recycling competition.	Legitimate interest	<ul style="list-style-type: none"> <li>• Non-specific pictures or videos</li> <li>• Name</li> <li>• Position</li> <li>• Result from the competitions</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees	<b>Car management:</b> To manage cars with drivers for the executives, including keeping records of route logs and car cameras.	Contract	<ul style="list-style-type: none"> <li>• Name and basic identification of the executives</li> <li>• Name and basic identification of the drivers</li> <li>• Route logs</li> <li>• Car camera footage</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Car facilitation:</b> To facilitate executives with cars without any driver.	Contract	<ul style="list-style-type: none"> <li>• Name and basic identification of the executives</li> </ul>	During the employment and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
			<ul style="list-style-type: none"> <li>• Car camera footage</li> <li>• Traveling records</li> </ul>	
Subsidiaries' employees	<b>Pool car management:</b> To provide pool cars and manage tracking system along with log records of employees using such cars.	Contract	<ul style="list-style-type: none"> <li>• Name of employee's using pool cars</li> <li>• Traveling records</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Flight booking:</b> To liaise with the external agencies to book a flight for employees and deal with relevant issues.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• National ID Card</li> <li>• Passport</li> <li>• Traveling details</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Train ticket booking:</b> To book train tickets for employees.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• National ID Card</li> <li>• Passport</li> <li>• Traveling details</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Hotel booking:</b> To arrange for the hotel booking both by CKP itself and by outsource agencies.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• National ID Card</li> <li>• Passport</li> <li>• Traveling details</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Travel insurance:</b> To procure ad-hoc insurance for the travellers.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Age</li> <li>• National ID Card</li> <li>• Passport</li> <li>• Traveling details</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Travelling-related reimbursement:</b> To deal with reimbursement forms submitted by employees for travel-related reimbursement.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Reimbursement forms</li> <li>• Receipts</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Processing general work:</b> To process reports on general work stream from Vientiane Office, including general documentation,	Contract	<ul style="list-style-type: none"> <li>• Employee's information</li> <li>• Name</li> <li>• Position</li> </ul>	During the employment and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
	government liaison, trade partner activities, and meetings. This process may include transferring data of employees from XPCL, NN2, and other Laos-based personnel.		<ul style="list-style-type: none"> <li>Organization name</li> <li>General activities report</li> <li>General performance</li> </ul>	
<b>Business Controlling</b>				
Subsidiaries' personnel and external parties (personnel of external parties) dealing with both the Company and the Subsidiaries	<b>Document retainment:</b> To deal with and retain most documents of the companies and external parties, including contracts, personal licenses, and other basic information.	Contract and legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Professional licenses</li> <li>Basic identification information</li> <li>National ID Cards (without religion and blood type)</li> <li>Portfolio</li> <li>General performance</li> <li>Signatures</li> </ul>	During the service agreement period or employment period and for ten years after, or ten years from the last transaction with the relevant company.
External parties (Company's shareholders)	<b>Shareholders' meeting packet:</b> To liaise with external parties to print out meeting packets to be sent out to shareholders and have them delivered accordingly.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Shareholder ID numbers</li> <li>Shareholding information</li> </ul>	Retain for ten years after printing.
External parties (Company's shareholders and their proxies)	<b>Shareholder's meeting attendance record:</b> To keep records of attendants of the shareholders' meetings.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>National ID Card (with no religion and blood type)</li> </ul>	Retain for ten years after meeting.
External parties (Subsidiaries' shareholders and their proxies)	<b>Shareholder's meeting attendance record:</b> To keep records of attendants of the shareholders' meetings.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>National ID Card (with no religion and blood type)</li> <li>Basic information of attendees</li> <li>Pictures and videos of conference calls</li> </ul>	Retain for ten years after meeting.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
Subsidiaries' personnel	<b>Meeting arrangement:</b> To arrange meetings for board of directors' and committees.	Contract	<ul style="list-style-type: none"> <li>• Names</li> <li>• National ID Cards</li> <li>• Basic information of attendees</li> <li>• Pictures and videos of conference calls</li> <li>• Summary of certain incidents</li> </ul>	During the employment and for ten years after.
External parties (directors of XPCL and NN2)	<b>Liaison with Laotian authority:</b> To liaise with Laotian authority to comply with Laotian laws and regulations, such as provide documents in relation to directors.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Passport</li> <li>• Address</li> <li>• Other details requested by the government</li> </ul>	During the employment and for ten years after.
External and internal parties (personnel and shareholders of CKP and Subsidiaries)	<b>Shareholding network and related parties:</b> To keep track of of shareholding structure within the larger CKP group to ensure proper and lawful voting at each meeting.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Organization</li> <li>• Shareholding</li> <li>• Family relationships</li> <li>• Conflict of interest</li> </ul>	Retain for ten years after involvement with CKP group.
External parties (individual cornerstone shareholders and employees of corporate cornerstone shareholders of CKP)	<b>Registration and movement of shareholders:</b> To manage registration and movement of cornerstone shareholders, including big lot reports when requested so by the authority.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Shareholding Relationship</li> <li>• Other details required by official form</li> </ul>	Retain for ten years after involvement with CKP group.
Subsidiaries' employees	<b>Corporate registration and operational licensing:</b> To sign and submit documents and to deal with corporate registration and operational licensing for the companies to ensure full compliance with all regulations.	Contract	<ul style="list-style-type: none"> <li>• Basic Personal Data of directors</li> <li>• Name</li> <li>• Address</li> <li>• Position</li> </ul>	During the employment and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
Subsidiaries' employees	<b>Advice and dispute:</b> To provide advice and deal with lawsuits.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Basic information of employees</li> <li>• Consulting stories</li> <li>• General performance</li> </ul>	Retain for ten years after incident.
Subsidiaries' employees	<b>Processing property insurance:</b> To process a particular claim form for property insurance and send to the insurer.	Legitimate interest and legal right	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details of responsible person</li> <li>• Email address</li> <li>• Text messages</li> <li>• Non-specific pictures of the incident and aftermath</li> <li>• Injury details</li> </ul>	Retain for ten years after incident.
External parties (third parties of the Subsidiaries)	<b>Processing third-party liability insurance:</b> To process a particular claim form for third-party liability insurance and send to the insurer.	Legitimate interest and legal right	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details of responsible person</li> <li>• Email address</li> <li>• Text messages</li> <li>• Non-specific pictures of the incident and aftermath</li> <li>• Injury details</li> </ul>	Retain for ten years after incident.
External parties (beneficiaries of a dead employee)	<b>Processing life and health insurance:</b> To manage life and health insurance benefits of a dead employee and liaise with relevant beneficiaries.	Legitimate interest	<ul style="list-style-type: none"> <li>• Basic Personal Data of beneficiaries</li> <li>• Name</li> <li>• Gender</li> <li>• Contact number</li> <li>• Address</li> </ul>	Retain for ten years after incident.
Subsidiaries' employees	<b>Processing life and health insurance:</b> To manage life and health insurance claim and benefits regarding IPD, OPD, personal accident, and dental policies, for employees.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Details of insurance uses and incidents</li> </ul>	Retain for ten years after incident or use.



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Subsidiaries' employees	<b>Processing the movement of employees:</b> To summarize and pass the change in conditions/positions of employees to insurers for insurance adjustment and effectuation.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Salary</li> <li>• Address</li> <li>• Contact number</li> </ul>	During the employment and for ten years after.
External parties (BIC's employees' family members)	<b>Processing the movement of employees:</b> To summarize and pass the change in conditions/positions of employees to insurers for insurance adjustment and effectuation.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Salary</li> <li>• Address</li> <li>• Contact number</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Procurement for life and health:</b> To manage procurement for life and health insurance in accordance with the insurance policy.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Salary</li> <li>• Address</li> <li>• Contact number</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Director's liability insurance:</b> To provide relevant information to insurers/insurance brokers to manage procurement of directors' liabilities insurance.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Basic identification information</li> <li>• Historical lawsuits</li> <li>• Termination term of a director</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees (from XPCL and NN2)	<b>Workmen compensation and employer's liability:</b> To provide information to insurers/insurance brokers to manage procurement of workmen compensation and employer's liabilities.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Salaries</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Overall scheme for occupational safety:</b> To create work instructions for each specific type of operational function, in order to facilitate safe workspace.	Legitimate interest	<ul style="list-style-type: none"> <li>• Information about happened incident</li> <li>• Name</li> <li>• Position</li> <li>• Basic information of employees</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Overall scheme for work instructions:</b> To assess employee's ability considering nature and instructions of each work for work	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Certificates</li> <li>• Licenses</li> </ul>	During the employment and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
	approval as an overall scheme for work instructions.			
Subsidiaries' employees	<b>Overall scheme for safety engineering:</b> To consider safety issue from engineering perspective and reduce risks in workspace as an overall scheme for safety engineering.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Responsible work and tasks</li> <li>• General performance</li> </ul>	During the employment and for ten years after.
<b>Human Resource (HR)</b>				
Subsidiaries' employees	<b>Identifying problem:</b> To identify problems via different channels, such as individual complaint by employees; ooperational pain point by management personnel; and individual request for training.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Note of complaints</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Creation of a training roadmap:</b> To identify which individuals from which roles/positions within the organizations need to be trained, and for which training, as a part of process to create training catalog.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Information regarding performance of employees</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Creation of training plan:</b> To create training plan.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Information regarding performance of employees</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Pre-training preparation:</b> To prepare and arrange for trainings. In some case, CKP might need to share employees' information with trainers in advance to allow the trainers to prepare training materials.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Position</li> <li>• Tenure</li> <li>• Work experiences</li> <li>• Training records</li> <li>• Resumes</li> <li>• ID Cards</li> </ul>	During the employment and for ten years after.
External parties (trainers)	<b>Training arrangement:</b> To choose trainers and prepare and arrange for trainings.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Work experiences</li> <li>• Training records</li> <li>• Resumes</li> <li>• ID Cards</li> </ul>	During the service agreement period and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
Subsidiaries' employees	<b>Organizing training:</b> To organize trainings including trainings at office, off-site, and by both internal and external trainers; preparing meals (if needed); and arranging pre and post-training tests.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Position</li> <li>• Test scores</li> <li>• Non-specific content records</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Post-training surveys:</b> To conduct post-training survey to determine the effectiveness of the training and how to improve future training.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Training results/ feedbacks</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Post-training internal reports:</b> To create a document named Summarized Evaluation of Training to provide summary of training to the team, the function's supervisor, and the board of directors, if necessary.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Position</li> <li>• Training feedbacks</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Internal knowledge sharing:</b> To share knowledge internally in a more casual manner compared to trainings.	Legitimate interest	<ul style="list-style-type: none"> <li>• Work lessons</li> <li>• Non-specific pictures of employees</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Government liaison:</b> To prepare reports summarizing trainings to be submitted to a government entity, namely, Department of Labour Development.	Legal requirement	<ul style="list-style-type: none"> <li>• Name</li> <li>• Training courses</li> <li>• National ID Cards</li> <li>• Signatures</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>ISO certification:</b> To provide require documents as on-site disclosure to ISO representative for the audit for ISO certification.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Positions</li> <li>• Work experiences</li> <li>• Certificates</li> <li>• General performance</li> <li>• Other details requested by the auditing entity</li> </ul>	None.
Subsidiaries' employees	<b>Intranet Learn application:</b> To manage the intranet Learn	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul>	Retain indefinitely.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
	application which contains all all historical presentations training materials, and summaries of past issues.		<ul style="list-style-type: none"> <li>• Work experiences</li> <li>• General performance</li> <li>• Work lessons</li> <li>• Non-specific pictures of employees</li> <li>• Summaries of past issues</li> </ul>	
Subsidiaries' employees	<b>Collecting Kaizen sheet:</b> To collect Kaizen sheet from employees for records of shared ideas.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Practices</li> <li>• Personal rationale</li> <li>• Non-specific pictures</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Event accommodation:</b> To accommodate events, namely, townhall, team building, CSR, and project announcement.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Gender</li> <li>• Announcement of promotion</li> <li>• CSR contents</li> </ul>	Retain for ten years after collection.
Subsidiaries' interns	<b>Internship:</b> To interview and examine documents for application review, improvement comments, and exit interview.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Resume</li> <li>• Academic records</li> <li>• Extra-curricular activities</li> <li>• Emergency contact</li> <li>• Short discussion contents</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees	<b>Review of company structure and creation of job descriptions and confirmation of annual manpower plan:</b> To review company structure, create job descriptions, and confirm annual manpower plan to finalize manpower-related documents.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Role</li> <li>• Survey results</li> </ul>	Retain indefinitely.
External parties (job applicants for Subsidiaries)	<b>Recruitment:</b> To undertake recruitment starting with advertisement and receipt of applications.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Profile description</li> <li>• Contact number</li> </ul>	During the employment and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
			<ul style="list-style-type: none"> <li>Email address</li> <li>Degrees</li> <li>Portfolio</li> <li>Past experiences</li> </ul>	
External parties (job applicants for Subsidiaries)	<b>Aptitude test:</b> To arrange for employees to take aptitude tests by using service from an external service provider, PTS.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Test results</li> </ul>	During the employment and for ten years after.
External parties (job applicants for Subsidiaries)	<b>Interviews and references:</b> To set up interview with the line manager and the HR team, following by the session with MD.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Candidates' responses</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Adjustment of position:</b> To consider transferring an employee to a different position.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Position</li> <li>Salary</li> <li>Family details</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Internal announcement of newcomer:</b> To announce the joining of a newcomer via email to all relevant receivers.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Position</li> <li>Gender</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Vendor account opening and data inputting:</b> To manage vendor account and data inputting for employees by opening a vendor account, sending notification to external entities such as Social Security Office and provident fund manager, and updating asset checklist.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Position</li> <li>Gender</li> <li>National ID Cards (without religion and blood type)</li> <li>House registrations</li> <li>Passport</li> <li>Bank books</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Introductory training:</b> To provide introductory training, including those on sustainability, CSR, rules, corporate governance, harassment, etc.	Legitimate interest	<ul style="list-style-type: none"> <li>Presentation with non-specific contents of employees</li> <li>Videos or pictures with non-specific contents of employees</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Probation period review:</b> To review performance of employees during probation period.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Position</li> <li>Performance records</li> </ul>	During the employment and for ten years after.

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Subsidiaries' employees	<b>HR-regulated benefits:</b> To manage and regulate benefits for employees regarding, for example, allowance for living, travel, phone, and fuel.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Salary</li> <li>• Work performance</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>HR-regulated leaves:</b> To manage and regulate leaves for employees, such as for administrative/duty leave, vacation leave, military duty leave, and leave without pay.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Position</li> <li>• Contact Number</li> <li>• Leave form with reasons</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Payroll:</b> To manage payroll and send summary to the bank.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Salary</li> <li>• Legal deductions and company's deductions</li> <li>• Judgement deduction</li> <li>• Education fund deduction</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Salary payment:</b> To arrange salary payment to employees.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Identification information such as National ID Card</li> <li>• Bank account numbers</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Loan:</b> To issue a confirmatory letter for employees to ask for loan from a bank and liaise with the bank's inquiry.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Tenure</li> <li>• Salary</li> <li>• Contact number</li> </ul>	Retain for ten years after issue.
Subsidiaries' employees	<b>KPI assessment:</b> To arrange KPI assessment through discussion, self-evaluation, evaluation by supervisors, to determine promotion, salary increase, and bonus, or in the alternative certain measures. In case of promotion, notification email may be sent to relevant colleagues.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Salary</li> <li>• Work performance</li> </ul>	During the employment and for ten years after.

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Subsidiaries' employees	<b>Promotion:</b> To determine job description, tenure records, new package, and other necessary details, in case of promotion.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Position</li> <li>Salary</li> <li>Work performance</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Government liaison regarding employment management:</b> To liaise with government authorities, such as Social Security Office, regarding the management of employees.	Legal requirement	<ul style="list-style-type: none"> <li>Name</li> <li>Training courses</li> <li>National ID Cards</li> <li>Signatures</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Complaint management:</b> To manage complaint by process notifications submitted to the HR team and notify responsible persons and arrange an investigation.	Legitimate interest and/or legal right	<ul style="list-style-type: none"> <li>Name</li> <li>Details of the meeting and investigation</li> <li>Possible sensitive Personal Data</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Termination of employment:</b> To improve work conditions from the records and/or summary from exit interview at the termination of employment.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Details from exit interviews</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Shared service report:</b> To generate report covering details about employment statistics, health cases, finance, lawsuits, major issues, sickness trend, event attendance, comments to management, etc., and circulate to all Subsidiaries.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>Financial information</li> <li>Work performance</li> <li>Lawsuits</li> <li>Individual comments</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Audits:</b> To disclosure required information for periodic audit by external entities, such as EY and ISO, and for internal audit.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>Financial information</li> <li>Work performance</li> <li>Lawsuits</li> <li>Individual comments</li> </ul>	None.
Subsidiaries' employees	<b>Cooperation with vendors:</b> To cooperate with vendors in relation to programming, calculation, engagement survey, salary, etc.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>Salary</li> <li>Position</li> </ul>	Retain indefinitely.

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			<ul style="list-style-type: none"> <li>Working experience</li> <li>Tenure</li> <li>Survey results</li> </ul>	
Subsidiaries' employees (committee candidates)	<b>Benefit committee:</b> To manage and keep the operation of benefit committee.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Position</li> <li>Meeting minutes</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees	<b>New employee introduction:</b> To introduce the employee to all employees via an introductory email and a walk-around.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>Basic work information</li> <li>Work responsibility</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Issuance of employee ID card and data for TA system:</b> To issue Employee's ID cards and data for TA system.	Contract	<ul style="list-style-type: none"> <li>Profile picture</li> <li>Name</li> <li>Gender</li> <li>Position</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Sports sponsorship:</b> To organize and sponsor sports events, such as soccer, badminton, yoga, and golf.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Position</li> <li>Sign-up list</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees	<b>Annual new year party:</b> To organize the annual new year celebration party, including hosting a voting for celebrity invitation, choosing hotels and caterers, choosing subject of donation, and creation of presentation.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Attendance</li> <li>Non-specific contents in videos and pictures</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees	<b>Annual merit-making event:</b> To undertake annual merit-making event to celebrate companies' anniversary.	Legitimate interest	<ul style="list-style-type: none"> <li>Non-specific content in videos and pictures</li> </ul>	Retain indefinitely.
Subsidiaries' employees	<b>Pre-travel health check:</b> To facilitate employees with pre-travel physical health check required by an authority for certain trip, by having them visit the partner hospital.	Legal requirement	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>Position</li> <li>Contact number</li> <li>Health check results</li> <li>Traveling details</li> </ul>	Retain for ten years after collection.



Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
Subsidiaries' employees	<b>Medical emergency scheme:</b> To assist personnel with urgent health issues or injuries.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Gender</li> <li>• Contact number</li> <li>• General information without health and injury information</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Travel documents:</b> To assist personnel with regard to obtainment of passports, visas, and work permits including liaising with external service providers.	Contract or legal requirement	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Passport</li> <li>• Contact number</li> <li>• Address</li> <li>• Bank statement</li> <li>• House registrations</li> <li>• Work details</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Business cards:</b> To create business cards for employees.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact number</li> <li>• Address</li> <li>• Email address</li> <li>• Position</li> </ul>	During the employment and for ten years after.
External parties (family members of personnel of CKP and Subsidiaries)	<b>Insurance benefits for spouses and children:</b> To arrange for insurance benefits for spouses and children of employees.	Legitimate interest	<ul style="list-style-type: none"> <li>• Name</li> <li>• Child birth certificate</li> <li>• Proof of relationship</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees	<b>Monthly medical reimbursement:</b> To finalize monthly reimbursement for all personnel regarding medical reimbursement.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Total purchase amount (no sensitive Personal Data)</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Leave summaries:</b> To provide annual report/summary about leaves of each employee for annual KPI evaluation.	Contract	<ul style="list-style-type: none"> <li>• Name</li> <li>• Total leave dates</li> <li>• Supporting document to the leave form (if any and no specific content)</li> </ul>	During the employment and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
Subsidiaries' employees	<b>Opening of bank accounts in Laos:</b> To arrange for the opening of bank accounts in Laos for Thai employees. This action includes offshore transfer of data from Thailand to Laos.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>Passport</li> <li>Certificates of employments</li> <li>Contact information</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Set-up of accommodation in Laos:</b> To arrange for accommodation in Laos, including long-term and on-site accommodation. This action includes offshore transfer of data from Thailand to Laos.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Position/tier</li> <li>Gender</li> <li>Housing information</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Set-up of site accessibility:</b> To set up access for each employee for different sites. This action includes offshore transfer of data from Thailand to Laos.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>IP Address</li> <li>Employee ID Card</li> <li>Position</li> </ul>	During the employment and for ten years after.
<b>IT</b>				
Subsidiaries' employees	<b>Project management:</b> To manage the initiation and operation of projects especially when concerned about query population.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Employee ID Cards</li> <li>Role designation</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>IT program training:</b> To provide IT-related training.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Position</li> <li>Contact information</li> <li>IT knowledge</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Service request and maintenance:</b> To handle a request and an incident and provide assistance and maintenance.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Email address</li> <li>Contact information</li> <li>Incident details</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Wifi connection verification:</b> To verify a new device upon a request, by checking the programs inside a device to ensure there is no dangerous program, before allowing it to connect to the company's network and wifi.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Contact information</li> <li>Details of uses in device</li> </ul>	Retain for ten years after collection.
Subsidiaries' employees	<b>Monitoring:</b> To monitor internet log use, CCTV, file use, device logs, and intrusion.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>IP address</li> <li>Accessed websites</li> </ul>	Retain for ten years after collection.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
			<ul style="list-style-type: none"> <li>Files</li> <li>Device logs</li> <li>CCTV records</li> </ul>	
Subsidiaries' employees	<b>Device borrowing:</b> To keep records of devices borrowing.	Contract	<ul style="list-style-type: none"> <li>Name</li> <li>Contact information</li> <li>Email address</li> <li>Position</li> <li>Borrowed device</li> </ul>	During the employment and for ten years after.
Subsidiaries' employees	<b>Internal application (new project):</b> To operate an internal application with multiple functions, such as access to training courses, historical materials, etc.	Legitimate interest	<ul style="list-style-type: none"> <li>Name</li> <li>Visited pages</li> <li>Historical materials containing details of employees</li> </ul>	Retain indefinitely.
External parties (website users)	<b>Website user's requests:</b> To manage request submitted via online/website channels to CKP.	Legitimate interest and/or lawsuit basis	<ul style="list-style-type: none"> <li>Name</li> <li>IP Address</li> <li>Some information in the request</li> </ul>	Retain for ten years after collection.
<b>Other Activities under Consent</b>				
External parties	Various activities undertaken under consent basis.  See External Consent Form for more details.	See External Consent Form	<ul style="list-style-type: none"> <li>See External Consent Form</li> </ul>	See External Consent Form

In cases where the Company does not receive your Personal Data, the Company may not be able to fulfill some, or all of the purposes outlined in the list of Personal Data as mentioned above.

### Formats

Your Personal Data may, upon discretion of the Company, be collected on hardcopies, electronic median, or other formats. The Company shall do it best to afford appropriate safety measures to protect these files and documents.

### Consent and Withdrawal of Consent

- (a) Your consent will be obtained (via the External Consent Form) before the Company collects, uses, or discloses your Personal Data which requires consent.

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- (b) You may choose to withdraw your consent (but not retrospectively) by providing the Company with a written notice at least fourteen (14) days in advance. All communications on your withdrawal of consent should be directed to the Company's Data Protection Officer (as defined below), whose business details are set out below. However, please note that there may be consequences of withdrawing the consent, which the Company will determine and notify to you before the withdrawal or as soon as possible after the withdrawal. The Company will cease (and cause any of Company's data intermediaries and agents to cease) collecting, using, or disclosing such Personal Data unless it is required or authorized under applicable laws.

**Updating and Correcting Personal Data**

- (a) You must ensure that all Personal Data provided to the Company by you is true, accurate, and complete at all times. Any change to Personal Data shall be notified to the Data Protection Officer (as defined below) or the Human Resources Department or any personnel specially designated to deal with this change within seven (7) days after the change has taken effect.
- (b) The Company shall correct your Personal Data as soon as practicable and provide confirmation of such correction to you, and if it is unable to do so within thirty (30) days of receiving your request, the Company shall notify you of the time within which it will respond.

**Transfer and Sharing of Employee's Personal Data**

- (a) The Company may transfer your Personal Data to the Company's Subsidiaries or related companies or external service providers in Thailand so these service providers can perform certain tasks on our behalf, such as for cloud and non-cloud storage, recruitment, payroll, analytics, and general assistance, or when there is legal obligation or legitimate interest to do so, such as for audits and corporate sale or restructuring. We will rely on the same basis as notified or consented by you for these domestic transfer and processing activities. In such cases, we will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Law and our standards.
- (b) The Company may transfer your Personal Data to the Company's Subsidiaries or related companies or external service providers throughout the world so these service providers can perform certain tasks on our behalf, such as for cloud and non-cloud storage, recruitment, payroll, analytics, and general assistance, or when there is legal obligation or legitimate interest to do so, such as for audits and corporate sale or restructuring. If we have contract basis for any such processing, we will also rely on such for offshore transfer or processing. However, for non-contract basis transfer or processing, we will rely on your consent as given in your respective Consent Form. In such cases, we will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Law and our standards.

**CK Power Public Company Limited and Subsidiary**  
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- (a) Your Personal Data will be retained for period(s) as are necessary to meet the Company's legal and/or business purposes, and the Company will cease to retain your Personal Data as soon as it is reasonable to assume that the purpose for collection such Personal Data is no longer being served by such retention, and such retention is no longer necessary for legal and/or business purposes. Our current policy is to retain certain Personal Data of you for up to ten (10) years after they cease to be necessary, subject to the applicable anonymization procedures and at all times in accordance with our document retention and disposal policy, and applicable laws and regulations.
- (b) We will notify you if there is any change in policy or specific retention of any of your Personal Data that is not in line with the current policy, or is in any way relevant and warrants your special attention.

**Data Protection Officer**

- (1) Details of the Data Protection Officer of the Company (“**Data Protection Officer**”) are  
CKP Power Public Company Limited  
587 Viriyathavorn Building, Sutthisan Winitchai Road  
Ratchadaphisek, Dindaeng, Bangkok 10400  
Tel: +66(0) 2691-9720-34  
Fax: +66(0) 2691-9723  
Email: ckpdpo@ckpower.co.th

**Complaint**

Apart from your rights provided herein, you may issue any complaints regarding this Policy to the Company's Data Protection Officer whose business details are set out above in accordance with procedures issued by the Company. The Company aim to accept your complaint as soon as possible and commit to resolve all complaints no later than 30 days, provided, however, there may be circumstances where this is not possible due to the contents of the complaint. In such circumstances, The Company will respond to your complaint within a reasonable time. You may wish to contact the Personal Data Protection Committee in case you are not satisfied with the Company's response to your complaint.

**Your Rights**

- (1) Right to be notified: If we wish to collect, store, use, or disclose your Personal Data in any manner beyond the scope of your given consent or the scope already outlined to you herein, we will notify and/or seek your prior consent with respect to such additional scope.

- (2) Right to access: You may, at any time, request to have access to your Personal Data in order to review it and also request to know about how we have come to possess your Personal Data.
- (3) Right to copies: You may request for a copy of your Personal Data in a form that can be reasonably accommodated.
- (4) Right of portability of data: You may request us to transfer your Personal Data in a format that is reasonable and acceptable to another entity of your choice.
- (5) Right to rectification: If your Personal Data has been changed or is not up-to-date, you have the obligation to ensure that your Personal Data is accurate, up-to-date, complete, and not misleading by submitting a request to rectify it in accordance with the procedures announced by us. This, besides being your obligation, is also your right.
- (6) Right to withdraw consent: You may withdraw your consent at any time. We may deny your withdrawal only if the law or the contract does not allow so. Your withdrawal will not have any effect on our previous collection, usage, and disclosure of your Personal Data. If your withdrawal will affect any part of your Personal Data, rights, or benefits, we will notify you of such effect before your withdrawal if it is possible, or as soon as practicable thereafter.
- (7) Right to erasure: You may request to erase or make your Personal Data pseudonymised under any of the following circumstances: (a) your Personal Data is no longer needed for the intended purposes, (b) you withdraw your consent and we no longer have any legal right to collect, store, use, or disclose your Personal Data, (c) you object to the collection, storage, use, or disclosure of your Personal Data and we do not have any legitimate reason to reject your objection, or (d) your Personal Data was collected, stored, used, or disclosed in contravention of the Law. However, we may deny your request if our collection of your Personal Data is made for the purposes authorized by the Law, which include a data collection for statistical research purpose with appropriate protective measures, or for establishment of legal claims, legal compliance, or exercise of legal rights or defences.
- (8) Right to suspension: You may request us to suspend the use of your Personal Data in any of the following events: (a) when we are in the process of verifying certain information for the purpose of rectifying or updating your Personal Data under your request, (b) when your Personal Data is to be erased but you instead request to suspend its use, (c) when it is no longer necessary to store your Personal Data, but you request us to continue the storage of your Personal Data for establishing legal claims, legal compliance, or exercise of legal rights or defences, or (d) when we are in the process of verifying our legitimate interests, against your objection or, in our collection, storage, use, or disclosure for various purposes including the statistical research, as may be permitted by the Law.
- (9) Right to object the processing of Personal Data: You may object to the collection, storage, use, or disclosure of your Personal Data in any of the following events: (a) in case where

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your Personal Data was collected for the purpose of (i) public interest, (ii) our compliance with a governmental order, or (iii) any legitimate interest of ours or other legal entity (we may object to such request if (aa) your objection will lead to a non-compliance with the law, or (bb) it relates to an establishment of legal claims, legal compliance, or exercise of legal rights or defences, (b) in case where we have collected, stored, used, or disclosed your Personal Data for the purpose of direct marketing, or (c) in case where we have collected, stored, used, or disclosed your Personal Data for any research purposes as specified in the Law, including for statistical purpose.

- (10) Right to file a petition: In case you found that staff or employees of the Company committed a violation of the Law or this Policy. You may file a petition to the Company through the channels and procedures specified by the Company.

**Language**

In the event of any conflict or inconsistency between any term of this Policy or any Thai translation version, this English version shall prevail.

To cancel the original policy that was announced on 19 May 2022 by adopting the 2nd revised policy which has been approved by the Board of Directors Meeting No. 7/2022 on 29 November 2022. This Policy shall Effective from 29 November 2022 onwards.

It is hereby announced for general acknowledgment and action.

-Signature-

(Dr. Thanong Bidaya)

Chairman of the Board of Directors