

Stakeholder Privacy Notice

Major Development Public Company Limited (the "Company") is strongly devoted to protecting everyone's Personal Data and is aware of its obligations under the Personal Data Protection Act of B.E. 2562, which places significance on upholding privacy rights. This Privacy Notice applies to Personal Data of the stakeholders in order to inform and explain that; How does the Company collect your Personal Data? What data does the Company collect? What is the purpose of data processing? How is your data disclosed? What safeguards are in place to secure your data? including, your legal rights as the data subject which are specified below.

1. Effectiveness of the Announcement

This Privacy Notice applies to Personal Data of the Company's shareholders and debenture holders, including the individual acting on behalf of juristic person which is the owner of the Personal Data such as directors, advisors, executives, employee, representatives, proxies, and other persons related to the above mentioned persons which hereinafter referred to as "you".

2. Definition

The definitions and meanings table:

Definition	Meaning
The Company	Major Development Public Company Limited and its subsidiary companies.
The Subsidiary Company	A company or legal partnership that has relationship with any other entity that Major Development Public Company Limited controls, is controlled by, or that is under its overall direction which might have the same group of majority of directors or shareholders.
The Individual	Only individual, not including juristic person.
Data Subject	The Individual who can be identified by the information.
Personal Data	Information about a person that can be used to identify them, either directly or indirectly, but excludes details on a specific deceased individual.
Sensitive Personal Data	Information about an individual's nationality, ethnicity, political views, creeds, religion, or philosophy, sexual orientation, behavior, criminal record, health, disability, trade union membership, genetic information, biological information, or any other personal information that could affect the owner of the Personal Data in a similar manner as specified by PDPC.
Processing of Personal Data	Collect, use or disclose Personal Data.
Data Controller	The individual or juristic person who have the authority to make decisions regarding the collection, use, or disclosure of Personal Data.
Data Processor	The individual or juristic person who carries out the collection, use, or disclosure of Personal Data in

	accordance with the order or on behalf of the Personal Data controller. However, the individual or juristic person who performs such action is not the Personal Data controller.
Non-Personal Data	Various information that does not identify an individual, such as company registration numbers and business contact information that does not identify an individual, such as phone numbers, working email, company email, office addresses, anonymous data, and information about the deceased.

3. The Company's Collection of Personal Data

Your Personal Data is kept on file by the Company as needed. The Company retains the contractual parties' Personal Data. The table below lists the categories of Personal Data that the Company retains:

Personal data collection table:

Personal Data	Details
Basic Personal Data	Identity information such as an individual's first and last names, ID card or passport number, date of birth, gender, age, nationality, signature, picture, professional license number, marital status, place of employment, occupation, and work history, including the job's location, title, and range of responsibilities. Information about family members, such as a spouse, children, emergency contacts, guarantors, guardians, and/or legal representatives, attorneys, as well as any other disqualifying features, such as bankruptcy, other similar basic personal information.
Sensitive Personal Data	Such as food allergy information only with your express consent or as permitted by law.
Contact Data	Such as address, copy of house registration, telephone number, email, workplace information such as name of workplace, work address, telephone number, email and position and, etc.
Educational Data	Name of the educational institution, diploma, major, degree, graduation year, and any other similar educational information.
Financial Data	Bank account details, sources of funds, transaction record details and personal property details such as salary certificates, vehicle registrations and any other similar financial information.
Stakeholder Data	Date of issuance, date of registration, number of receipt or transfer document, number of shares/debentures, reference

	share/debentures number, share/debenture certificate number and date, number of shares transferred, amount paid for each share/debenture, name of transferor or transferee, share transfer dates, rights and dividends, interest, bonds, debentures, and B/E details, unit trusts, voting data, proxies, video recordings, and communication with other stakeholders.
Third Party Data	If you give the Company any Personal Data of any third parties, including executives, authorized persons, attorneys, directors, employee information, representatives, and proxies, as well as information about other individuals who are not directly connected to the Company but have connections to it through other relationships.
Communication Data	Such as type of product or service you choose, your request to apply for the product or service, booking details and any other information contained in the evidence you have provided to the Company.
The Company's Electronic Systems Usage Data	Such as username, information about application usage, browsing information, website visiting history, IP address, cookies, log file and, etc.
Meetings, Seminars and Activities Data	Such as information on participating in meetings, seminars, activities, or other projects organized by the Company that may include still images, moving images, and/or sound during such meetings, trainings, seminars, or activities.
Safety Data	CCTV images, vehicle information, license plate information, date and time information for entering and exiting Company's premises.
Suggested Data	Such as comments, suggestions and complaints.
Communication Data	Such as conversations, email and information used in various communications.
Other Data	Other Personal Data for necessary convenience.

4. The Source of Personal Data

The Company collects Personal Data from the following sources of Personal Data:

4.1 Personal Data Received Directly from You

From contacting directly to you as shareholders, registering to attend shareholders' meetings and information from security sources.

4.2 Personal Data Received from Other Sources

The Company may collect your Personal Data from other sources such as your secretary or coordinator, government agencies e.g. the securities registrar, or third parties that are

involved in collecting, using, or disclosing Personal Data as required by or on behalf of the Company or as requested by the Company or from other sources as necessary and as permitted by law.

4.3 Third Party's Personal Data

The Company may receive personal data of any third parties that are connected to you which have been provided by you such as contact person, employee, worker, representative, proxy, or for referencing information that is benefiting you. Please make sure that these third parties are aware of the Company's Privacy Notice and seek their consent if required together with notifying them of this Privacy Notice unless there is another legal obligation for the Company to get Personal Data about third parties without obtaining their consent.

4.4 Personal Data Received from Cookies

This data is collected when you visit the Company's website to assist the Company's offer a better, quicker, safer service and to protect your privacy when you use the service and/or enter the platform.

5. Basis for Processing Personal Data

The Company may collect, use, or disclose your Personal Data with the purposes under the following data processing basis:

5.1 Contractual Basis

Using for processing your request or application prior to entering into a contract, as the situation may require, or for contractual basis to which you are a party, such as share/debenture purchase agreement, share/debenture transfer agreement service agreement with other relevant agencies or any other contract.

5.2 Legal Obligation

To fulfill legal obligations, such as those imposed by the Public Limited Companies Act B.E. 2535, the Securities and Exchange Act B.E. 2535, Stock Exchange of Thailand Rules and Regulations, Corporate Governance Code 2017 for Listed Companies, Revenue Code, Computer Crime Act B.E. 2550 and other related laws that the Company is required to comply.

5.3 Legitimate Interest

For legitimate interest of the Company without going over your fundamental rights and freedoms rights that may be reasonably expected by you.

5.4 Consent

In case where your consent is required by law or the Company does not have a need to process your Personal Data using the aforementioned legal basis, the Company will request for your consent.

6. The Purpose of Collecting, Using and Disclosing Personal Data (Processing Personal Data)

The Company collects, uses, or discloses your Personal Data for the following purposes:

The purposes of processing Personal Data table:

The Purposes of Processing Personal Data	Data Processing Basis
To prepare share/ debentures certificates and shareholder/ debenture holders registration book. To update the shareholder/ debenture holders registering to be accurate and up to date. Granting of proxies and others for shareholders/ debenture holders according to the Civil and Commercial Code, the Public Limited Companies Act B.E. 2535 and the Securities and Exchange Act B.E. 2535 and other related laws.	- Legal Obligation
To prepare financial statements and reports on financial status and business operations in accordance with the Public Limited Companies Act B.E. 2535 and the Securities and Exchange Act B.E. 2535 and other applicable laws. To comply with other legal requirements such as the Civil and Commercial Code, the Accounting Act B.E. 2543, and the Computer Crimes Act B.E. 2550. To carry out financial audits of each company as required by law. To comply with court orders and/or government orders.	- Legal Obligation
To verify and confirm the individual's identification.	- Contractual Basis - Legitimate Interest
To be a database of stakeholders of the Company. To proceed with providing any benefits as a stakeholder, such as paying dividends or interest, repaying principal, including tax reduction and other benefits, etc. To facilitate stakeholders in exercising their rights in shares and/or debentures held in accordance with relevant laws and company regulations.	- Contractual Basis - Legitimate Interest

The Purposes of Processing Personal Data	Data Processing Basis
To carry out a variety of tasks, including planning shareholder meetings, issuing meeting invitation letters, managing meetings by setting up locations, activities, and facilities, registering for meetings, checking, identification verification, recording votes and, etc.	<ul style="list-style-type: none"> - Contractual Basis - Legitimate Interest
To record meetings and prepare reports of extraordinary shareholder meetings to send to relevant agencies such as the Department of Business Development, etc.	<ul style="list-style-type: none"> - Legal Obligation - Legitimate Interest
To manage relationships or coordinate various matters related to the Company. To communicate with stakeholders regarding stakeholder announcements including dividend payments, annual reports, invitations to Annual General Meetings (AGM), Extraordinary General Meetings (EGM), and any related correspondence through by telephone, email, postal mail and telephone applications.	<ul style="list-style-type: none"> - Legal Obligation - Legitimate Interest
To carry out planning, reporting, business forecasting, risk management, auditing and internal management and provide management for good corporate governance.	<ul style="list-style-type: none"> - Legitimate Interest
To establish legal claims, granting power of attorney and receiving power of attorney, exercising court rights, complying with or exercise legal claims, raising legal claims, prosecuting various cases, complying with court orders, various legal proceedings and proceedings for legal enforcement.	<ul style="list-style-type: none"> - Legal Obligation - Legitimate Interest
To comply with laws, subpoenas, letters, orders of government agencies, independent organizations and officials with duties and powers according to laws. To report or disclose information to shareholders, government agencies and independent organizations.	<ul style="list-style-type: none"> - Legal Obligation

The Purposes of Processing Personal Data	Data Processing Basis
To manage operations, after-sales care, operate, manage, and improve business operations.	<ul style="list-style-type: none"> - Legitimate Interest - Consent
To manage and protect business security. To prevent loss, crime, or illegal activity. To assess the risks that may arise from investments. To protect the security of the business. To verify the identity of stakeholders. To carry out anti-money laundering and transaction failure investigations to prevent crimes, fraud and illegal or harmful acts. To carry out internal audits of the entity and enter into contracts or communicate with the organization's stakeholders through agents such as directors or employees. To share a data subject's Personal Data on a need-to-know basis for the purposes of corporate mergers, restructurings, bankruptcy, rehabilitation, and similar proceedings.	<ul style="list-style-type: none"> - Legitimate Interest
To maintain security within the building or premises of the Company, exchanging cards before entering the office area and recording images of those who come into contact with the Company with CCTV.	<ul style="list-style-type: none"> - Legal Obligation
To comply with legal procedures. To operate the Company in conformity with all relevant laws, rules, regulations, agreements, and policies that have been established by governmental regulatory and law enforcement organizations that oversee the Company's operations.	<ul style="list-style-type: none"> - Legal Obligation
To manage information technology in storing, creating documents and various information, regardless of the format, which includes processing Personal Data as well as solving technical problems that arise.	<ul style="list-style-type: none"> - Legal Obligation - Legitimate Interest - Consent

7. Disclosure of Personal Data

To accomplish the purposes specified in this Privacy Notice. The following divisions within the Company, the Subsidiary Company, individual, or other organizations may receive disclosures or emails containing your Personal Data:

7.1 Inside the Company

Any departments within the Company may receive or be disclosed of your Personal Data. Your Personal Data will only be disclosed to those who are relevant and necessary to perform their work within the purpose such as IT/ computer department, administrative department, legal department, accounting department will be given permission as required and appropriate.

7.2 Outside the Company

The following are examples of outside organizations to whom your Personal Data could be given or disclosed.

7.2.1 Governmental, regulatory, or other organizations as required by law such as Revenue Department, Legal Execution Department, The Securities and Exchange Commission or other agencies by virtue of laws.

7.2.2 The Subsidiary Company, agents, contractors/subcontractors, financial institutions, prospective investors, service providers such as legal service, outside auditor, IT service who provide advises in various field, juristic person management, mail/package delivery service, the Company's representatives or the Individuals who is responsible to act on behalf of the Company, including Data Processor of the Company. However, when the Company employs outside agencies for services, the Company is responsible for ensuring that these service providers adhere to legal requirements and that your Personal Data is safeguarded with appropriate measures.

8. Transferring or Sending Personal Data Abroad

As part of the Company's business operations, the Company may be required to communicate or transfer your Personal Data to other recipients, such as sending or transferring Personal Data to be held on servers or Cloud systems abroad. The Company will take legal requirements for Personal Data protection into account when determining whether the destination nation meets such criteria.

9. Your Personal Data Retention and Length of Retention

The Company will retain your Personal Data for so long as is required during your status being shareholder of the Company or to carry out the relevant tasks in line with this Privacy Notice. However, if the law requires or permits, it may be necessary by the Company to keep it after that.

When it is no longer required or at the end of the specified term, the Company will delete, erase, or otherwise render non-personally identifiable data of your Personal Data.

10. The Safeguarding of Your Personal Data

The Company will procure appropriate safeguard measure in order to protect the loss, unauthorized or illegal access, use, change, modify or disclose your Personal Data and ensure appropriate confidentiality, integrity, availability of your Personal Data. The Company has put in place protective measures for safeguarding, organizational measures, technical measures,

physical measures for maintaining appropriate safeguard Personal Data processing. As required and appropriate, the Company has revised these policies, rules, and standards on a regular basis. Furthermore, it is the responsibility of executives, employees, contractors, agents, consultants, and other people who receive information from the Company to uphold the Personal Data in accordance with the Company's established measures.

11. The Data Owner's Rights

The rights listed in this section apply to the legal rights you have in relation to your Personal Data. You may exercise these rights in consultation with the Company in accordance with the terms of applicable legislation and the rights management procedure of the Company.

11.1 The Right to Withdraw Consent

If you have authorized the Company to collect, use, and disclose your Personal Data (whether the authorization was made prior to the Personal Data Protection Law's enforcement date or after). Unless this right is prohibited by law or there is a contract in your favor, you have the right to withdraw your permission at any time throughout the duration that your Personal Data is stored by the Company.

11.2 The Right to Access Personal Data

You have the right to access your Personal Data held by the Company and a copy of that information for yourself, as well as, the right to ask the Company to explain how it came into possession of your Personal Data without your consent.

11.3 The Right to Transfer Personal Data

If a corporation has stored your Personal Data in a format that may be read or generally used by instruments or devices that operate automatically and can use or disclose Personal Data by automated means, you have the right to seek that information. The right to request Personal Data that the Company sends or transfers Personal Data in such a form directly to other Personal Data controllers, unless it is impossible to do so for technical reasons, and the right to request that the Company sends or transfers Personal Data in such a form to another data controller when this can be done automatically.

11.4 The Right to Protest Data Processing

If the Company, another party, or the accomplishment of a public interest purpose requires the collection, use, or disclosure of your Personal Data, you have the right to protest at any time. In the event that you raise a concern, the Company will stop collecting, using, and disclosing your Personal Data unless and until it can prove that doing so is legally required, is necessary to uphold the law, or is necessary to defend against legal claims.

11.5 The Right to Request Deletion or Destruction of Personal Data

If you think your Personal Data has been obtained, used, or disclosed in violation of applicable laws, and you believe the Company has used all reasonable efforts to keep your information after you have exercised your right to withdraw consent or your right

to object as described above, you have the right to request that the Company delete or destroy your Personal Data or render it non-personally identifiable.

11.6 The Right to Request the Suspension of Personal Data

You have the right to request a temporary suspension using your Personal Data while it investigates your request for Personal Data correction, your objections, or any other situation in which the Company no longer needs your Personal Data and is required to delete or otherwise dispose of it by law.

11.7 The Right to Update Personal Data

You have the right to request the Company to update your Personal Data to be accurate, current, complete and not misleading. If you are current stakeholder or personnel of the Company, you can update your Personal Data according to the Company's procedures.

11.8 The Right to Complain

If you believe that the collection, gathering, use, and disclosure of your Personal Data violates or doesn't comply with applicable laws, you have the right to file a complaint with the appropriate authorities. Section 13 provides information on how to get in touch with the Personal Data Protection Committee (PDPC).

12. The Changing of the Privacy Notice

This Privacy Notice is periodically reviewed by the Company to ensure that it complies with all guidelines, regulations and legislation. In the event that the Privacy Notice is altered, the Company will inform you by publishing the information on its website.

13. The Appropriate Authority

If you have a complaint to make or believe the Company hasn't handled your issue satisfactorily, you may contact and/or make a complain to The Office of the Personal Data Protection Committee (PDPC) using the information provided below:

Phone number	02 141 6996 or 02 142 1033
Email	saraban@pdpc.or.th
Website	https://www.pdpc.or.th
Address	The Office of the Personal Data Protection Committee 120 Moo 3, Ratthaprasasanabhakti Building (Building B), Chaengwattana Government Complex, Chaengwattana Road, Thung Song Hong Subdistrict, Lak Si District, Bangkok 10210

14. The Company Contact

If you have any recommendations or questions concerning the collection, use, and disclosing of your Personal Data, you may also ask to exercise your legal options in accordance with this Privacy Notice. The following methods are available for contacting the Company:

Data Protection Officer (DPO)

Email dpo@major.co.th

Website <https://www.major.co.th/>

Address Major Development Public Company Limited
141 Soi Sukhumvit 63 (Ekkamai), Sukhumvit Road,
Khlong Tan Nuea Subdistrict, Watthana District,
Bangkok

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