

## **Privacy Notice for Customers and External Parties**

Double A (1991) Public Company Limited ("**Company**", "**we**", "**us**", or "**our**") recognizes the importance of the privacy and protection of the personal data of customers and external parties, including: (1) individual customers (such as website or application users and marketing event participants); (2) contact persons, authorized persons, directors, or shareholders of corporate customers (such as stores, printing houses, or private or government agencies); (3) business partners (such as vendors, contracting parties, owners of installation points for printers, copiers, or vending machines, distributors or dealers, suppliers, farmers, and service providers), both as individuals, and the contact persons, authorized persons, directors, or shareholders of corporate business partners; and (4) other individuals (such as the persons involved in community relations projects, promotional marketing activities, or surveys, the media, persons that may be captured by cameras used to record images and audio of various activities, persons involved in accidents, and visitors) (persons under (1) - (4) are collectively referred to as "**you**").

Therefore, we have prepared this Privacy Notice for Customers and External Parties ("**Privacy Notice**") to describe how your personal data will be collected, used, disclosed, and/or transferred overseas. We and our affiliates will appropriately use the personal data you disclose to us in operations relating to your relationship with us.

We reserve the right to amend this Privacy Notice from time to time. We then request that you regularly check any amendments made to this Privacy Notice. Any amendments will come into effect immediately after we have uploaded the amended Privacy Notice on <https://www.doublepaper.com>

### **1. Personal data we collect**

#### **1.1 Channels through which we collect your personal data**

The Company may collect various types of personal data from you directly or indirectly from other sources as you have communicated with the Company and in accordance with your relationship with the Company in the following cases.

- (1) Where we directly collect personal data from you:** via offline channels, such as documents that you fill-in information or submit to the Company; direct contact with the Company's personnel; our Call Center; CCTV devices and/or cameras used to record images and audio of various activities; and SMS, or via online channels, such as our website; application; social media; purchasing system or any other system; online forms; images and audio recordings through programs; and emails.

- (2) **Where we indirectly collect personal data from our affiliates.**
- (3) **Where we indirectly collect personal data through third parties or other sources,** such as shareholders; stakeholders; councils; associations; clubs; gatherings and meetings; business partners; marketplaces; service providers; insurance companies; consultants; government agencies; other persons; and public sources.

You acknowledge that the Company has provided appropriate standards for personal data protection that meet the standards for the protection of rights, freedom, and benefits of data subjects as specified in this Privacy Notice.

## **1.2 Types of your personal data we collect**

The Company may collect different types of your personal data, which include but are not limited to the following, in accordance with your relationship with the Company.

- (1) **Personal information:** such as your title; first name; last name; change of first name or last name; signature; date of birth; age; gender; photos; video and voice recordings; occupation; nationality; marital status; location; organization name; type of organization; other information used for membership registration or sign-in; ID number; records of entries and exits; work experience; and vendors' ID numbers (including the types of the vendors, types of company, and types of business).
- (2) **Information related to documents:** such as a copy of national ID card; national ID number; taxpayer ID number; copy of employee card; copy of civil servant ID card; copy of passport; copy of driver's license; copy of house registration; identification and verification documents; juristic person registration documents; copy of company certificate; VAT registration (Por.Por. 20); commercial registration certificates; and organization charts.
- (3) **Information related to automobiles:** such as car registration numbers; type of car; and GPS tracking information.
- (4) **Contact information:** such as address on national ID card; current address; workplace; business address; delivery address; billing address; permanent address; telephone numbers; email address; Line ID; social media username; and other similar information.
- (5) **History of purchases of goods or services:** such as date and time of transactions; place of transactions; characteristic of goods or services; product quantity; selling price; services fee; distribution or service channels; delivery history; details in relation to free gifts; receipt details.

- (6) **Service information:** such as contract details; the quantity or amount of raw materials delivered or required to be delivered; selling price; service fee; contract compliance history.
- (7) **Information given in quotations, contracts, or documents of right:** such as timber sales and purchase contracts; wood cutting service contracts; lease contracts for timber, pulp, and goods storage; truck service contracts; loan contracts; title deeds (Nor.Sor.4); utilization certificates (Nor.Sor.3Gor. and Nor.Sor.3); and permits for land utilization in reform areas (Sor.Por.Gor.4-01).
- (8) **Financial information:** such as copy of bank books; bank account numbers; credit card numbers; and credit information.
- (9) **Technical information:** such as account and password information; IP Address; MAC Address; GPS information; types of browser; electronic device information; settings; location; online identifiers and other similar technologies; preferences; web browsing history; duration of visit; and any other computer traffic data.
- (10) **Other information related to your existing or future relationship with the Company:** such as information provided in documents attached to the contract made between you and the Company; information in tax documents; information collected when you interact with the Company; and other information related to the provision of goods or services of the Company or our business partners, in accordance with your existing or future relationship with the Company.
- (11) **Lawsuit information:** such as when a dispute arises between you and the Company.
- (12) **Information from CCTV devices:** please refer to the details of the collection, use, and/or disclosure of personal data from the Company's CCTV devices in the Company's CCTV Notice, available at [https://vendor.doublepaper.com/Manual/AnnouncementCCTV\\_Notice\\_2024.pdf](https://vendor.doublepaper.com/Manual/AnnouncementCCTV_Notice_2024.pdf)
- (13) **Sensitive data, including:**
- sensitive data in identification documents issued by government agencies (such as religion shown in a copy of a national ID card); and
  - health data (such as food allergies, or accidents encountered).

If you provide personal data of any third parties (e.g., persons paying money on your behalf; references; parents; spouse; children; and family members) to the Company (e.g. first name; last name; educational background; age; relationship; and photos) for the purposes detailed in this Privacy Notice, you must ensure that you have rights and/or authority to provide such personal data and authorize us to use such personal data in accordance with this Privacy Notice. Also, you must be responsible for

notifying such third parties of this Privacy Notice and/or obtaining consent from such third parties if necessary, and/or relying on other legal bases.

We will not collect the personal data of minors (who have not yet become sui juris, i.e., under 20 years of age or who have not reached legal age through marriage as applicable by law); quasi-incompetent persons; and incompetent persons, and do not allow such persons to conduct any juristic acts or enter into any agreements with us if consent is not obtained or we cannot rely on any other legal bases. In the event we learn that we have unintentionally collected personal data from such persons without consent, or without relying on other legal bases, we will delete it immediately, and may need to terminate our relationship with such persons, unless we may rely on other legal bases apart from consent.

## **2. Purpose and lawful basis on which we rely to collect, use, and/or disclose personal data**

### **2.1 Purposes for which we rely on your explicit consent to collect, use, and/or disclose your personal data**

The Company may collect, use, and/or disclose personal data or sensitive data that requires your consent for the following purposes, based on your relationship with the Company.

- (1) Information related to accidents:** to use as evidence to support insurance claims.
- (2) Food allergies data:** to prepare food and beverages as suitable.
- (3) Marketing and communications:** the Company may collect, use, and/or disclose your personal data (e.g., first name, last name, contact information, and purchase history) as necessary to send marketing communications and news, such as promotional activities; provision of marketing privileges; trade shows; holding or sponsorship of special events; discounts; announcements; notifications; special offers; marketing campaigns and activities; advertisements; direct marketing activities; provision of information on our products and services; and loyalty program, where we cannot rely on other legal bases.

The Company will collect, use, and/or disclose the personal data or sensitive data for the above purposes only if we have obtained explicit consent from you, or the law permits us to do so. The Company may request additional consent from you on a case-by-case basis if we cannot rely on any other legal bases for the collection, use, and/or disclosure of your personal data.

Please be informed that you have the right to withdraw your consent at any time by using the Company's Data Subject Rights Request Form, according to the contact details of the Data Protection Officer (DPO) provided below.

## **2.2 Purposes for which we rely on other legal bases to collect, use, and/or disclose your personal data**

The Company may collect, use, and/or disclose your personal data on the legal basis of: (1) contractual basis, for starting or entering into a contract or for performance of a contract with you; (2) legal obligation, for fulfilment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties; (4) vital interest, for the prevention or suppression of danger to a person's life, body, or health; (5) public interest, for the performance of tasks carried out in the public interest or for exercising official authorities' duties; and (6) the establishment, compliance, exercise or defense of legal claims, or other legal bases permitted under the law on personal data protection, as the case may be, for the following purposes.

Some of the following purposes may not apply to you. Please consider the relevant purposes based your relationship with the Company.

- (1) **For registration, verification, and conducting transactions:** such as to register and record information; prove and authenticate identity; to consider qualifications and conduct background checks; to check financial or business operation status; to carry out conflict of interest checks; to analyse creditability; to enter into transactions; and to prepare the reports of the results of related assessments or analysis.
- (2) **For provision of goods and services:** such as to process purchase orders; to provide goods or services; to prepare quotations; for shipping; for goods exchange or refund; to audit and improve services; to provide after-sales services; to support and undertake other activities in relation to the provision of goods or services; to perform other relevant business functions and responsibilities; and to fulfil contractual obligations; to fulfill contract obligations, goods, or services; to manage the contractual relationship between you and the Company; for contract management; for contract enforcement; to provide facilitation ; to buy or accept raw materials; for the acceptance of the delivery of work; and for complaint or dispute handling or resolution.
- (3) **For procurement and acceptance of goods or services:** such as to procure goods and services; to request quotations; to carry out bidding procedures; to conduct due diligence or other forms of background checks; for risk identification; to assess your qualifications; and to examine and accept goods and services delivered.
- (4) **For management of our relationship with you:** such as to comply with requests; to manage the contractual relationship between you and the Company; for contract management; for contract enforcement; to provide facilitation; to create your database; to keep your personal data updated and maintain the accuracy of personal data; for retention of contracts and relevant documents; to communicate and manage our cooperation with

you; to audit and evaluate business partners' performance; to inform policies to business partners; and for complaint or dispute handling or resolution.

- (5) **For marketing and communications:** such as to announce information and news; to send marketing communications and news, such as promotional activities; provision of marketing privileges; trade shows; holding or sponsorship of special events; discounts; announcements; notifications; special offers; marketing campaigns and activities; advertisements; direct marketing activities; and provision of information on our products and services; to hold exhibitions and activities; for shipment of prizes, free gifts, and souvenirs; to prepare public relations plans and strategies; to receive complaints via our website or social media platforms; to hold press conferences; to provide news to the media; to coordinate with public relations and brand's reputation management service providers, including to run loyalty programs; and for checking compliance with the marketing conditions.
- (6) **For data analytics and profiling:** such as to learn more about the goods and services of interest; to conduct service satisfaction surveys; to collect information from goods and services; to undertake statistics, behaviour analysis, and customer segmentation based on groups of goods or services, time span, and customer's location; to analyse market trends for promotional purposes; to offer our goods or services that customers may be interested in; to know more about our customers; to resolve issues with goods or services; for goods or services development; and to improve our and/or affiliates' business operations.
- (7) **For public relations and maintenance of corporate image:** such as to send information and news; for communication; for advertisements and announcements; to hold exhibitions and activities; for shipment of prizes, free gifts, and souvenirs; to prepare public relations plans and strategies; to receive complaints via our website or social media platform; to hold press conferences; to provide news to the media; to coordinate with public relations and brand's reputation management service providers.
- (8) **For management of information technology, websites, applications, or other systems:** such as for the management of the business of the Company and/or our affiliates; for the management of operating systems related to information technology; for the management of communication systems, and security systems regarding the information technology of the organization; to track the usage of the internet and work systems of the Company and/or our affiliates; to provide the service of the websites, applications, or other systems of the Company and our affiliates; to connect to the websites or other systems of the Company or our affiliates, or other third-party agencies; to analyse users' usage for the development of the communication strategies of the Company and/or our affiliates; to solve issues arising from, and to maintain, create, and improve systems for system users;

to control access to information and systems; and to update information on websites, applications, or other systems.

- (9) **For performance of legal obligations:** such as to comply with legal obligations, legal proceedings, or government authorities' orders, and/or to cooperate with courts, regulators, government authorities, and law enforcement bodies where we reasonably believe we are legally required to do so. We may need to disclose your personal data strictly to comply with said legal obligations, legal proceedings, and/or government authorities' orders, including to comply with internal investigation procedures, complaints or claims, investigations or prevention of crime or fraud, and/or to establish legal claims.
- (10) **For audit of disbursement:** such as to assess and receive raw materials, products and services; for audit relating to marketing events; to assess the quality of disbursement operations for employees, business partners and related service providers.
- (11) **For financial, accounting, and tax affairs operations of the Company:** to prepare account and balance sheet, including the summary of expenses within the company; to ensure the accuracy of the accountant entries and proof of payments; for tax operations; for opening accounts, loaning of money, acquiring funds of the company; to submit documents or information to auditors.
- (12) **For internal management and necessary actions of the Company and/or our affiliates:** such as for identity proofing and authentication; for the purposes of business operation and internal management; data analytics; risk management; supervision; audits; carrying out conflict of interest checks; verification of ownership; identification of the source of funds and source of wealth; gathering and reference of evidence; and internal audits and internal management of the organization, to establish creditability in internal management systems; for coordination; to organize activities; to facilitate collaborations; to receive complaints and ask for additional information related to a request, complaint, or given information; to consider whether to comply with any request; to contact and send information; to undertake financial, accounting, or tax affairs of the Company; to issue receipts; to disburse expenses; for debt collection; for fact checking; to keep records for performance tracking; to comply with obligations under the Company's rules and regulations; for the assessment of the credibility and credit to perform credit scoring; to determine a credit limit; and for creating social and environmental responsibility.
- (13) **For protection of the legitimate interests of the Company and/or our affiliates:** such as for protecting the security and integrity of our business and affiliates; for analysing, assessing, managing, and responding to risks; to prepare or review legal documents; to exercise our rights and protect the interests of the Company and/or our affiliates, where it is necessary and lawful to do so (e.g. to detect, prevent, and respond to fraud, claims

regarding intellectual property infringement, or violations of law); to check for and prevent conflicts of interest; to prepare and retain documents relating to our business operation; to take action regarding requests for approval or permission, or registrations under the law; to ensure compliance with our terms and investigations where there is a breach of the terms; to detect and prevent misconduct within the premises of the Company and/or our affiliates (e.g. using CCTV devices), and reporting of misconduct; to manage, and prepare reports and internal policies within the scope of our operation; for remedies or mitigation of damages to the Company and/or our affiliates; for the Company's and/or our affiliates' establishment, exercise, or defence of legal claims; and/or to take other action for the protection of customers; employees; other persons; trade secrets; rights and property of the Company and/or our affiliates; and to use as evidence to support insurance claims.

- (14) **For transactions of the organization:** such as where there is any sale; transfer; merger; reorganization; or other similar transactions, the Company may transfer personal data to one or several third parties as part of making any of the transactions.
- (15) **For the prevention or suppression of danger to a person's life, body, health or property:** such as to control communicable diseases or epidemics; to consider and provide access to premises, or the right to participate in any activity; to supervise and monitor operations in risk areas, and ensure occupational safety; for theft detection; to prevent corruption; and to respond to emergencies.

However, failure to provide personal data to us, refusal to consent, or withdrawal of consent may affect our ability to comply with your request, and/or may affect our performance of contractual obligations that we have with you, or may prevent us from providing certain benefits, or may affect our compliance with our certain obligations under agreements we have with you. In some cases, such a failure may affect the performance of any legal obligations that we or you have, which could result in penalties, if the performance relies on consent basis and you have refused to or withdrawn your consent.

### **3. Who might we disclose or transfer personal data to?**

We may disclose or transfer your personal data to the following third parties who collect, use and/or disclose personal data in accordance with the purposes under this Privacy Notice. We recommend you visit their privacy notices to learn more details on how they collect, use and disclose your personal data as you may be subject to their privacy notices.

#### **3.1 Affiliates**



We may need to disclose or transfer your personal data to our affiliates, including companies that might be established in the future, or otherwise allow such companies to access your personal data for the purposes set out in this Privacy Notice.

### **3.2 Government agencies and third parties as required by the law**

In certain cases, where we have reason to believe that we must comply with obligations under the law or legal requirements, or where there are other necessary causes, or to protect the rights of the Company or other persons, or for the safety of persons, or to detect, prevent, or handle issues related to corruption, security, or safety, we may need to disclose and/or transfer your personal data to government or law enforcement agencies, such as courts; the Public Prosecution Organization; the police; the Ministry of Digital Economy and Society; the Revenue Department; the Department of Intellectual Property; the Department of Business Development; the Department of Provincial Administration; the Department of Consular Affairs; the Customs Department; the Legal Execution Department; foreign embassies in Thailand; the Board of Investment; the Consumer Protection Board; the Securities and Exchange Commission (SEC); the Securities Exchange of Thailand; the Office of the National Anti - Corruption Commission; the Anti-Money Laundering Office; regulators; or any other government agencies, including their competent officials, or any other third parties.

### **3.3 Business partners**

In certain cases, we may need to disclose and/or transfer your personal data to our business partners for the purposes specified in this Privacy Notice, such as vendors; contracting parties; owners of installation points for printers, copiers, or vending machines; distributors or dealers; or co-branding partners.

### **3.4 Our service providers**

We may hire other companies, agents or contractors to perform services relating to our business operation. We may share your personal data to our third-party service providers including, but not limited to: (1) infrastructure, internet, website developer and IT service providers, such as cloud service providers; (2) event organizers; (3) marketplace platforms; (4) suppliers; (5) procurement service providers; (6) domestic and international logistic service providers; (7) public relations and news service providers; (8) marketing, advertisement, advertising creation and design, and communication service providers; (9) data analytics service providers; (10) property service providers, and warehouse service providers; (11) insurance service providers, including insurance agents, brokers, loss adjusters, and surveyors; (12) financial service providers, and financial institutions; (13) payroll service providers; (14) internal audit service providers; (15) telecommunication and communication service providers; and (16) wood cutting service providers, and timber brokers. In the course of providing such services,

the service providers may have access to your personal data. However, we will only provide our service providers with personal data that is necessary for them to perform the services, and we ask them not to use your personal data for any other purposes.

### **3.5 Consultants and professionals**

We may need to disclose personal data to our consultants or professionals, including but not limited to: (1) independent consultants, such as project consultants, financial consultants, accounting consultants, or marketing consultants; (2) legal counsel assisting in our business operation, and providing litigation services, whether defending against or filing lawsuits; and (3) auditors providing accounting or auditing services to us.

### **3.6 Assignees of rights and/or obligations**

In the event of any reorganization, merger, or business transfer, whether in whole or in part, or the sale, purchase, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock or similar transaction, the assignee of our rights and/or obligations will comply with this Privacy Notice to respect your personal data.

### **3.7 Other recipients of personal data**

We may disclose your personal data to any other person or juristic person for the purposes specified in this Privacy Notice. The recipients of personal data may include, without limitation, any person or juristic person who makes a request; a person who requests CCTV footage; the media; and followers of our social media.

## **4. International transfer of personal data**

We may disclose or transfer your personal data to third parties, such as government agencies; our affiliates; business partners; service providers; customers; consultants; professionals; or other recipients located outside Thailand. The destination countries may not meet the same level of personal data protection standards as those in Thailand. In that case, we will take actions according to procedures and measures, to ensure that there are adequate safeguards in place to protect the transferred personal data, and the recipient has appropriate personal data protection standards or is in accordance with the law. We may request your consent where consent to cross-border transfer is required by law.

## **5. Retention of personal data**

We will retain your personal data for as long as necessary to fulfill the purposes we give notice of in this Privacy Notice, and to comply with contractual, legal, and regulatory obligations. However, we may retain your personal data for a longer period, if necessary and/or permitted by the applicable

laws, such as retaining your personal data for as long as we are required to comply with our contractual obligations we have with you, or a period specifically prescribed under the law.

## 6. Your rights as a data subject

Subject to the provisions of laws and exceptions thereof, you may have the following rights.

- (1) **Request access to your personal data:** You may have the right to access or obtain a copy of your personal data we collect, use and/or disclose about you.
- (2) **Request to rectify:** You may ask us to have any inaccurate, outdated, incomplete, and misleading personal data that we collect, use and/or disclose about you rectified.
- (3) **Request to port:** You may have the right to obtain personal data we hold about you, in a structured, electronic format, and to send or transfer such data to another data controller, where this is: (a) personal data which you have provided to us; and (b) if we are collecting, using, and/or disclosing your personal data on the basis of your consent or to perform our contract with you. However, if exercise of your rights violates the rights and freedoms of others or we must use your personal data to perform a task carried out in the public interest, or for compliance with law, we have the discretion to reject your request.
- (4) **Request to object:** You may have the right to object to the collection, use and/or disclosure of your personal data for certain cases as required by the applicable laws.
- (5) **Request to restrict:** You may have the right to suspend use of your personal data in certain cases.
- (6) **Request to withdraw your consent:** You can withdraw your consent at any time where we collect, use and/or disclose your personal data based on your consent in certain cases.

However, withdrawal of consent may prevent us from continuing to comply with certain obligations under agreements we have with you. If you wish to learn more about the consequences of withdrawal of your consent, or to withdraw your consent, you may request access by using the contact details of the Data Protection Officer (DPO) provided below.

- (7) **Request to delete:** You may have the right to ask us to delete, destroy or anonymize your personal data that we collect, use, and/or disclose, except where the retention of such personal data is for compliance with legal obligations or to establish, exercise, or defend legal claims.
- (8) **Lodge a complaint:** You may have the right to lodge a complaint to the competent authority where you believe that we do not comply with the applicable data protection laws.

Before we can comply with your request to exercise your rights, we may need to verify and authenticate the identity of the person who makes the request for the privacy and safety of your personal data. Therefore, we may ask you to supply or provide your authentication information (such as a copy of your national ID card that excludes any sensitive personal data). Upon completing the verification and authentication of your identity, we will comply with your request without delay. If we view that the request is manifestly unfounded or excessive, we may charge a fee for complying with the request.

## **7. Security measures**

We maintain appropriate security measures for personal data in accordance with the applicable laws, including the law on personal data protection. These measures will apply to the collection, use, and/or disclosure of personal data in hard copy, electronic, and/or other formats, and include organizational, technical, and physical measures, covering the elements of the information system relating to the processing of personal data. These measures will take safety and security into account, as required under the personal data protection law, for the purposes of maintaining appropriate confidentiality, accuracy, and availability of personal data, in accordance with the risk level, characteristics, purposes of the processing of personal data, and the risk and effects of data breach. Our data security measures include restricting access to personal data and key elements of the information system; appropriate user access management; assigning duties and responsibilities of users; ensuring that any access to and modification and deletion of personal data would be retrospectively traceable; ensuring that threats and data breach incidents are monitored and inspected; ensuring that threats and data breach incidents will be responded to when they are discovered; and having damage caused by a threat or data breach incident remedied. We also raise awareness and understanding about personal data protection and security among our staff members in order to prevent the unauthorized or unlawful loss, access to, use, alteration, correction or disclosure of your personal data.

## **8. Contact us**

If you wish to exercise your rights regarding your personal data, or have any questions about your personal data under this Privacy Notice, please contact us or our data protection officer at:

### **Double A (1991) Public Company Limited**

Address : Double A Business Park 187/3 Moo 1, Bangna-Trad km.42 Road,  
Bangwua District, Amphur Bangpakong, Chachoengsao, 24180 Thailand  
Tel : : Call Center 1759 or 02-6591234 or 085-835-1558 (IT)

### **Data Protection Officer: DPO**

Tel : 085-835-3274 or 085-835-4869  
Email address : dpo@doublea1991.com