



Announcement No. 20/2022

Subject: Personal Data Protection Policy pursuant to Personal Data Protection ACT B.E. 2562 (2019)

Fine Metal Technologies Public Company Limited realizes the significance of the personal data protection of the Company's related parties, who may include the personnel of the Company, business partners, shareholders, or other companies who performs the works relating to the Company's personal data to assure that the right of the said data subject is completely protected according to the Personal Data Protection Act B.E. 2562 (2019). Accordingly, the Company has announced the following personal data protection policy and regulations by virtue of the provisions in article 22 and article 23 of this Act.

1. Scope of Enforcement

The Personal Data Protection Policy is applied to the Company, the Company's personnel, and the parties related to personal data processing according to the notifications or orders in the name of the Company, both inside and outside the Kingdom of Thailand.

2. Definition

"Company" means Fine Metal Technologies Public Company Limited.

"Personal Data" means the natural person-related data that can identify that person's identity either directly or indirectly, such as name, surname, Identification Card No, Telephone No. Tax ID No., Motor Vehicle Registration No, etc.

"Data Subject" means a natural person whose personal data can identify that person's identity either directly or indirectly.

"Data Controller" means a natural person or a juristic person with the authority to decide on the collection, use, or disclosure of personal data.

"Data Processor" means a natural person or a juristic person who collects, uses, or discloses personal data according to the orders or in the name of the personal data controller.

"Personal Data Protection Officer" means a natural person or a group of persons appointed by the Company to act as the personal data protection officer according to the Personal Data Protection Act B.E. 2562 (2019).



3. Collection of Personal Data

The Company shall collect the personal data of the Company's staff, applicants, employees, and business partners, including the persons who obtain the consent to work or make a benefit for the Company or in the Company's establishment with the source, principle, and objective of personal data collection as follows.

3.1 The data is directly collected from the data subject, such as the collection of personal data from filling the personal data through documents and/or forms and/or answers to the Company's questionnaire or access to use through the Company's electronic channel or website system.

3.2 Objective and Principle of the Personal Data Collection

The Company shall collect personal data as much as necessary according to the legitimate objective as previously informed to the data subject or at the time of personal data collection only, such as for the Company's human resource management, and shall request explicit consent from the data subject before or at the time of the personal data collection, unless in the case prescribed by laws that the Company can collect personal data without the need to request for consent, such as:

- 3.2.1 For achieving the objective relating to the preparation of historical documents or archives for public interest or relating to the research or statistics, the Company shall establish the appropriate preventive measures to protect the rights and freedoms of the data subject.
- 3.2.2 For preventing or suspending harm to the person's life, body or health.
- 3.2.3 Being essential for complying with the contract to which the data subject is a party to the contract or for using in the execution according to the data subject's request before entering the contract.
- 3.2.4 Being essential for performing the duty to carry out the tasks for the public interest of the personal data controller or performing the duty to exercise the state power granted to the data controller.
- 3.2.5 Being essential for the legitimate interest of the data controller or of another person or juristic person who is not the data controller, unless such interest is less important than the fundamental right in the data subject's personal data, etc.

4. Use and Disclosure of Personal Data

The Company shall execute according to the objective and principle consistent with Article 3.2 Objective and Principle of Personal Data Collection. The Company may limit the disclosure of the personal data as



much as necessary to the agencies or third parties, such as business partners, cooperation partners, and alliances, to operate the Company's business, the government agencies in authority, such as the Revenue Department, Office of the Social Security, Court, etc.

5. Storage Period for Personal Data

The Company shall store personal data for the period particularly determined by law about personal data protection, such as Computer-Related Crime Act B.E. 2550 (2017), Revenue Code, etc.

If the laws do not schedule the specific storage period for personal data, the Company shall store personal data as much as necessary for execution according to the determined objective of processing the said personal data. Accordingly, the storage period of personal data is altered depending on the determined objective of collecting and processing the said personal data.

When the said storage period is expired, the Company shall erase, destroy, or de-identify the personal data to be the data that cannot identify the individual who is the data subject.

6. Security of Personal Data

The Company shall establish personal data security measures that are efficient, adequate, appropriate, and in line with the law requirements to prevent the loss, access, use, change, or disclosure of personal data within the Company's wrongful possession and arranges the regular review and audit of the said measures regularly.

In the case where the Company assigns the agency or third party to be the data processor for representation relating to the collection, use, or disclosure of the data subject's personal data, the Company shall make a mutual agreement to control the operation according to the data processor's duty by determining the said data processor to store the personal data as confidential, and secure the said personal data, as well as prevent the collection, use, or disclosure of personal data for any other undertaking without power or in conflict with laws.

7. Rights of Data Subject

The Company shall provide the channels so that the data subject can contact the Company to submit the request according to the following rights.

- 7.1 Right to Withdraw Consent
- 7.2 Right to Access
- 7.3 Right to Data Portability
- 7.4 Right to Erasure
- 7.5 Right to Restriction of Processing



- 7.6 Right to Object
- 7.7 Right to Rectification
- 7.8 Right to file a Complaint

However, the Company reserves its right to refuse the request due to the following events, which are the law requirement for the ability to execute, the personal data that is made to be anonymous or to describe the characteristic that can identify the data subject, no proof from the applicant that he/she is the data subject, or is the person who has the power to submit the said request or the said request is unreasonable.

8. Review of the Personal Data Protection Policy

The Company shall arrange the periodical review and update or revision of this Policy to conform to the matters of law, and change of the Company's operation, including the suggestions, considered, and deemed by the Company to be appropriate and useful for all parties according to the Company's communication channels.

9. The Company Contact Channels

The data subject can express an opinion and inquire about the additional information, and request for exercising the data subject's rights as informed in Clause 7 as per the following detail.

Fine Metal Technologies Public Company Limited

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

Data Controller or

Data Protection Officer (DPO)

E-mail: dpo@fmt.co.th

Factory Address

213 Moo 4, Mittraphap Road, KM. 125, Tabkwang Sub-district, Kaengkoi District,

Saraburi Province 18260

Tel: (036) 329811-19 Fax: (036) 329822

Office Address

183 Regent House Building, 14th Floor, Rajdamri Road, Lumpini Sub-district,

Pathumwan District, Bangkok 10330

Tel: 02-2560641-50 Fax: 02-2560651



บริษัท ไฟน์ เมทัล เทคโนโลยีส์ จำกัด (มหาชน)
Fine Metal Technologies Public Company Limited



Announced on 26 August 2022.

Mr. Shingo Nishijima
Factory Manager

Mr. Junichi Ishihara
Managing Director