

ZEN Corporation Group Public Company Limited and its subsidiaries.

(Translation)

Personal Data Protection Policy

Applicants and/or employees

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Personal Data Protection Policy

Applicants and/or employees

Zen Corporation Group Public Company Limited and its subsidiaries

Objectives ZEN Corporation Group Public Company Limited and its subsidiaries, hereinafter collectively referred to as "the Company", recognize the importance of protecting the personal data of job applicants and employees of the Company which hereinafter will be collectively referred to as "Personal data owner" "you". Therefore, the Company has established a Personal Data Protection Policy specifically in relation to the Data Owner so that everyone knows about purpose of data collection and use processing of your personal data, method that the Company handles personal data and sensitive data with correct actions. It is safe, honest, and transparent, and will not be used or disclosed illegally, including your rights as the subject of personal data.

1. Definitions

"Company" means Zen Corporation Group Public Company Limited and its subsidiaries, and the 9 subsidiaries consist of 1) Zen Supply Chain Management Co., Ltd., 2) Zen & Spicy Co., Ltd., 3) Tokyo Concept Co., Ltd., 4) Zen Restaurant Holding Co., Ltd., 5) Gyu Grill Group Co., Ltd., 6) Aka Interfoods Co., Ltd., and 7) Spice Synergy Co., Ltd., 8) Zen & Gosum Interfoods Co., Ltd., and 9) King Marine Foods Co., Ltd.

"Applicant" means an applicant for employment as an employee of the Company, including but not limited to full-time employees, temporary employees, workers, part-time employees, Interns, counselors, regardless of the applicant's application channel.

"Employee" means a person who has been selected as an employee of the Company with or without an employment contract, including but not limited to full-time employees, temporary employees, workers, part-time employees, Interns, advisors.

"Personal Data" means information about an individual that enables the identification of that person, directly or indirectly, in accordance with the Personal Data Protection Act.

"Sensitive Information" means personal data that is sensitive and the data collection will receive explicit consent from the data subject, including race, ethnicity, color, political opinions, religion, including sexual behavior, criminal record, health, disability information, trade union information, genetic information, biological information, and any other information as required by law.

"Data Controller" means an individual or juristic person who has the authority to make decisions regarding the collection, use or disclosure of Personal Data.

However, The Data Controller will determine the purpose and method of processing the Personal Data.

"Personal Data Processor" means an individual or juristic person who engages in the collection, use or disclosure of Personal Data pursuant to instructions or on behalf of the Data Controller. The natural person or juristic person who does so must not be the controller of the personal data.

"Data Protection Officer" means a person appointed to provide advice, monitor the actions of the data controller or data processor in compliance with the law.

"Data Processing" means any action or set of actions performed on personal data, or a set of personal data, whether by automatic means or not, such as collecting, recording, systematizing, structure, preservation, modify, receive, consider, use, disclose by forwarding, disseminating, or any other act that makes it available, arranged, or mixed, restrictions, deletion or destruction.

2. Collection of Personal Data

The Company will collect your Personal Data as follows:

2.1 Your identity information includes your name, surname, gender, date of birth, age, ID card number, passport number, entry and exit information, including but not limited to nationality, driver's license, marital status, number of family members, details of children, signatures, voices, recorded sounds, facial shapes and characteristics for recognition Images from CCTV cameras, addresses on ID cards, postal addresses, phone number mobile phone number, fax number Emergency contact information, vehicle registration, license, email address, LINE ID, Facebook or other media account, and other contact information.

2.2 Your sensitive information includes your race, ethnicity, skin color, political opinions, religion, sexual behavior, criminal record, health and disability information, trade union information, genetic information, biological information, or any other information as required by law, etc.

2.3 Information about financial transactions, including but not limited to financial account numbers, loans, and liabilities.

2.4 Information related to job performance includes information for consideration for work or for the performance of duties or for any other purpose, including but not limited to information in job applications, employee identification number codes or other identification numbers. Salary, remuneration, bonus, other remuneration Position, Benefits, Social Security Details, Tax Information Assignments, merit consideration, evaluation results, rewards, Behavioral details and disciplinary history Offenses under the Company's regulations and/or other laws Lack of late lalom Training Information Security-related information and other communications Equipment under responsibility Technical Data Use of the website or computer information of the company related to you.

2.5 Youth's Information In the event that you are a youth, the Company must obtain consent only from the person exercising parental authority who has legal authority to act on its behalf.

3. Purpose of collection and use expose Personal Information

The Company will collect and use expose your personal data and sensitive information in job recruitment, execution of labor contracts, both fixed-term and non-fixed-term employment contracts, consultancy contracts, or other employment contracts. The Company shall have all personal data that is accurate, complete, and sufficient for various operations, including but not limited to recruitment, operation under contracts, regulations, procedures, rules, notices, regulations, or procedures for the Company's operations, as well as compliance with laws or regulatory authorities.

In the event that the Company does not receive accurate, complete, and sufficient Personal Data, it may cause problems or disruptions in operation and administration. The Company may need to refuse to perform certain obligations in order to perform in accordance with the contract. The Company will use your Personal Data and sensitive information to the extent necessary to comply with the contract and lawfully by using your Personal Data on the basis of one or a combination of the following items as follows:

(1) Contractual basis between the Company and you, (2) Legal obligations for the performance of legal obligations, (3) Legitimate interests of the Company and third parties, (4) Interests necessary for the prevention or suppression of danger to life, (5) For the public interest, education and research (6) consent

Storage collect use or disclose including the processing of your personal data and sensitive data. The Company may operate directly or through a third-party service provider for the following purposes:

3.1 For Recruitment Management Employment of workers and operational operations such as recruitment, information checks include criminal background checks in some cases, interviews, and other activities, verification of educational records, work history, reference persons, preparation of labor employment contracts, or preparation of other contracts related to labor employment, medical examinations, preparation of resumes, identification cards, licenses, assignment of duties and responsibilities, equipment including but not limited to computers, emails, user IDs in various systems, related training.

3.2 For remuneration management Employee benefits and benefits, such as salary, bonuses, other remuneration, overtime pay, other benefits related to employees, travel expenses, transportation expenses, including but not limited to the Social Security Fund, Provident Fund, actions related to taxes and related laws.

3.3 For performance evaluation adjustment, promotion, judging merit

3.4 For complaint management disputes, such as the provision of work regulations, complaint procedure investigation and punishment, as well as prosecution and/or management of labor disputes. compliance with labor and labor relations laws supervision and implementation in accordance with the law and as required by regulatory authorities.

3.5 For management at the end of the employment contract or when the employee ceases to be an employee.

4. Disclosure or transfer personal and/or sensitive information to third parties

Under the execution of a contract and/or the implementation of any other agreement, the Company may disclose or transfer your personal and/or sensitive information to third parties because the Company may arrange

for third parties, both domestic and international, to process or process the data on behalf of the Company or as a legal obligation to perform. This includes but is not limited to clauses 4.1 - 4.6.

4.1 Domestic and foreign service providers hired by the Company to act on behalf of the Company such as infrastructure technology service providers, internet software and software development, websites, cloud computing, and information technology service providers, etc.

4.2 Business partners and partners of the Company who conduct transactions or have joint activities in relation to employees.

4.3 Experts such as HR consultants and advisers, auditors, external auditors, legal advisers, lawyer.

4.4 Associations and organizations of which the Company is a member or participate in activities.

4.5 Government agencies or persons with legal authority, such as regulatory agencies, competent officials, courts, etc.

4.6 Proceedings in the transfer of rights, mergers, transfers, sales of businesses, or other operations of the same nature.

5. Rights Regarding Personal Data

You, the data owner in the Company, have the right to take action as follow: **5.1 You have the right to withdraw your consent** in the processing of personal data that you have given your consent to the Company to keep, collect, use, and disclose your personal data at any time that your personal data is with the Company.

5.1 You have the right to access your Personal Data, have the right to access your Personal Data and can request the Company to request a copy of such Personal Data to you, including requesting the Company to disclose the acquisition of your Personal Data without the Company's consent, but the Company may refuse your request to take action as required by law, by court order, or as a performance under a contract.

5.2 You have the right to have your Personal Data corrected by having the right to request the Company to correct any inaccurate information or add information that is not complete and current in fact.

5.3 You have the right to withdraw your consent, including requesting the suspension of use, deletion or destruction of your Personal Data, and the Data owner has the right to withdraw your consent and

request the Company to delete or destroy his/her data for any reason, except in cases where the Company is required to comply with a contract or any other agreement or to comply with the law or a court order.

5.4 You have the right to use your personal data for certain reasons.

5.5 You have the right to request or request the transfer or transfer of your Personal Data and have the right to transfer personal information that has been provided to the Company directly to other persons if such operations are possible technically.

5.6 You have the right to lodge a complaint with an authorized officer if the Company violation or non-compliance with the Act in the event that the Data owner submits an application to exercise his/her rights under the provisions of the law. Once the Company receives such request, it will be processed within the period prescribed by law, and the Company reserves the right to refuse or not comply with such request in the case prescribed by law. and/or under the contract you have entered into with the Company, including the Company may not be able to work with the Data owner if the Data Subject does not agree to provide information and/or does not comply with the procedures prescribed by the Company.

5.7 You have the right to object, collection, use or disclosure of information processing all or part of your Personal Data is temporary or permanent unless any other actions of the Company that perform the contract or are required to comply with the law or by court order.

However, You will not be charged any fees for exercising the above rights. The Company will consider and notify the result of the consideration of your request within 30 days from the date the Company receives the request.

6. Processing of Personal Data

6.1 Processing of Personal Data: The Data Controller, the Data Processor, shall comply with a contract or other agreement, or consent or in accordance with the law, and to the extent necessary to conduct the business with regard to appropriateness.

6.2 There are processes and controls in place to manage personal data at all stages to comply with the Personal Data Protection Policy and in accordance with the law.

6.3 Maintain records of the processing of personal data in accordance with the law . Update, edit when there are changes to be current.

6.4 There are procedures to ensure that the collection and processing details are in accordance with the law.

6.5 There is a mechanism to verify the accuracy of personal data including procedures and procedures for correcting personal data.

6.6 Transmission Transfer or allow other parties to use personal data: enter into an agreement with the recipient or use the personal data, determine the rights and duties in accordance with laws and policies.

6.7 Actions to manage or mitigate risks to ensure that the implementation of personal data protection is standardized. The Company considers risk assessment based on the main topics of operation, such as personal data, collection, use Personal Data, prevent leakage, and transmit and transfer data to comply with your rights.

7. Personal Data Security System

7.1 The Company has an adequate and appropriate security system. The right to use and access to personal information, in whole or in part, is restricted to prevent loss, destruction, access, use, change. There are measures to prevent data leakage. The Company will review such measures periodically to protect your Personal Data.

7.2 Have a management system for abnormal incidents related to Personal Data . Identify and manage abnormal events quickly and promptly.

7.3 Have clear operating procedures in the event of a breach of personal data. The relevant officers and assignees will carry out the process according to the time period and conditions prescribed by law.

8. Governance and Protection of Personal Data

8.1 Establish an appropriate regulatory system

8.2 Formulate policies procedures standards of practice regarding Personal Data Protection

8.3 Inspection supervision closely monitor the implementation of relevant policies and laws.

8.4 Providing training for the Company's executives and employees to provide knowledge and understanding of the Personal Data Protection Policy, the Personal Data Protection Act and other relevant laws.

9. Duties and Responsibilities

9.1 Board of Directors

9.1.1 Approve the Personal Data Protection Policy

9.1.2 Supervise the operation in accordance with the Personal Data Protection Policy and in accordance with the law.

9.2 Executive Committee

9.2.1 Monitor, evaluate, and advise the Data Controller, Personal Data Processors, Data Officers, Executives, and Employees in compliance with the Personal Data Protection Policy and the Personal Data Protection Act and related notices.

9.2.2 Appoint a Data Protector, a Data Processor, and a Data Protection Officer to perform their duties as required by law.

9.2.3 Arrange for the evaluation of legal compliance and report on the results of the operation. According to the law, the Board of Directors shall be notified at least once a year .

9.3 Human Resources Group

9.3.1 Human Resources Group Executives

9.3.1.1 Supervise, supervise, and monitor employees in responsible departments to operate and strictly comply with the Company's Personal Data Protection Policy.

9.3.1.2 Controlling access to personal data, deletion Changes in rights in responsible entities

9.3.1.3 Enhance knowledge and understanding of compliance with the Personal Data Protection Policy and related regulations.

9.3.2 Employees

9.3.2.1 Comply with the Personal Data Protection Policy and the Operating Procedures, Practice Standards, Safety Standards Notices or any other documents related to the protection of personal data strictly.

9.3.2.2 Report to the hierarchical supervisor immediately when any abnormalities are found, leakage, violation, or non-compliance with the Company's Personal Data Protection Policy.

9.4 Data Controller

9.4.1 Obligations to carry out the collection, use or disclosure of Personal Data in accordance with the Personal Data Protection Act as stipulated in Chapter 2, Part 1 on General Chapters In Section 19, Section 21, Part 2 Collection of Personal Data In Article 22 and Section 26. Part 3 Use or Disclosure of Personal Data under Sections 27 - 29 including the implementation of other relevant sections as prescribed in the law.

9.4.2 Supervise and process data within the scope of the contract or with consent or relying on legal bases with technical and managerial measures to process personal data in accordance with the law. Consider technical and managerial measures to maintain security and security in processing that is appropriate to the risk.

9.4.3 Consider the risks, possibilities, and seriousness that will affect the rights and freedoms of data subjects by taking the following security measures as deemed appropriate to the nature of the data and processing.

- Pseudonymization or encryption
- Ability to maintain confidentiality, accuracy, and authenticity, availability, and readiness for changes to any system or processing service.
- The ability to make personal data available and usable and accessible in a timely manner in the event of a physical or technical failure.

- Normal processes for testing, evaluating and measuring the effectiveness of technical and managerial measures to ensure processing security

9.5 Personal Data Processors, whether they are agencies or individuals within the Company and/or persons outside the Company.

9.5.1 It is responsible for carrying out the activities stipulated in the provisions of the law, such as the collection, use, and disclosure of information, as well as the provision of appropriate security measures to prevent loss, access or any other action as prescribed.

9.5.2 Collecting, using, or disclosing personal data in accordance with instructions or on behalf of the data controller, such as notifying the data controller of the reason in case of data breach.

- Notify the Data Controller in the event that it deems that there is a more secure alternative to processing.
- Keep records of data processing items.

9.6 Data Protection Officer

9.6.1 Have the duty as required by law to advise the Data Controller/Data Processor and other relevant persons regarding the compliance with the Personal Data Protection Act B.E. 2019 as well as other Personal Data Protection Laws.

9.6.2 Monitoring the Operations of the Data Controller Personal data processors and employees in collecting, using, and disclosing personal data of the organization and related personnel in accordance with the Personal Data Protection Law and the Company's Personal Data Protection Policy, including managing data protection activities within the Company.

9.6.3 Coordinate and provide assistance to or related agencies. In case of problems arising from the operation of the agency, employees and contractors who carry out operations as required by law.

9.6.4 Maintain the confidentiality of personal data from the performance of duties.

9.7 Persons authorized to access personal information

Supervisors of agencies and officers of the Company or persons designated by the Company duties or responsibilities are related to the collection. The Company will only control the Company's officers or persons designated by the Company to strictly comply with the Personal Data Protection Policy and relevant laws.

10 Period of Collection, Use and Processing of Personal Data

The Company has the right to collect, use, and process your Personal Data and sensitive data, including disclosing your Personal Data to Processors. The use of information or disclosure of information among the group companies (parent companies and subsidiaries) listed in this policy or as may change in the future, or the disclosure of your information to the relevant authorities, or may be required by law, as the case may be, provided that the information of the job applicant is subject to a period of 2 years for the storage and processing period of all employee data, and the period for storage and processing of all employee data is determined to be 10 years from the date of termination of the employee's status.

11. Punishment

Those who do not comply with the Company's data protection policy. In all aspects, whether it is disclosure, any violation, use, or any other matter as prescribed by law is considered a disciplinary offense and may be subject to disciplinary sanctions in accordance with the Company's regulations, including may be prosecuted for damages or any other lawsuit in accordance with the relevant laws prescribed by Thai law and the Thai court having jurisdiction to consider the dispute arising from the dispute.

12. Review and Revision of the Personal Data Protection Policy

To ensure that the operation is in accordance with the law or in accordance with the announcement of the Office of the Personal Data Protection Commission or other relevant rules. The Company may review and update this Personal Data Protection Policy at any time as appropriate and necessary.

13. Channels of contact with the Company

If you would like to know the details of your personal data available to the Company, report a problem with your information, privacy, security, or other matters. You can contact us by email or contact the company at:

Company Name: Zen Corporation Group Public Company Limited, Zen Supply Chain Management Co., Ltd., Zen & Spicy Co., Ltd., Tokyo Concept Co., Ltd., Zen Restaurant Holding Co., Ltd., Gyugrill Group Co., Ltd., Aka Interfoods Co., Ltd., Spice Synergy Co., Ltd., Zen & Gosum Interfoods Co., Ltd., and King Marine Foods Co., Ltd.

Contact address: 662 Soi On Nut 17 Suan Luang Sub-district Suan Luang District Bangkok 10250

Telephone 02-019-5000

อีเมล dpo@zengroup.co.th

The agreement shall take effect from June 28, 2022 with the approval of the Board of Directors at the meeting No. 5/2022.

Mr. Paitoon Taveebhol

Chairman of the Board of Directors