

ZEN Corporation Group Public Company Limited and its subsidiaries.

(Translation)

Personal Data Protection Policy

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Personal Data Protection Policy

Zen Corporation Group Public Company Limited and its subsidiaries

Company Objectives ZEN Corporation Group Public Company Limited and its subsidiaries, hereinafter collectively referred to as "the Company", are aware of the importance of protecting the personal data of their personnel, business partners, customers, service users, and those who come into contact with the Company, and stakeholders. The company has therefore established a personal data protection policy in order to explain to all owners of personal data the purposes of data collection, using and processing of your personal data that the Company has correct execution, safe, used in good faith, transparent, and not to be misused or disclosed, including your rights as the data owner to be able to process your 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) Gyuril Group Co., Ltd., 6) Aka Interfoods Co., Ltd., 7) Spice Synergy Co., Ltd., 8) Zen & Gosum Interfoods Co., Ltd., and 9) King Marine Foods Co., Ltd.

"Personal Data" means information about an individual who enables the identification of that person, directly or indirectly, but does not include information about a deceased person in particular.

"Personal Data Owner" means the person to whom the Personal Data is identified, which must be a living natural person and it is not a case where a person has ownership of the data or collects the data themselves only, not the owner in the form of property rights including but not limited to customers, service users, partners, service providers, card members, visitors, and stakeholders with the company.

"Sensitive Information" means personal information that is of a sensitive nature. It is prohibited to collect data without the explicit consent of the data subject because there is a risk of unfair discrimination such as ethnicity, race, color, political opinions, religion, including sexual behavior, criminal history, health information, disability, trade union information, genetic information, biological information, and any other information as required by law.

"Data Controller" means an individual or legal entity that 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 conducts the collection, use or disclosure of Personal Data pursuant to instructions or on behalf of the Data Controller. However, the person or juristic person who performs such operations is not the controller of 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 operation or set of actions performed on personal data or sets of personal data, whether by automated means or not, such as collecting, recording, systematizing, etc. 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 the Company's Personal Data

In the course of its business operations, the Company will collect your Personal Data as follows:

2.1 Your identity information includes information such as name, surname, gender, date of birth, age, ID card number, passport number, including but not limited to nationality, qualifications, job title, position or status, income, type of business, marital status, number of family members, details of children, handwriting, voice, recorded audio, facial shapes and characteristics for recognition, CCTV footage.

2.2 Contact information including ID card address, postal address, This includes but is not limited to email addresses, LINE IDs, Facebook accounts, or other media, as well as contact information.

2.3 Information on financial transactions includes financial related information, including but not limited to credit/debit card information or bank information, credit/debit card number, type of credit card, payment details, including member account details, membership card number, reward points, card issuance/expiration date, not limited to membership ID, membership ID, customer ID, membership type, customer type, date and month of participation/date of application, membership period, Bank Account.

2.4 Transaction information includes details of payment transactions made through the Company's website or through the POS system at the branch, including but not limited to the date and time of payment,

payment amount, transaction history, location, transaction status, past transactions, and other information about the products and services you have transacted with, including information from your transaction behavior related to the Company's products and services.

2.5 Technical information including IP address, cookies, MAC addresses, web beacons, logs, device IDs, device models and types of devices. The network includes but is not limited to login logs, browser type and version, time zone and location settings, browser plug-in types and versions, operating system and platform, location, and other technologies on the device you use to access the Company's Platform.

2.6 Profile information including username and password, bookings you have made, photos of personal information, including but not limited to order history and purchased products, number of products, an order or recall order made by you, orders placed through the website, order ID, email, financial records, personal PIN number, your interests, preferences, responses, and surveys, satisfaction surveys, use of social media, event participation Information.

2.7 Usage information including Information about your use of the Company's website, including but not limited to information about your search or use of the Company's website, platforms, applications, details of your use of the Company's products and services.

2.8 Marketing and communication information such as your preferences for receiving marketing information from the Company, its subsidiaries, third parties, business partners, and preferred forms of communication.

In the case that you have provided personal information of a third party to the Company, not limited to first name, surname, address, and phone number. To contact you in an emergency, please notify them of this Privacy Policy and/or obtain their consent if necessary.

2.9 Information of youths, quasi-incompetent persons, and incompetent persons, the Company must obtain the consent of the person who has the authority to act on behalf of the person who uses the administrative authority or guardians or keepers according to the law.

3. Purpose of Collection and Use of Personal Data

The Company will collect and use your Personal Data in accordance with the agreement or consent for the Company to use your Personal Data based on the following:

(1) Consent, (2) Contractual basis between the Company and you, (3) Legal obligations for the performance of legal obligations, (4) Legitimate interests of the Company and of third parties, (5) Interests necessary for the prevention or suppression of danger to life. (6) For the public interest, for the performance of tasks in the public interest or the exercise of rights of government officials.

However, for your Personal Data, the Company aims to keep, collect, and may use or disclose your Personal Data for the benefit of you and some of the Company for the following purposes:

3.1 To support the delivery of goods and services, advertisements, products, privileges, marketing activities that meet your needs. Marketing Communication and Notification To carry out other activities related to such services or products, and to conduct financial transactions and services related to payments or other operations.

3.2 For research and behavior analysis according to your interests, including web users, social media applications so that you can use it continuously meet the needs

3.3 For promotional purposes, soffers, loyalty programs, reward programs, prize draws, contests and other offers/promotions, marketing offers, news, notifications based on the content you are interested in are sent to you through various channels so that you can participate in or receive promotions, special offers based on the ongoing loyalty program.

3.4 To fulfill orders through the Platform, whether through the Company or its partners.

3.5 To carry out the transportation of goods through various channels, whether operated by the Company, third parties or partners.

3.6 For contractual performance any other agreement or condition between you and the Company in relation to the products and services for your purpose and the Company.

3.7 To carry out legal purposes, compliance with duties and obligations compliance with the rules announcement of the agency as required by law.

3.8 To protect the property rights or safety of the Company or the User or the Data Subject, exercise the rights or protect the interests of the Company as necessary and can be done by law, including conducting legal audits or other applicable regulations.

However, if you are unable to provide personal data to the Company upon request, the Company will not be able to provide personal information. We may not be able to offer or provide you with our products or services.

4. Disclosure Transfer of data to third parties

Your Personal Data, the Company may disclose or transfer your Personal Data to third parties because the Company may arrange for a third party to act on behalf of the Company, or from the conduct of business, or as a legal obligation, outsiders include, but are not limited to the following:

4.1 The Company's service providers are hired by the Company to act on behalf of the Company , technology provider for infrastructure, Internet, software, and software development Websites and information technology service providers, logistics service providers, and warehouses.

4.2 Partners and partners of the Company that jointly conduct certain transactions, such as financial institutions, credit card operators, and e-commerce operators, who jointly organize events or activities.

4.3 Experts , such as advisors and financial advisers. Auditors, External Auditors, Legal Advisors, lawyer.

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

4.5 Social media sites

4.6 Government agencies or persons with legal authority, officials, court

4.7 Execution of Transfer, Merger and Establishment of Joint Venture, Company Business transfer, sale of business, 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 follows:

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.

5.2 You have the right to access your personal data, including the right to access your personal data. and may request the Company to provide you with a copy of such Personal Data, including requesting the Company to disclose the acquisition of his/her Personal Data. However, the Company may refuse your request for action as required by law or by court order.

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

5.4 You have the right to delete or destroy your Personal Data, and the Data owner has the right to request the Company to delete or his/her data for certain reasons, except in cases where the Company is required to comply with relevant laws or perform a contract.

5.5 You have the right to use your personal data , including the right to suspend the use of your personal data for certain reasons.

5.6 You have the right to request to receive 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.

5.7 You have the right to lodge a complaint with the authorized officer if the Company violates or fails to comply with the said Act in the event that the Data Subject submits a request to exercise his/her rights under the provisions of the Act. 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 where the data subject is restricted by choosing to provide specific personal information. As a result, the Company may not be able to work with the Data Subject or provide any services if the Data Subject does not agree to provide the information requested by the Company.

5.8 You have the right to object the collection, use or disclosure of information, processing all or part of your Personal Data, temporarily or permanently, unless, any other actions of the Company that are carried out in accordance with the law, or must comply with the law or court order.

However, The Company will consider and notify the result of the consideration of your request within 30 days from the date of receipt of such request.

6. Processing of Personal Data

6.1 Processing of Personal Data: Data Controller, Data Processor proceed in accordance with the law and to the extent necessary to conduct business with consideration for appropriateness the interests of the data subject are important.

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 and update, edit when there are changes to be current.

6.4 There are procedures to ensure the collection of processing details, consent is complied by law, and there are such supervision and inspection measures.

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

6.6 Sending, transferring, or allowing any other person to use your personal data will enter into an agreement with the recipient or use of your personal data and determine the rights and duties in accordance with laws and policies.

6.7 **Retention Period of Personal Data:** The Company will retain your Personal Data for as long as necessary for the purpose of collection, use and disclosure of personal data as specified in this Notice. In case the data subject is no longer a customer of the company, the Company will store the Personal Data of the Data Owner in accordance with the law, announcement or relevant policies, and the Company will consider destroying the Personal Data by having an effective monitoring and operation system to prevent errors or damages that may occur.

6.8 **Actions to manage or mitigate risks** in order to ensure that the implementation of personal data protection is standardized. Risk assessment shall be considered according to the main topics of operation, such as personal data, collection and use of personal data, prevention of leakage, and transmission and transfer of data. Implementation of data subject rights.

7. Use of Particularly Sensitive Personal Information

Where the Company needs to use particularly sensitive information. In some cases, such as personal information related to race, religion, disability, etc. The Company will notify and obtain the consent of the Data Owner to continue using the data, or if permitted by law.

8. International Transfer and Transmission of Information

Where necessary, the Company may need to transmit your Personal Data to third parties or servers located abroad, which may or may not have laws that protect Personal Data or have different levels of personal data protection. In this case, the Company will follow the procedures and methods required by law, including obtaining your consent for the transfer of your Personal Data overseas.

9. Personal Data Security System

9.1 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 information leak, unauthorized use of personal information or taking any other action in a dishonest manner and is not legal and such measures will be reviewed periodically to protect your personal information. The company agrees to proceed according to its rights, and duties that should be or should comply with the law on personal data protection.

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

9.3 Have clear operating procedures in the event of a breach of personal data. The relevant officers and assignees will take steps to notify the Office of the Personal Data Protection Commission, including the actions that notify the Data Owner within the time period and conditions prescribed by law.

10. Governance and Protection of Personal Data

10.1 Establish an appropriate regulatory system

10.2 Develop policies Procedures Standards of Practice Regarding Personal Data Protection

10.3 Inspection Supervision Closely monitor the operation under relevant policies and laws.

10.4 Organizing 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.

11. Duties and Responsibilities

11.1 Board of Directors

11.1.1 Approve the Personal Data Protection Policy

11.1.2 Supervise the implementation of the Personal Data Protection Policy and in accordance with the law.

11.2 Executive Committee

11.2.1 Monitoring, evaluating, and advising 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.

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

11.2.3 Arrange for the evaluation of compliance with the law and report the results of the implementation in accordance with the law to the Board of Directors at least once a year .

11.3 Executives

11.3.1 Control, supervise and monitor employees in responsible departments to implement and strictly comply with Personal Data Protection Policy of the Company.

11.3.2 Controlling access to personal data, deletion Changes in rights in the responsible authorities.

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

11.4 Employees

11.4.1 Strictly comply with the Personal Data Protection Policy, including the Operating procedures, standards, notices, or any other documents related to the protection of personal data.

11.4.2 Immediately report to the hierarchical supervisor when any abnormalities are found such as leakage, violation, or non-compliance with the Company's Personal Data Protection Policy.

11.5 Data Controller

11.5.1 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 Section 22, 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.

11.5.2 Supervising the processing of data to the extent of consent or relying on legal bases with technical and managerial measures to process personal data in a lawful manner, consideration of technical and managerial measures to maintain processing security appropriate to the risk.

11.5.3 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 to respond to changes to systems or processing services.
- Ability to make available, use and access to personal data back to that state; Timely operation 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

11.6 Personal Data Processors

11.6.1 It is responsible for carrying out the necessary actions as 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.

11.6.2 Collecting, using, or disclosing personal data as instructed or on behalf of the data controller, such as:

- Notify the data controller in case of personal data breach
- Notify the data controller in the event that it deems that there is a processing option with higher security and security.
- Keep records of data processing items.

11.7 Data Protection Officer

11.7.1 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. 2562 (2019) as well as other Personal Data Protection Laws.

11.7.2 Monitor the operation of the Data Controller, Personal data processors and employees in collecting, using, and disclosing personal data of organizations and related personnel in accordance with

the Personal Data Protection Law and the Company's Personal Data Protection Policy, as well as managing data protection activities within the Company.

11.7.3 Coordinate and cooperate with or related agencies, in the event of problems arising from the performance of the work of the agency, employees, and contractors that are carried out in accordance with the law.

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

11.8 Persons authorized to access personal information

Only the Company's officers or persons assigned by the Company with duties or responsibilities related to the purpose of using personal data or to comply with the law have the right to access your personal data. The Company will control that only the Company's officers or persons designated by the Company have access to your Personal Data.

12. Cookies and Use of Cookies

The Company uses cookies and similar tracking technologies to better improve the website and mobile applications for all users, so that the Company can better understand the customers or users who visit the Company's website. or provide relevant marketing information. Cookies allow us to collect information about your visits to the website, or applications on the Company's mobile phone, such as the links you choose, the pages you visit, etc. The presence of these cookies allows us to know your preferences based on what you have visited before and to be able to present you with additional information on your next visit.

13. 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 action in accordance with the Company's regulations, including may be prosecuted by the Company for damages or any other lawsuit in accordance with the relevant laws prescribed by Thai law, and the Thai courts shall have jurisdiction to consider any disputes that arise.

14. 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 regulations. The Company may review and update this Personal Data Protection Policy at any time as appropriate and necessary.

15. Channels of contact with the Company

If you would like to know the details of your personal data available to the Company, report problems with your data, 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 Zen Management Co., Ltd., Zen & Spiciy 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

Email: 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