



# Privacy Policy



## PRINCIPLE

Metro Systems Corporation Public Company Limited, subsidiaries, and affiliated companies recognize the importance of protecting personal data belonging to stakeholders under their possession, including any related data processing activities. The Company is committed to implementing and maintaining effective personal data protection measures to ensure security, support good corporate governance, and build confidence among investors and stakeholders.

## OBJECTIVE & SCOPE

Due to increasing incidents of online personal data theft and unauthorized access causing reputational and financial damage, Thailand enacted the Personal Data Protection Act B.E. 2562 (2019). Therefore, the Company has established this policy and related guidelines to ensure that directors, executives, and employees comply with applicable laws.

- ◆ To establish this policy that creates trust and aligns with standards across the organization.
- ◆ To define the scope of personal data protection and improve related measures.
- ◆ To communicate this policy to personnel at all levels and ensure strict compliance.
- ◆ To ensure that executives, employees, and external parties working for the Company understand the importance of personal data protection and comply accordingly.
- ◆ To review this policy , at least once a year, to ensure it remains current and effective.

## DEFENITION

**The Company** means Metro Systems Corporation Public Company Limited, Associated Company and Affiliated Company

**Associated Company** means Metro Connect Company Limited and Metro Professional Products Company Limited

**Affiliated Company** means HIS MSC Company Limited

**Personal Data** means Information relating to an individual that enables identification directly or indirectly, such as name, surname, age, date of birth, identification number, contact information, address, workplace, and telephone number, excluding data of deceased persons.

**Sensitive Personal Data** means Specific categories of personal data defined by law, including race, ethnicity, political opinions, religious beliefs, sexual behavior, health information, criminal records, biometric data, or similar information.

**Data Controller** means a person or legal entity authorized to make decisions regarding the collection, use, or disclosure of personal data.

**Data Processor** means a person or legal entity that processes personal data on behalf of or under the instructions of a Data Controller.

## COLLECTION OF PERSONAL DATA

The Company shall collect personal data lawfully, fairly, and only to the extent necessary for its business operations and stated objectives. Such personal data may include information that can directly or indirectly identify an individual.

Personal data may be collected directly from the data subject or from other lawful sources, including publicly available sources, where necessary and in compliance with applicable laws. Where consent is required by law, the Company shall obtain consent from the data subject prior to or at the time of collection.






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## PURPOSE OF DATA COLLECTION

Personal data may be collected or used for purposes reasonably necessary for the Company's operations, such as: Procurement and contracting, Financial transactions, Business activities and coordination, Service improvement and database management and Compliance with laws and regulations. The Company will retain personal data only for the period necessary to fulfill the stated purposes or as required by law. If the purposes of processing change, the Company will notify the data subject and comply with legal requirements.

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## LEGAL BASES FOR PROCESSING PERSONAL DATA

1. Contractual Basis  Processing necessary for providing products, services, or fulfilling contractual obligations.
2. Consent  Processing based on explicit consent provided by the data subject.
3. Legitimate Interest  Processing necessary for the Company's legitimate interests, provided that: Only necessary data is processed, The data is publicly available and not sensitive, Privacy risks are low and Data subjects can easily opt out
4. Legal Obligation  Processing required to comply with applicable laws, court orders, tax regulations, securities laws, or other legal requirements.
5. Vital Interests  Processing sensitive data, health information, or epidemic monitoring data to prevent harm to individuals or the Company.



## DISCLOSURE OF PERSONAL DATA

The Company may disclose personal data to third parties both domestically and internationally when necessary for business operations. Such parties are required to maintain confidentiality and use the data only within the Company's specified purposes.

Personal data may also be disclosed to: Government authorities, Regulatory agencies, Courts or legal processes and Authorized private entities involved in legal proceedings

## PERSONAL DATA SECURITY

The Company implements information security and cybersecurity measures to protect personal data against unauthorized access, disclosure, misuse, leakage, or destruction.

Measures include:

- Access control systems
- Secure storage locations
- Regular security reviews and monitoring
- Protection against data breaches



The Company will not transfer personal data to third parties unless:

- Consent has been obtained, and
- The receiving party maintains adequate data protection standards under applicable law.



## RIGHTS OF DATA SUBJECTS

Under the Personal Data Protection Act B.E. 2562 (2019), data subjects have the following rights:

- ☀ Right to be informed
- ☀ Right to access personal data
- ☀ Right to rectify inaccurate or incomplete data
- ☀ Right to withdraw consent
- ☀ Right to object to collection, use, or disclosure
- ☀ Right to restrict processing
- ☀ Right to erasure or destruction
- ☀ Right to data portability
- ☀ Right to lodge complaints

Requests may be submitted through the Company's website. The Company will respond within 30 days unless otherwise permitted by law.

## RETENTION OF PERSONAL DATA

The Company retains personal data only for as long as necessary, including: Contractual and legitimate interest processing: 5 years

After the retention period expires, data will be deleted, destroyed, or anonymized.

## COLLECTION OF PERSONAL DATA BEFORE PDPA ENFORCEMENT

Personal data obtained before the enforcement of the PDPA will continue to be treated confidentially and used only for legitimate business purposes and lawful operations.

## REVIEW OF THE POLICY

The Company will regularly review the prevention of Privacy policy to ensure that it remains aligned with and complies with legal requirements and regulations.

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This Prevention of Privacy Policy has been approved by  
the Company's Board of Directors

## CONTACT INFORMATION

For inquiries regarding this Privacy Policy or personal data processing:

Metro Systems Corporation Public Company Limited  
400 Chalerm Phrakiat Rama IX Road, Nong Bon, Prawet, Bangkok  
10250, Thailand



+66 2-089-8466 (Data Protection Officer)



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