



## -Translate-

### Personal Data Protection Policy Sky ICT Public Company Limited

#### Scope and purpose

The Sky ICT Public Company Limited respects and values the right to privacy and the protection of personal data of those involved or who have an interest in the company, thus establishing this personal data protection policy to ensure the transparency and accountability of the company to collect, use or disclose (collectively called " **process** ") your data in accordance with the Personal Data Protection Act, D & C 19: 00. 2019 (" **Personal Data Protection Law** "), as well as other relevant laws, has also provided for measures to maintain proper data security, standardized and in accordance with the law.

This policy applies to the personal data of individuals who have current and potential future relationships with the Company, including the personal data of personnel, employees, customers, partners, business partners, and other stakeholders, processed by the Company, including counterparties or outsiders who process personal data instead of or on behalf of the Company (" **Personal Data Processor** "). The Company also provides measures to maintain proper data security in accordance with accepted standards to ensure the protection of the personal data of all personnel, customers, partners, and business partners. The company is stable, secure, as required by law, where:

1. This policy frames the principles and guidelines for the important actions for the protection of the company's personal data so that all operations of the company meet its duties and responsibilities, with relevant processes and measures as provided for in the Personal Data Protection Act 2019, as well as other relevant legislation.
2. This policy applies to all processing of personal information that takes place in accordance with the scope and purpose of the Company.
3. This policy does not cover the processing of the personal information of the company's personnel conducted for their personal benefit or for the activities of that person's family. It does not relate to the scope and purpose of the company.

#### Principles of personal data protection

The processing of the company's personal information, whether it is the information of its personnel, customers, partners, business partners and other stakeholders, shall comply with the following principles:

1. It is the lawful, transparent and verifiable processing of personal information (Lawfulness, fairness and transparency).
2. It is the processing of personal information within a specified scope and purpose and is not applied or disclosed outside the scope and purpose of that information processing (purpose limitation).



3. It is the processing of personal data as necessary, relevant and sufficient to the scope and purpose of that data processing (data minimization).
4. It is accurate processing of personal information and carrying out the information up to date where necessary (Accuracy).
5. It is the storage of personal data for a period of time necessary to process that data (storage limitation).
6. It is the processing of personal data with measures to maintain data security (Integrity and confidentiality).

### **Duties and responsibilities**

1. The Board of Directors is responsible for approving the Personal Data Protection Policy and supervising the implementation of the Personal Data Protection Act 2019 and related laws through the Audit Committee, which is responsible for supervising and monitoring the implementation of relevant policies and regulations.
2. Executives shall require regulations, practices and measures to store, collect, use and disclose personal information appropriate to the context of the Company in conformity with international policies, laws and standards, as well as provide an organizational structure with appropriate responsible and functional roles to oversee its operations in accordance with relevant policies and practices.
3. All segments and employees at all levels have the responsibility to implement this policy and carefully apply the personal information that the company controls. Learn to understand and strictly comply with the laws, business ethics, regulations, policies, practices and measures of the company. If you see an act that may be networked in violation of this policy, you must make a notification through the whistleblowing channels required by the company.

### **Personal Data Protection Officer**

The Personal Data Protection Officer has the following duties:

1. Establish and monitor the implementation of the company's personal data protection policies and measures so that the processing of personal data complies with the Personal Data Protection Act 2019 and related rules.
2. Provide practices and guidelines for the implementation of this policy for training and practice for the work section and staff. Various include the practice of storing records of items of personal data processing activities so that the Office of the Personal Data Protection Board can monitor them.
3. Provide guidance to various segments, including employees of the Company, on the implementation of this policy.
4. Audit the operation of various segments, including company employees, on the processing of personal data in accordance with this policy.



5. Coordinate and cooperate with the Office of the Personal Data Protection Board in case of problems with the company's personal data processing, including its employees, in complying with this policy.
6. Maintain the confidentiality of personal information that they have known or acquired due to the performance of their duties in accordance with this policy.
7. Report directly to the Board of Directors and the Chief Executive Officer in case of difficulties in fulfilling this policy function.
8. Support and assist the personal data protection impact assessment of various segments.
9. Consult discusses the protection of personal data, and is a liaison contact for personal data owners to receive requests and take action on the exercise of personal data owners' rights.
10. Monitor, investigate and resolve complaints about the protection of personal data.
11. Store a record of entries on incidents of personal data breaches and serve to notify the Office of the Personal Data Protection Board as required by law.
12. Memorandum to Various Discussion Issues on the Processing of Personal Information of the Company
13. Be in touch and coordinate about the company's personal information processing.
14. Take other actions as assigned in accordance with this policy.

### **Cases of violations of personal data protection**

1. Personal data breach incidents may occur in cases where personal data is disclosed or accessed by unauthorized persons, or where personal data is used in a manner unforeseen by the owner of the personal data by law.
2. The Personal Data Protection Officer will conduct a reliability assessment of notified data and investigate incidents involving breaches of legal personal data protection in conjunction with the Information Technology Department and other relevant agencies to take appropriate measures to mitigate the impact and prevent future incidents of personal data breaches.
3. Where appropriate according to the condition and seriousness of the incident, the Personal Data Protection Officer shall proceed to notify the personal data breach incident to the Personal Data Owner and the Office of the Personal Data Protection Board as required by law and the relevant notice in accordance with the following criteria.



Impact on the rights and freedoms of personal data owners	Proceedings
The case is no risk.	<ul style="list-style-type: none"><li>Personal data breach records</li></ul>
The case is risky.	<ul style="list-style-type: none"><li>Personal data breach records</li><li>Notify the Office of the Personal Data Protection Committee within 72 hours.</li></ul>
The case is high risk.	<ul style="list-style-type: none"><li>Personal data breach records</li><li>Notify the Office of the Personal Data Protection Committee within 72 hours.</li><li>Notify the owner of the personal data together with remedies guidelines ASAP.</li></ul>

**4.** Other incident cases involving personal data breaches. Provide employees or segments who find the cause directly to the personal data protection officer as soon as possible to take appropriate action.

### Policy compliance

- Violations of non-compliance with this policy, and related measures, constitute a serious case of discipline which requires further relevant disciplinary action.
- An employee or other person involved in the processing of personal information in accordance with the scope and purpose of the Company may be liable personally by law from his or her actions in accordance with the condition and seriousness of the incident.

### Review and revision

The Personal Data Protection Officer shall review and propose amendments to this policy and related measures at least once a year, taking into account the criteria and methods required by the Personal Data Protection Board, including rules, regulations and other announcements that may be made in the future that affect the protection of personal data of the Company.

### Reporting clues or complaints.

When an act believed to violate relevant policies and practices is observed, all personnel, customers, partners, business partners, and employees of the company must provide whistleblowing or complaints in accordance with the policy guidelines for reporting clues. Complaints or whistleblowers are protected and the information is kept confidential



without affecting their position during the investigation and after the completion of the process.

1. By electronic mail. By mailing to Email: [whistle-blower@skyict.co.th](mailto:whistle-blower@skyict.co.th)
2. By mail, by sending a letter to the inspection committee of Sky ICT Public Company Limited, No. 55, A.A.Capitol Ratchada Building, 6th-7th Floor, Ratchadapuk Road, Red Din District, Red Din District, Bangkok, 10400.
3. Online. By sending it to <http://www.skyict.co.th/contact/whistleblowing>

In case of enquiry, consultation for advice in compliance with this policy or in accordance with the Personal Data Protection Act 2019, as well as other relevant legislation, the Legal and Regulatory Department can be contacted at: [legal-group@skyict.co.th](mailto:legal-group@skyict.co.th) or the Personal Data Protection Officer at [DPO@skyict.co.th](mailto:DPO@skyict.co.th)

To take effect from 14 November 2025 onwards.

-SOMKIT LERTPAITHOON-

(PROF. DR. SOMKIT LERTPAITHOON)

Chairman

Approved by the Board of Directors Meeting No. 9 / 2025

On November 13, 2025