



**Privacy Notice**

**For SONIC Shareholders, Debenture Holders and their Representatives/Agencies**

Sonic Interfreight Public Company Limited (hereinafter called “SONIC” or “We”, “we”) giving highest precedence to protect the personal data of our shareholders or our debenture holders and also in a circumstance you are the power of attorney (hereinafter called “agent”) from aforesaid shareholders or debenture holders. In order to enhance the confident that we will protect and manage your personal data in accordance with the Personal Data Protection Act B.E 2562 (“PDPA”) then we establishing this Privacy Notice for your acknowledgement of the details of the processing of personal collecting, use and disclosure (shall collectively called “the processing”) that may be arising and including to inform you of the rights of your personal data and the contacting us channels.

**1. Purposes of Collecting, Use and Disclosure of Personal Data**

SONIC may collect, use or disclose your personal data under the lawful basis for the various purpose as follows;

<b>Clause</b>	<b>Purposes</b>	<b>Lawful Basis</b>
1.1	For management of shareholders and debenture holders registration including for issuance of proxy by shareholders and debenture holders as well as other relevant activities pursuant to public company law and securities and exchange law and or other relevant laws.	Legal Obligation Basis
1.2	For payment of dividend to shareholders or for repayment the face value and or interest to debenture holders	Legal Obligation Basis & Contractual Basis
1.3	For the subscription for accessing and using any website or application providing by SONIC to debenture holders such as SONIC Debenture Cyberplus website and for using such website or application under the prescribed using conditions.	Contractual Basis
1.4	For holding the general meeting and the attendees register of shareholders or debenture holders including the related organizing of such meetings for example; to register the attendees of the meetings, to record the resolution of the meetings for instance.	Legitimate Interests
1.5	For recording of images, audio and video recordings during the meetings for the benefit of broadcasting the meeting via SONIC website and through other SONIC communication channels or to facilitate the attendees of the meetings to rerun in after or for the public relation of SONIC or for other benefit of the attendees of the meetings	Legitimate Interests
1.6	For recording the meeting and to arrange the minute of meeting for submission to the relevant authorities such as the Stock Exchange of Thailand, SONIC	Legitimate Interests

Clause	Purposes	Lawful Basis
	Legal Consultant, shareholders, debenture holders, and to publicize via SONIC website and other communication channels.	
1.7	For issuing the newsletter regarding any investor relation activities arranged for shareholders and debenture holders as SONIC deem appropriate and for using as procedure for selecting the eligible participants.	Legitimate Interests
1.8	For analyzing any information for the preparation of activities, to organize the event, to facilitate shareholders and debenture holders who attending the activities arranged by and deem appropriated by SONIC such as the preparation of venue, the preparation of food and beverage or preparation of transportation or keepsake for instance.	Legitimate Interests
1.9	For being the data base and for any management regarding to provide any right and benefit to you as SONIC shareholders or debenture holders such as the right for subscription for the IPO shares of companies under SONIC Group, right for subscription for debenture or to provide the discount for health check at named hospitals.	Legitimate Interests
1.10	For being the data base for SONIC's stakeholders and or for being the information for the relationship administering and for any coordination with SONIC concerned parties.	Legitimate Interests
1.11	For risk management and internal control, monitoring supervisory including internal audit of Internal Audit Office, good corporate governance and for internal organization management.	Legitimate Interests
1.12	For establishing the right to legal claim, for compliance with or exercise any legal claim or for raising any defense against any legal claim, for proceeding any litigation and including for execution of the judgement	Legitimate Interests
1.13	For compliance with legal obligations, orders of the competent and legally authorities or any competent official such as to comply with summon, court injunction, police officers, prosecutors, government authorities and for reporting or disclosure any information to government bodies or independence entities.	Legal Obligation

Personal data collected by SONIC for the purposes of payment of dividend to shareholders, payment of face value and or interest to debenture holder, administering of shareholders registration or debenture holders and including proxy are necessary for SONIC to comply with the contractual obligation and under the right and obligation of the issuance of debenture and with the debenture holders, to comply with the applicable law as well as to comply with the public limited company law, to comply with securities and exchange law. If you do not provide SONIC such necessary personal data, SONIC may unable to manage and administer the shareholder or debenture holder agreement between you and SONIC including any benefit (if any) of shareholders or debenture holders

## 2. Personal Data that collected

In general SONIC shall collect your personal data by request directly from you for example by have you to fill in any formats determined by SONIC or enquiring data from you or request you to submit any document already containing your personal data. However, there may be any some circumstance that SONIC collect your personal data from other sources in order to fulfil the aforesaid purposes such as from the securities registrar.

The categories of personal data collected by SONIC are follows;

### 2.1 General Personal Data

- (1) Data used for Identifying you (Identity Data) such as first name, last name, identity card number, passport number, date of birth, gender, age, nationality, signature, information regarding to changing of first name and or last name, current photo.
- (2) Your contact detail (Contact Data) such as address, phone number, email
- (3) Financial information (Financial Data) such as bank account number (used for receiving dividend payment, face value and or interest), your number of share or debenture held.
- (4) Data regarding to the communication with SONIC (Communication Data) such as video and audio recording when you contact SONIC
- (5) Data regarding to any activity participated with SONIC such as image recording or video recording
- (6) Data regarding to any use of electronic account such as user name of Line ID
- (7) Other data such as occupation

### 2.2 Personal Data that sensitive

In general, SONIC do not require to collect any religion and blood type specified in your identity card, for any specific purpose. In the event that you provide SONIC the copy of your identity card, you are requested to make invisible such data. If you do not make invisible of such data, it will be deemed that you already authorized SONIC to make invisible those data and such document shall be deemed valid and legally binding in all aspects. In case SONIC is unable to make invisible of those data as limited by some technical issue, SONIC shall collect and use such data as being part of your identification documentation only.

However, for the personal data processing of shareholders and debenture holders of SONIC, there may be some activities that SONIC shall request some additional sensitive personal data when you participate in any activities for shareholders and debenture holders. SONIC may request for sensitive data for example the data regarding to your health for instance in order to facilitate you related to such activity or for other purpose which we will specifically notify in the request consent form and SONIC shall clearly request your consent before collecting such sensitive personal data.

### **3. Retention Period of Personal Data**

SONIC shall retain your personal data as long as it is necessary for the purposes of collecting, use or disclosure such personal data set out in this Privacy Notice. The criteria for establishing the retention period are the duration of relationship between SONIC and you, the ongoing duration of any interest SONIC still providing to you, further retaining your personal data as necessary period in order to comply with applicable law or within legal prescription for establishing of right to legal claim, to comply with or to exercise the right to legal claim or to raise against any right to legal claim for other courses as specified in Policy and Internal Rules and Regulation of SONIC.

### **4. Disclosure of Personal Data**

In order to comply with the purposes, set out in this Privacy Notice, SONIC may disclose your personal data to outsiders as determined below;

- 4.1 subsidiary companies, affiliated companies and SONIC Group companies for their supporting for the achievement of the aforesaid purposes set out
- 4.2 government authorities, regulator authorities or other authorities as prescribed by law including the competent officers utilizing power under any applicable laws such as court, police, the Securities and Exchange Commission, revenue department
- 4.3 Agencies, contractors, subcontractors, and/ or other service providers providing any operation of SONIC for example, the organizers for operating any activities and to facilitate shareholders, debenture holders, auditors, lawyers, legal consultant, financial institutes appointed as financial advisor or debenture underwriter
- 4.4 Insurance companies and or insurance brokers, life insurance brokers providing any insurance of travelling insurance to shareholders or debenture holders or their agents in case those insurance are provided as of your participating in any activities arranged by SONIC
- 4.5 Banks responsible for any payment to shareholders or debenture holders
- 4.6 Registrar of shareholders and debenture holders
- 4.7 Debenture Holders Representative

### **5. Submit or transfer Personal Data to abroad**

SONIC may install your personal data on computer servers or in cloud of the service providers situated in abroad and there may be the personal data processing by using software package of program or application of service providers in abroad.

In any circumstance, the submission or transferring any personal data to abroad, SONIC shall comply with the Personal Data Protection Act B.E 2562.



## **6. Your rights as owner of Personal Data**

As the owner of personal data, you have legal right as prescribed in the Personal Data Protection Act B.E 2562. You can exercise your rights in accordance with terms specified under Clause 8. Of this Privacy Notice or via SONIC website. You will be able to exercise any right when the Personal Data Protection Act B.E 2562. Come to enforce with SONIC Your rights are as follows;

### **6.1 Right to Withdraw Consent**

In the event SONIC requested your consent, you will have the right to withdraw such consent for the processing of your personal data already given to SONIC unless such withdrawal restricted by law or by any contract that benefit you

Such consent withdrawal shall not affect any personal data processing legally conducted according to your prior consent.

### **6.2 Right to Access to Personal Data**

You have the right to request to access to your personal data, to request for making copy which is under controlled by SONIC including to request SONIC to disclose the source of data gained that you not giving consent to SONIC of such data.

### **6.3 Right to request for submitting or transferring your Personal Data (Data Portability Right)**

You have the right to request SONIC to transfer your given SONIC personal data to other party as prescribed by law.

### **6.4 Right to Object the Collect, Use or Disclosure of Personal Data (Right to Object)**

You have the right to object the data processing relating to you on collecting, use or disclosure personal data as prescribed by law.

### **6.5 Right to Request to Delete Personal Data (Erasure Right)**

You have the right to request SONIC to delete your personal data as prescribed by law. Nevertheless, in the event that SONIC installed your personal data by using electronic system which some system may unable to delete your personal data and in such circumstance, SONIC shall destroy such personal data or make such personal data to be unidentified personal data.

### **6.6 Right to Request to Restrict of Processing Personal Data (Right to Restrict Processing)**

You have the right to request SONIC to restrict the use of your personal data as prescribed by law.



#### **6.7 Right to Request the Personal Data to be Rectified (Rectification Right)**

In the event you finding that any data controlled by SONIC is incorrect, you have the right to request SONIC to correct your personal data so that such personal data shall be accurately, currently, completely and shall not lead to any misunderstand.

#### **6.8 Right to Lodge Complaint**

You have the right to file the complaint with the competent authority under the Personal Data Protection Act B.E 2562 if SONIC breach or not compliance with the said Act.

In the event that the owner of personal data filing such complaint under Personal Data Protection Act B.E 2562 and once SONIC receives such complaint; we will comply within the period stipulated by law. However, SONIC reserves the right to decline or not comply to such complaint if there is any legal prescribed.

### **7. Amendment of this Privacy Notice**

We may amend and update this Privacy Notice from time to time. We will publish such amendment (if any) via SONIC website. and or inform you in the general meeting invitation letter and or through the Stock Exchange of Thailand newsletter channel and or via email. In the event that it is necessary to receive your consent, we will also request for such consent too.

### **8. Contacting Channel**

If you have any inquiries or need more detail related to the protection of your personal data collected, used or disclosed your personal data, your rights exercising or you may have any complaint, you can contact SONIC as follows;

#### **Sonic Interfreight Public Company Limited**

Office Address: 79/349,350 1st,2nd floor,Sathupradit Rd., Chongnonsee Yannawa Bangkok 10120

Telephone: 02-6737000

#### **Data Controller Officer**

Office Address: 79/349,350 1st,2nd floor,Sathupradit Rd., Chongnonsee Yannawa Bangkok 10120

Telephone: 02 213 2999 ext. 1271

Email: pdpa@sonic.co.th