

Privacy Notice for Shareholders, Debenture Holders and their Representatives

Gulf Development Public Company Limited (the “Company”) recognizes the importance of the personal data protection of our shareholders, debenture holders, proxy holders and their authorized representatives under the power of attorney. The Company therefore established measures for personal data protection as detailed below in order to ensure that the Company will protect and manage your personal data in accordance with the Personal Data Protection Act B.E 2562.

1. Collected Personal Data

The Company will collect your personal data that directly provided by you, or collected from proxy/power of attorney form, or from Thailand Securities Depository Company Limited (as the Company’s registrar), which includes, but not limited to the following personal data:

- General Personal Data: e.g. name-surname, date of birth, age, address, telephone number, facsimile number, e-mail address, identification card number, passport number, nationality, signature, shareholder’s registration number, educational background, training background, working experience, occupation, position, office, photo, etc.
- Financial Data: e.g. bank account number, number of shares/debentures held, type of shares, etc.
- Data in relation to any activity organized by the Company: e.g. image and video recorded during the Shareholders’ Meeting and/or any site visit activity, electronic traffic data collected from the registration or attendance of such Shareholders’ Meeting and/or site visit activity, etc.
- Other Personal Data: e.g. opinions or recommendations, any data provided by you through the channel of Investor Relations on the Company’s website or other channels designated by the Company, etc.
- Stakeholders Relationship or Conflicts of Interest Data that show direct and/or indirect relationships with the Company and its Group Companies: e.g. name-surname, age and number of shares of the spouse and children of candidates who are nominated for the Company’s directorship, etc.

In general, the Company does not intend to collect and process your sensitive personal data (i.e. religion and blood type (if any) as appeared on the identification documents of you and/or your representatives that were submitted to the Company). In the case where you provide any of such identification documents to the Company, you and/or your representatives are requested to make invisible the sensitive personal data appeared on such documents. If you do not make invisible of such sensitive personal data, the Company shall be entitled to make invisible those data, and the Company shall not be deemed to collect any of such sensitive personal data in all respects.

However, there may be a case where the Company is required to collect and process your sensitive data (i.e. health data) in order to facilitate your participation in the Company’s activities (i.e. site visit) or any other activity that the Company shall notify and request for your consent in specific form on a case by case basis.

2. Purposes

The Company is obliged collect, process and/or disclose personal data as required by legal obligation, and/or the Company’s legitimate interest, and/or contractual basis, and/or vital interests basis, and/or as consented by you (as the case may be) for the following purposes:

- To manage the shareholders and debenture holders’ registration, the issuance of proxy by shareholders and debenture holders, including other related activities pursuant to the applicable law such as securities and exchange law
- To carry out any action in relation to the dividend payment or other benefits for the shareholders and/or debenture holders such as interests and subscription right for shares/debenture
- To arrange the general meetings, which includes proposing the agenda item, nomination of candidates for the directors of the Company, sending documents in relation to the meetings, verifying identity at the registration, processing vote, preparing minutes of the meetings and any action in relation to such meetings
- To record images, audio and/or video recordings during the meetings or any activity for the purpose of broadcasting through the Company’s website and other communication channels
- To record the meetings and prepare the minutes of such meetings for the submission to the relevant authorities such as the Stock Exchange of Thailand and the Company’s legal advisors
- To inform information regarding the Company’s activities and to select qualified participants
- To organize the Company’s activities and facilitate participation as deemed appropriate by the Company such as preparing the venue, arranging food and beverage, and providing transportation
- To manage and administer health and safety of you and other third parties such as emergency contact and prevention of infectious diseases
- To manage relationships concerning the Company, such as conducting surveys to analyze and improve the Company’s operations
- To manage the Company’s risks and internal control, audit supervision, internal audit, good corporate governance and organizational management
- To undertake obligations in compliance with laws, orders, independent organizations, competent authorities, including to cooperate with courts, governmental authorities, regulatory bodies and law enforcement agencies

In the event that you are unable to provide certain necessary personal data to the Company, it may impede the Company’s ability to manage and administer any agreement between you and the Company, including any benefit you, as a shareholder, may be entitled to (if any).

3. Disclosing Personal Data

To achieve the aforementioned purposes, the Company may disclose your personal data to third parties as follows:

- Thailand Securities Depository Company Limited (TSD)
- Banks or financial institutions
- Service providers, such as printing, document delivery, data storage, technology services for shareholder meetings, or any other related services to fulfill the Company's obligations towards shareholders, debenture holders, and/or proxies
- Professional service providers such as legal consultants, auditors, etc.
- Investors only if required by relevant laws or regulations
- Courts, governmental authorities, regulatory bodies, law enforcement agencies, or any other individual or juristic person to whom the Company must disclose information, in order to comply with laws, orders from governmental authorities, or as per agreements between the Company and other individuals or juristic persons for the benefit of the personal data owners (e.g. the Ministry of Commerce, the Revenue Department)

4. Personal Data Retention Period

The Company will retain your personal data as required by the relevant laws and/or as necessary to fulfill the purposes stated in this Privacy Notice. Upon the expiration of such period, the Company will either destroy or anonymize such personal data.

5. Rights of Data Subjects

According to the provisions under the Personal Data Protection Act B.E 2562, you, as the data subjects, are entitled to exercise any of the following rights:

- Right to access and obtain copy of your personal data, or to request the disclosure of the acquisition of such personal data
- Right to request rectification, completion and updating of your personal data
- Right to request sending or transferring of your personal data to other entities or persons in compliance as prescribed by the relevant laws
- Right to request a suspension of the use of your personal data
- Right to object to the collection, use, or disclosure of your personal data
- Right to request the deletion, destruction, or anonymization of your personal data
- Right to withdraw consent for the processing of your personal data that you have already given to the Company, unless such withdrawal is restricted by law or by any contract that benefits you. However, the withdrawal of such consent will not affect the processing of any personal data for which you have provided consent
- Right to file a complaint with the Office of the Personal Data Protection Commission in case that the Company violates applicable personal data protection laws

In the event that you, as the data subject, submit any of the above requests to exercise any of the above rights, the Company will act on such request within the period prescribed by law. However, the Company will consider such requests by taking several factors into consideration and shall reserve the right to refuse any request to the extent permitted by the applicable personal data protection laws.

6. Contact Information

Should you have any inquiries or require further information regarding the protection of personal data under this Privacy Notice, and/or would like to exercise the rights of data subject as described in Item No. 5, shareholders and/or proxies may contact the Company at the following address:

*Corporate Secretary
Gulf Development Public Company Limited
No. 87 M Thai Tower, 11th Floor, All Seasons Place, Wireless Road,
Lumpini Sub-district, Pathumwan District, Bangkok 10330
or via email at cs@gulf.co.th*

The Company reserves the right to amend this Privacy Notice and disclose it through the Company's website and/or the invitation to the meeting of shareholders and/or the Stock Exchange of Thailand's information disclosure system and/or in accordance with the relevant laws and regulations.