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Data Protection Policy

Millennium Group Corporation (Asia) Public Company Limited

Amendment No.: 1

Effective Date: February 25, 2025

Approved by: Board of Directors Meeting No. 1/2025

Data Protection Policy

Millennium Group Corporation (Asia) Public Company Limited (the “Company”) acknowledges the importance of safeguarding personal data in accordance with the Personal Data Protection Act B.E. 2562 (2019) (the “Personal Data Protection Act”) and related laws, including any future ministerial regulations, notifications, and announcements issued in connection with the Personal Data Protection Act (hereinafter collectively referred to as the “Personal Data Protection Laws”). In compliance with the Personal Data Protection Laws, the Group Chief Executive Officer has authorized the implementation of this Data Protection Policy within the Company and its subsidiaries to establish governance and management guidelines ensuring that personal data collected, used, or disclosed by the Company and its subsidiaries is adequately protected in accordance with the Personal Data Protection Laws. The key provisions of this Policy

1. Directors, executives, employees, permanent staff, temporary staff, and contractors of the Company or its subsidiaries shall strictly comply with the applicable laws, policies, regulations, guidelines, and practices concerning personal data protection as stipulated by the Company.
2. Directors and executives at all levels shall promote awareness of the importance of personal data protection among employees, permanent and temporary staff of the Company or its subsidiaries. They are responsible for ensuring that appropriate risk management measures concerning data protection are implemented at all organizational levels. Furthermore, they shall ensure the establishment and enforcement of internal control measures to prevent the unlawful collection, use, or disclosure of personal data.
3. The Company shall appoint a Head of Personal Data Protection (Head of PRC) to serve as the designated person responsible for providing advice, consultation, and oversight of activities related to the collection, use, or disclosure of personal data by the Company or its subsidiaries, ensuring compliance with the Personal Data Protection Laws. The Head of PRC shall also liaise and cooperate with the Personal Data Protection Commission. Directors and executives shall provide support to the Head of PRC by ensuring sufficient tools, resources, and access to personal data necessary for the performance of the duties in accordance with this Policy.
4. The Company shall collect personal data solely to the extent necessary to fulfill the lawful purposes of the Company’s operations.
5. The collection, use, or disclosure of personal data shall only occur with the explicit consent of the data subject. The data subject must be informed of the essential details regarding the collection of their personal data prior to, or during, the collection process, as stipulated by the Personal Data Protection Laws.

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6. Personal data collected, used, or disclosed shall be done so in accordance with the purposes communicated to the data subject, unless otherwise required by law. Personal data shall not be collected from sources other than the data subject unless the data subject has been informed without delay and has granted their consent, or an exemption applies under the Personal Data Protection Laws.
7. The Company and its subsidiaries shall maintain records of personal data processing activities (Record of Processing Activities) in accordance with the standards and procedures prescribed by law. Such records shall be accurate, up-to-date, and complete, ensuring that they can be inspected by the data subject and the Personal Data Protection Commission.
8. The Company and its subsidiaries shall implement appropriate and sufficient security measures to safeguard personal data from unauthorized access, loss, alteration, or disclosure. These measures shall be subject to regular reviews and updates, especially when necessary, or when technological advancements dictate the need for change, to ensure compliance with the Personal Data Protection Laws.
9. The Company and its subsidiaries shall ensure that personal data is deleted or destroyed once the retention period has expired, or if the data is no longer relevant to the purposes for which it was collected, unless the retention is required by law.
10. In cases where the Company or its subsidiaries engage third-party data processors to process personal data, the Company shall enter into agreements with such processors to ensure their compliance with the Personal Data Protection Laws. These agreements shall prevent the processors from unlawfully using or disclosing personal data, and the Company shall implement systems to regularly monitor the processors' compliance.
11. Personal data shall not be disclosed to third parties, such as government agencies, regulators, or law enforcement officials, without the data subject's consent, except where otherwise required by law, such as compliance with legal obligations, or in cases where personal data must be disclosed to prevent or mitigate harm to life, health, or safety, and the data subject is unable to consent. All disclosures of personal data shall be recorded and appropriately documented.
12. If the Company or its subsidiaries are required to transfer personal data to foreign countries, the Company shall ensure that the destination country provides an adequate level of data protection or that a Data Transfer Agreement is in place, as required by the Personal Data Protection Laws.
13. In the event of a personal data breach, the Company's directors, executives, employees, permanent and temporary staff, and contractors must report the breach to the Personal Data Protection Commission within the legally prescribed timeframe. The data subject shall also be notified without undue delay if the breach is likely to result in a significant adverse impact on their rights and freedoms.
14. All employees must cooperate with the Head of PRC and the Personal Data Protection Commission when requested to provide documents or information related to personal data protection, including clarifications to support audits and compliance activities.

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15. The Company shall provide ongoing training on personal data protection to all employees, at all levels, to ensure that they understand their obligations and can effectively comply with the Personal Data Protection Laws.

This Data Protection Policy shall apply to all departments of the Company and its subsidiaries. All directors, executives, permanent staff, and temporary employees of the Company and its subsidiaries must acknowledge, understand, and comply with this Policy. Executives at all levels must lead by example and actively support the rigorous enforcement of this Policy.

This Data Protection Policy was approved at the Company's Board of Directors Meeting No. 1/2568 on February 25, 2025, and shall be effective from February 25, 2025, onwards.

- Patchara Yutidhammadamrong -

(Mr. Patchara Yutidhammadamrong)
Chairman of the Board of Director