



บริษัท เคดับบลิวไอ จำกัด (มหาชน)
สำนักงานใหญ่: เลขที่ 138/108 อาคารจิวเวลรี่ เซ็นเตอร์ ชั้น 30
ถนนรัชดาภิเษก แขวงสี่พระยา เขตบางรัก กรุงเทพมหานคร 10500 ประเทศไทย
สำนักงานสาขา: เลขที่ 43 อาคารไทย ซีซี ทาวเวอร์ ชั้น 26 ถนนสาทรใต้
แขวงยานนาวา เขตสาทร กรุงเทพมหานคร 10120 ประเทศไทย
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KWI Public Company Limited
Head Office: 138/108 Jewellery Centre Building, 30th Floor,
Nares Road, Sraya, Bangrak, Bangkok 10500, Thailand
Branch Office: 43 Thai CC Tower, 26th Floor, South Sathorn Road,
Yannawa, Sathorn, Bangkok 10120, Thailand

Personal Data Protection Policy

1. Objective

KWI Public Company Limited (“KWI”) is committed to safeguarding the personal data of all directors, management, staff, customers, suppliers, and business partners. In alignment with the Thailand Personal Data Protection Act (“PDPA”) B.E. 2562 (2019), KWI is dedicated to processing personal data securely, transparently, and in compliance with legal requirements to protect the privacy and rights of data subjects.

This policy outlines the principles and procedures for collecting, using, disclosing, storing, and protecting personal data within KWI and its subsidiaries. Regular updates to this policy may occur to ensure continuous compliance. Any significant changes affecting your personal data rights will be communicated through the Company’s website.

2. Roles and Responsibilities

The Company’s Board of Directors, Management, and designated Responsible Departments have defined roles to ensure the effective implementation of this policy, as outlined below:

2.1 Board of Directors

- 2.1.1 Ensure the existence of Personal Data and Privacy Policy guidelines.
- 2.1.2 Implement measures to collect, use, and disclose personal data in compliance with local laws and international standards.
- 2.1.3 Oversee the selection of external companies with standardized data protection measures when engaging third parties for personal data handling.

2.2 Management

- 2.2.1 Develop rules and procedures tailored to the nature of business operations while adhering to KWI’s policies, relevant local laws, and international standards.
- 2.2.2 Establish an organizational structure to support compliance, designating specific departments or personnel responsible for personal data management.
- 2.2.3 Monitor compliance with this policy, identify areas for improvement, and implement measures to enhance data protection.

2.3 Responsible Department / Personnel

- 2.3.1 Inform data subjects of their rights and obtain consent before collecting any personal data.



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2.3.2 Implement security measures to restrict access to stored personal data.

2.3.3 Amend or delete data upon request from data subjects in accordance with PDPA requirements.

3. Collection of Personal Data

3.1 Purpose and Consent

KWI collects personal data only for specified purposes and seeks explicit consent before doing so. Personal data collection is limited to what is necessary and includes general and sensitive data, ensuring compliance with the PDPA. Sensitive data, such as racial or ethnic origin, religion, or health information, is collected only when necessary and with explicit consent.

3.2 Categories of Data Collected

General Personal Data: Name, contact details, identification numbers, employment history, etc.

Sensitive Personal Data: Health, genetic, and biometric data, among other categories as defined under PDPA Section 26.

4. Data Processing and Disclosure

4.1 Legal Grounds for Processing

KWI processes personal data based on the following grounds:

- Consent: Explicit consent from the data subject.
- Contractual Necessity: Data required for the performance of a contract.
- Legal Obligations: Processing to comply with legal requirements.
- Vital Interests: Processing to protect individuals' lives or safety.
- Legitimate Interests: Processing based on KWI's legitimate business interests, ensuring that these do not override individuals' fundamental rights.

4.2 Disclosure of Personal Data

KWI uses and discloses personal data solely for legitimate purposes and in compliance with the PDPA. Disclosure is limited to the following cases:

- Internal: Within KWI Group for business and compliance purposes.
- External: To subsidiaries, government agencies, financial institutions, and authorized third parties as required for legal compliance, business operations, or in the performance of a contract.



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4.3 Third-Party Processing

KWI may engage third parties to process personal data. All third parties are selected based on their adherence to data protection standards and must comply with KWI's data protection policies and relevant privacy laws.

5. Storage and Retention of Personal Data

5.1 Data Security

KWI employs appropriate technical and organizational measures to protect personal data from unauthorized access, alteration, or destruction. These measures include encryption, access controls, and regular reviews of security practices.

5.2 Data Retention

Personal data is retained only as long as necessary for the purposes outlined in this policy or as required by law. Upon expiration of the retention period or request for deletion, data will be securely deleted, anonymized, or otherwise disposed of.

6. Rights of Data Subjects

Under the PDPA, data subjects have the following rights, which KWI will honor in accordance with applicable laws:

- Right to access or receive the Personal Data concerning him or her from the Data Controller.
- Right to object to the collection, use, or disclosure of the Personal Data concerning him or her, at any time.
- Right to request the Data Controller to erase or destroy the Personal Data or anonymize the Personal Data to become anonymous data which cannot identify the data subject.
- Right to request the Data Controller to restrict the use of Personal Data.

7. International Data Transfers

KWI may transfer personal data to affiliates, or third parties located outside Thailand to facilitate business operations or comply with contractual obligations. Such transfers will be to countries with adequate data protection standards or will be safeguarded by appropriate measures to ensure compliance with PDPA requirements.

8. Data Disposal

Once personal data has reached the end of its retention period or is no longer relevant, KWI shall securely delete, anonymize, or destroy such data to prevent unauthorized access or misuse.

9. Use of Cookies



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KWI's website may use cookies to enhance user experience and monitor website performance. Users have the option to manage cookie settings via their browser; however, disabling cookies may impact website functionality.

10. Review and Updates to the Policy

This policy is subject to periodic review and updates by KWI's Legal and Compliance Department and Human Resources Department at least annually. Any significant changes will be communicated through KWI's website.

This policy was announced on 14 November 2024.

(Mr. Antonio Hang Tat Chan)

Board of Directors
KWI Public Company Limited