

(Translation)

Nippon Steel Trading (Thailand) Co., Ltd.
Privacy Policy

Nippon Steel Trading (Thailand) Co., Ltd. (hereinafter referred to in this policy as the “Company”) recognizes the significance of personal data and other information about you (collectively referred to as “Information”) so that you can believe that the company is transparent and responsible for collecting, using, or disclosing your information, according to the Personal Data Protection Act B.E. 2562 ("Personal Data Protection Act"); as well as other relevant laws. This Privacy Policy (“Policy”) has been made to explain to you in detail about the company’s collection, using, or disclosing (collectively referred to as “process”) personal data processed by the Company, including its officers and related persons acting on behalf of, or for the Company, having the following subject matter:

Scope of Policy Enforcement

This policy is used to enforce **the personal information of individuals who have a relationship with the Company**, now and that may be in the future which there is processing of personal data by individuals for. or on behalf of the Company (“personal data processor”), under products and services, such as websites, systems, applications, documents or other forms of service that is controlled and taken care by the Company (collectively referred to as the “Services”).

Persons who are related to the Company according to the provisions of the first paragraph, including:

- 1) Staff, or employees, means both permanent employees, employees who are in probationary period and according to the contract.
- 2) Individual customers
- 3) Partners and service providers who are natural persons
- 4) Directors, attorneys, representatives, agents, shareholders, employees or other persons having relationship in the same form of a juristic person having relationship with the Company.
- 5) Users of the company's products or services
- 6) Visitors or users of the website www.nst-th.com including systems, applications, devices, or other communication channels controlled and taken care by the Company.
- 7) Other persons with whom the Company collects personal information such as job applicants, employees' families, persons certifying employee’s conduct, beneficiaries in insurance policies, etc.

Articles 1) to 7) are collectively referred to as “You”.

In addition to this policy, the Company may specify Privacy Notice (“Notice”) for the Company’s products, or services to explain to the personal data owner, who is the user of service about the personal data which is processed, purpose and legal reasons for processing of data, period of keeping of personal information, as well as right in personal data that the personal data owner has, in such products or services specifically.

In addition, in case there is conflict in important essence between the provisions in the Privacy Notice and this Policy, the provisions in the latest Privacy Notice of that service shall prevail.

Definition

- **Company** means Nippon Steel Trading (Thailand) Co., Ltd.,
- **Personal data** means information about a natural person. which makes it possible to identify that person, either directly or indirectly, but does not include information of the deceased in particular.
 - **Sensitive Personal Data** means personal data as provided for in Section 26 of the Personal Data Protection Act B.E. 2562, including data of race, ethnic group, political opinion, belief in doctrine, religion, or philosophy, sexual behavior, criminal history, health information, disability, genetic information, biological information, or any other information that affects the owner of personal data in similar way as announced and specified by the Personal Data Protection Committee.
 - **Personal data processing** means any processing of personal data, such as collecting, recording, copying, organizing, keeping, improving, changing, using, recovering, disclosing, forwarding, disseminating, transferring, merging, deleting, destroying, etc.
 - **Personal data owner** means an individual who owns personal data that the Company collects, uses or discloses.
 - **Personal data controller** means a person or juristic person who has the authority to make decisions regarding the collection, use, disclosure or destruction of personal data.
 - **Personal data processor** means an individual or a juristic person who performs the collection, the use, or the disclosure of personal data, according to the orders, or on behalf of the Personal Data Controller. The person or juristic person who operates such thing is not the Personal Data Controller.

Source of personal information collected by the company

The Company collects or acquires various types of personal information from the following sources:

- 1) Personal data that the Company collects directly from the personal data owner, such as answering questionnaires, filling the form both in paper form and online form, or access to the Company's website system through cookies. In case such data has reference or consisting of data specifying third parties, the Company must also obtain the consent of the third parties personal data owner, to use, collect or disseminate such information.
- 2) Personal information that the Company collects from other sources other than the personal information owner directly, such as inquiries or inspection from government agencies. or from a third party, such as inspection of criminal background, in case of applying for job, or health check result. The Company will obtain consent for collection of such personal data from the personal data owner, except in case which is exempted from requesting consent, or notifying the personal data owner as required by law.

This also includes the case where you are third party personal information provider to the Company as follows: You have duty to be responsible for providing details under this policy or Notice of products or services, as the case may be, to such parties for acknowledgement, as well as obtaining consent from that person in writing, if it is a case where consent to disclose information to the Company is required.

Collection and duration of personal data collection

The Company will collect personal data according to the purpose, scope and the Company will use lawful and fair methods; by collecting only the data as necessary to carry out the Company's purposes. The company will collect personal information, such as specific personal information, information related to personal life, or personal interest, financial information and sensitive personal information. However, the company will notify the personal information owner to know the purpose, and the period for keeping, in order to give consent in writing or electronically, or according to the company's method. The sources and processing of personal data are as follows:

The information which is collected:

The company may collect the personal information according to the job application form, or under the agreement, such as:

- **Personal Information:** Title preceding first name, real name, middle name, nickname, surname, signature, nationality, identification card number, driver's license number, passport number, house registration data, or other official documents which can be identified the person, etc.

- **Information related to features of person:** date of birth, gender, height, weight, age, marital status, military conscription status, photo, speaking language, etc.

- **Contact information:** Address, postal address, telephone number, Fax number, E-mail, Line ID, Facebook, etc.

- **Work and education information:** Professional status, job position, education and training, etc.

- **Insurance policy information :** the insured, beneficiary, etc.

- **Sensitive information:** Information about race, ethnic group, political opinion, belief in doctrine, religion, or philosophy, sex behavior, criminal record, health information, disability, genetic information, biological information, etc.

- Information on marketing survey

- Information through Cookies

- Video data, closed circuit television

- Conversation and telephone communication, or electronic equipment

Processing of personal data

1) The company may have purpose to process personal data which is different, as the case may be, the personal data will be kept for the data which is necessary for operation only, for example:

- For making agreement and performance according to the agreement between the company and personal data owner, for example, the information of job application, or making of purchase or procurement agreement, etc.

- For management inside the company, such as employment, paying salary and remuneration, as well as welfare, to directors, staff, and employees of the Company, etc.

- For operation of activities of the company, contact and coordination and performance of duty under the agreement with third parties, such as arranging welfare to have annual health checks, etc.

- To comply with the law relating to operation of the company, such as keeping of data for use in deducting withholding tax, sending accumulated money/contribution money, social security fund, compensation fund, provident fund, etc.

- To survey marketing information and satisfaction of customers for developing and improving products.

- To have the information relating to products, service, or marketing public relations, or for ordering products and issuing documents relating to buying and selling.

To obtain consent from the personal data owner, the company will clearly notify the purpose of using personal information in each case.

2) If the personal data owner does not allow, or is unable to provide personal data necessary for entering into an agreement, or compliance with the law may result in any transaction, or action related to the personal data owner to be suspended or temporarily stopped until the Company receives such information for processing.

3) The Company will provide appropriate preventive measures, to keep and protect personal information including the rights and freedoms of the personal data owner.

4) Collection of sensitive personal data, the Company will obtain express, written or electronic consent from the personal data owner, before or while collecting such sensitive personal data, according to the rules set by the company without contravening the law, except such collection of such sensitive information is exempted as required by the Personal Data Protection Act B.E. 2562 or other laws.

Sending or transferring your personal information abroad

The Company may send, or transfer your personal information abroad for the purpose of sending the necessary information to a contracting party existing in Japan for the benefit of the performance of duties and related tasks, to manage and monitor travel for business. The Company has operated in accordance with the criteria for the protection of personal data sent, or transferred to foreign countries as announced by the Personal Data Protection Committee. except in the following cases:

- It is a legal practice that requires us to send or transfer personal information abroad.
- We have notified you and obtain your consent in case that the destination country has insufficient standards for personal data protection; this is in accordance with the list of countries announced by the Personal Protection Committee.
- To prevent or suppress a danger to your life, body or health or that of another person. when you are unable to give consent at that time or to carry out task in the public interest.

Period of keeping of personal information

- During the period specified by law regarding the keeping of personal data in particular.
- In cases where the law does not specify a specific period of keeping of personal information, the Company will determine the keeping period as necessary while performing the Company's work and obtaining the consent of the personal data owner.
- After the expiration of the period of collecting such personal data, the Company will delete, destroy or make personal information non-identifiable information about the personal information owner.

Providing services by third parties or sub-providers

The Company may assign or employ third parties (personal data processor) to process personal data on behalf of, or for the Company. Such third parties may offer services in various ways, such as hosting (hosting), sub-services. (Outsourcing) or as a cloud computing service/provider or a job in other forms.

Assigning a third party to the processing of personal data as a processor of that personal data, the Company will provide an agreement specifying the rights and duties of the Company in the status of personal data controller and of persons assigned by the Company as a personal data processor. This includes defining in detail the types of personal data the Company entrusted to process, including the purpose, scope of processing of personal data and other related agreements. The personal data processors have duty to process personal data according to the scope specified in the agreement and in accordance with the instructions of the Company and cannot be processed for other purposes.

Disclosure of personal information

The Company will use and disclose personal information in accordance with the purposes and principles of operation in accordance with the details in the topic: collection and duration of personal information collection. The company will not disclose personal information of the personal information owner to any person or entity without their consent and will be disclosed according to the purpose for which it has been informed unless done within the framework of the law.

However, in order to benefit the Company's operations and providing services to the personal data owner, the Company may have necessity to disclose personal information of the personal data owner to its affiliates, or other people both in the country and abroad. In disclosing personal information to such persons, the Company will ensure that those individuals keep their personal information confidential and not used for purposes other than the scope specified by the Company.

In case the Company sends or transfers personal data abroad, the Company will take steps to ensure that the said destination country has the standards which are sufficient protection of personal data. Personal data may be disclosed to third parties, organizations or government agencies as follows:

- Affiliates or companies in the Nippon Steel Trading Corporation Group
- Contract parties, service providers and business partners of the Company.
- Regulators and government agencies who have legal powers and duties such as the Social Security Office, the Revenue Department, etc.

By disclosing to outsiders, organizations or government agencies as mentioned above, it will be for the following actions:

- Comply with laws such as the Personal Data Protection Act. Civil and Criminal Code, Code of Civil and Criminal Procedure, or for the benefit of the investigating officer's investigation or the trial and judgment of the court.
- To prevent or suppress life hazards. a person's body or health
- For use in business operations. and personnel development of the Company

Protection and security of personal information

The Company will determine the protection and security measures of personal data that are appropriate and consistent with the law and this Privacy Policy, to prevent loss, access, use, alteration, correction or disclosure of personal data and to serve as a guideline for the Company's directors, executives and employees of the Company and other related persons, including supporting and organizing training for the Company's personnel to be knowledgeable and aware of their duties and responsibility to the personal data owner.

And the company will prevent the loss of personal information, prevent unauthorized access, destruction, use, modification, alteration or disclosure of personal information. and will limit persons who have the right to access personal data to staff, employees, to the extent that it is necessary to know such data in order to process it. The employees or those persons must keep such information confidential.

For the case where the company has hired an agency or third party to collect, or use or disclose personal information of the personal data owner, the company will designate such agency, or third parties to keep such personal information confidential and maintain the security of such information, including preventing the use of personal information to be collected, used or disclosed for any other purpose that is not in accordance with the scope of employment or contrary to the law.

Data Protection Officer

The Company has appointed a Data Protection Officer to perform audit, supervise and advise on the collection, use or disclosure of personal information, including coordinating and cooperating with the Office of the Personal Data Protection Committee, to comply with the Personal Data Protection Act B.E. 2562.

Rights of personal data owner

There is stipulating about the rights of the personal data owner that the owner has the rights under the Personal Data Protection Act B.E. 2562 as follows:

- 1) Right to access personal data and ask the Company to make a copy of personal information including asking the Company to disclose the acquisition of personal data without consent.
- 2) Right to request, send or transfer personal data
- 3) The right to object to the processing of personal data
- 4) The right to request the erasure or destruction of the data subject's personal data. or make personal information non-identifiable to the person who owns it.
- 5) Right to suspend the use of personal data
- 6) Right to correct, complete and current personal data
- 7) Right to withdraw consent at any time during the period the personal data is in the possession of the Company

Complaints to supervisory authorities

In case you find that the Company has not complied with the Personal Data Protection Laws, you have the right to complain to the Personal Data Protection Committee, or a supervisory authority appointed by the Personal Data Protection Committee, or by law. Before you complain, the Company

asks you to contact the Company, in order for the Company to have the opportunity to know the facts and clarify various issues, as well as to resolve your concerns at the first opportunity.

Updates to the Privacy Policy

The company may consider improving, amend or change this policy at its discretion and will notify you through the website: www.nst-th.com with the effective date of each revised version.

Contacting the Company

If you have any questions or would like to inquire about the Company's policy and protection of personal information, or you want to exercise your rights under the Personal Data Protection Law, you can contact us at:

Data Protection Officer : DPO

- Name : Nippon Steel Trading (Thailand) Co., Ltd.

- Contact Address: No. 909 Ample Tower, 14th Floor, Debaratana Road, Bangna Nuea Sub-district, Bang Na District, Bangkok Metropolis.

- Contact method : Call 02-7441844 (10 automatic lines) Email dpo_info@nst-th.com
