

# **Privacy Policy**

## **for Business Partner**



**Super Turtle Public Company Limited**

6 February 2025  
Reviewed and revised on 5 February 2026

## **PRIVACY POLICY FOR BUSINESS PARTNER OF SUPER TURTLE PUBLIC COMPANY LIMITED**

Super Turtle Public Company Limited (the “**Company**”) recognizes the importance of the protection of personal data. The Company will adhere to security measures and prioritize the privacy of data subject when collecting, using, disclosing, and/or transferring your personal data abroad (collectively referred to as “**Processing**”). This is to ensure that the Company handles and processes personal data appropriately in accordance with the Personal Data Protection Act B.E. 2562 and relevant subordinate laws (“**Data Protection Laws**”).

This privacy policy for business partner (“**Privacy Policy**”) explains how the Company collect, use and/or disclose Personal Data of the business partner’s personnel, authorized persons, authorized signatories, directors, shareholders and other contact persons (collectively referred to as “**you**”, or “**your**”) and informs you the rights relating to Personal Data protection.

“**Business Partner**”, according to this Privacy Policy including but not limited to business partners, distributors, suppliers, vendors, service providers, construction contractors, investors, analysts, tenants, billboard tenants, independent advisors, securities companies, insurance companies, insurance brokers, insurance agents, banks, joint venture partners, and third parties e.g., third parties requesting to enter into the area, contractor’s sub-contractors, related persons according to the rules of the Securities and Exchange Commission (e.g., spouse and children under the age of 20), and other business partners.

The Company collects, uses and/or discloses your Personal Data because the Company currently have business relationship with you or may have business relationship with you in the future, or because you work for, represent, or proceed on behalf of our business partners, e.g., companies which supplies or provide services for the Company, or which the Company have business communication with which may involve you.

The Company may change and/or update this Privacy Policy from time to time. Therefore, the Company recommend that you regularly read the Privacy Policy and visit the Company’s website to review for any changes or updates that may be made by the Company to this Privacy Policy.

### **1. PERSONAL DATA COLLECTED BY THE COMPANY**

For the purposes of this Privacy Policy, “**Personal Data**” means any identified or identifiable information about you as listed below.

The Company may directly or indirectly collect your Personal Data from other sources. For example, the Company may directly collect your Personal Data (such as, when you do business with the Company or sign a contract or fill out a form when you interact with the Company, including having interactions through the Company's online platform, through the Company's website or mobile application, communication via email, telephone, questionnaires, business cards, postage, during meetings and events, scheduling meetings with you or from a source in the system, central drive system/central database of the Company or transport software and/or electronic files).

In addition, the Company may indirectly collect your Personal Data, e.g., from business partner or service provider you work for, act on its behalf, or represent, the BTS Group Companies (as defined in “**TO WHOM THE COMPANY MAY DISCLOSE PERSONAL DATA**” section below), public sources (e.g., social media and websites of third parties or relevant government agencies), other third parties (e.g. other business partners of the Company, reference persons and complainants). The specific types of Personal Data collected will depend on the relationship which you have with the Company or the BTS Group Companies. The followings are example of Personal Data that may be collected:

- 1.1. **Personal details**, such as name - surname, title, age, gender, occupation, photo, video, geographic location, date of birth, nationality, marital status, financial status, educational and professional information (e.g. position, division, division code, occupation, information contained in job application, company that you worked for or past employer, certification of employment, salary confirmation letter, professional license, work permit, visa, training information, income and salary and first date of work), identifiable information on government-issued document (e.g., national identification card number, passport number, taxpayer identification number, driving license number, house registration number), vehicle-related information (e.g., vehicle identification number or vehicle registration number), signature (including electronic signature), business partner's identification number (including type of business partner, type of business, area of business), business partner's information (e.g., evaluation score of business partner/service provider, merchant identification number and business partner registration date), including information relating to pricing strategy, discount rate, sales volume, disbursement items, disbursement amount, details relating to lands that you own (e.g., land rights certificate number), number of shares, securities holder registration number, number of securities and dividend amount);
- 1.2. **Contact details**, such as postal address, house registration address, national identification card address, phone number, mobile phone number, facsimile number, address, place of business address, email address, postal code, social media account information (e.g., LINE ID, Facebook account and available time) and other similar information;
- 1.3. **Transaction information**, bank account and payment information (e.g., bank account name, bank, bank account type and number, beneficiary account name, payment date, payment method, payment currency and payment account, domestic and cross-border transfer details), credit card details (e.g., credit card number, cardholder name and expiration date), information in transaction-related documents (e.g., contracts, invoices, receipts, tax invoices);
- 1.4. **Information relating to the interactions between the Company and the business partner**, such as information that you have given to the Company (as appeared in agreement, form or survey), transactional information between you and the Company (e.g., lease agreement or purchase and sale agreement, contractor agreement, consultancy agreement, tendering or bidding document), information relating to purchase and sale transaction with related person/third party, product type, budget type, disbursement budget, expense details, traveling expense, date of purchasing product/service, amount of products/services purchased, number of disbursement items, budget, headquarter number, document number, project name, registered company, creditors, branch, area and payment terms, computer data (e.g., IP address or cookies), vendor and service provider status inspection result, including information from the terms of reference or scope of tendering/bidding/procurement, report of interests, incident report, litigation information, details of quotation in procurement project, annual vendor/service provider evaluation report, opening of customer account, dispute resolution information, reporting data, communication records with the Company and construction details for each project;
- 1.5. **Technical information**, such as Internet Protocol (IP) address, web beacon, log, device model and type, hardware-based identifiers such as universal device identifier (UDID), media access control information, software-based identifier such as identifier for advertisers for iOS operation system (IDFA), or identifier for advertisers for Android operation system (AAID), connection information, access information, single sign-on (SSO) information, login log, access time, time spent on our webpage, cookies, login data, search history, browsing detail, browser type and version, time zone setting and location, plug-in browser types and versions, operating system and platform, and other technology on devices used to access the platform;
- 1.6. **Information of your related person**, such as identified information of your spouse or children, information about employee working for company relating to you;

- 1.7. **Sensitive data**, such as health data, sensitive data from national identification card (e.g., nationality and religion) or sensitive data which can be used in litigation.
- 1.8. **Information from Closed-Circuit Television (CCTV) cameras**, such as still images and video footage recorded by CCTV cameras. Please see the Company's "CCTV Privacy Policy" for more details on how the Company collect, use and/or disclose the information from CCTV cameras at [https://drive.google.com/file/d/1\\_wxq0BdxrwcVmHn273XGi4BP38FTovTX/view](https://drive.google.com/file/d/1_wxq0BdxrwcVmHn273XGi4BP38FTovTX/view).

The Company do not intentionally collect your sensitive data ("Sensitive Data"). However, in case that the Company do, the Company will only collect, use, and/or disclose Sensitive Data on the basis of your explicit consent or where permitted by law.

The Company only collect the Personal Data of children, quasi-incompetent person and incompetent person where their parent or guardian has given their consent. The Company do not knowingly collect Personal Data from any person under the age of 20 without their parental consent when it is required, or from quasi-incompetent person and incompetent person without their legal guardian's consent. In the event that the Company learn that the Company have unintentionally collected Personal Data from anyone under the age of 20 without parental consent when it is required or from quasi-incompetent person and incompetent person without their legal guardians' consent, the Company will immediately delete such Personal Data or only collect, use and/or disclose if the Company can rely on other legal basis apart from consent or where permitted by law.

If you provide Personal Data of any third party (such as parent, spouse, children, emergency contact, or referral person) to us, e.g., their name, family name, address, relationship, contact details, and related documents, you represent and warrant that you have the authority to do so by (i) informing such other persons about this Privacy Policy; and (ii) obtaining consents (where required by law or necessary) to permit us to use such Personal Data in accordance with this Privacy Policy.

## **2. THE PURPOSE FOR PROCESSING OF PERSONAL DATA**

The Company collect, use and/or disclose Personal Data for the following purposes:

### **2.1 THE PURPOSES OF WHICH THE COMPANY RELY ON CONSENT**

The Company rely on consent for the collection, use, and/or disclosure of Personal Data and/or Sensitive Data for the following purposes:

**Health data:** for food preparation and facilitation.

Where the Company relies on consent for the collection, use and/or disclosure of Personal Data (marketing communication, sales, special offers, promotions, announcements, and information about products and services), you have the right to withdraw your consent by contacting the Company (as detailed in "**OUR CONTACT DETAILS**" this Privacy Policy). The withdrawal of consent will not affect the collection, use and/or disclosure of Personal Data and Sensitive Data that was previously consented before the withdrawal. However, if you do not give consent or withdraw your consent, the Company may not be able to employ or engage in your service or the service under the service agreement which the Company has with your employer. The Company may request your consent directly from you or through the BTS group companies, business partners. and/or other juristic persons

### **2.2 THE PURPOSE THAT THE COMPANY MAY RELY ON LEGAL BASES IN PROCESSING YOUR PERSONAL DATA**

The Company may process Personal Data based on the following legal bases: (1) For the Performance of a Contract: To assess, enter into, or fulfill a contract with the data subject. (2) To Comply with Legal Obligations: To perform the Company's legal duties. (3) For Legitimate Interests: To pursue the Company's

or other parties' legitimate interests. The Company will take special care to ensure a balance and proportionality between these legitimate interests and your privacy. (4) To Prevent or Avert Harm: To protect or prevent harm to an individual's life, body, or health. (5) To Establish or Defend Legal Claims: For the establishment and defense of legal claims. The Company may process Personal Data for these purposes depending on your relationship with the Company.

- (1) **For business purposes**, such as to proceed business transactions with business partners and fulfil our duties and/or requests from business partners, to contact business partners regarding products, services and projects of the Company or the business partners (e.g., to respond to questions or requests);
- (2) **For selection of business partners**, such as to verify you and status of business partners, to check status of business or perform other background checks and screen you and business partners, to assess your and business partners' suitability and qualifications, to assess your and business partners' risks (including the verification of public information from law enforcement agencies and/or the Company's blacklist record), to prepare quotations or bidding offer, to enter into agreements, prepare purchase orders or purchase requests with you or business partners and to evaluate your and business partners' management;
- (3) **For relationship management**, such as to keep your Personal Data up-to-date, to maintain the accuracy of Personal Data, to keep agreements, relating documents, agreement's reference documents and evidence of the work of business partners which may mention you, to plan, operate and manage (contractual) relationships and rights with business partners (e.g., to appoint, withdraw or authorize business partners to engage in transaction and order products or services, process payment, to conduct activities relating to accountancy, audit, invoice issuance, management of product and service delivery), to manage your requests or complaints, to improve, support, monitor, and record;
- (4) **For business communications**, such as communication with business partners about products, services and projects of the Company or business partners (e.g., communication via document, response to questions, requests or operational progress report) and public relations;
- (5) **For marketing purposes**, such as to inform you about news and public information which may be useful, including activities, new product and service offers, product and service price negotiation and survey, as well as for to evaluate and consider providing financial aid (e.g., financial loan) to you or business partners;
- (6) **For internal management and communication within the organization**, such as to publish internal activities and to comply with business codes of conduct, including but not limited to, procurement, disbursement, internal management, training, inspection, report, document delivery and management, data processing, risk control or management, trend and statistical analysis and planning, and other similar or relating activities;
- (7) **For business analysis and improvement**, such as to research, analyse data, estimate, survey and evaluate and report on our products and services and your or business partners' performance, including to develop and improve our marketing strategy, and our products and services;
- (8) **For registration and authentication**, such as for your registration, verification, identification and authentication;
- (9) **For management IT-related matter**: such as, for IT management, management of communication system, IT security system and to control access to data and system and to conduct IT security audit; internal business management for internal compliance requirements, policies and procedures; and to revise and update our database;

- (10) **For business partner information management**, such as to compile list of business partners, record data in the system and update the list and directory of business partners (which includes your Personal Data), as well as to store and manage agreements and relating documents which may contain your name;
- (11) **For system monitoring and security**, such as to control access, verify access to relevant locations, monitor systems, equipment and internet, and safeguard IT security;
- (12) **For dispute management**, such as to resolve dispute, enforce the Company's agreements, establish, exercise, or raising legal claims, including to grant authorization;
- (13) **For investigation, complaint and/or crime and fraud prevention;**
- (14) **For compliance with legal obligations and orders from government agencies**, such as in cases where there is a reasonable belief that compliance with the law and/or orders is required, or to cooperate as necessary to comply with legal proceedings or orders from government agencies, including government agencies outside of Thailand, and/or to cooperate with courts, regulators, government agencies, and law enforcement authorities to strictly adhere to legal provisions, legal processes, or government orders. This includes conducting internal investigations, preventing crime, fraud, and/or establishing legal claims.
- (15) **For protecting the interests of the Company**, such as to ensure the security and integrity of business operations. To exercise legal rights and protect legitimate interests, such as to detect, prevent, and address fraud, misconduct, intellectual property violations, or legal breaches. To manage and prevent asset loss, detect and prevent wrongdoing on premises, ensure compliance with regulations or requirements, monitor and oversee events, prevent and report criminal activities, and safeguard business security and confidence.
- (16) **For danger prevention towards life, body or health of a person**, such as to control contagious disease or epidemic;
- (17) **For providing security**: such as, to prevent or suppress a danger to a person's life, body, health, or asset, or for disease or epidemic control.
- (18) **For organizing corporate social and environmental responsibility**

Where the Personal Data the Company collect from you is needed to meet our legal, regulatory, or contractual obligations or enter into an agreement with you, if you do not provide your Personal Data when requested, the Company may not be able to achieve the aforementioned purposes.

### **3. PERSONS TO WHOM THE COMPANY MAY DISCLOSE YOUR PERSONAL DATA**

The Company may disclose or transfer your Personal Data to the following third parties. The Company will collect, use, and/or disclose Personal Data in accordance with the purposes under this Privacy Policy. These third parties may be located in Thailand and outside Thailand. You can visit their privacy policy to learn more details on how they collect, use and/or disclose Personal Data since you could also be subject to their privacy policies.

#### **3.1 Super Turtle Group Companies**

The Company may disclose your personal data to its affiliates and subsidiaries (“**Super Turtle Group Companies**”). As part of the Super Turtle Group Companies, which may use some shared systems or

manage data jointly, the Company needs to share, transfer, or jointly process your Personal Data to achieve the purposes outlined in this Privacy Policy.

The Super Turtle Group Companies under this Privacy Policy include Group Work Co., Ltd., Nation Global Edutainment Co., Ltd., and Super Rich Turtle Exchange Co., Ltd. The list of Super Turtle Group Companies may change or be updated in the future, and the Company will notify you of such changes by updating this Privacy Policy.

### **3.2 BTS Group Companies**

As the Company is part of the BTS Group Companies which all collaborate and/or partially share customer services and systems, e.g., service systems and website-related systems, the Company may need to transfer your Personal Data to, or otherwise allow access to such Personal Data by the BTS Group Companies for the purposes set out in this Privacy Policy. BTS Group Companies may rely on the consent obtained by the Company to use your Personal Data. Please see the list of the BTS Group Companies at <https://www.btsgroup.co.th/en/about/subsidiaries-and-associated>.

### **3.3 Our business partners**

The Company may transfer personal data to its business partners for the purpose of conducting business and providing services.

The Company may transfer personal data to its business partners for the purpose of conducting business and performing services or to assist us in our business with you. The Company may share Personal Data to third parties, including but not limited to infrastructure, software and website developers and IT service providers; marketing, advertisement, design, creative advertising and communication service providers; hospitals; data storage and cloud service providers; banks and financial institutions; insurance companies, sub-insurance companies, insurance brokers, insurance agents, loss adjustors and risk surveyors; logistics and transportation service providers; payment and payment system service providers; voting and vote counting service providers; analysts; travel service agencies; garages and auto parts stores; booking system service providers; outsource internal operation service providers; printing houses; and surveying service providers business partners, project owners, contract parties, securities companies, tenant, construction contractors, joint venture partners, companies that the Company invests in, co-shared partners and third parties that the Company share marketing or promotional campaigns for the business operation and service provision of the Company

In the course of providing such services, business partners and the service providers may have access to your Personal Data. However, the Company will only provide the Company's service providers with the Personal Data that is necessary for them to perform business partners and the services, and the Company will ask them not to use your Personal Data for any other purposes. The Company will ensure that all business partners and the service providers the Company work with will keep your Personal Data secure and shall agree to treat Personal Data in a manner consistent with this Privacy Policy.

### **3.4 Legal Authorities**

In certain cases, the Company may need to disclose or share Personal Data with external parties for legal or regulatory purposes. Those external parties may include the securities and exchange commission, the stock exchange of Thailand, courts, embassies, consulates, or other government agencies, or any other external parties that the Company believes that it is necessary for legal or regulatory compliance, or to protect the Company's rights, the rights of third parties, personal safety, or to detect, prevent, or manage fraud risk, or for security-related purposes.

### **3.5 Professional advisors**

The Company may disclose Personal Data to the Company's expert advisors including but not limited to, (1) independent advisors; (2) legal advisors who assist the Company in its business operations and

provide litigation services such as defending or initiating legal actions; (3) external advisors; (4) project advisors; (5) financial advisors; and (6) auditors who provide accounting services or conduct financial audit for the Company.

### **3.6 Third parties connected with business transfer**

The Company may disclose or transfer your Personal Data to our business partners, investors, significant shareholders, assignees or transferees in the event of any reorganization, restructuring, merger, acquisition, sale, purchase, joint venture, assignment, or any other similar events involving transfer or other disposition of all or any portion of our business, assets or stock. If any of above events occurs, the receiving party will comply with this Privacy Policy to protect your Personal Data.

### **3.7 Other third parties**

The Company may be required to disclose Personal Data based on the legal bases in accordance with the purposes as specified in this Privacy Policy to other third parties, such as the public, complainants or other third parties that the Company receive a request to access our CCTV records etc. (as the case may be).

The Company will ensure that any third parties or entities that receive Personal Data from the Company will adhere to this Privacy Policy to ensure strict protection of Personal Data.

## **4. CROSS-BORDER TRANSFERS OF YOUR PERSONAL DATA**

The Company may disclose or transfer Personal Data to third parties or servers located overseas, which the destination countries may or may not have the same data protection standards as Thailand's. This includes, without limitation, IT service providers, system developers and maintenance service providers, data storage and cloud service providers, bank/financial institutes, securities companies, shareholders, companies that the Company invest in, business alliances, agents and distributors, advisor companies, in case of international transfer to customers overseas, business partners or alliances overseas, hotels, training agencies, embassies, and/or consulates. The Company takes steps and measures to ensure that Personal Data is securely transferred, and the receiving parties have in place suitable data protection standard and that the transfer is permitted under the law.

## **5. RETENTION PERIOD FOR PERSONAL DATA**

The Company will retain your Personal Data for as long as it is reasonably necessary to fulfil purposes for which the Company obtained them and to comply with the Company's legal and regulatory obligations. However, the Company may have to retain Personal Data for a longer duration, as required by applicable laws.

## **6. DATA SECURITY**

As a way to protect personal privacy of your Personal Data, the Company maintain appropriate security measures, which include administrative, technical and physical safeguards in relation to access control, to protect the confidentiality, integrity, and availability of Personal Data against any accidental or unlawful or unauthorized loss, alteration, correction, use, disclosure or access, in compliance with the applicable laws.

In particular, the Company have implemented access control measures which are secured and suitable for our collection, use, and/or disclosure of Personal Data. The Company restrict access to Personal Data as well as storage and processing equipment by imposing access rights or permission, access management to limit access to Personal Data to only authorized persons, and implement user responsibilities to prevent unauthorized access, disclosure, perception, unlawful duplication of Personal Data or theft of device used to store and process Personal Data; This also includes methods that enabling the re-examination of access, alteration, erasure, or transfer of Personal Data which is suitable for the method and means of collecting, using and/or disclosing of Personal Data.

## 7. RIGHTS AS A DATA SUBJECT

Subject to applicable laws and exceptions thereof, a data subject may have the following rights to:

- 7.1 **Access:** Data subjects may have the right to access or request a copy of the Personal Data the Company are collecting, using and/or disclosing. For privacy and security, the Company may require proof of the data subject's identity before providing the requested Personal Data;
- 7.2 **Rectification:** Data subjects may have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data that the Company collect, use and/or disclose rectified;
- 7.3 **Data Portability:** Data subjects may have the right to obtain Personal Data the Company hold about that data subject, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) if the Company are collecting, using and/or disclosing that data on the basis of data subject's consent or to perform a contract with the data subject;
- 7.4 **Objection:** Data subjects may have the right to object to certain collection, use and/or disclosure of Personal Data subject to the applicable law;
- 7.5 **Restriction:** Data subjects may have the right to restrict our use of Personal Data where the data subject believes such Personal Data to be inaccurate, that our collection, use and/or disclosure is unlawful, or that the Company no longer need such Personal Data for a particular purpose;
- 7.6 **Withdraw Consent:** For the purposes the data subjects have consented to our collection, use and/or disclosure of Personal Data, data subjects may have the right to withdraw consent at any time;
- 7.7 **Deletion:** Data subjects may have the right to request that the Company delete, destroy or anonymize Personal Data that the Company collect, use, and/or disclose, except the Company are not obligated to do so if the Company need to retain such Personal Data in order to comply with a legal obligation or to establish, exercise or defend legal claims; and
- 7.8 **Lodge a complaint:** Data subjects may have the right to lodge a complaint to the competent authority where the data subject believes our collection, use and/or disclosure of Personal Data is unlawful or non-compliance with applicable data protection law.

## 8. OUR CONTACT DETAILS

If you wish to contact us to exercise the rights relating to Personal Data or if there is any queries about your Personal Data under this Privacy Policy, please contact our Data Protection Officer (DPO) at:

### **Super Turtle Public Company Limited**

1000/9 BTS Visionary Park - South Tower, 19th floor, Unit No. 1901-1907,  
Phahonyothin Road, Chomphon Sub-district, Chatuchak District, Bangkok 10900  
Email: [dpo@superturtle.co.th](mailto:dpo@superturtle.co.th)

This Privacy Policy has been revised and become effective since 5 February 2026.