

**Privacy Policy
for the Shareholders' Meeting**



Super Turtle Public Company Limited

26 December 2023
Reviewed and revised on 5 February 2026

**PRIVACY POLICY FOR THE SHAREHOLDERS' MEETING
SUPER TURTLE PUBLIC COMPANY LIMITED**

This privacy policy for the shareholders' meeting of Super Turtle Public Company Limited (the "**Company**") is provided to inform you, as a shareholder, a proxy, a custodian, or an authorized person of a shareholder who is a juristic person, of the policy with respect to the collection, use and/or disclosure of your personal data, and your rights as a data subject.

1. PERSONAL DATA TO BE COLLECTED

The Company shall collect your personal data, including but not limited to, name-surname, nationality, age, date of birth, photograph, identification card number (or government identification card number, or passport number), securities registration number, address, telephone number, email, number of share/securities held, proxy information, vote casting information, images taken at and voice recorded during the shareholders' meeting and information related to electronic systems access and usage such as IP address.

Remark For registration documents and/or proxy submitted by you to the Company which may contain sensitive data, such as race, blood type, and religion, which are not required for the purpose of holding the shareholders' meeting, the Company would like to inform you that the Company has no intention to collect such sensitive data. As such, you may redact those sensitive data prior to submitting your documents to the Company. In case you did not redact those sensitive data contained in your documents, the Company reserves its right to redact such sensitive data of yours. In such case, it shall be deemed that the Company has not collected any of the said sensitive data.

2. PURPOSE OF THE COLLECTION, USE AND/OR DISCLOSURE PERSONAL DATA

- 2.1 identity check and verification and proceeding as you requested;
- 2.2 holding the meeting of shareholders/securities holders and proceeding regarding voting and vote counting at the meeting of shareholders/securities holders;
- 2.3 preparing the register book of shareholders/securities holders or preparing title documents for holding or transferring, issuing of new share/securities certificates and/or splitting share/securities certificates for any sale and purchase and/or exchange of share/securities;
- 2.4 dividend payment to the shareholders/securities holders;
- 2.5 security and maintaining security for the Company's business;
- 2.6 compliance with rules, regulations and articles of association of the Company, including laws and/or legitimate orders of the courts, competent authorities, government agencies, and/or state organizations;
- 2.7 exercising of rights or protecting the legitimate interest of the Company as necessary, such as auditing and protecting fraud, crime or non-compliance with laws;
- 2.8 public interest for protecting third parties who are in the premises or places under the Company's supervision; and
- 2.9 protecting or preventing harm against your life, body, health, or properties or those of third parties (as the case may be), such as to control communicable diseases or epidemics.

By relying on (1) contractual basis, for our initiation or fulfilment of a contract with you; (2) legal obligation, for the fulfilment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties. We will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your Personal Data; (4) vital interest, for preventing or suppressing a danger to a person's life, body or health; (5) public interest; (6) exercise, or defense of legal claims in the future; or (7) the preparation of historical documents or for purposes related to educational research and statistics.

If you do not wish to provide your personal data to the Company where such personal data is needed for performing the objectives abovementioned, the Company reserves its right to reject your registration to attend the shareholders' meeting or performing any other action for you if such action requires the said personal data.

3. PERIOD FOR RETENTION OF PERSONAL DATA

The Company shall retain your personal data for as long as it is reasonably necessary to fulfil the Company's purpose of personal data collection, use and/or disclosure. To consider the retention period, the Company will take into account the accounting standards, legal statutes of limitations, as well as the necessity to retain your personal data for the required duration to comply with the law, or exercise legal rights.

4. CROSS-BORDER TRANSFERS OF PERSONAL DATA

The Company may disclose or transfer your personal data to overseas countries with or without a personal data protection standard that is equivalent to that of Thailand. In such case, the Company shall ensure that the appropriate procedures required by the law shall be undertaken.

5. COOKIES AND HOW THEY ARE USED

If you visit our websites, we will gather certain information automatically from you by using tracking tools and cookies. Cookies are tracking technologies which are used in analyzing trends, administering our websites, tracking users' movements around the websites, or to remember users' settings. Some of the cookies are necessary because otherwise the site is unable to function properly. Other cookies are convenient for the visitors and they remember your username in a secure way as well as your language preferences.

Most internet browsers allow you to control whether or not to accept cookies. If you reject cookies, your ability to use some or all of the features or areas of our websites may be limited. Please see our Cookies Policy for more details.

6. DISCLOSURE OR TRANSFER OF YOUR PERSONAL DATA TO THIRD PARTIES

The Company may disclose or transfer your personal data to the following parties:

- 6.1 Service providers, for example, advisors or any service providers that the Company engages for processing your personal data for the purpose of registration to attend the shareholders' meeting, calculation of the meeting quorum and vote counting in the shareholders' meeting;
- 6.2 Government agencies or competent authorities, so that the Company fulfills with its legal obligations, e.g., the Department of Business Development, the Ministry of Commerce, and the Stock Exchange of Thailand for submission of minutes of meetings and shareholders list; and
- 6.3 The Company's website in order to publicize video taken at the shareholders' meeting and the minutes of the shareholders' meeting.

7. YOUR RIGHTS AS DATA SUBJECT

You, as the data subject, are entitled to withdraw consent given for the collection, use or disclosure of personal data (only in case the Company rely on your consent), to request access to or to obtain a copy of your personal data processed by the Company, to request for personal data transfer, to object the personal data processing, to delete or de-identity personal data, to restrict the data processing, to request for correction of personal data and to lodge a complaint, subject to rules and procedures as required by the personal data protection laws. The Company may reasonably and lawfully refuse to proceed with your request.

8. DATA SECURITY

Protection of your privacy is the most important thing. The Company then maintains 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.

9. CONTACT DETAIL

If you have any queries or if you wish to exercise the rights relating to your personal data, please contact the Company 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

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