

Personal Data Retention Policy

Primo Service Solutions Public Company Limited

PRIMO SERVICE SOLUTIONS PUBLIC COMPANY LIMITED

496 Moo 9 Sukhumvit 107 Road, Samrong Nuea,

Muang Samut Prakarn District, Samut Prakarn 10270

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1. Introduction

Primo Service Solutions Public Company Limited recognizes the importance of personal data protection, as the protection of personal data forms part of corporate social responsibility and serves as a foundation for building trustworthy business relationships with customers. The Company is therefore committed to complying with personal data protection laws, regulations, guidelines, and other relevant ministerial regulations.

The purpose of this Policy is to establish methods for storing documents containing personal data to ensure that personal data protection within the Company complies with the Personal Data Protection Act B.E. 2562 (2019), including the determination of retention periods for documents containing personal data.

2. Objectives

This Policy aims to establish guidelines for the storage of documents containing the Company's personal data in order to ensure that such documents are not retained longer than necessary and that appropriate storage measures are implemented in compliance with business requirements and the Personal Data Protection Act B.E. 2562 (2019).

3. Definitions

<p>Processing of Personal Data</p>	<p>Any operation performed on personal data or sets of personal data, whether by automated means or not, such as collection, recording, organization, structuring, storage, alteration or modification, retrieval, consultation, use, disclosure by transmission, dissemination, or any other act making such data available, alignment or combination, restriction, deletion, or destruction.</p>
<p>Deletion/Destruction of Data</p>	<p>Permanent deletion or destruction of personal data from the system in such a</p>

	manner that the data cannot be recovered or reconstructed, whether by the data subject, the personal data controller, or the personal data processor.
Personal Data Protection Law	Personal Data Protection Act B.E. 2562 (2019), including any amendments thereto, as well as related rules, regulations, and orders.
Data	All forms of data, both electronic and non-electronic, received from or possessed by the data subject, the Company's partners, or external parties.
Personal Data	Any information relating to a person that enables the identification of such person, whether directly or indirectly, but excluding information relating specifically to deceased persons under Section 6 of the Personal Data Protection Act B.E. 2562 (2019), such as first name, surname, email address, fingerprint, or national identification number, which can directly identify an individual, or location data and cookie data, which enable indirect identification of an individual.
Data Subject	A person who can be identified, directly or indirectly, by such personal data.
Company	The business group of Primo Service Solutions Public Company Limited as of July 2022, comprising Passion Realtor Co.,

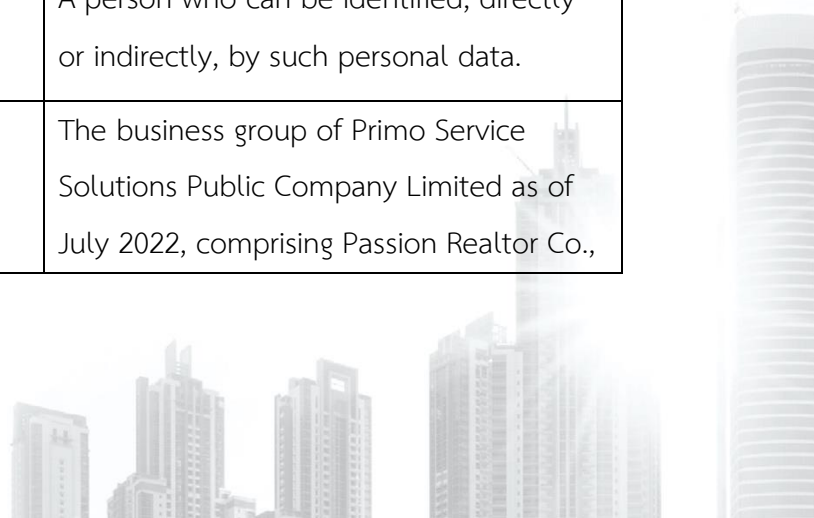
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	Ltd., Primo Management Co., Ltd., Crown Residence Co., Ltd., Wyde Interior Co., Ltd., Uno Service Co., Ltd., United Project Management Co., Ltd., UPM Design Studio Co., Ltd., and Hampton Hotel and Residence Management Co., Ltd.
Third Party	A natural person, juristic person, government office, government agency, or any other person other than the data subject, the Company, the personal data processor, or persons authorized by the Company or authorized by the personal data processor to directly process personal data.
Data Processor	A person who carries out the collection, use, or disclosure of personal data pursuant to the instructions of, or on behalf of, the personal data controller.
Document	All documents containing personal data created, collected, or processed by the Company, whether in electronic form (Soft Copy) or paper form (Hard Copy), including copies of documents such as paper documents, as well as copies in electronic file formats such as images or scanned copies of paper documents.

4. Scope

This Personal Data Retention Policy applies only to:

- Employees, consultants, contractors, workers, service providers, the Company's partner organizations and business partners, employees of partners, and external parties.

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- All documents containing personal data created, collected, or processed by the Company, whether in electronic form (Soft Copy) or paper form (Hard Copy).

5. Data Storage Locations

5.1 Electronic Documents, Electronic Mail (Email), and Multimedia Records

All electronic documents, emails, and multimedia records shall be stored in appropriate locations to ensure that security measures are implemented in accordance with standards prescribed under personal data protection laws, including other relevant laws, guidelines, and orders.

5.2 Paper Documents

Paper documents necessary for daily business operations must be stored in filing cabinets and desk drawers when not in use. Employees shall lock filing cabinets and drawers containing documents with personal data at the end of each working day.

6. Document Protection

The Company is committed to preventing the loss, unauthorized access, use, alteration, modification, or disclosure of documents containing personal data under the Company's control. Documents containing personal data, whether in paper or electronic form, shall be securely stored until destruction. The Company shall implement technologies and processes that are regularly reviewed to maintain the security of personal data.

7. Document Destruction

Upon expiration of the personal data retention period or when personal data is no longer necessary for processing purposes, paper documents containing personal data shall be destroyed by shredding by authorized personnel assigned to carry out such destruction. Personal data stored electronically shall be deleted from storage media, such as hard disks, which shall be destroyed or erased by methods that prevent data recovery, by authorized personnel assigned to carry out such destruction.

8. Retention and Retention Period of Personal Data

The Company shall clearly specify retention periods for the collection of personal data in accordance with the purposes of collection for personal data processing, which may be based on periods prescribed by law, business practices, or processing standards.

The Company shall establish monitoring systems to ensure the deletion or destruction of personal data upon expiration of the retention period, upon exercise of rights by data

subjects under personal data protection laws, upon other grounds prescribed by personal data protection laws, or in accordance with the Personal Data Disposal Policy.

This Policy shall be effective from 26 July 2022 onwards.

(Mr. Marote Vananan)

Chairman of the Board

Primo Service Solution Public Company Limited