

Enclosure 12

Privacy Notice pursuant to the Personal Data Protection Act B.E. 2562 (2019)

IT City Public Company Limited (the “**Company**” or “**we**” or “**us**”) recognizes the importance of the personal data of a shareholder and/or its proxy. Therefore, the Company has issued this privacy notice to uphold the obligations under the Personal Data Protection Act, B.E. 2562 (2019) (the “**Privacy Notice**”) and to describe how we collect, use and disclose (collectively referred to as “**processing**”) personal data of a shareholder and/or its proxy (which shall be collectively referred to in this Privacy Notice as “**you**” or “**your**”) and explain your rights in connection with your personal data.

In this Privacy Notice, “**personal data**” means any data relating to an identifiable living individual who can be identified from that data or from that data and other data; and “**sensitive data**” means any personal data revealing racial, ethnic origin, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data and biometric data.

1. Personal Data We Collect

We directly collect the following personal data from a shareholder and/or its proxy, and indirectly collect personal data from Thailand Securities Depository Co., Ltd., the share registrar of the Company:

- 1.1 General personal data, such as full name, national ID card number, date of birth, gender, nationality, share register number, number of shares, picture and video from the video recording of the shareholder meeting;
- 1.2 Contact details, such as address, telephone number, email, etc.;
- 1.3 Sensitive data, such as health data (vaccination records and diagnosis of infectious diseases)

2. Purpose of Processing Personal Data

We process your personal data in order to carry out tasks and undertake activities, including but not limited to:

- 2.1 Calling, holding and conducting the Company's shareholders' meeting including preparing minutes of the meeting in order to comply with the Company's Articles of Association, applicable laws, notifications and criteria set by the government regarding shareholder meeting arrangements;
- 2.2 Verification of the identity of a shareholder and/or proxy who attends the meeting;
- 2.3 Preparation of a share register or documents pertaining to the rights of the shareholders;
- 2.4 Processing dividend payment;
- 2.5 Protection of personal safety and property of meeting attendees, including the protection of buildings, facilities, and assets of the Company from damage, disturbance, destruction and other forms of crimes;
- 2.6 Prevention, suppression or control of diseases or epidemics.

We rely on the following legal bases to process your personal data for the purposes stated above. The Company may rely on one single or a combination of several legal bases.

- 1) **Contractual Basis** in the case when it is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract;
- 2) **Legitimate Interests** in the case when it is necessary for the legitimate interests of the Company or any other parties, except where such interests are overridden by your fundamental rights and freedoms;
- 3) **Legal Obligation** in the case when it is necessary for compliance with applicable laws, notifications, obligations and any court order or judgment to which the Company is subject;
- 4) **Preventing or suppressing a danger to a person's life, body or health** in the case when it is necessary to prevent or suppress a danger to the life, body or health of you or other parties;
- 5) **Consent Basis** in the case when the purpose of processing your personal data requires your consent.

In the case where you do not provide your personal data, we may not be able to process your personal data with respect to the specified purpose in this Privacy Notice or allow you to attend the shareholders' meeting.

3. External Parties We Will Share Your Personal Data with

We may be required to disclose or transfer your personal data to certain external parties in order to process your personal data, such as affiliated companies, meeting consultants, Thailand Securities Depository Co., Ltd., service providers, government agencies or relevant regulators.

4. Your Personal Data Rights

Subject to your personal data rights under the Personal Data Protection Act, B.E. 2562 (2019), including the right to withdraw consent, the right to access and receive a copy of your personal data, the right to rectification of personal data, the right to erasure or destruction of personal data, the right to restrict the use of personal data, the right to personal data portability in accordance with lawful means, the right to lodge a complaint and the right to object to any processing activities of your personal data.

Please be informed that your above-mentioned rights are subject to relevant factors and we may not be able to proceed with your request if we can rely on any lawful grounds to further process your personal data.

5. Retention Period of Your Personal Data

We will retain your personal data stated in Clause 1 for as long as it is reasonably necessary to fulfill our scope and purposes set out in Clause 2, and to establish, exercise or defend legal claims. However, we may have to retain your personal data for longer if required by any applicable law.

6. Contact Information to Exercise Data Subject's Rights

If you have any inquiries concerning this Privacy Notice, or if you intend to exercise your personal data protection rights, specified in Clause 4, please contact us through the channels below:

Company Secretary

IT City Public Company Limited

Email Address: companysec@itcity.co.th

Postal Address: P.O. Box 62 Pratunam Post Office, Bangkok 10409

Tel: 0-2656-5030 – 39 Ext. 1318, 1427