

PERSONAL DATA MANAGEMENT POLICY

FOR CLIENTS AND PROSPECTIVE CLIENTS

R&H Law Office Co., Ltd.

Version dated 27 July 2026

ENGLISH CONVENIENCE TRANSLATION

This English translation is provided for convenience only. In the event of any inconsistency or discrepancy, the Thai-language version shall prevail.

1. INTRODUCTION

1.1 Scope of this Personal Data Management Policy

This Policy explains the methods, reasons, and details by which R&H Law Office Co., Ltd. (the "Firm") collects, uses and/or discloses your personal data as a current client or prospective client of the Firm. In addition to this Policy, the Firm may issue a specific processing notice in the future when the Firm processes your personal data, in order to explain the particular methods and reasons for which the Firm uses your data. This Policy may also supplement any other notice.

1.2 Data Controller and Data Protection Officer

The Firm is the data controller and is responsible for your personal data. The Firm has appointed a Data Protection Officer (the "DPO") to respond to inquiries and receive comments concerning this Policy. If you have any questions or suggestions concerning this Policy, or wish to exercise any right available to you under applicable law, you may contact the DPO using the details below:

Item	Details
Name	Mr. Suebsarn Rojanawon
Position	Director / Lawyer and Partner
Email	office@rhlawth.com
Address	R&H Law Office Co., Ltd., No. 89 Chaopraya Tower, 2nd Floor, Room 209 (Shangri-La Hotel), Wat Suan Plu Lane, Charoen Krung Road, Bang Rak Subdistrict, Bang Rak District, Bangkok 10500, Thailand
Telephone	02-235-2398; +66 81 559 5295

1.3 Amendments to this Personal Data Management Policy

The Firm may amend or supplement this Policy. You may review any amended or supplemented version through the channels made available by the Firm. This Policy was last amended on 27 July 2026.

1.4 Changes to Personal Data

If your personal data changes while you are in contact with or receiving services from the Firm, please inform the Firm by contacting the relevant lawyer or staff member, or the Firm's DPO using the details above.

1.5 Links to Third-Party Websites

The Firm's website and electronic communications may contain links to third-party websites. Clicking such links may allow third parties to collect or share data about you. The Firm does not control those third-party websites and is not responsible for their privacy communications or practices.

2. PERSONAL DATA COLLECTED BY THE FIRM

2.1 Definition of Personal Data

Personal data means any information relating to an individual that enables that individual to be identified. It does not include data from which identifiers have been removed (anonymous data) or data relating to a deceased person. The Firm may collect, use, store and transfer the following categories of personal data about you.

2.2 Clients and Prospective Clients

Category of Data	Examples of Personal Data
Contact Data	Address, email address, telephone number, and contact accounts such as Facebook, LINE, Telegram, WhatsApp, and similar services.
Financial Data	Billing address, receipts, and bank account number.
Identity Document Data	Copy or photograph of national identification card, national identification number, passport biodata page, and signature.
Data Obtained from Public Sources	Any information capable of identifying an individual that is obtained from public websites or publicly accessible government databases.
Legal Representation Data	Any information capable of identifying an individual that is obtained in preparation for, or during, legal representation, including sensitive personal data such as criminal records and case numbers.
Personal Identification Data	Full name, surname, nickname, date of birth, position, occupation, educational history, employment history, and family information.
Sensitive Personal Data (National Identification Card)	Blood type and religion, as shown on the national identification card.

2.3 Personal Data of Minors, Incompetent Persons and Quasi-Incompetent Persons

The Firm's services are not intended for, and are not directed at, minors, incompetent persons and/or quasi-incompetent persons as defined under the Personal Data Protection Act B.E. 2562 (2019) and related laws, except where the Firm collects personal data relating to scholarship applicants or to a person who is a minor, incompetent person and/or quasi-incompetent person as part of legal services and the legal profession, a legal transaction, or research.

2.4 If You Refuse to Provide Personal Data

Where the Firm is required to collect personal data by law or under the terms of a contract, but you do not provide that data, the Firm may be unable to perform its obligations under a contract with you or to carry out an assignment given by you.

3. HOW THE FIRM COLLECTS PERSONAL DATA

The Firm collects personal data through the following methods.

3.1 Direct Interactions

The Firm may collect personal data relating to you when you provide it by completing forms or communicating with the Firm by post, telephone, email, or any other method. This includes personal data supplied through forms, documents delivered to the Firm, and communications sent to the Firm.

3.2 Third Parties or Publicly Accessible Sources

The Firm may collect personal data relating to you from third parties and other publicly accessible sources. This includes personal data provided through forms or evidence submitted to the Firm or to a third party associated with the Firm; the use of, or request for, services from a third party connected with the Firm, such as payment services; and personal data made publicly available with explicit consent.

4. PURPOSES AND LEGAL BASES FOR PROCESSING PERSONAL DATA

The Firm may process personal data on more than one legal basis. Where more than one basis applies as described below, you may contact the DPO for further information about the specific legal basis used by the Firm in a particular case.

Legal Basis	Explanation
Consent	The processing is based on consent given by you.
Contract	The processing is necessary to perform a contract to which you are a party, or to take steps requested by you before entering into a contract.
Legal Claims	The processing is necessary to establish, comply with, exercise or defend legal claims.
Legal Obligation	The processing is necessary to comply with a law applicable to the Firm.
Legitimate Interests	The processing is necessary to protect the legitimate interests of the Firm or another person or legal entity.

Purposes Applicable to Clients and Prospective Clients

Accounting

Purpose	Categories of Data	Legal Basis
- Preparing invoices and tax invoices as required by the Revenue Department - Preparing tax reports - Recording transactions in accounting books	- Personal Data - Identity Document Data - Contact Data - Sensitive Personal Data (National Identification Card)	- Legitimate Interests (for the stated purposes) - Contract - Legal Obligation - For sensitive personal data: Consent; Legal Claims
- Preparing time records for client billing	- Personal Data - Legal Representation Data	- Legitimate Interests (for the stated purpose) - Contract - For sensitive personal data: Legal Claims

Administration

Purpose	Categories of Data	Legal Basis
- Sending client information (including company regulations, shareholder lists and other information) to clients, government agencies, registries and courts as part of legal proceedings	- Personal Data - Identity Document Data - Contact Data - Legal Representation Data (as applicable)	- Legitimate Interests (for the stated purpose)
- Storing documents with an external storage provider in case of further disputes - Compliance with law	- Personal Data - Legal Representation Data	- Legitimate Interests (for the stated purposes) - Contract - For sensitive personal data: Legal Claims

Business Development

Purpose	Categories of Data	Legal Basis
- Marketing - Responding to inquiries - General communications	- Personal Data - Contact Data	- Legitimate Interests (for the stated purposes)
- Obtaining feedback concerning legal services	- Personal Data - Contact Data	- Legitimate Interests (for the stated purpose)
- Retaining documents from completed transactions for future reference - Establishing, complying with, exercising or defending future legal claims	- Personal Data - Identity Document Data - Contact Data - Legal Representation Data	- Legitimate Interests (for the stated purposes) - Contract - For sensitive personal data: Legal Claims

Client Intake and Billing

Purpose	Categories of Data	Legal Basis
- Drafting and sending fee proposals and engagement letters to clients	- Personal Data - Contact Data - Legal Representation Data	- Legitimate Interests (for the stated purpose)
- Conducting conflict-of-interest checks	- Personal Data - Contact Data - Legal Representation Data	- Legitimate Interests (for the stated purpose)
- Opening matters in the time-recording system for lawyers - Assigning transaction or case reference numbers	- Personal Data - Financial Data - Contact Data - Legal Representation Data	- Legitimate Interests (for the stated purposes)
- Issuing internal matter notifications	- Personal Data	- Legitimate Interests (for the stated purpose)
- Billing clients	- Personal Data - Financial Data - Contact Data - Legal Representation Data	- Legitimate Interests (for the stated purpose) - Contract - For sensitive personal data: Legal Claims

Reception and Hospitality

Purpose	Categories of Data	Legal Basis
- For incoming telephone calls: recording details and communicating them to relevant persons in writing and by email	- Personal Data - Legal Representation Data - Financial Data	- Legitimate Interests (for the stated purpose)
- Booking meeting rooms - Preparing meeting rooms - Identifying clients	- Personal Data - Legal Representation Data - Financial Data - Contact Data	- Legitimate Interests (for the stated purposes)
- Copying and printing documents in accordance with instructions from clients and lawyers	- Personal Data - Identity Document Data - Financial Data - Contact Data - Legal Representation Data	- Legitimate Interests (for the stated purpose) - Consent - For sensitive personal data: Legal Claims
- Storing and returning items left in meeting rooms, if any	- As applicable	- Legitimate Interests (for the stated purpose) - For sensitive personal data: Legal Claims

Legal Services

Purpose	Categories of Data	Legal Basis
- Legal work in accordance with client instructions - Legal work in preparation for a client engagement	- Personal Data - Identity Document Data - Contact Data - Legal Representation Data	- Legitimate Interests (for the stated purposes) - Contract - For sensitive personal data: Legal Claims
- Business development - Providing comments or information to clients	- Data Obtained from Public Sources	- Legitimate Interests (for the stated purposes)
- Legal research by lawyers - Developing the skills of lawyers and personnel	- Data Obtained from Public Sources	- Legitimate Interests (for the stated purposes)
- English-language proofreading	- Personal Data - Legal Representation Data	- Legitimate Interests (for the stated purpose) - Contract - For sensitive personal data: Legal Claims
- Formatting, copying and scanning documents	- Personal Data - Identity Document Data - Contact Data	- Legitimate Interests (for the stated purpose) - Contract

Changes of Purpose

The Firm will use your personal data for the purposes stated above unless the Firm considers that it is necessary to use the personal data for another purpose that is compatible with the original purpose. If the Firm needs to use personal data for an unrelated purpose, the Firm will inform you and explain the legal basis that permits such use.

5. DISCLOSURE OF PERSONAL DATA

The Firm may disclose your personal data to the following recipients.

Recipient	Frequency / Circumstances
Records storage providers	As necessary for the storage and retrieval of documents.
Government agencies and registries	As necessary in accordance with client instructions in legal proceedings.
Relevant courts and opposing parties in litigation	As necessary in accordance with client instructions in legal proceedings.
Partner law firms, experts or case consultants	As necessary in accordance with client instructions in legal proceedings.

The Firm may disclose your personal data to relevant agencies, organisations or third parties where necessary and lawful, subject to appropriate security principles and applicable personal data protection laws, including the following categories.

Category of Person	Details
Persons Associated with the Firm	- Directors, executives, employees, staff, contractors, representatives and advisers of the Firm - Business partners, independent auditors, and providers of data, document and data-processing services
Organisations Having a Legal or Professional Relationship with the Firm	- Suppliers and professional organisations of which the Firm is a member - Government agencies and organisations responsible for supervising the Firm's business - Courts and legal authorities that order the Firm to disclose data
Business Restructuring	- Rehabilitation, merger, transfer of business, sale, acquisition, joint venture or transfer of assets, which may require disclosure to contractual counterparties or entitled persons
Business Support Service Providers	- Data analytics, information search and platform development providers - Social media and advertising providers for marketing communications, without directly disclosing identifying data - Technology providers, including internet, cloud, document storage, document destruction, security system and website providers
Legal and Professional Advisers	- Lawyers, legal advisers, auditors and other professional experts supporting the Firm's business operations
Persons Having Legal Authority	- Attorneys-in-fact, legal representatives and persons authorised to take legal action on your behalf - Clients of the Firm where necessary and relevant

The Firm requires all third parties to give appropriate importance to the security of your personal data and to process it in accordance with applicable law. The Firm does not permit external service providers to use your personal data for their own purposes and permits them to process it only for specified purposes and in accordance with the Firm's instructions.

6. TRANSFER OF PERSONAL DATA OUTSIDE THAILAND

The Firm transfers personal data outside Thailand only where necessary. The Firm may need to transfer your personal data outside Thailand under the circumstances and legal bases used by the Firm to comply with requirements under the Personal Data Protection Act, as follows.

Legal Basis for Transfer	Explanation
Adequacy of Personal Data Protection Standards	The destination country has adequate personal data protection standards, and the transfer is conducted in accordance with requirements for protecting your personal data as prescribed by the Personal Data Protection Committee.
Consent	The transfer is made in accordance with consent given by you.
Performance of a Contract for the Benefit of the Data Subject	The transfer is necessary to perform a contract between the Firm and another legal entity for your benefit.
Compliance with Law	The transfer is necessary to comply with applicable law.
Necessity for Performance of a Contract or Pre-Contractual Steps	The transfer is necessary to perform a contract or to take steps before entering into a contract.

Purpose	Legal Basis
Sending legal work and billing	- Adequacy of personal data protection standards - Necessity for performance of a contract or pre-contractual steps - Performance of a contract for the benefit of the data subject
Personnel working on legal proceedings outside Thailand	- Adequacy of personal data protection standards - Performance of a contract for the benefit of the data subject
Transfer of personal data outside Thailand	- Adequacy of personal data protection standards - Compliance with law - Consent - Necessity for performance of a contract or pre-contractual steps - Performance of a contract for the benefit of the data subject

7. SECURITY OF PERSONAL DATA

The Firm has implemented appropriate security measures to prevent your personal data from being accidentally lost, used or accessed without authorisation, altered or disclosed. The Firm limits access to your personal data to employees, agents, contractors and other third parties who need to know it. Such persons process your personal data in accordance with the Firm's instructions and are subject to confidentiality obligations. The Firm maintains measures and procedures for responding to suspected personal data breaches and will notify you and the relevant supervisory authority of a breach where required by law.

8. RETENTION OF PERSONAL DATA

The Firm will retain personal data for as long as necessary for the purposes for which it is used. In determining an appropriate retention period, the Firm will consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which the Firm processes the personal data and whether those purposes can be achieved by other means, and the legal requirements applicable to the Firm.

The Firm generally retains personal data for the periods described below.

(1) General (Email)

Email is one of the principal channels through which the Firm collects personal data. The Firm archives email every six months and reviews email for deletion every ten years or when the email inbox is full.

(2) Clients and Prospective Clients

General Function	Retention Period
Accounting	- Accounting data is retained in accordance with accounting law and the limitation periods under the Civil and Commercial Code. - Documents not relating to value-added tax: 10 years from the

General Function	Retention Period
	closing of accounts or filing of tax documents. - Documents relating to value-added tax: 7 years from the closing of accounts or filing of tax documents.
Administration	- Electronic case data: approximately 10 years after completion of the case; if a further legal dispute arises, for as long as necessary. - Physical case files stored with a records storage provider: approximately 30 years after completion of the case; if a further legal dispute arises, for as long as necessary. - Data held by support functions, such as English-language proofreaders and document-formatting personnel: reviewed for deletion annually.
Business Development	Client data: approximately 10 years after the relationship with the Firm ends.
Client Intake and Billing	Client data: approximately 10 years after the relationship with the Firm ends.
Reception and Hospitality	Items left in meeting rooms will be returned to the owner as soon as possible. Items that cannot be returned will be retained by the Firm for one year before disposal or transfer.
Legal Services	- Electronic case data: approximately 10 years after completion of the case; if a further legal dispute arises, for as long as necessary. - Physical case files stored with a records storage provider: approximately 30 years after completion of the case; if a further legal dispute arises, for as long as necessary. - Data held by support functions, such as English-language proofreaders and document-formatting personnel: reviewed for deletion annually.

9. RIGHTS UNDER THE PERSONAL DATA PROTECTION ACT

9.1 Rights of Data Subjects

Under the Personal Data Protection Act, you have the following rights.

- (1) Right of Access.** You have the right to obtain a copy of your personal data held by the Firm and to request disclosure of personal data obtained without relying on your consent. The Firm may refuse to act only on grounds permitted by law or pursuant to a court order, including where access to and a copy of the personal data would adversely affect the rights and freedoms of another person.
- (2) Right to Data Portability.** You have the right to request that your personal data be transferred to you, unless this cannot be done because of technical circumstances, or to request that it be transferred to a third party in a format that is readable or commonly used by automated tools or devices and that can be used or disclosed by automated means. This right applies only to data for which you have given consent to the Firm or which the Firm uses to perform a contract with you. It does not apply where the Firm transfers personal data in the performance of a task carried out in the public interest or in the exercise of legal authority, and the request must not infringe the rights and freedoms of others.
- (3) Right to Object.** You have the right to object where the Firm relies on legitimate interests, whether of the Firm or a third party, and the processing is necessary for a task carried out in the public interest or for the exercise of authority vested in the Firm, unless the Firm can demonstrate compelling legitimate grounds for the processing or the processing is required for legal claims. You also have the right to object to processing for direct marketing. You may further object to processing for scientific, historical or statistical research, unless the processing is necessary for a task carried out in the public interest.
- (4) Right to Erasure.** You have the right to request that the Firm erase, destroy or anonymise personal data where it is no longer necessary for the purposes for which it was processed. You may also request erasure, destruction or anonymisation where you withdraw consent and the Firm has no other legal basis for processing; where you object to processing; or where the Firm may have processed the personal data unlawfully. The Firm may be unable to comply with an erasure request for specific legal reasons, in which case the Firm will inform you at the time of the request, as applicable.
- (5) Right to Restriction of Processing.** You have the right to request that the Firm restrict the use of your personal data where: (a) the Firm is verifying whether your personal data is accurate, current, complete and not misleading; (b) the Firm has used the data unlawfully but you do not wish the Firm to erase it; (c) you require the Firm to retain the personal data

even though the Firm no longer needs it, in order to establish, comply with, exercise or defend legal claims; or (d) you have objected to the Firm's use of your personal data and the Firm needs to verify whether it has other compelling legitimate grounds for using the data. Paragraph (d) does not include an objection to processing for direct marketing.

- (6) Right to Rectification.** You have the right to request that the Firm correct any personal data held about you so that it is accurate, current, complete and not misleading. The Firm may need to verify the accuracy of the new data you ask it to correct.
- (7) Right to Withdraw Consent.** Where the Firm collects your personal data on the basis of your consent, you may withdraw that consent at a later time in accordance with law. The withdrawal process must be as easy and uncomplicated as the process for giving consent, unless withdrawal is restricted by law or by contractual restrictions that create rights beneficial to you. Withdrawal of consent does not affect processing carried out lawfully on the basis of consent before its withdrawal.
- (8) Right to Lodge a Complaint.** If the Firm, including its employees and service providers, fails to comply with the Personal Data Protection Act, you have the right to lodge a complaint with the Personal Data Protection Committee or the Office of the Personal Data Protection Committee.

9.2 Exercising Your Rights

You may exercise the rights described above by contacting the DPO. The Firm may charge reasonable costs, including copying, transfer and document retrieval costs. The Firm may refuse to act on a request if it is unfounded, repetitive, excessive or otherwise subject to a legal ground for refusal. The Firm may request additional information to verify your identity before acting and may contact you for further information concerning the request. The Firm may also request additional information if it considers that you are unable to act independently under applicable law or if there is uncertainty concerning identity verification.

The Firm will endeavour to complete a request within 30 days after identity verification is completed. In complex cases or where multiple requests are made, the process may take longer. The Firm will inform you and provide progress updates from time to time.

Announced on 27 July 2026

(Mr. Suebsarn Rojanawon)

Lawyer and Partner