



Privacy Policy

MK Restaurant Group Public Company Limited

MK Restaurant Group Public Company Limited and its group companies (collectively referred to as “the Company”) respects the right to privacy and gives great importance to the protection of personal data in connection with or in conducting transactions with the Company. Therefore, the Company has prepared this Privacy Policy under the Personal Data Protection Act B.E.2562 (2019) (“Personal Data Protection Law”) applicable at the time of the preparation of this policy, with the purpose of

- Ensuring the Data Subject, which involves or transacts with the Company, be fully protected in accordance with the related law on personal data protection.
- Preventing the use of personal data for wrong purposes, unauthorized or unlawful.

1. Scope

This Privacy Policy applies to the work operations of all employees (including permanent employees, employees with definite contract period, temporary workers and contractors) and data processor who process personal data on behalf of the Company.

2. Definition

- 2.1 “Personal Data”** means any information relating to a person, which enables the identification of such person, whether directly or indirectly, but not including the information of the deceased persons in particular.
- 2.2 “Data Controller”** means a person or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the personal data.
- 2.3 “Data Processor”** means a person or a juristic person who operates in relation to the collection, use, or disclosure of the personal data pursuant to the orders given by or on behalf of a Data Controller, whereby such person or juristic person is not the Data Controller.
- 2.4 “Data Subject”** means a person who is the owner of the personal data.
- 2.5 “Processing”** means actions relating to the collection, use, disclosure, restriction, deletion or destruction of personal data.

3. Limitation

The Company’s website is not intended for use by children under the age of 18.

4. Roles and Responsibilities

4.1 Board of Directors

- Delegate policies to management for taking action in order to determine the importance of personal data protection in accordance with the laws and best practices.
- Provide control and supervision mechanisms, compliance, enforcement, and monitoring of personal data protection measures under the law.

- Support the governance structure concerning the effective of the personal data protection.
- Be a leader and role model for good performance, comply with Personal Data Protection Law.

4.2 Management

- Establish policies and measures to prioritize the protection of the Company's personal data under the laws and best practices, as well as send message from executives to employees and related persons to realize the importance of personal data protection.
- Supervise, enforce and monitor the measures of personal data protection.
- Appoint a Data Protection Officer (DPO) and ensure the appropriate corporate governance structure.
- Support and facilitate the tasks of the DPO.
- Provide adequate support in terms of financial, infrastructure, resources, and continuous training, as appropriate.
- Participate in regular meeting with the DPO and aware of the DPO's advice and recommendations.
- Evaluate performance and results.

In addition, the Chief Executive Officer (CEO) who is the highest executive of the Company, must provide support, assist, and resolve problems in the event of notification from the Data Protection Officers regarding their duties.

4.3 Data Protection Officer (DPO)

- Prepare, review, and present the policies and measures regarding the personal data protection in order to comply with the laws and best practices to management and Board of Directors.
- Advise the Data Controller or the Data Processor, including employees or contractors of the Data Controller or the Data Processor.
- Monitor data privacy operations of the Data Controller or the Data Processor, including the employees or contractors of the Data Controller or the Data Processor concerning the collection, use, and/or disclose of personal data.
- Coordinate and cooperate with the Office of the Personal Data Protection Commission in case of having problems of collection, use, and/or disclose of personal data of the Data Controller or the Data Processor, including employees or contractors of the Data Controller or the Data Processor.
- Maintain the confidentiality of personal data acquired due to the duties.
- Arrange for agreements or contracts related to the processing of personal data between the Company and the Data Processor in the case that the Company assigns the processing of personal data to other Data Processor or Data Controller.
- Inform information about the data protection officers, contact location, and how to inform the data subject and the Office of the Personal Data Protection Commission.
- Notify the Office of the Personal Data Protection Commission about the event of the personal data breach and/or the data subject without delay as required by the law.

4.4 Related divisions/departments to Personal Data

- Comply with the law on personal data protection and follow the policy, code of conduct, and notices related to personal data protection of the Company.

4.5 Employees

- Strictly comply with the law on personal data protection and follow the policy, code of conduct, and notices related to personal data protection of the Company
- Immediately inform supervisor and/or Data Protection Officer when a leak or breach of personal data occurs

5. Personal Data Protection Practice

The company will provide the measures of personal data protection in accordance with the law on personal data protection including risk assessment, data collection, data storage, data processing, deletion, exercise of personal data subject's rights, and disclosure of personal data as follows:

5.1 Risk assessment and actions before collection of personal data

- 5.1.1 The Company will evaluate the objectives and necessities of the activities in which personal data is collected, as well as analyze risks, mitigation measures and any means to mitigate the potential impact of the collection, processing, and breaching of such personal data.
- 5.1.2 The Company will set up a privacy standard for collection and processing of personal data in accordance with the laws on the protection of personal data.
- 5.1.3 The Company will provide adequate and appropriate security measures for personal data. This includes measures to prevent the breach of personal data and procedures for notification of the breach of personal data in accordance with the Personal Data Protection Law.
- 5.1.4 The Company will provide training for employees and related persons at least once a year to raise awareness of the importance of Personal Data Protection Law and penalties that will be obtained if there is a breach.
- 5.1.5 The Company will provide the contracts or documents that will apply to the Data Processor, including those who receive personal data from the Company in order to be legally enforceable including penalties and procedures for compensation to the Company if there is a breach of such agreement.

5.2 Collection and processing of personal data

- 5.2.1 The Company, as a Data Controller and a Data Processor will collect and process personal data from the Data Subject with lawfulness, fairness, and transparency.
- 5.2.2 The Company will provide a clear and verified process to ensure that the Company has informed the objectives, including the legal basis that provides authority and details as specified in the Privacy Notice.
- 5.2.3 The Company will provide procedures to ensure that the Company collects and processes personal data directly from the Data Subject or has acted in accordance with the laws in case that personal data is collected from other sources or minors, incompetent or quasi-incompetent persons.

5.2.4 The Company will only collect personal data in accordance with the objectives and lawful basis as informed and collect personal data as necessary.

5.3 Storage, processing, and destruction of personal data

5.3.1 The Company will set the scope of the purpose of processing personal data as necessary under the lawful basis and in accordance with the Company's operating guidelines.

5.3.2 The Company will retain the personal data of its Data Subject for as long as necessary in order to achieve the purpose of collecting the data and in accordance with the Company's privacy measures.

5.3.3 The Company will maintain adequate and appropriate confidentiality, accuracy, and security of personal data.

5.3.4 The Company will not use personal data for processing contrary to the purposes informed since the collection and storage of personal data. If the Company collects additional personal data or changes the purpose of the collection, the Company will notify the Data Subject and only comply with rules and methods specified by law.

5.3.5 The Company has established security measures to store personal data in accordance with the law on the protection of personal data and enforce strict policies on keeping personal data secure, as well as requiring employees and related persons to comply with the Privacy Policy and appropriate practices to store, use and/or transfer personal data.

5.3.6 The Company will prepare and maintain the data processing records for records and updates of activities related to the processing of personal data in accordance with the law.

5.3.7 The Company will delete or destroy unnecessary personal data for the purposes informed, when the retention period comes to an end, or when notified from the Data Subject. The Company will operate in accordance with the laws and the Company's operating guidelines.

5.4 Exercise of Data Subject Rights

5.4.1 The Company will ensure that the rights of the Data Subject in accordance with the law, including the right to withdraw consent, right to request access to personal data, right to request to correct personal data, right to request the deletion of personal data, right to request the suspension of the use of personal data, right to object to the processing of personal data, right to send or transfer personal data, and right to file a complaint, will be responded in a timely manner under the law.

5.4.2 The Company will provide a mechanism for verifying the accuracy of personal data, as well as a mechanism for correcting personal data when requested by the Data Subject.

5.4.3 The Company will provide measures, channels, methods and procedures in order to response to the exercise of the rights of the Data Subject, as well as record and evaluate the response to the exercise of the rights of such Data Subject.

5.4.4 In the case that the Company collects and processes personal data by the consent of the Data Subject, the Company will give the right to the Data Subject to withdraw the consent given to the Company at any time. In this regard, if the Data Subject withdraws the consent

given to the Company or refuses to provide certain information, it may result in failing to fulfill some or all of the Company's objectives as stated in the Privacy Notice.

5.5 Disclosure of Personal Data to Other Persons

5.5.1 If it is necessary to disclose personal data of the Data Subject to the third parties or other juristic persons in order to act on behalf of the Company as the Data Controller or the Data Processor, in order to achieve the purpose of collection, use, disclosure, and storing personal data as stated in the Privacy Notice, the Company will verify that such person or entity has the measures of personal data protection no less than or equivalent to the Company's privacy measures.

5.5.2 In the case of sending or transferring of personal data internationally, the Company will evaluate whether the destination country has adequate personal data protection measures and/or other privacy protection standards set by the Personal Data Protection Act and will make the best efforts to send or transfer personal data in the most secure way in order to secure personal data.

6. Use of Cookies

Cookies are small text files that are stored on your computer or gadgets that connect to the internet, such as your smartphone or tablet, when you visit the Company's Website, which typically record your personal data on the websites such as name, address, e-mail, user & password, IP Address, search terms and other user settings (e.g., language), etc.

Cookies help the Company to understand how the Company's website is being used and to further develop or improve the user experience in order to provide service that meets your needs by recording cookies settings which help to collect your user settings to make your next visit easier and precisely respond to your needs. Such information will be stored and will not be disclosed, and no one will know that the data subject has chosen unless the Data Subject has logged in as a member. The Company uses the information only for improving the website and making it for the best under purpose as stated.

You can manage cookies through changing your cookies settings by accepting, rejecting, or deleting cookies that are set on the Company's website. You can do so by selecting your cookies settings or your browser settings to, e.g., prohibit the installation of cookies on your device by disabling such cookies. However, setting such cookies may affect the efficiency of the Company's website since you may not be able to use some parts of the website or the Company may not be able to collect information about your personal settings. In addition, it may affect the display of the Company's website. This may prevent the results from being displayed properly.

7. Connecting to external websites

If any part of the Company's website contains any links to other websites. Other websites may have different privacy statements/policy/notice. The Company recommends that the data subject check those websites for their privacy statements/policy/notice for the data subject to understand the policies for the collection, usage, and disclosure of the personal data of that website.

8. Contact the Company

In case that the Data Subject would like to ask for more information about the Privacy Notice or exercise the rights of personal data of the Data Subject, please contact the Company's Personal Data Protection Officer at

MK Restaurant Group Public Company Limited

1200 Debaratna Road, Bangnatai, Bangna, Bangkok 10260

E-mail: dpo@mkrestaurantgroup.com

Tel: 02-836-1088 or 02-066-1000

9. Penalties for non-compliance with the Privacy Policy

If any person violates and does not comply with the Privacy Policy and other measures issued under this Privacy Policy, the Company shall investigate and take disciplinary action to such person.

This policy was effective from May 19, 2021 onwards.