

Privacy Policy of Mitutoyo (Thailand) Co., Ltd.

1. Principle and Rationale

Mitutoyo (Thailand) Co., Ltd. (“Company”) is aware of the importance of personal data protection according to the Personal Data Protection Act B.E. 2562 (2019) and any relevant laws, including any amendments which may be made thereto in the future (“Laws on Personal Data Protection Act”). Therefore, the Company has issued a Privacy Policy to comply with the laws and to ensure that the Company collects, uses, and discloses personal data correctly, including providing personal data protection standards and prescribing procedures and measures for the security of personal data for the proper and efficient supervision and management of personal data in accordance with the Laws on Personal Data Protection.

2. Scope of Enforcement

- 2.1. This Privacy Policy applies to the collection, use, disclosure, or any other action (“Processing” or “Process”) of personal data in accordance with the Laws on Personal Data Protection carried out by the Company, which includes the board of directors, directors, executives, employees, operators at all levels of the Company or any person involved in the Company's operations where personal data are processed according to the orders given by or on behalf of the Company.
- 2.2. For the personal data which the Company has previously collected prior to the effective date of the Personal Data Protection Act B.E. 2562 (2019), the Company will continue to collect and use such personal data for its original purposes, unless the Data Subject notifies to withdraw its consent to the Company for the collection and use of its personal data, in accordance with the Laws on Personal Data Protection.

3. Definition

- 3.1. Personal Data means information relating to a person which enables the identification of such person, whether directly or indirectly, but not including the information of deceased persons in particular.
- 3.2. Sensitive Personal Data means information which is truly personal to an individual, sensitive, and may be a risk of unfair discrimination, such as information related to racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health information, disability, trade union information, genetic data, biometric data, or any other information affecting the Data Subject in the same manner as prescribed by laws.
- 3.3. Data Subject means a person who owns its Personal Data which such Personal Data can indicate or identify such person, whether directly or indirectly.

- 3.4. Data Controller means a person or a juristic person who has the authority and duty to make decisions regarding the collection, use, or disclosure of Personal Data.
- 3.5. Data Processor means a person or a juristic person who carries out in relation to the collection, use, or disclosure of Personal Data according to the orders given by or on behalf of a Data Controller only. However, such person or juristic person is not a Data Controller, and has no-decision making power and cannot process of the data on their own.
- 3.6. Security of Personal Data means the confidentiality, integrity, and availability of Personal Data to prevent unauthorized or unlawful loss, access, use, alteration, correction or disclosure of Personal Data.

4. Collection of Personal Data

- 4.1. The Company will collect Personal Data to the limited extent necessary for lawful and fair purposes only, and, the Company will collect Personal Data received directly from the Data Subject. The Company will ask for consent from the Data Subject prior to or at the time of the collection of the Personal Data, unless it is exempted from obtaining consent as prescribed by laws.
- 4.2. In the event that the Company collects Sensitive Personal Data, the Company will request explicit consent from the Data Subject prior to or at the time of the collection of such Personal Data, unless it is exempted as prescribed by laws.
- 4.3. In the event that the Company collects Personal Data from other sources apart from the Data Subject, the Company will notify the Data Subject within 30 (thirty) days from the date of collection and the consent of the Data Subject has been obtained, unless such collection of Personal Data from other sources is exempt from obtaining consent as prescribed by laws.
- 4.4. The Company will collect Personal Data specified or notified in writing by you including, but not limited to, any forms, requests, demands or documents whether in tangible form or through electronic systems. Any person authorized by the Company to collect such Personal Data is aware of and will comply with the authorities and duties, rules, policies and procedures of the Company in order to comply with the laws, and will ensure that such Personal Data remains accurate, up-to-date, complete, and not misleading.
- 4.5. The Company will notify the Data Subject prior to or at the time of the collection of the Personal Data regarding any details as prescribed by laws, at least, of the following:

- 4.5.1. Purposes of the collection for use and disclose of Personal Data;
- 4.5.2. The necessity for the Data Subject to provide its Personal Data to the Company in order to comply with laws, or contracts, or where it is necessary to enter into a contract, including the possible impacts where the Data Subject does not provide its Personal Data;
- 4.5.3. Personal Data to be collected and retention period of collection
- 4.5.4. Types of persons or entities to whom the Data Subject's Personal Data may be disclosed;
- 4.5.5. Information regarding the Data Controller, including address and contact method;
- 4.5.6. Rights of Data Subject;
- 4.5.7. Others as prescribed by laws

Subject to Clause 4.5.1, the Company will not collect, use or disclose Personal Data that is different from the purposes notified to the Data Subject, unless the Company has notified the Data Subject of the new purpose, and the consent is obtained prior to such collection, use or disclosure, or it can be done by the provision of laws.

5. Use or Disclosure of Personal Data

- 5.1. Except for the case where it is exempted according to the prescription of laws, the Company will not use or disclose Personal Data in which the Data Subject has not given consent to. The Company will use or disclose Personal Data in accordance with the purposes for which the Data Subject has been informed only, unless the Company has notified the Data Subject of the new purpose and the consent is obtained prior to such collection, use, or disclosure, or it can be done by the provision of laws.

Except for the case where it is exempted according to the prescription of laws, the Company may disclose Personal Data to the extent necessary under the principle of consent given by the Data Subject, to any agencies or persons including, but not limited to, affiliates, business partners, outsource service providers, or Data Processors, etc., for the benefit of the Company's operations and providing services to the Data Subject, or to be able to achieve the purposes according to contracts, or any laws, or in the case where the Company engages such agencies or persons to operate in relation to Personal Data, such as sending information to outsourcing agencies for marketing analysis, etc. The Company will provide appropriate confidentiality measures and security measures for Personal Data, including providing an agreement between the Company and such agencies or persons as prescribed by laws in order to prevent unauthorized or unlawful loss, access, use, alteration, correction, or disclosure of Personal Data, and to prevent the use of such Personal Data other than the Company's orders, and assigns such entities or persons to have appropriate

confidentiality measures and security measures for Personal Data that are equal to or better than the same of the Company.

- 5.2. In the event that the Company sends or transfers Personal Data to a foreign country, the Company will ensure that the destination country receiving the Personal Data has adequate personal data protection measures in accordance with the legal basis, except in the case of exemption as prescribed by laws. If such sending or transferring of Personal Data to a foreign country is made to the Data Controller or Data Processor who is in the same affiliated undertaking or in the same business group in order to jointly operate the undertaking or business, the Company will provide a policy of personal data protection or provide appropriate protection measures which enable the enforcement of the Data Subject's rights, including efficient legal remedial measures as prescribed by laws, as the case maybe.

6. Retention Period for the Collection of Personal Data

- 6.1. The Company will retain Personal Data for as long as it is necessary to fulfil the purposes as prescribed, or according to the standard period for the collection of each type of data as prescribed or permitted by laws, or until the Data Subject informs the Company to delete or destroy the Personal Data.
- 6.2. The Company will provide the examination process for deletion or destruction of Personal Data after the expiration of the Personal Data retention period.
- 6.3. The Company will delete, destroy, or make Personal Data become anonymous data which cannot be identified (anonymization) as soon as there is a reasonable assumption that such retention of Personal Data is no longer useful or unnecessary according to the purposes as set out, or in any contracts or by laws.

7. Rights of Data Subject

The Data Subject is entitled to its Personal Data in accordance with the Laws on Personal Data Protection as follows:

- 7.1. Right to access and obtain a copy of Personal Data which is under the responsibility of the Company, or to request to be informed or to disclose the source of Personal Data to which the Data Subject has not given consent.
- 7.2. Right to withdraw consent, the Data Subject has the right to withdraw its consent for the period in which Personal Data is with the Company at any time, whether in whole or in part.

- 7.3. Right to rectification of Personal Data, the Data Subject has the right to request the Company to correct any of its Personal Data which is incorrect, incomplete, out-of-date, or misunderstood.
- 7.4. Right to deletion or destruction of Personal Data, the Data Subject has the right to request the Company to delete or destroy its Personal Data, or to make its Personal Data become anonymous data which cannot be identified to you, as prescribed by laws.
- 7.5. Right to restrict the use of Personal Data, the Data Subject has the right to restrict the use of its Personal Data as prescribed by laws.
- 7.6. Right to receive and transfer Personal Data, the Data Subject has the right to obtain its Personal Data, including requesting that the Company send or transfer its Personal Data to other Data Controllers or to you.
- 7.7. Right to object to the processing of Personal Data, the Data Subject has the right to object to the collection, use, or disclosure of its Personal Data at any time, in accordance with the laws.

The Company will provide a contact channel for the Data Subject to inquire or notify the exercise of its rights to the Company as detailed in Clause 10. of this Privacy Policy. The Company reserves the right to consider any requests for exercising any rights of the Data Subject and will notify the result of such consideration within 30 (thirty) days from the date the Company receives the request from the Data Subject. And, in the event that the Company rejects any request, the Company will notify the reason for the refusal to the Data Subject, in accordance with the Laws on Personal Data Protection.

In the event that there are reasonable grounds to believe that the Company has failed to comply with the Laws on Personal Data Protection, the Data Subject has the right to lodge a complaint with the Personal Data Protection Committee which is established under the Laws on Personal Data Protection.

8. Security of Personal Data

- 8.1. The Company will provide appropriate security measures for Personal Data to prevent unauthorized or unlawful loss, access, use, alteration, correction, or disclosure of Personal Data, in compliance with the laws.
- 8.2. The Company will provide a review of measures according to Clause 8.1 above when necessary, or when the technology changes, for the efficiency and appropriation of security, by taking into account the level of risk based on factors on technology, context, environment, acceptable standards for agencies or businesses in the category

or in the same or similar manner, nature and purpose of collection, use and disclosure of Personal Data, required resources, and the possibility of taking action altogether. Such review of measures includes the event of a Personal Data breach, unless such breach has no risk to affect the rights and freedoms of individual.

9. Update of the Privacy Policy

The Company will provide a review of the Privacy Policy at least once a year, or when necessary due to the changes or if there are any incidents related to personal data matters which may significantly affect any requirements or criteria in this Privacy Policy. The Company will notify the Data Subject via the Company's website or other channels as appropriate, as the case may be.

10. Contact

In the event that the Data Subject has any questions for the Company or would like to inquire about any matters relating to the protection of Personal Data, the Data Subject is able to notify and contact the Company according to the details below.

Mitutoyo (Thailand) Co., Ltd.

Contact address: 76/3-5 Chaengwattana Road, Kwaeng Anusaowaree, Khet Bangkaen,
Bangkok

Telephone: 02 080 3500

E-mail: DPO@mitutoyo.co.th