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## PRIVACY NOTICE

### 1. Privacy Notice

Nova Organics Public Company Limited ("the Company") is a manufacturer and distributor of food supplements and health supplements, which are marketed under the brands "Donutt" and "Livnest" and others (if any). The company respects the privacy rights of shareholders, directors, employees, partners, customers, contractors, participants in activities, and/or other persons related to the company's business so that such persons can be confident that such rights will be fully protected under the Personal Data Protection Act 2019; as a result, the company has a personal data protection policy. By specifying the nature of the rules for collecting, using, disseminating, processing, transferring, and disclosing personal data, regulatory measures and management of personal information are clarified and managed appropriately.

In this regard, in processing your personal data according to the objectives in this announcement, the company acts as a "Data Controller," which means that the company has the authority to make decisions about the collection, use, or disclosure of personal data.

### 2. Objective

2.1 In order for the company's operations related to your personal data to be in accordance with applicable data protection laws.

2.2 To be a channel to notify data subjects about the methods that the company collects, uses, discloses, and/or transfers to foreign countries that personal data, including other details as required by the Personal Data Protection Law (such as the retention period of personal data, the owner's rights to personal data, or the contact channel).

### 3. Personal Information

"Personal data" means information about an individual that makes it possible to identify that person and shall include any other information about a particular individual that can be directly or indirectly associated with that individual.

"Sensitive personal data" means personal data specifically stipulated by the Personal Data Protection Act, including race, ethnicity, and political opinions, religious, or philosophical beliefs, sexual behavior, Criminal records, Health information; disability, union information, Genetic information, biological information, or any other information that the Personal Data Protection Committee notifies.

#### 4. Limited Collection of Personal Data

4.1 The collection of personal data is done with the company's objectives, scope, and using lawful and fair means to collect and store information, as well as collect and store personal data only to the extent necessary to provide the service. The company will proceed to inform the owner of the information to acknowledge and give consent, in writing or electronically, except without being able to give such consent.

4.2 Personal information collected as follows:

Personal Data	Details and Examples
<ul style="list-style-type: none"> <li>Personal identifiers</li> </ul>	For example, title, first name, last name
<ul style="list-style-type: none"> <li>Sensitive information</li> </ul>	For example, health information.
<ul style="list-style-type: none"> <li>Contact information</li> </ul>	For example, addresses on important documents, current address, type of residence, Mobile phone numbers, email addresses, social media account names (such as LINE ID or Facebook), correspondence, and communication record, the channels that wish to receive the media.

<ul style="list-style-type: none"> <li>• Technical data, Device information</li> </ul>	<p>For example, usage data at corporate offices (WiFi at co-working spaces) and identifying cookies Information Technology (IT).</p>
<ul style="list-style-type: none"> <li>• Other information</li> </ul>	<p>For example, information from closed-circuit television cameras, marketing data specific to a complaint, or information from survey preparation.</p>

#### 4.3 Collection Channel

Your personal information will be collected by the company through its website and applications, customer service centers (telephone, post office, events, or seminars), or from other sources (e.g., partners, business partners, external service providers, public sources, or government agencies). The amount collected will be determined by your relationship with the company or the nature of your use of its products or services.

#### 4.4 Personal information of third parties

If you disclose third-party personal information (for example, to directors or attorneys), you are responsible for informing them of the details as an authorized person to sign on behalf of your affiliated company, a close person, or a reference person. this release to such third parties regarding the collection, use, disclosure, and/or international transfer of personal data; obtaining consent or having other legal bases for the collection, use, disclosure, and/or international transfer of personal data from such third parties; and proceeding for the company to be able to collect, use, disclose, and/or transfer to other countries their personal data in accordance with the law.

#### 4.5 Personal information of minors, incompetent quasi-persons, and incompetent persons

The company has no intention of collecting personal information about minors, incompetent quasi-competents, or incompetent persons. Unless the company's consent has

been obtained from the parent who has the authority to act on behalf of the minor (in cases where consent is required and minors are legally unable to consent), guardians or guardians (depending on the case).

If the company discovers that it has unintentionally collected personal information about a minor or an incompetent or quasi-incompetent without the consent of the parent, guardian, or both, it will delete that personal information as soon as possible. Unless the company There will be legitimate grounds with relevant legal bases that will allow the company to collect, use, disclose, and/or transfer personal data to other countries.

Failure to provide personal information to the company may have consequences for you, such as the company being unable to perform as requested by you or in accordance with the contract; or the company being unable to offer or provide the company's products or services. You may not be comfortable or capable of carrying out the contract.

## **5. Purpose of Using Information**

The company will collect, use, or disclose your personal data as necessary or if there is a law requiring it, except in the case where the company is involved and has stated that the collection, use, or disclosure of personal data will rely on your consent; in that case, the company will rely on other legal bases for the collection, use, or disclosure of personal data, which are as follows: (1) Contract bases (2) Important life benefit bases (3) Legal duty performance bases (4) State mission bases (5) Legitimate interests (6) Archives, research, statistics, and/or (7) other bases on which the company can operate in accordance with applicable laws.

Some of the following purposes may apply to all customers or may not apply to all customers. Please consider the nature of the objectives according to the relationship between you and the company.

5.1 Objectives Relying on Consent

Objective	Details
<ul style="list-style-type: none"> <li>Marketing Communications</li> </ul>	<p>For example, publicize the company's products and business partners in the event that other legal bases are unavailable.</p>

The company will collect, use, and/or disclose personal information only upon your explicit consent. or when the law allows it to be done.

5.2 Other purposes that may rely on other legal bases

Objective	Details
<ul style="list-style-type: none"> <li>Communication</li> </ul>	<p>For example, coordination receiving complaints through various communication channels.</p>
<ul style="list-style-type: none"> <li>Marketing</li> </ul>	<p>For example, strategic planning in public relations, advertising, and real estate sales; digital marketing or social media marketing communications through service providers (e.g., organizing marketing events); analyzing customer data for the purpose of offering other projects and/or financial products to promote the purchase of the company's products or those of a selected business partner; and determining that the service or product will be of benefit to you.</p>
<ul style="list-style-type: none"> <li>Customer relationship management</li> </ul>	<p>For example, creating a customer database and updating customer information Organizing events, press conferences, and booths Assessment of customer satisfaction</p>

	after receiving complaints Consideration of complaints and resolution of complaints.
<ul style="list-style-type: none"> <li>Internal management of the company and Data analysis</li> </ul>	<p>For example, preparing reports and performance analysis, consideration of investing in new business investment and business expansion related to current business, preparation of the internal control checklist assessment form, preparation of audit reports, reports related to corruption, and preparation and presentation of risk management guidelines, developing processes, tools, systems, and/or models for analyzing risks design and development of system database structures and/or guidelines for various risk models; determination of guidelines for risk assessment; supervision, inspection, and collection of evidence; establishment, use, or defense of legal claims.</p>
<ul style="list-style-type: none"> <li>Comply with the law</li> </ul>	<p>For example, compliance with policies, announcements, or orders of the company; compliance with laws that the company has a duty to comply with; cooperating with government agencies or other authorities Notifying or submitting reports as required by law.</p>

<ul style="list-style-type: none"> <li>• Protection or suppression of danger</li> </ul>	<p>For example, the prevention or suppression of danger to the life, body, or health of a person.</p>
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## 6. Disclosure of Personal Information

The company may disclose your personal information to recipients of personal information as follows: certain categories of recipients of personal data may apply to certain customers and may not apply to some customers. Please consider the objectives according to the relationship between you and the company.

Personal Data	Details and Examples
<ul style="list-style-type: none"> <li>• Affiliates</li> </ul>	<p>All affiliates and subsidiaries in the group of the company may therefore be able to access your personal data for the purposes set out in the policy. In this regard, other companies in the group of companies can rely on the consent that the company has obtained.</p>
<ul style="list-style-type: none"> <li>• External service providers</li> </ul>	<p>The company may hire outsourced service providers to operate instead, or on behalf of the company or to support the operations of the company. This may include the case where the company will disclose your personal information to external service providers as follows: information technology service providers and computer systems; service providers as an online advertising agency; service providers as a customer</p>

	<p>service center, event organizer, short message service provider, and incubator service provider.</p>
<ul style="list-style-type: none"> <li>• Business partners</li> </ul>	<p>The company may also disclose your personal information to business partners or business alliances of the company (such as telesales service providers).</p>
<ul style="list-style-type: none"> <li>• Independent consultant</li> </ul>	<p>The company may disclose personal information to consultants of the company in order to ensure that the company's operations are in accordance with the objectives stated in this policy and as required by applicable laws. Such independent advisors may include, but are not limited to, the following: project advisors, financial advisors, legal advisors, accounting advisors, information technology advisors, data analysts, and finance and investment advisors.</p>
<ul style="list-style-type: none"> <li>• Government</li> </ul>	<p>The company may need to disclose your personal data in order to comply with laws or regulations, to cooperate with government agencies and state enterprises, law enforcement agencies, or any other person. Receivers of such personal data may include, but are not limited to, the departments of lands, highways, revenue,</p>



	<p>excise, customs, and intellectual property, as determined by the company. Department of Business Development, Regional Office, Securities and Exchange Commission, Anti-Money Laundering Office, Office of the National Anti-Corruption Commission, Royal Thai Police, Courts, and/or other relevant government agencies, or requesting information on a case-by-case basis.</p>
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## 7. International transfer of personal data

The Company may disclose your personal data to overseas recipients (e.g., for backing up data on cloud storage servers located overseas or to brokers or sales representatives of the company's products), which may or may not have the same level of personal data protection standards as those set forth in Thailand. The transfer of your personal data is secure, and to ensure that recipients of personal data have appropriate personal data protection standards, or there are other exceptions, as required by the law on personal data protection.

## 8. Period of collection of personal data

The company will retain your personal data for a reasonable period of time and as long as necessary to operate according to the stated objectives or longer as required by the law on personal data protection, according to the statute of limitations as requested by you and/or according to the time period specified by the relevant law.

## 9. Security Measures for Personal Data

9.1 In order to prevent loss, destruction, change, correction, use, disclosure, or unauthorized access to personal data in accordance with the applicable law, the company

will provide security measures for personal data covering the Management Administrative measures, technical measures, and physical measures, which may include but are not limited to Controlling access to personal data and devices for storing and processing personal data with regard to use and security determining the permission or setting the rights of users to access, use, disclose, and process personal data. User Access Management determining the user's responsibilities to prevent unauthorized access to personal data, disclosure, knowledge, or unauthorized duplication of personal data, or theft of personal data storage or processing equipment. Providing means for traceability regarding access, change, deletion, or transfer of personal data to be consistent with the methods and media used to collect, use, or disclose personal data, including showing or verifying the identity of who accesses or uses personal information according to the company's information policy.

9.2 In the event of a violation of the company's security measures that causes a personal data breach or leakage of personal information to the public, the company will promptly notify the owner of the information, including informing them of the damage remedial plan from the breach or leakage of personal information to the public caused by the company's inadequacy, arising from the use or disclosure of personal information to third parties, including neglecting or ignoring the logout of the database or the company's online social communication system by the action of the data subject or another person with the consent of the data subject.

## **10. Amendments to the Personal Data Protection Policy**

The company reserves the right to change details, update, or amend the policy on this issue from time to time. The company will announce or disseminate corporate policies. The revised version of the Personal Data Protection Policy will be published on the company's website. The company may notify you of an amendment to this policy only in the case of significant changes. As a result, please review and understand the organization's policy on the protection of personal data on a regular basis.

## 11. Cookie Policy

The company uses cookies that store or remember user information until the browser is closed or until the user deletes or refuses the collection of cookies. You will find that using the website will be more convenient. Cookies help the website store information about the website that you have visited or accessed, and the website will use the collected cookie information for statistical analysis and/or for other activities of the Company. To improve the company's products and services, make them better.

## 12. Owner's Rights to Personal Data

Under the law on the protection of personal information as required, you have the following rights as a data subject:

1. **Right to withdraw consent** You have the right to withdraw the consent that you have previously given to the company for the collection, use, or disclosure of personal information at any time.

However, the refusal to give consent or the withdrawal of consent may affect the performance of contractual obligations or the company's duty to follow the law. If you want to study the effects that may occur in detail, please contact the company. According to the contact channels in Item 13.

2. **Right to access and obtain a copy of personal data** You may have the right to obtain a copy of your personal data that is under the responsibility of the company and the right to request the company disclose the acquisition of personal information. In order to ensure the safety of personal information, the company may verify the applicant's identity before providing personal information upon request.
3. **Right to rectify personal data** You may have the right to request the correction of personal data. In the event that the personal information under the company's responsibility is incomplete, inaccurate, causing misunderstandings, or not current.

4. **Right to transfer personal information** You may have the right to obtain your personal data in electronic format. You also have the right to request that the company send or transfer such personal data to other data controllers under the conditions required by law.
5. **Right to object** You may have the right to object to the collection, use, or disclosure of personal information in certain circumstances, such as direct marketing.
6. **The right to withhold the use of personal information** You may have the right to request that the company suspend the use of your personal information in certain cases.
7. **Right to erasure of personal data** You may have the right to request the company delete or destroy your personal information, or make it so that it cannot be identified under the conditions required by law.
8. **The right to complain** You have the right to complain to the competent authority if you believe that the collection, use, and/or disclosure of your data is unlawful. However, the company would like to ask for the opportunity to acknowledge your concerns, complaints, and requests for clarification and correction before you contact the relevant authorities.

Exercising the rights of the above personal data subject may be limited by applicable laws or other exemptions that apply to the company. If the company is unable to comply with the request to exercise the rights of the owner of the personal data, it will notify you of the reason for the refusal.

### 13. Contact Channels

If you wish to contact us, have questions, or would like to inquire about the details of the processing of personal data, including your rights as the owner of personal data according

to this policy, or in the event that your personal information is used in an unlawful way, you can contact the company through the following channels:

1. Nova Organic PCL.
  - 190/4 Moo 8, Naiklongbangplakot, Phrasamutchedi, Samutprakan 10290
  - Telephone 02-4171130
2. Data Protection Officer : DPO
  - 174, 176, 178 Soi Rama II soi 60, Samaedum, Bangkhuntian, Bangkok 10150
  - Telephone 02-4171130 EXT 301
  - Email Address : [info@nova-organic.com](mailto:info@nova-organic.com)

**Effective date:** January 3, 2022