



บริษัท นอร์ทอีสท์ รับเบอร์ จำกัด (มหาชน)
NORTHEAST RUBBER PUBLIC COMPANY LIMITED
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Personal Data Protection Management System Manual

Northeast Rubber Public Company Limited

Personal Data Protection Working Group

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Prakhon Chai District
Buri Ram Province
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Mr. Sakchai Juengsathapongpan
Company Data Controller

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25 January 2021



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Personal Data Protection Management System Manual, Northeast Rubber Public Company Limited (25 January 2021)

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Northeast Rubber Public Company Limited

Northeast Rubber Public Company Limited has been registered to transform into a public limited company on 8 June 2018 to operate the business for manufacturing Ribbed Smoked Sheet (RSS), Crepe Rubber, Standard Thai Rubber (STR), Latex Rubber, and rolling rubbers into sheets, and manufacturing rubbers in any other similar forms. Throughout the past business operation period, the Company focuses on the efficient business operation consistently with the business environment and the global situational changes in each period.

The Company's business growth has been continued with both domestic and foreign sales to cover the customer demand and create the business opportunities. In the said business operation, it is necessary of the Company to collect, use, disclose, and transfer the personal data to the third parties and across the border. The personal data relating to a person who is a data subject may result in the authentication of the data subject either directly or indirectly.

1. Personal Data Protection Policy

Personal Data means "the person-related data which can identify the said individual either directly or indirectly, but excluding the particular data of the deceased."

The Company gives precedence to maintenance of the personal data both of the employees and all related parties, such as customers, business partners, service contractors, viewers, and visitors, etc. who are protected by law. The Company always observes as a guidance whereas the wrongful exploitation of the personal data or disclosure of data which can identify the individual without consent shall be the act of violation, breach of law, and the Company's discipline. Therefore, the Company has established the Personal Data Protection Policy and applied in the organization.



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Northeast Rubber Public Company Limited realizes on the significance of the personal data protection. Therefore, the Personal Data Protection Policy has been established. This Policy describes the method for the Company's treatment to the personal data, for instance, collection, storage, usage, disclosure, and rights of the personal data subject, etc. to ensure that the data subject is informed of the Company's Personal Data Protection Policy. Therefore, the Company has announced the Company's Personal Data Protection Policy to every one for acknowledgement.

The Company promises to maintain and protect the personal data, and establish a necessary measure and guidance for protecting the personal data collected, used, and disclosed by the Company according to the requirement of law.

2. Objective of the Personal Data Protection Management System

The Company prepares this personal data protection management system under the Company's Personal Data Protection Policy to be used as the Company's direction of the personal data management whether storage, collection, usage, or disclosure of the data. The operations inside the Company shall be controlled in protection of every one's personal data according to the requirement of law, and as a guidance of all employees to ensure that the personal data shall be protected and prevented to have minimum risk.

3. Applicable Laws

The Company establishes this personal data protection management system as a guidance of all employees in determining a minimum standard for collection, usage or disclosure subject to the Personal Data Protection Act B.E. 2562 (2019), as well as laws and notifications, and other related rules.

This personal data protection management system consists of the personal data protection policy, personal data protection management manual, and attachment in case where any document has statements which are in conflict or contradiction, this personal data protection management shall be effective.

4. Scope of Application

4.1 This personal data protection management system shall be applicable with the Company, participant, and the Company's employees.

4.2 This personal data protection covers all data processing from data collection, data usage, or data disclosure.



4.3 Protection of the personal data of all data subjects consisting of:

the executives/shareholders, the Board of Directors, business partners, customers, trade creditors, debtors, and public sector agencies, mass media, private agencies, communities/society, employees, visitors, or Website, contractors, and consultants; and the personal data acquired from employing for data processing, and visitors, etc.

4.4 In the case where the law of the transferee's country on personal data protection has personal data protection standard above what is determined in this document, the Company shall comply with the said law.

4.5 In the case where no law of the transferee's country on the personal data protection is applicable with personal data processing, or in the case where the law of the said country has standard below what is determined in this document, the Company shall comply with the condition prescribed in this document.

5. Principle and Guidance for Processing the Personal Data

The Company establishes a principle and guidance for processing the personal data to be used as an employee guideline for performing to ensure that the personal data processing is in line with the requirement of law.

5.1 Principle for Processing the Personal Data

5.1.1 The processing of data or transmission or transfer of personal data shall be legally carried out as explicitly and fairly prescribed.

5.1.2 The personal data shall be processed particularly of the notified objective. The data subject must give a prior-consent on the change of objective or addition of objective unless as required by law.

5.1.3 The Company has duty to firstly inform the objective, data controller, data transmission or transfer to the third party (if any), and the right to the personal data subject or in the time of personal data collection.

The Company shall publicize the Personal Data Protection Policy, document of the personal data protection management system in the Company's website to allow the data subject and the general person to access for studying the guidance, and store in a central documentary data file of the Company.

5.1.4 The Company shall collect and use the particular personal data as much as



necessary according to the objective of the collected personal data.

5.1.5 The Company shall destroy the personal data of which the specified storage duration is overdue or the Company has no right or is unable to refer the base for processing personal data of the data subject.

5.1.6 The Company shall use a reasonable measure for storing personal data to be correct, updated and reliable.

5.1.7 The Company shall define the appropriate security and safety of the personal data both of the management system and technique to ensure that the personal data will be protected and prevented as required by law in prevention of loss, leakage, violation from the unauthorized person, and illegal processing or transmission, and transfer, as well as loss from accident.

5.2 Guidance for Processing the Personal Data

The Company establishes a guidance for processing data covering the entire process as prescribed in the Personal Data Protection Act B.E. 2562 (2019) as follows.

5.2.1 The personal data shall be collected under the objective, and adequate as much as necessary according to the objective framework or for benefit which is directly related to the collection objective. The data subject must be notified for acknowledgement prior or during collection of data relating to the details of collection as follows.

- 1) Collection objective
- 2) Collected personal data
- 3) In the case where the data subject must provide his/her personal data to comply with laws or contract, or to enter into the contract, whereas the possible impact from not using personal data must be notified to the data subject for acknowledgement.
- 4) Type of the person or work unit of which the collected personal data may be disclosed
- 5) Right of the data subject

The data subject shall give a consent on data collection, unless upon the requirement of law for performing, for instance, general data not requiring the consent according to the contract base or as required by law, such as transmission of wage payment data to the Revenue Department, or sensitive data not requiring the consent, for instance, health data in preventing the communicable diseases, etc.



5.2.2 Data usage or disclosure

The personal data must be used or disclosed according to the objective or necessity for benefit which is directly related to the collection objective, and the consent must be firstly given by the data subject or at that time unless according to the requirement of law, for instance, it is the data legally disclosed to the public to prevent or abate danger to the individual's life, body or health, etc.

6. Framework of the Personal Data Protection Management System

- 1) Establishing the policy and control to ensure that the personal data is protected according to the requirement.
- 2) Preventing the security of personal data of each type of data subject
- 3) Determining each type of data subject covering processing from the process of collection until demolition and notification of the right
- 4) Establishing a corrective measure upon occurrence of violation of the personal data
- 5) Training and developing the employees to have knowledge and understanding on laws and the personal data protection management system manual.
- 6) Meeting for considering the operations and reviewing the personal data protection management system once a year

For efficient control and operation according to the personal data protection management system, the Company, therefore, has appointed a Personal Data Protection Working Group to supervise and control the personal data protection management system, and support the operations according to the order of the Company's data controller.

7. Criteria of the Personal Data Protection

The criteria of the personal data protection shall be established and classified according to the type of the data subject, control on processing process from the beginning of process in right notification, collection, usage or disclosure, until demolition and request for exercising the right. The objective of the personal data processing shall be firstly notified to the visitor and other rights to the data subject for acknowledgement, or the data subject shall be asked for consent during collection unless no requirement for asking the consent as required by law. The data transmission and transfer to the third party or across the border shall be notified. In the case of change of objective or addition of objective, the data subject shall be notified for acknowledgement unless



required by law, and the following elements shall be contained.

- 1) Stored data
- 2) Source of origin
- 3) Collection
- 4) Usage
- 5) Disclosure
- 6) Transmission or transfer
- 7) Prevention
- 8) Notification of right
- 9) Data update
- 10) Responsible person
- 11) Contact persona and contact address

8. Processing Contract

The Company establishes a guidance for entering into the data processor employment contract.

- 1) Prior to employment of the data processor, the Company must assess the personal data protection system of the contractor.

*If the processing contractor has no or inadequate preventive system upon entry into the processor employment contract, the processor shall comply with the Personal Data Protection Policy as prescribed by the Company.

- 2) In the employment contract, it must specify objective, data storage method, and notification to the data subject, data usage, transmission and transfer, and data disposal.

3) The contractual party must sign the personal data protection according to laws or manual as prescribed by the Company.

4) Upon employing the processor, the control must be carried out according to a guidance for protecting personal data.

- 5) Upon expiration of data storage, the processing contractor must be controlled to



destroy data as specified.

9. Right of the Data subject

9.1 In the case where the Company directly collects personal data from the data subject, the Company shall inform the data/Personal Data Protection Policy to the individual for acknowledgement prior to storage or during storage to the data subject for acknowledgement as per the following minimum details.

9.1.1 Identity and data of the data controller

9.1.2 Processor

9.1.3 Processing objective and law based on the intention of the data subject

9.1.4 Type of the data receiver (if any)

9.1.5 (if any) fact relating to the data controller's intention to transmit personal data to other countries or international organizations, as well as description and reference to the appropriate preventive measure for the said transmission or transfer.

9.1.7 Collection duration of the personal data

9.2 Right of the data subject to access the personal data, call the data controller to revise personal data, or object the data processing

9.3 Right to withdraw the data subject's consent whenever

9.4 Right of the data subject to submit the request to the authorized officer

9.5 The Company has duty to certify and protect the following rights of the data subject.

9.5.1 Right to request for access and request for receiving a copy of his/her related personal data under the responsibility of the data controller or request for disclosing the acquisition of the said personal data which is not approved by him/her.

9.5.2 Right to request for receiving his/her related personal data from the data controller

9.5.3 Right to object the collection, usage, or disclosure of the personal data

9.5.4 Right to request the personal data controller to delete or destroy

9.5.5 Right to request the data controller to restrict the personal data usage.

9.5.6 Right to request for rectifying, updating, and validating the said personal data, and not causing misunderstanding.

10. Personal Data Protection Measure



The Company has duty to establish an appropriate security measure to prevent loss, access, usage, change, revision, or disclosure of the personal data without authorization or wrongfully according to the Personal Data Protection Policy established by the Company.

11. Audit

The Company has appointed a working group of personal data protection to perform its duty in reviewing the Company's personal data protection management system, and the data controller to audit the Company's personal data protection, and report the Chief Executive Officer for acknowledgement.

12. Training

12.1 To make all in-house employees acquire adequate data, the Company shall carry out as necessary for the employees' acknowledgement and awareness on the personal data protection.

12.2 The Company's employees have duty to process the personal data, and must create understanding on the personal data protection.

Details are according to the Company's training practices

13. Document Control

The Company has duty to store the record of the personal data processing activity transactions, and the activity operation, and send to the authorized person to verify and approve as per the details of the document and data control regulations, as well as duration as specified by the rules, regulations, or laws.

14. Complaint Process and Related Procedures

14.1 The personal data subject who believes that his/her personal data is collected, used, or disclosed by breach of law or data protection policy prescribed by the Company, and he/she intends to exercise his/her right, can directly submit the petition to the personal data controller or the Office of the Personal Data Protection Commission via letter or e-mail.

14.2 The Company's employee who believes that his/her personal data is improperly collected, used, or disclosed, can ask for exercising his/her right from the Company's personal data controller.

14.3 The Company's personal data controller shall respond the petition without delay and not exceeding 1 (one) month from the received date of the petition

14.4 In the case where the complainant disagrees with the consideration of the Company's



personal data controller, the complainant can further directly appeal the consideration with the Office of the Personal Data Protection Commission.

15. Liability

The Company and/or an employee who performs to violate law shall be responsible for the breach of the provisions pursuant to Section 77 to Section 90 of the Personal Data Protection Act B.E. 2562 (2019), and the said act shall be an act that breaks the Company's discipline.

16. Update of the Personal Data Protection Management System

16.1 The data processor and/or employee whose duty is related to the personal data protection management system can update the manual, requirements, forms, or any other announcements, causing a higher and appropriate efficiency of the personal data protection management system for the Company's operations, shall propose to the Personal Data Protection Working Group to propose the data controller for auditing and the Chief Executive Officer for approval accordingly.

16.2 The Personal Data Protection Working Group shall have authority to consider improving and updating the personal data protection management system by taking into account the accuracy, appropriateness, adequacy, and efficiency of the personal data protection management system. After considering the approval on improvement and update, the approval date of update shall be altered every time.

16.3 The Personal Data Protection Working Group shall notify the announcement to the related parties for acknowledgement and compliance as updated.

17. Responsible Person and Contact

The Company defines the responsible person and authority, and the Company's contact to ensure that personal data protection is carried out and verified, and the right of the personal data subject is exercised as required by law.

17.1 Responsible Person and Duty

17.1.1 Personal data controller has the following duties.

1) To give advice to the personal data processor, and the staff relating to compliance with the Personal Data Protection Act and the working group in personal data protection works.

2) To audit the operation of the related parties in storing, collecting,



using or disclosing the personal data according to law.

3) To coordinate and collaborate with the Office of the Personal Data Protection Commission in case where there are problems relating to storage, collection, usage or disclosure of personal data of the Company's personal data processor.

4) To keep the secret of the personal data perceived or acquired by him/her due to his/her duty performance.

17.1.2 Personal Data Protection Working Group has the following duties.

1) To carry out according to the personal data controller's order pursuant to the Personal Data Protection Act B.E. 2562 (2019).

2) To screen and comment to the Management about the compliance with the Personal Data Protection Act.

3) To monitor the operating progress according to the Personal Data Protection Act.

4) To consider and suggest about an operating guideline and guidance according to the Personal Data Protection Act.

5) To consider and suggest an update of criteria and policy for the personal data protection to be consistent with laws and measures.

17.1.3 Data processor has the following duties.

1) To carry out the storage, collection, usage, or dissemination of the data according to the data controller's order or according to the regulations of each department entrusting the processor to record data according to the Personal Data Protection Policy only.

2) To carry out according to the appropriate security measure to prevent loss, access to use, change, revise, or disclose the personal data without the wrongful authority as specified in the Personal Data Protection Policy, as well as notify the personal data controller for acknowledgement about the arisen violation of the personal data.

3) To prepare and maintain the record of the personal data processing activity transactions as prescribed in to the regulations of the document and data control

17.1.4 Information Technology Department has the following duties.

1) To carry out the design, monitoring, verification, and suggestion on the personal data prevention system.



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2) To notify the personal data controller and the Personal Data Protection Working Group for acknowledgement about an event of the arisen violation of the personal data.

3) To mutually take corrective action of loss, leakage, and violation of the personal data.

17.2 Contact person and contact channel

The Company defines a personal data controller as specified in the Personal Data Protection Management System Manual to be a contact person from the complainant.

The data subject or complainant can contact the Company in the matter of personal data and inform at the Company's Human Resource Management Department which will report to the personal data controller.

Human Resource Management Department

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