

## Personal Data Protection Policy for Shareholders, Investors, and Directors

Bangkok Chain Hospital Public Company Limited (“BCH”) and its affiliated companies as listed in Annex 1, as well as any future affiliates (which will be notified accordingly) (“Affiliated Companies”), operating the following hospital groups: (a) World Medical Group, (b) Kasemrad International Hospital Group, (c) Kasemrad Hospital Group, and (d) Karunvej Hospital Group, including the provision of multispecialty clinics and other related businesses (collectively referred to as “the Group”), value your privacy and are committed to maintaining high standards in operational practices and personal data protection.

This Personal Data Protection Policy for Shareholders, Investors, and Directors (“Policy”) is established to ensure that the collection, use, and disclosure of personal data are in accordance with the Personal Data Protection Act B.E. 2562 (“PDPA”).

This Policy applies to the protection of your personal data in the capacity of:

- 1. Shareholders and Investors:** Shareholders and debenture holders of the Group, including representatives of legal entities, authorized persons, and proxies of such individuals (“Shareholders and Investors”).
- 2. Directors and Executives:** Directors and executives of the Group (“Directors and Executives”).
- 3. Related Persons:** Individuals related to Shareholders, Investors, Directors, and Executives, such as family members, parents, spouses, children, heirs, estate managers, or witnesses to any contractual documents (“Related Persons”).

### 1. Types of Personal Data

“Personal Data” means any information relating to an identified or identifiable individual, whether directly or indirectly, and does not include the personal data of deceased persons or any other personal data specifically exempted under the PDPA.

#### 1.1 For Shareholders and Investors

The personal data that the Group may collect from you includes the following:

No.	Types of Personal Data	Details
1.	“Identifiable Information”	(a) Full name (b) Nationality (c) Date of birth (d) Age (e) Gender

		(f) Marital status (g) National ID number (h) Passport number (i) Signature (j) Video recordings from CCTV (k) Photographs and video recordings (l) Information about relationships with directors, executives, or other stakeholders of the Group (m) Vehicle registration
2.	<b>“Financial, Investment, and Transaction Data”</b>	(a) Bank account details (b) Number of shares/bonds, holding period, and other related information regarding share or security holdings (c) Related transaction data
3.	<b>“Contact Information”</b>	(a) Address
4.	<b>“Sensitive Personal Data”</b>	(a) Body temperature, travel history related to health information, and symptoms of communicable diseases.

1.2 If you are a director or executive, the personal data that the Group may collect from you includes:

No.	Types of Personal Data	Details
1.	<b>“Identifiable Information”</b>	(a) Name and Surname (b) Photos and video recordings (c) Nationality (d) Date of Birth (e) Age (f) Gender (g) National ID number (h) Vehicle registration (i) CCTV video recordings (j) Signature (k) Marital status (l) Driver’s license number (m) Passport number (n) Information on relationships with directors,

		executives, major shareholders, or other stakeholders of the Group
2.	<b>“Contact Information”</b>	(a) Address (b) Email (c) Phone number
3.	<b>“Educational Qualification Information”</b>	(a) Education history or training history (b) Work experience (c) Field, skills, expertise, and competencies (d) Achievements and awards (e) Information indicating disqualifications or personal attributes, such as bankruptcy (f) Being a director or holding a position in other companies or businesses
4.	<b>“Financial, investment, and transaction information”</b>	a. Bank account details b. Number of shares/bonds, holding period, and other information regarding share or security ownership c. Related transaction information d. Compensation
5.	<b>“Sensitive Personal Data”</b>	a. Sensitive personal information regarding disqualifications or prohibited characteristics, such as criminal history, legal incapacity, or quasi-incapacity b. Body temperature, travel history related to health data, and symptoms of communicable diseases

1.3 If you are a related person, the personal data that the Group may collect from you includes:

No.	Types of Personal Data	Details
1.	<b>“Identifiable Information”</b>	(a) Full name (b) Nationality (c) Date of birth (d) Age

		(e) Gender (f) National ID number (g) Information regarding relationships with directors, executives, major shareholders, or other stakeholders of the Group
2.	<b>"Investment and Transaction Information"</b>	(a) Information on shareholdings or other securities (b) Related transaction information
3.	<b>"Contact Information"</b>	(a) Address

If you wish to work, enter into a contract, or engage in any legal relationship with the Group, the Group needs to collect your personal data. If you do not provide your personal data to the Group, the Group may not be able to enter into a contract with you, carry out any requests you make, or perform its obligations under the contract, agreement, or legal relationship. In addition, the Group may be unable to comply with any legal requirements it must follow.

If you provide personal data of another individual to the Group, you confirm that such individual has reviewed this Personal Data Protection Policy and has given consent for the processing of their personal data under this Policy (in cases where there is no other legal basis for processing). You must submit the written consent of such individual to the Group upon the Group's request.

## 2. Personal Data Collected Prior to the Enforcement of the Personal Data Protection Act

For personal data collected prior to June 1, 2022, the Group will process such personal data in accordance with the Personal Data Protection Act (PDPA). If you do not wish the Group to continue collecting or using such personal data, you may withdraw your consent at any time by contacting the Group or the Data Protection Officer as detailed in Section 9.

## 3. Collection of Personal Data

The Group may collect your personal data directly from you or from other sources as follows:

3.1 Affiliate companies

3.2 Registrars, such as the Thailand Securities Depository Company Limited

3.3 Public sources, such as company websites, government agencies, and regulatory authorities, including the Office of the Securities and Exchange Commission and the Stock Exchange of Thailand

3.4 In the case that you are a related party of a director or executive, the Group may collect your information from the directors and executives.

#### 4. Retention Period of Personal Data

The Group will retain your personal data for as long as necessary to achieve the purposes set out in this Personal Data Protection Policy, but not exceeding **10 years** from the termination of your status as a director, executive, shareholder, or investor. However, the Group may retain your personal data beyond this period as long as:

- (a) permitted by the Personal Data Protection Act (PDPA) and/or other applicable laws;
- (b) you and the Group continue to have a legal relationship;
- (c) the Group has a legal duty to retain the personal data;
- (d) you have provided consent to the Group; and/or
- (e) it is necessary under the law to achieve the purposes of processing under this Personal Data Protection Policy.

#### 5. Purpose of Personal Data Processing

Your personal data will be collected, used, and disclosed for the purposes outlined below, or for purposes for which you have provided consent, or as required by the Personal Data Protection Act (PDPA) and/or other applicable laws.

No.	Objectives	Personal Data	Legal basis under Section 24	Legal basis under Section 26
<b>Shareholders and Investors, including Related Parties</b>				
5.1	<b>Actions Taken Regarding You as a Shareholder and Investor</b> (a) For the management of shareholder meetings, including notification of meetings, identity verification, registration, conducting the meeting, and voting (whether in person or via proxy). (b) For the purpose	<u>Shareholders and Investors</u> (a) Identification information (b) Contact information (c) Financial, investment, and transaction information	(a) Contracts (b) Legal compliance	-

	of paying dividends to shareholders or interest to bondholders of the group companies, or any other benefits related to being a shareholder or bondholder.			
5.2	<p><b>Legal compliance</b></p> <p>(a) To comply with applicable laws, such as the Public Limited Companies Act B.E. 2535, the Securities and Exchange Act B.E. 2535, the Anti-Money Laundering Act B.E. 2542, the Royal Decree on Electronic Meetings B.E. 2563, the Civil and Commercial Code, the Revenue Code, and the Communicable Disease Act B.E. 2558. This includes managing the rights and duties of shareholders or bondholders, registration, disclosure and reporting of information to</p>	<p><u>Shareholders and Investors</u></p> <p>(a) Identification data</p> <p>(b) Contact information</p> <p>(c) Financial, investment, and transaction data</p> <p>(d) Sensitive personal data</p> <p><u>Related Persons</u></p> <p>(a) Identification data</p> <p>(b) Contact information</p> <p>(c) Investment and transaction data</p>	Legal compliance	Legal compliance

	<p>relevant authorities, tax-related matters, and reporting information of individuals who are, or are reasonably suspected to be, infected with communicable diseases to public health authorities.</p> <p>(b) To comply with court orders and/or orders from competent government authorities.</p>			
5.3	<p><b>Legitimate Interests</b></p> <p>(a) To verify identity and/or authority to act on behalf of others</p> <p>(b) For risk management, including regulatory compliance, internal control, and corporate governance within the group</p> <p>(c) To monitor and maintain security, prevent accidents and crime, and investigate unlawful or harmful activities</p>	<p><u>Shareholders and Investors</u></p> <p>(a) Identification data</p> <p>(b) Contact information</p> <p>(c) Financial, investment, and transaction data</p> <p><u>Related Persons</u></p> <p>(a) Identification data</p> <p>(b) Contact information</p> <p>(c) Investment and transaction data</p>	Legitimate Interests	-

	<p>(d) To retain your information as a witness for contractual or legal purposes</p> <p>(e) To disclose information for mergers, business restructuring, bankruptcy or rehabilitation processes, capital increases, or similar processes</p> <p>(f) To establish, enforce, exercise, or defend legal claims, including court proceedings</p> <p>(g) To evaluate, analyze, and improve the business operations of the group</p> <p>(h) To record images and videos of meetings for publicity purposes without revealing your identity</p>			
5.4	<p><b>Actions Upon the Death of Shareholders or Investors</b></p> <p>Actions in accordance with</p>	<p><u>Related Persons</u></p> <p>(a) Identification information</p> <p>(b) Contact information</p>	Law	-

	inheritance law and compliance with court orders when a shareholder or investor passes away.			
<b>Directors and Executives, including Related Persons</b>				
5.5	<p><b>Contracts</b></p> <p>(a) For the appointment, selection, and consideration of you to assume a position.</p> <p>(b) For the payment of remuneration.</p> <p>(c) For organizing board meetings, including shareholder meetings and any other meetings necessary for the operations of the Group.</p> <p>(d) For entering into any legal acts or transactions on behalf of the Group, such as managing financial transactions with banks, signing contracts, communicating with government authorities or any relevant agencies, and granting power</p>	<p><u>Directors and Executives</u></p> <p>(a) Identification information</p> <p>(b) Contact information</p> <p>(c) Qualification and competency information</p> <p>(d) Financial, investment, and transactional information</p>	Contract	-

	of attorney to persons designated by the board to carry out legal acts or transactions necessary for the operations of the Group.			
5.6	<p><b>Compliance with the Law</b></p> <p>(a) To comply with applicable laws, such as the Public Limited Companies Act B.E. 2535, the Securities and Exchange Act B.E. 2535, the Anti-Money Laundering Act B.E. 2542, the Royal Decree on Electronic Meetings B.E. 2563, the Civil and Commercial Code, the Communicable Diseases Act B.E. 2558, etc. This includes registration, disclosure and reporting of information to relevant authorities, verification of your legal qualifications and related matters, tax compliance, and</p>	<p><u>Directors and Executives</u></p> <p>(a) Identification information</p> <p>(b) Contact information</p> <p>(c) Qualification and competency information</p> <p>(d) Financial, investment, and transaction information</p> <p>(e) Sensitive personal information</p> <p><b>Related Persons</b></p> <p>(a) Identification information</p> <p>(b) Investment and transaction information</p> <p>(c) Contact information</p>	Legal compliance	Legal compliance

	<p>reporting individuals suspected or confirmed to have communicable diseases to public health authorities.</p> <p>(b) To comply with court orders and/or orders from competent government authorities, including communications with any relevant government agencies.</p>			
5.7	<p><b>Legitimate Interests</b></p> <p>(a) To verify identity.</p> <p>(b) For risk management, including internal audits, compliance checks, and organizational management within the company group.</p> <p>(c) To monitor, maintain security, prevent accidents and crimes, and investigate unlawful acts or activities that may cause harm.</p> <p>(d) To retain your</p>	<p><u>Directors and Executives</u></p> <p>(a) Identification data</p> <p>(b) Contact information</p> <p>(c) Qualifications and credentials</p> <p>(d) Financial, investment, and transaction data</p> <p><u>Related Persons</u></p> <p>(a) Identification data</p> <p>(b) Investment and transaction data</p> <p>(c) Contact information</p>	Legitimate Interests	-

	<p>information as a witness for contractual or legal evidence.</p> <p>(e) To disclose information for purposes such as mergers and acquisitions, business restructuring, bankruptcy or rehabilitation processes, capital increases, or similar processes.</p> <p>(f) To establish, exercise, enforce, or defend legal claims, including conducting legal proceedings in court.</p> <p>(g) To evaluate, analyze, and improve the business operations of the company group.</p> <p>(h) To record photos and videos of meetings for public relations purposes without identifying you personally.</p>			
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## 6. Disclosure of Personal Data to External Parties

The Group may disclose your personal data to external parties and/or government authorities as follows:

6.1 Affiliates

6.2 Commercial banks

6.3 Auditors and internal auditors, including various advisors such as legal, accounting, and tax consultants

6.4 Government or regulatory authorities, such as the Stock Exchange of Thailand, the Office of the Securities and Exchange Commission, the Revenue Department, the Department of Business Development, Thai Institute of Directors Association, and courts

6.5 Shareholders or investors

6.6 The general public, and visitors to the Group's websites, social media, or applications

6.7 Service providers, such as document or printing service providers, newspapers, event management contractors (both physical and online), etc.

6.8 The Group's contracting parties

6.9 Registrars, such as Thailand Securities Depository Co., Ltd.

## 7. Your Rights

You have the rights as prescribed under the Personal Data Protection Act (PDPA), subject to the conditions and limitations set forth by the PDPA and other applicable laws:

**7.1 Right to Access and Receive a Copy:** You have the right to access or request a copy of your personal data collected, used, or disclosed by the Group, and to request disclosure of how your personal data was obtained without your consent.

**7.2 Right to Receive and Transfer Personal Data:** You have the right to receive your personal data in a format that is generally readable or usable by automated means and can be used or disclosed automatically. You may also request the Group to send or transfer your personal data to an external party or to receive data that the Group has transferred to an external party, unless technically impossible. This applies only to personal data collected, used, or disclosed with your consent, under a contract, or based on other legal grounds.

**7.3 Right to Object:** You have the right to object to the collection, use, and disclosure of your personal data when the Group is processing data based on legitimate public interest, lawful interest, or for purposes related to direct marketing, scientific, historical, or statistical research.

**7.4 Right to Request Deletion:** You have the right to request that the Group delete, destroy, or anonymize your personal data.

**7.5 Right to Request Suspension:** You have the right to request that the Group suspend the use of your personal data if your request for correction, objection to collection/use/disclosure, or request for suspension in lieu of deletion is under review. You may also request suspension if the data is no longer necessary but should be retained for establishing, exercising, or defending legal claims.

**7.6 Right to Rectification:** You have the right to request that the Group correct your personal data to ensure it is accurate, current, and not misleading.

**7.7 Right to File a Complaint:** You have the right to file a complaint with the Personal Data Protection Committee of Thailand if the Group, its employees, or contractors violate or fail to comply with the PDPA.

**7.8 Right to Withdraw Consent:** You have the right to withdraw any consent previously given to the Group at any time, either partially or entirely, following the procedures prescribed by the Group. Withdrawal of consent will not affect the lawfulness of processing based on prior consent.

You may exercise these rights by contacting the Group or its Data Protection Officer as specified in Section 9.

Withdrawal of consent may affect the Group's ability to process certain requests or may reduce convenience to you. However, withdrawing consent will not affect the lawful collection, use, or disclosure of your personal data based on consent already granted.

For the protection and security of your personal data, the Group may refuse your request if:

- (a) The requester cannot provide evidence of being the data subject or lacks authority to make the request, or the Group does not receive sufficient information to process the request;
- (b) The request is unreasonable, such as requesting data that the requester has no legal right to or that the Group does not possess;
- (c) The request is excessive or repetitive without justification; or
- (d) The Group has the legal right to refuse the request under the PDPA or other applicable laws.

## **8. Privacy Policy**

The Group has published a Privacy Policy that outlines general information regarding the collection, use, and disclosure of all types of personal data of data subjects, as well as other details such as cross-border data transfers, cookies, and personal data security measures.

The provisions in the Privacy Policy are supplementary to this Personal Data Protection Policy and do not cancel, replace, or modify any provisions herein. In the event of any conflict or inconsistency, the provisions in the Personal Data Protection Policy shall prevail, as the Group has provided this policy for your specific review and consent.

For more details, please review the Privacy Policy at: [www.bangkokchainhospital.com](http://www.bangkokchainhospital.com)

## 9. Contacting the Group

If you have any questions or wish to inquire further about this Personal Data Protection Policy or other activities of the Group, including exercising your rights as specified in Section 11, you may contact:

- (a) The Group's Data Protection Officer using the contact details below, and
- (b) The Group, as detailed in Attachment 1.

### Data Protection Officer

To: Data Protection Officer

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi 11120, Thailand

Contact Number: 02-836-9999

Email: [dpo@bangkokchainhospital.com](mailto:dpo@bangkokchainhospital.com)

This Privacy Policy was reviewed and came into effect on May 14, 2024.

## **Attachment 1**

### **List of Bangkok Chain Hospital Group Companies and Contact Addresses**

#### **Bangkok Chain Hospital Public Company Limited**

##### **Head Office**

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9999

##### **World Medical Hospital**

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9999

##### **Kasemrad Bangkae Hospital**

Address: 586, 588 Phetkasem Road, Bangkae Nuea Subdistrict, Bangkae District, Bangkok 10160

Phone: 02-804-8959

##### **Kasemrad Prachachuen Hospital**

Address: 950 Prachachuen Road, Wongsawang Subdistrict, Bang Sue District, Bangkok 10800

Phone: 02-910-1600

##### **Kasemrad Rattanathibet Hospital**

Address: 58 Moo 15, Bang Rak Pattana Subdistrict, Bang Bua Thong District, Nonthaburi Province 11110

Phone: 02-921-3400

##### **Kasemrad Ramkhamhaeng Hospital**

Address: 99/9 Ramkhamhaeng Road, Saphan Sung Subdistrict, Saphan Sung District, Bangkok 10240

Phone: 02-339-0000

##### **Kasemrad International Aranyaprathet Hospital**

Address: 885 Moo 5, Ban Mai Nong Sai Subdistrict, Aranyaprathet District, Sa Kaeo Province 27120

Phone: 037-640-000

##### **Rattanathibet Hospital Co., Ltd.**

##### **Kasemrad International Rattanathibet Hospital**

Address: 60 Moo 6, Sao Thong Hin Subdistrict, Bang Yai District, Nonthaburi Province 11140

Phone: 02-594-0020



**Siburind Medical Co., Ltd.**

Kasemrad Sriburind Hospital

Address: 111/5 Moo 13, San Sai Subdistrict, Mueang Chiang Rai District, Chiang Rai Province 57000

Phone: 053-910-999

**Kasemrad Maesai Hospital**

Address: 952 Moo 1, Wiang Pang Kha Subdistrict, Mae Sai District, Chiang Rai Province 57130

Phone: 053-731-391

**Kasemrad Sriburind Clinic, Chiang Saen Branch**

Address: 339 Moo 6, Wiang Subdistrict, Chiang Saen District, Chiang Rai Province 57150

Phone: 053-777-213

**Saraburi Medical Co., Ltd.**

**Kasemrad Saraburi Hospital**

Address: 2/22 Mittraphap Road, Pak Priao Subdistrict, Mueang Saraburi District, Saraburi Province 18000

Phone: 036-315-555

**Navanakorn Medical Co., Ltd.**

**Karunvej Pathumthani Hospital**

Address: 98 Moo 13, Phahonyothin Road, Khlong Nueng Subdistrict, Khlong Luang District, Pathum Thani Province 12120

Phone: 02-529-4533

**Karunvej Ayutthaya Hospital**

Address: 61/9 Moo 4, Khlong Chik Subdistrict, Bang Pa-In District, Phra Nakhon Si Ayutthaya Province 13160

Phone: 035-315-100

**Sothornvejkit Co., Ltd.**

**Kasemrad Chachoengsao Hospital**

Address: 29 Moo 3, Suwinthawong Road, Na Mueang Subdistrict, Mueang Chachoengsao District, Chachoengsao Province 24000

Phone: 038-812-702

**Kasemrad Prachinburi Hospital**

Address: 766 Moo 10, Tha Tum Subdistrict, Si Maha Phot District, Prachinburi Province 25140

Phone: 037-627-000



**Bangkok Chain Management Co., Ltd.**

**Head Office**

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9999

**Branch (1)**

Address: 223/2 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9999

**Bangkok Chain Laboratory and Pathology Clinic**

Address: 141 Moo 12, Bang Rak Pattana Subdistrict, Bang Bua Thong, Nonthaburi 11120

Phone: 02-080-9445

**Bangkok Chain International (Lao) Co., Ltd.**

**Kasemrad International Vientiane Hospital**

Address: 999 450th Anniversary Road, Ban Don Nok Koom, Xaysetha District, Vientiane Capital, Lao PDR

Phone: +85621 833333

**Kasemrad Aree Radiation Oncology Center Co., Ltd.**

**Kasemrad Aree Specialized Radiation Oncology Clinic**

**Head Office**

Address: 223/2 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9983

**Health Chain Innotech Co., Ltd.**

**Head Office**

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9912

**Bangkok Chain Dental Co., Ltd.**

**Head Office**

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9985