



**บริษัท เทิร์นคีย์ คอมมูนิเคชั่น เซอร์วิส จำกัด (มหาชน)**  
**TURNKEY COMMUNICATION SERVICES PUBLIC COMPANY LIMITED**

**นโยบายคุ้มครองข้อมูลส่วนบุคคล**  
**Personal Data Protection Policy**  
**P-BOD-004**





**Turnkey Communications Services Public Company Limited (“the Company”)** understands the importance of protecting personal data and has prepared the Personal Data Protection Policy, whereby this policy explains the management of personal data, such as collection, storage, usage, disclosure, as well as the rights of the owner of such data. In highlighting the rights, obligations, and various conditions related to the collection, storage, use, and private disclosure, the Company will notify the owners of such data of the policy that protects their personal information. The Company hereby announces its policy as follows.

This Personal Data Protection Policy has no control over apps and external websites, since the Company has no authority, control, or ownership over them. The owner of the data must enter into separate agreements and study the Personal Data Protection Policies of those external apps, services, and websites.

If the owner of the information does not agree with the terms of this Personal Data Protection Policy or its amendments, the Company reserves the right to bar them from using the Company’s service, since the evaluation of personal data according to this Policy is vital to the Company’s operations. In addition, if the owner of that data is still using the Company’s service, we will assume that you have consented to this Policy.

The Company may amend the Policy at any time to align with business practice, relevant laws, and the Company’s various services. Additionally, the Company will inform users of changes and revisions to the policy. Once the changes are publicized, they will be effective immediately.

### **Definitions**

- **Company** refers to Turnkey Communications Services Public Company Limited.
- **Group Companies** refers to Turnkey Communications Services Public Company Limited, its subsidiaries, affiliates, or companies within the group.
- **Owner of Personal Data (User)** refers to the person who owns personal data collected by or disclosed to the Company. This includes but is not limited to customers, shareholders, suppliers, users, and other stakeholders.
- **Data** refers to personal data, non-personal data, system data, and cookies.
- **Personal Data** refers to data that can be used to identify its owner either directly or indirectly according to the Data Protection Act, Royal Gazette B.E. 2562 (A.D. 2019), its amendments, and other related laws.
- **Sensitive Personal Data** refers to private data linked to race, ethnicity, political leanings, association to cult, religion, or philosophy, gender orientation, criminal record, health, disability, employment status, genetic information, biometric or equivalent data as designated by the Board.
- **Biometric** refers to data that is created by technology in the form of using unique physical aspects for identification purposes, such as facial recognition, retinal scan, or fingerprint.
- **Public Information** refers to information that the person has disclosed in the public domain such as social media information, which includes social media credentials on Facebook,



Instagram, Twitter, Line, and other online platforms to link to their services, such as social media account ID, personal interests, likes, friends list, which the user can control via social media platforms.

- **Controller of Personal Data** refers to the person who has power to collect, use, and disclose personal data.
- **Processor of Personal Data** refers to the party that can collect, use, and disclose personal data according to the order of the controller.
- **Data Processing** refers to any interaction with personal data, either automatic or manual, such as collection, storage, profiling, amending the storage process, receipt, consideration for forwarding and dissemination, or other interactions in order that the processed data becomes ready for use, combination, management, deletion, or destruction.
- **Application** refers to programs or codes used to control laptops or other mobile devices to make them follow a set of instructions or respond to the users' request such that the application must have a UI (user interface) as a point of access for the user.
- **IP Address** refers to a number that allows certain devices such as laptop or printer to link to a computer network via Internet protocol for communications.
- **Cookie** refers to text files inside the computer of the user (owner of data) used to store information such as log-in, Internet usage, or user behavior. In order to provide efficient service, the Company may need to use multiple cookies such as:
  - **Functionality Cookies** - Used to memorize items selected by the user in the past or data on the platform such as account number, language preference, fonts, platform format in order to customize offering to the user or customer based on their past selections.
  - **Advertising Cookies** - Used in memorizing your visits and nature of usage in order to promote certain goods or services customized to your preferences and to improve the effectiveness of other functions in the system.
  - **Strictly Necessary Cookies.** A cookie that is vital to the functioning of the company in order to ensure accessible and safe service.
- Small data stored within the Company website are sent to a computer or mobile device linked to the Internet in order to store personal data. The cookie sends data back to the website each time the user visits the site.
- **Log** refers to a set of data used in the application, which includes its source, destination, timeline, date, volume, distance, type of service or other information linked to usage of the said application.
- **Non-personal data** refers to anonymous data.



## **Personal Data Storage**

The Company collects personal data within the objectives, scope, and appropriate, legal, and fair usage such that this collection of data is necessary for the Company's operation. The Company must notify the owner of the data, so that they can acknowledge and grant permission electronically, or according to the Company's normal process. If collecting sensitive personal data, the Company must gain explicit consent of the owner unless the personal data or sensitive personal data is an exception under the Personal Data Protection Act, Royal Gazette B.E. 2562 (A.D. 2019) or other laws.

## **Purpose in Collecting, Using, and Disclosing Personal Data**

The Company collects or uses personal data of the user for the Company's business, such as procurement, contracts, financial transactions, corporate operations, coordination, or to improve quality and efficiency of work such as database analysis to improve company operations and for other purposes which are not prohibited by the law, or in order to comply with the law. In this matter, the Company will collect and use such data only for the duration and objectives required and will inform the user accordingly.

The Company will not do anything with the data apart from that stated in the objectives, unless:

- (1) The company has informed the user of new objectives and has received their consent.
- (2) It is required to comply with the Personal Data Act or related laws.

In addition, the Company can store and collect personal data as long as the user remains with the Company, and the Company reserves the rights to store the data for 3 years following the end of any interaction for the purpose of protecting the Company's own rights except in cases where the Company has a legal duty to store certain personal data for longer than 3 years.

## **Disclosure of Personal Data**

The Company will not disclose personal data of the user without prior consent and will only disclose for the reasons discussed earlier. However, in the interest of smoother operations and providing better service to the user, the Company may need to release personal data to Group companies or other persons within and outside Thailand, such as other service providers who need to process the data. However, by releasing those personal data, the Company will ensure that those service providers keep the user's personal data confidential and not utilize it for purposes other than those which the Company dictates.

Cookies may be used to enhance service efficiency and improving the Company's service to the user, but the user can delete the cookies from their own browser. However, deletion of cookies may impact on the efficiency of the Company's service to some extent, as that is the purpose of a cookie.



Apart from this, the Company may disclose the user's personal data within the confines of the law, such as disclosing information to government agencies, regulators, as well as complaints to release user data as enforced by the law, such as the plaintiff requiring release of the user's data in a lawsuit or requests by private companies or other external bodies in legal proceedings.

### **Procedures for Protecting Personal Data**

The Company will set measures and procedures for data security that is in compliance with the law, rules, regulations, and accepted practices for personal data protection and will communicate this to the Company's staff and related parties. This includes encouraging its own staff to be knowledgeable and aware of their roles and responsibilities in collecting, storing, using, and disclosing personal data of the user, whereby the Company's staff must follow the policies and procedures in protecting personal data specified by the Company. For the Company to comply with its policies and laws protecting personal data accurately and efficiently.

### **Rights of the Owner of Personal Data (User)**

The Company realizes and respects the legal rights of the user (owner of personal data) related to their personal data. These rights include:

- 1) Rights to access and request copies of their own personal data, including the rights to update, correct, and change their personal data.
- 2) Rights to receive personal data in a form that is readable or usable on automatic devices, including the right to send and transfer data of different formats to controllers of personal data.
- 3) Rights to argue with the processing of personal data.
- 4) Rights to delete, destroy, or make the data untraceable to the user. When the data is no longer necessary, the user should have the right to withdraw their consent.
- 5) Rights to stop the use of personal data when the personal data needs to be deleted or when there is no longer a need to use that data.
- 6) Rights to remove consent in processing data that the user has once consented to.

Additionally, the user can contact the Company and request these rights according to the details specified by the Company without any cost. The Company will consider the request within 30 days from the day the request is made.

### **Revision and Amendment to Personal Data Protection Policy**

The Company can improve and revise policy from time to time to comply with the law, business changes, as well as request and opinions of various agencies. The Company will announce such changes clearly before implementing those changes.



**Channel for the Company Contact**

**Details of the Data Controller**

**Name :** Turnkey Communications Services Public Company Limited

**Address :** 44/44 Vibhavadi-Rangsit 60 Yake 18-1-2, Talad Bangkhen, Laksi, Bangkok 10210

**Telephone Number :** +66 2 401 8222

**Email :** [hr@tkc-services.com](mailto:hr@tkc-services.com)

**Website :** [www.tkc-services.com](http://www.tkc-services.com)

**Details of Data Protection Officer (DPO)**

**Name :** Mr. Piya Jirapapongsa

**Address :** 44/44 Vibhavadi-Rangsit 60 Yake 18-1-2, Talad Bangkhen, Laksi, Bangkok 10210

**Telephone Number :** +66 2 401 8222

**Email :** [piya@tkc-services.com](mailto:piya@tkc-services.com)

This Personal Data Protection Policy was approved by the Board of Directors at Meeting No. 5/2567 (No. 5/2024) on November 11, 2024, and shall be effective from November 11, 2024.

.....

(Mr. Kittisak Amornchairojkul)

Chairperson of the Board of Directors