

## Privacy Notice

For the Annual General Meeting of Shareholders for the Year 2025  
held via Electronic Meeting (E-AGM) of Onsen Retreat and Spa Group Public Company Limited (“AGM”)

**Onsen Retreat and Spa Group Public Company Limited** (the “Company”) recognizes the importance of protecting the personal data of shareholders, proxies, and authorized representatives. In order to inform you of how the Company collects, uses, discloses, and processes your personal data in accordance with the Personal Data Protection Law, the Company hereby provides the following details.

**Data Controller:** Onsen Retreat and Spa Group Public Company Limited. The Company’s contact details appear in the meeting invitation documents.

### 1. Personal Data Collected by the Company

The Company is required to collect your personal data for the purpose of organizing and conducting the AGM and facilitating your participation in the meeting as follows:

#### a) General Personal Data

- 1) Contact information, such as address, telephone number, mobile phone number, email address, and social media account information (e.g., Line ID or Facebook account).
- 2) Identification information, such as name-surname, gender, nationality, occupation, date of birth, marital status, photograph, signature, identification card number, passport number, or other information appearing on documents issued by government authorities.
- 3) Other information, including still images, video recordings, and audio recordings captured during the preparation for or the conduct of the AGM.

#### b) Sensitive Personal Data

Such as information relating to race, religion, labor union membership, biometric data (e.g., facial recognition data or fingerprint data), health information, physical or mental condition, and criminal records.

### 2. Purposes and Legal Bases for Processing Personal Data

The Company collects, uses, processes, and discloses your personal data based on the following legal grounds:

#### a) Legal Obligation

The Company processes your personal data as specified in Clause 1 (a) and (b) for the purpose of organizing the AGM, verifying your identity, delivering relevant documents, and implementing the resolutions of the AGM, as well as complying with applicable laws such as the Public Limited Companies Act B.E. 2535 (1992),

the Civil and Commercial Code, and other relevant laws, including compliance with orders issued by competent government authorities.

**b) Legitimate Interest**

The Company may use your personal data as specified in Clause 1 (a) to prepare the minutes of the AGM as evidence of your participation in the meeting and for other related activities such as satisfaction surveys, which are considered the legitimate interests of the Company and other parties, within the scope reasonably expected by you.

The Company may also record still images, video, and audio during the AGM for the purposes of meeting documentation, reporting, and public relations through electronic media or printed materials, which may include images of meeting participants.

**c) Legal Claims**

The Company may process your personal data for the purpose of identity verification and for the establishment, exercise, or defense of legal claims.

**3. Sources of Personal Data**

The Company may obtain your personal data from the following sources:

- Shareholders directly
- Proxies appointed by shareholders
- Thailand Securities Depository Co., Ltd. (TSD)

**Note:**

Identification documents provided to the Company, such as copies of national identification cards, may contain sensitive personal data (e.g., religion or race) which is not necessary for the AGM. The Company therefore requests that you conceal such information before submitting copies of such documents to the Company.

**4. Disclosure of Personal Data**

The Company may disclose your personal data to the following people or entities:

- Government agencies, regulatory authorities, courts, or law enforcement agencies such as the Ministry of Commerce, the Securities and Exchange Commission (SEC), and the Stock Exchange of Thailand (SET)
- Shareholders, investors, and the public through the Company's website, the Stock Exchange of Thailand, or Thailand Securities Depository Co., Ltd.
- Personal data processors or related service providers
- Advisors, service providers, or regulatory authorities

- Electronic and printed media for the publication of meeting reports or meeting publicity

## 5. Cross-Border Transfer of Personal Data

The Company may need to disclose or transfer your personal data to third parties or service providers located overseas, where the destination countries may have personal data protection standards that differ from those in Thailand. In such cases, the Company will implement appropriate safeguards to ensure that your personal data is adequately protected in accordance with applicable laws and may obtain your consent where required by law.

## 6. Data Retention Period

The Company will retain your personal data only for as long as necessary to fulfill the purposes stated herein. The Company expects to retain general personal data for 10 years, and sensitive personal data for 6 months from the date the Company receives your data. After such period, the Company will delete, destroy, or anonymize the personal data. However, the Company may retain the data for a longer period if required by applicable law.

## 7. Rights of Data Subjects

Under the Personal Data Protection Law, you have the following rights:

- The right to access or obtain copies of your personal data
- The right to request data portability
- The right to rectify, erase, destroy, or anonymize personal data
- The right to object to or restrict the processing of personal data in certain circumstances
- The right to withdraw consent (where processing is based on consent)
- The right to request disclosure of the source of your personal data

If the Company fails to comply with the applicable personal data protection laws, you have the right to lodge a complaint with the relevant government authority.

## 8. Data Security Measures

The Company has implemented appropriate security measures to safeguard personal data, both in documentary and electronic forms. These measures include organizational, technical, and physical safeguards designed to prevent loss, unauthorized access, use, alteration, or disclosure of personal data. The Company also establishes access control procedures, monitoring mechanisms, and incident management procedures to ensure the security of personal data.

9. Contact Information

If you have any questions regarding the protection of your personal data or wish to exercise your legal rights, please contact:

**Data Protection Officer**

Onsen Retreat and Spa Group Public Company Limited

120/5 Sukhumvit Soi 26, Khlong Tan Sub-district,

Khlong Toei District, Bangkok 10110

Email: [secretary@comsecgroup.co.th](mailto:secretary@comsecgroup.co.th)

If you have any objections regarding the use of your personal data, please notify the Company by 22 April 2026 at 4:00 p.m. so that the Company may take appropriate actions.