

Privacy Policy

Principle

Gulf Energy Development Public Company Limited (GULF) recognizes that the right to privacy is an essential part of a sustainable society. As every aspect of life becomes more digital, the protection and security of personal data becomes especially more important. GULF thus seeks to ensure that it appropriately manages personal data throughout all its business processes in line with national and international regulations and principles related to privacy and personal data protection.

Scope

This policy applies to all members of the Gulf Group of Companies including members of the Board of Directors, executives, management team and employees. It also applies, where applicable, to GULF's suppliers and service providers, as well as any other external parties working with or on behalf of GULF that may have need to handle the personal data of individuals inside or outside the organization.

Definitions

Personal data refers to any information that relates to a natural person which may be used to identify such a person, directly or indirectly. Data owner refers to the person that the data relates to, or the person or entity providing such data.

Oversight

This privacy policy has been approved by the Board of Directors. Revisions to the policy shall be advised by the Sustainability, Governance and Risk Management Committee (SGRC), who shall also represent the Board of Directors in providing oversight for the Company's performance in line with this policy.

References

Universal Declaration of Human Rights Personal Data Protection Act B.E. 2562 Gulf Sustainability Policy



Policy

Gulf Energy Development Public Company Limited (GULF) shall:

- 1. Ensure it conducts all business activities, especially any activities involving the handling of personal data, in compliance with laws and regulations related to privacy and personal data protection.
- 2. Establish an appropriate data management system that covers all phases of the data life cycle including creation or collection, distribution and use, storage and retention, and destruction. This shall include development of policies, processes, regulations and systems related to ensuring privacy and data protection within the bounds of GULF's business activities, both domestically and overseas.
- 3. Implement appropriate technological measures to help protect privacy and personal data, including measures to limit access to data and verify authorized users.
- 4. Communicate to data owners the purpose of data collection, retention, use, and/or destruction, and outline clear criteria for each phase of data management.
- 5. Provide notification, in the form of signs, pop-up messages or other written forms, of the use of any surveillance or recording technology such as CCTV or audio recording devices.
- 6. Obtain in advance the appropriate and necessary consent from data owners to collect, use, retain and/or destroy data.
- 7. Provide regular training for all employees to build awareness and understanding of the policies, processes, regulations and systems in place and ensure compliance with such policies, processes, regulations and systems.
- 8. Conduct regular internal or external audits of compliance with this policy as well as with any privacy or data management policies, processes or systems related to this policy.
- 9. Designate the Corporate Legal Department as the unit responsible for handling any issues related to privacy or data protection, including determining wrongdoing in cases where the privacy policy or related policies, processes, regulations or systems may have been breached. In any case, all departments and functions are responsible for implementing the policies, processes, regulations and systems related to privacy and data protection, and for monitoring compliance with such policies, processes, regulations and systems.
- 10. Implement appropriate and proportionate disciplinary actions in cases where the privacy policy or related policies, processes or regulations have been breached. Such actions may range from verbal or written warnings to termination of employment, and may proceed to legal action where necessary.
- 11. Report GULF's performance regarding privacy and data protection to the management and Board of Directors on a regular basis, with additional reporting as necessary should any incidences of breaches or non-compliance occur.

These commitments shall be undertaken within the principles of good corporate governance and social responsibility to ensure that GULF continues to create a positive impact in all spheres where it operates.

Contact

Inquiries, suggestions, and complaints related to this policy may be directed to the Company at sustainability@gulf.co.th.

Violations of the policy may be reported to the Internal Audit Department at ia@gulf.co.th. The Company's whistleblowing policy shall apply in all cases of reporting.