



Personal Data Privacy Policy

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Asia Aviation Public Company Limited and Thai AirAsia Company Limited, a wholly owned subsidiary of Asia Aviation Public Company Limited (the "Company"), respects privacy rights of customers, shareholders, employees, and all related parties. To ensure that personal data of such persons is protected and processed in accordance with applicable personal data protection laws, the Board of Directors of the Company therefore approved this Privacy Policy to enable the company to have clear and appropriate guidelines, mechanisms, governance measures, and management of personal data.

1. Principle Scope of application

This privacy policy applies to employees of, and persons processing Personal Data by order or on behalf of the Company.

2. Definition

Act	means Thailand's Personal Data Protection Act B.E. 2562 (2019) and its subordinate regulations, as amended or superseded from time to time.
Company	means Asia Aviation Public Company Limited and Thai AirAsia Company Limited
Data Subject	means a natural person whose personal data can be used to directly or indirectly identify that person.
Data Controller	means the natural or juristic person who has authority to make decisions relating to the processing of personal data.
PDPC	means Thailand's Office of the Personal Data Protection Commission
Processing	means any operation(s) made in connection with personal data such as collection, recording, systematization, storage, maintenance, change, recovery, use, disclosure, transfer, dissemination, combination, erasure, or destruction
Personal Data	means name, age, address, contact number, ID number, race, financial information, health information and other information which can reveal identity of the Data Subject whether directly or indirectly.

3. Personal Data Protection Policy

1. The Company protects Personal Data which we collect, use, disclose, delete, destroy or perform any other actions related to Personal Data according to the rights of the Data Subject and in accordance with the Act.
2. The Company will process the Data Subject's Personal Data for the Company's business, or to improve the quality of work so that it can be more efficient, or in compliance with the Act and other applicable laws or regulations relating to the Company's operation. The Company will store the use of such Personal Data only as necessary to fulfill the purposes as informed to the Data Subject and for other legitimate purposes as specified by the Act.
3. The Company will establish an organizational structure with clear roles, missions, and responsibilities of related persons in order to establish mechanisms for governance, control, accountability, operations, enforcement, and monitoring of Personal Data protection measures, all in accordance with the Act and this Personal Data Privacy Policy.
4. The Company will provide appropriate security measures in accordance with the Act. This includes restricting access of Personal Data from the employees or other relevant persons to prevent leakage of Personal Data from being used, disclosed, destroyed, or accessed without authorization.
5. The Company will establish an appropriate data protection risk assessment and data protection impact assessment to determine the risk of processing of the Personal Data which may impact on the rights and freedoms of the Data Subject.
6. The Company has appointed a Data Protection Officer (DPO) with roles and responsibilities as defined in this Personal Data Privacy Policy.
7. The Company will comply with the applicable laws when sending or transferring Personal Data to recipients located outside Thailand.
8. The Company will establish adequate security measures related to Personal Data including taking steps to prevent the leakage and the unauthorized use of Personal Data, and if it does happen, the Company will notify of the Personal Data breach to the PDPC without delay and within the timeframe as provided by the Act.
9. The Company will establish an incident response guideline in order to identify and handle incidents related to Personal Data in a timely manner.
10. The Company will establish a monitoring process related to changes in laws and constantly adjusting Personal Data protection measures to be always consistent with the Act and applicable law.

4. Roles, and Responsibilities

4.1 Project Advisory

- (1) Chief Executive Officer
- (2) Chief Financial Officer

The Project Advisory has the following roles and responsibilities;

1. Ensure the establishment of Personal Data protection structure and internal control structure in order to comply with the Act and this Personal Data Privacy Policy.
2. Supervise and support the Working Team to take effective protection of Personal Data in compliance with the Act.

4.2 Project Management

- (1) Head of Guest Service
- (2) Head of Commercial
- (3) Head of People Department
- (4) Head of Flight Operations
- (5) Legal Manager
- (6) PDPA Coordinator

The Project Management has roles and responsibilities:

1. Set up policies and guidelines to ensure that Personal Data of Data Subject is protected and processed in accordance with the Act. Continuously review this Personal Data Privacy Policy and relevant guidelines on a regular basis at least once a year.
2. Continuously communicate and conduct training for the employees to make the employees aware of the importance of protecting Personal Data and ensure that all relevant employees are trained and have knowledge and understanding in protecting Personal Data and comply with this Personal Data Privacy Policy.
3. Assign departments who handle Personal Data to regularly monitor and review risks with respect to the collection, use, and/ or disclosure of Personal Data, including risk management plan on regular basis at least twice a year.

4. Consider the surveillance report from the Data Protection Officer with respect to the collection, use, or disclosure of Personal Data by departments, and to provide opinions as necessary.
5. Control and ensure that risks related to Personal Data are properly managed with appropriate risk management guidelines.
6. Supervise and monitor the operations of related persons to keep them following the prescribed guidelines. Perform risk assessment on a regular basis. If any process becomes inconsistent with the law or it is at risk, all related processes of Personal Data collection, use and disclosure must be reviewed or improved.
7. Report to the Company's Chief Executive Officer for the operation issues or data breach incidents to determine the solutions.

4.3 Working Team

- (1) Manager, People Department
- (2) Manager, Ground Operations Department
- (3) Manager, ICT Department
- (4) Manager, Commercial Department
- (5) Manager, Customer Happiness
- (6) Manager, Procurement Departments
- (7) Financial Controller, Financial Departments
- (8) Manager, Flight Operations Department

The Working Team has roles and responsibilities:

1. Establish appropriate security measures related to Personal Data in accordance with the Act.
2. Establish Personal Data protection to control and protect unauthorized use of Personal Data.
3. Establish notification and obtain the consent from Data Subjects in accordance with the Act.
4. Establish measures, channels, and methods allowing Data Subjects to exercise their rights as permitted by Act.
5. Establish the method for destroying Personal Data when the time limit expires. The disposal will be made in accordance with the Act and the Company's business operations.
6. Ensure and sustain the quality of data managed under each department.

7. Manage the Personal Data under each department's control to be in compliance with the Act.
8. Implement a risk assessment related to collection, use, and disclosure of personal data and report to the project management on a regular basis at least twice a year.
9. Create and maintain records of Personal Data activities for the benefit of monitoring, supervising, and taking care of the Personal Data of each department.
10. Ensure that all the employees comply with this Personal Data Privacy Policy, information security policies and guidelines.

4.4 Data Protection Officer

Head of Innovation Commercial and Technology

The Data Protection Officer has roles and responsibilities prescribed by the Act, including the following roles and responsibilities:

1. Monitor the organization's compliance with the Act and internal data protection policies and procedures. This will include monitoring the assignment of responsibilities, awareness training, and training of staff involved in processing operations and related audits.
2. Regularly report the status of Personal Data protection to Project Advisory and Project management, and make recommendations to improve the Company's Personal Data protection to be at all times up to date and in accordance with the Act on a regular basis at least twice a year.
3. Regularly review security measurements to ensure compliance with the laws and this Personal Data Privacy Policy and make recommendations.
4. Review a risk assessment report and make recommendations to mitigate risks and reduce the impact that may arise.
5. Keep confidential of Personal Data known or acquired in the course of his or her performance of duty under this Personal Data Privacy Policy and the Act.
6. Serve as the point of contact between the Company and the PDPC in the circumstance where there are problems with respect to the collection, use, or disclosure of the Personal Data undertaken by the Company, including the employees or service providers of the Company with respect to the compliance with the Act.

7. Advise management, employees, and related parties to comply with the Act and this Personal Data Privacy Policy.
8. Notify of the Personal Data breach to the PDPC without delay and within the timeframe as provided by the Act.

The Company shall review this Personal Data Privacy Policy annually or whenever there arises any significant change to ensure its consistency with the Act or other laws, regulations and practices concerned. The revised version of this Personal Data Privacy Policy will further be made publicly.