

ESGVTrace PRIVACY NOTICE

This Privacy Notice ("**Notice**") explains how PALO IT (Thailand) Ltd. ("**we**", "**us**", or "**our**") collects, uses, discloses and otherwise processes personal data in connection with your access to and use of the ESGVTrace website ("**Website**") and ESGVTrace application ("**Platform**"), in accordance with the Personal Data Protection Act B.E. 2562 ("**PDPA**").

This Notice applies to personal data of our customers, authorised users, and other individuals whose personal data is processed through the Platform, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

1. PERSONAL DATA

A. As used in this Notice:

- (1) "**customer**" means the organisation that has entered into an agreement with us for use of the Platform;
- (2) "**authorised user**" means an individual authorised by a customer to access and use the Platform on the customer's behalf, such as an employee, consultant, or representative;
- (3) "**Personal data**" means data, whether true or not, about a person who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

B. **If you are an authorized user**, personal data which we may collect includes, without limitation, your: (a) name, job title, and employer/organisation; (b) business email address, telephone number and other contact details; (c) account login credentials and authentication data; (d) usage data, such as log-in times, features accessed, and actions taken within the Platform

C. The Platform is not intended for the collection or storage of personal data relating to your employees, suppliers, contractors, or other third parties as part of your organisation's ESG or carbon activity data. You should not input or upload such personal data to the Platform unless expressly required or permitted for the use of a specific Platform feature.

D. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

2. COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

- A. We generally collect, use and disclose your personal data (a) where it is provided to us voluntarily by you or your authorised representative in order to enter into or perform our agreement with your organisation for use of the Platform; (b) where you (or

your authorised representative) have provided consent to the collection and usage of your personal data for purposes notified to you; or (c) where collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

- B. By providing personal data relating to a third party (see clause 4 above), you shall ensure you are lawfully entitled to provide such data to us for collection, use and disclosure for the purposes set out in this Notice.
- C. If you visit or interact with our Website, we may collect and use your personal data to respond to your enquiries or requests, provide marketing communications where you have provided your consent, analyse and improve the performance and use of the Website, and maintain the security and functionality of the Website. For more information about our use of cookies and similar technologies, please refer to our Cookie Policy.
- D. **If you are a customer or authorised user**, your personal data will be collected and used by us for the following purposes, and we may disclose your personal data to third parties (including our sub-processors) where necessary for the following purposes:
 - 1) providing you with access to, and enabling your use of, the Platform;
 - 2) creating and managing your account, verifying your identity, and administering your subscription;
 - 3) administering subscriptions, billing and related commercial arrangements;
 - 4) providing customer support and responding to your enquiries;
 - 5) monitoring, maintaining, and improving the performance, security, and functionality of the Platform;
 - 6) communicating with you about service updates, notices, or changes to the Platform or this Notice; and
 - 7) complying with our legal and regulatory obligations.
- E. We may disclose your personal data:
 - 1) to our sub-processors and service providers who support the operation of the Platform (see Section 6 below), under contractual obligations to protect your personal data;
 - 2) where such disclosure is required for performing obligations in the course of, or in connection with, our provision of the Platform requested by you; or
 - 3) where requested by law enforcement or regulatory authorities.
- F. Please note that should you not consent and provide us with the relevant personal information to fulfil the purposes of collection, use and disclosure of your personal data by us, it may hinder our ability to provide you with access to, or continued use of, the Platform.

3. WITHDRAWING YOUR CONSENT

- A. Where our processing of your personal data relies on your consent, that consent will remain valid until it is withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details in Section 8 below.
- B. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) to process your request and to notify you of the consequences, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within thirty (30) days of receiving it.
- C. Please note that where our processing of your personal data is necessary for the performance of our agreement with your organisation, withdrawing consent may mean we are unable to continue providing the Platform to you for the duration such data is required, and we shall notify you before completing the processing of your request.
- D. Withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

4. ACCESS TO AND CORRECTION OF PERSONAL DATA

Subject to the conditions and limitations under the PDPA, you may have the right to access and obtain a copy of your personal data, request correction, deletion or restriction of processing, object to certain processing, request data portability where applicable, withdraw your consent, and lodge a complaint with the competent authority.

- A. If you wish to exercise any of the above rights, you may submit your request in writing or via email to our Data Protection Officer at the contact details in Section 9 below.
- B. A reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
- C. We will respond to your request as soon as reasonably possible, generally within thirty (30) days. Should we be unable to respond within thirty (30) days after receiving your request, we will inform you in writing of the time by which we expect to respond.

5. PROTECTION OF PERSONAL DATA

- A. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as minimized collection of personal data, authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), encryption of data, up-to-date antivirus protection, regular patching of operating system and other software, securely erase storage media in devices before disposal, web security measures against risks, usage of one time password (OTP)/2 factor authentication (2fa)/multi-factor authentication (MFA) to secure access, security review and testing performed regularly, firewall, data loss prevention system, single sign on, information security policy, and network segmentation.
- B. In relation to the Platform specifically, we apply additional safeguards including encryption of data at rest and in transit, role-based access controls within the Platform, audit logging of data access and changes, and regular security testing of our infrastructure.
- C. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

6. SUB-PROCESSORS AND THIRD-PARTY SERVICE PROVIDERS

We engage third-party service providers to support the operation of the Website and Platform, including cloud infrastructure and hosting providers, analytics and website measurement providers, and other technology service providers. These providers may process personal data on our behalf subject to appropriate contractual and data protection obligations.

7. ACCURACY AND RETENTION OF PERSONAL DATA

- A. We generally rely on personal data provided by you (or your authorised representative). To ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details in Section 8 below.
- B. We may retain your personal data for as long as necessary to fulfil the purposes for which it was collected, or as required or permitted by applicable laws. Personal data processed through the Platform will generally be retained for the duration of your organisation's subscription and thereafter only for as long as necessary for the purposes for which it was collected, unless a longer retention period is required or permitted by applicable law.
- C. We will cease to retain your personal data or remove the means by which it can be associated with you, as soon as it is reasonable to assume that retention no longer serves the purpose for which the personal data was collected and is no longer necessary for legal or business purposes.

8. TRANSFERS OF PERSONAL DATA OUTSIDE OF THAILAND

Your personal data may be transferred to, stored in, or processed in countries outside Thailand, including where our service providers or technology infrastructure are located. Where personal data is transferred outside Thailand, we will take appropriate steps to ensure that such transfers are made in accordance with the PDPA and applicable laws, including implementing appropriate safeguards where required.

9. DATA PROTECTION OFFICER

You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Name of DPO: Apichaya Aungprapakorn
Contact No.: +66 (0)2-180-6121
Email Address: th-admin@palo-it.com (please mark the subject line "ESGVTrace - Privacy" so it is routed correctly.)

10. EFFECT OF NOTICE AND CHANGES TO NOTICE

- A. This Notice applies in conjunction with any other notices, contractual clauses (including your organisation's subscription agreement or terms of service for the Platform) and

consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

- B. We may revise this Notice from time to time without prior notice. You may determine if a revision has taken place by referring to the “last updated” date below. Your continued use of the Platform constitutes acknowledgement and acceptance of such changes.

Effective date: 1 August 2026

Last updated: 1 August 2026



Frederic Bernaroyat
Managing Director

