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## **DATA PROTECTION EXECUTIVE COMMITTEE CHARTER**

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The Data Protection Executive Committee (the “DPEC”) is composed entirely of executive and senior officers of the Minor International Public Company Limited, its subsidiaries, and affiliated entities (together referred to as the “Company”). The DPEC's purpose is to oversee the Data Protection Program and advise on an effective system of Data Protection Program to mitigate risks and ensure compliance with applicable laws and regulations.

### **Composition**

The DPEC composition is set forth in *Annex 1*. The Group CEO and Management Committee shall have the authority to appoint and remove the members of the DPEC at its discretion.

### **Delegation of Authority**

The DPEC is sponsored by the Group CEO and is committed to:

- encourage and oversee the implementation of the Data Protection Program across the Company
- drive and maintain a compliance with the data protection laws e.g. GDPR, PDPA, PIPL, etc., including effectiveness of the Data Protection Program
- ensure and manage risks to personal data in the Company’s possession

### **Scope of Responsibilities**

With respect to performing the DPEC’s duties, the Group CEO shall provide a sponsorship to the DPEC, including but not limited to:

1. Sponsor a data protection culture across the Company by acting as a positive role model, communicating the goal of Data Protection Program to team members, gathering support from management and team members, building and maintaining collaborative environment and overcoming resistance
2. Sponsor the Data Protection Program’s goal
3. Provide strategies and directions to Data Protection Organization
4. Ensure resources and budget for the Data Protection Program

With the sponsorship from the Group CEO, the DPEC shall have the following authorities and responsibilities, including but not limited to:

1. Encourage the data protection culture within the Company and act as the positive role-model by ensuring that a protection of all personal data is clearly communicated and understood by all team members. This includes ensuring that the team members are trained and awareness campaigns are regularly implemented.
2. Build and maintain the collaborative environment for the Data Protection Program
3. Support driving the Data Protection Program across the Company
4. Ensure and oversee that the Data Protection Program is aligned with the Company's goal and regulatory requirements, taking into consideration a delivery of exceptional customer service, maintenance of financial performance and competitiveness, and corporate social responsibility
5. Provide strategies, directions and guidance to the Data Protection Office in implementing the Data Protection Program across the Company
6. Oversee and review the effectiveness of Data Protection Program, taking into consideration the protection of personal data
7. Ensure that personal data policies and procedures align and support the Data Protection Program to ensure availability, confidentiality, integrity, accessibility, quality, consistency, auditability and security of personal data in the Company's possession
8. Advise on and manage a potential impact to the Company's reputation, business operations and financial exposure as well as ensuring that a risk of personal data breach is maintained at a low level.
9. Support investigation of and solutions for all data protection incidents
10. Support the Data Protection Program with adequate resources to achieve the Company's goal and regulatory requirements

### Key Practices

The DPEC has adopted the following key practices to assist it in undertaking the functions and responsibilities:

1. **Meetings.** The DPEC meeting shall be held on a monthly basis. The DPEC members must attend the meeting in person, by telephone or videoconference, or by assigning representatives to attend the meeting on their behalf
2. **Minutes of Meetings:** The minutes of the meetings shall be prepared by the Data Protection Office and shall be communicated to the DPEC members upon approval by the Chairman

**Annex 1**

**Committee Composition**

Members

1. Chairman: Chief Commercial Officer and General Counsel – MINT
2. Chief Financial Officer – MINT
3. Chief Technology Officer – MINT
4. Chief People Officer – MINT
5. Chief Financial Officer – Minor Hotels
6. Chief Digital Officer – Minor Food
7. VP Digital & Distribution – Minor Hotels
8. VP Finance - Minor Lifestyle

Attendees

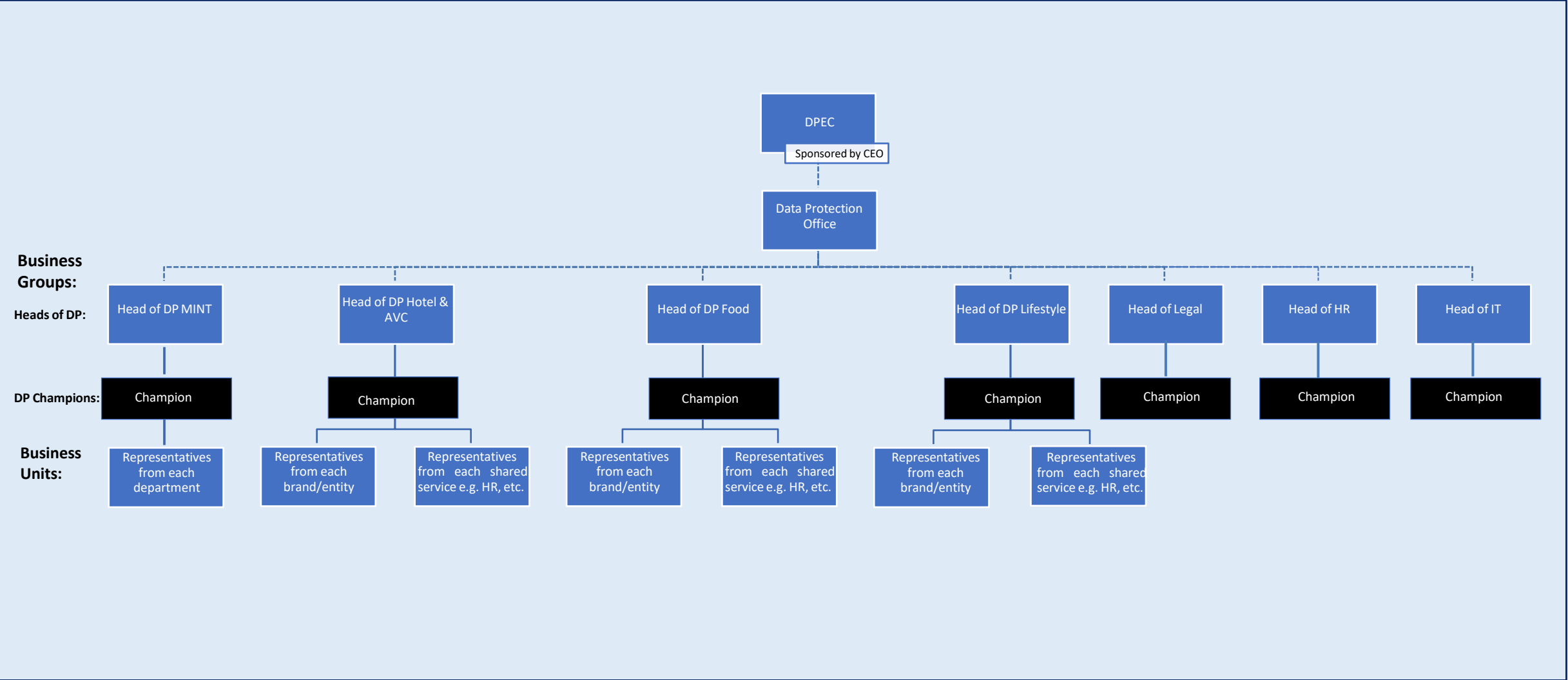
The following non-executive roles will attend the DPEC meeting and are responsible for providing advice and update to the DPEC:

1. Data Protection Office
2. Data Protection Champions
3. Head of Internal Audit

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# **Data Protection Executive Committee Governance and Responsibility**

# Data Protection Organization Structure



## Data Protection Office in Thailand (1/2)

- Fully lead Minor Group in **getting and staying compliant with the data protection laws**, particularly PDPA, GDPR, PIPL and others in related jurisdictions
- **Report progress, challenges and actions required** to and **receive directions and guidance** from the DPEC
- **Be a secretary of DPEC meeting**, responsible for arranging the meeting and conducting the minutes of meeting
- **Manage budget** for the Data Protection Program, including invoices and expenses attributing to the Data Protection Program
- **Ensure** that the Data Protection Program delivery is **on time, on scope, within a budget, and to the required quality standard**
- **Facilitate designing of remediation plans** for each Business Group (i.e. MINT, Minor Hotels Group, Minor Food Group and Minor Lifestyle Group) and **monitor actions required** under the remediation plans through progress update meetings with the Business Groups



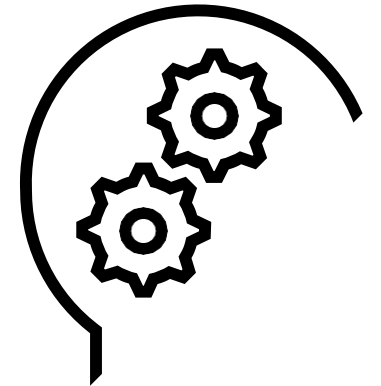
## Data Protection Office in Thailand (2/2)

- **Maintain and monitor** changes made to **RoPAs**
- Provide a **final review on any documents related to the Data Protection Program** such as privacy statements, consent forms, DPAs, DSAs, policies and procedures, etc.
- **Monitor data subjects' requests and provide guidance** to the Business Groups where needed
- **Monitor risks** associated to the Data Protection Program and **guide** the Business Groups on **mitigating the risks** where needed
- **Maintain, guide** the Business Groups and **review/revise security measures** for the personal data to mitigate potential data protection risks
- **Provide consultation to the Business Groups** on getting and staying compliant with the data protection laws, including attending meetings, teleconferences and events for relevant stakeholders to drive outcomes
- **Provide knowledge and awareness** to our people
- **Coordinate and cooperate with any data supervisory authorities** responsible for the data protection when required



## Heads of DP and DP Champions (1/2)

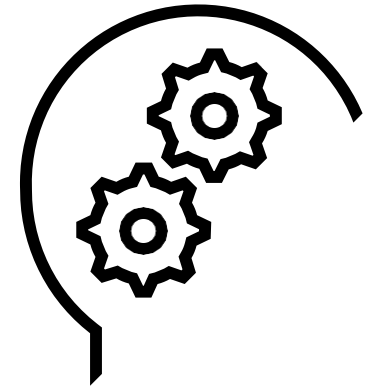
- **Lead the Data Protection Program within own Business Group, provide guidance, and work closely with the Business Units** on getting and staying compliant with the data protection laws, including **being a point of contact** withing own Business Group for all data protection matters and inquiries
- **Communicate progress and escalate challenges** to the Data Protection Office and **align directions** with the **Data Protection Office** regarding the Data Protection Program
- **Ensure** that the Data Protection Program delivery is **on time, on scope, and to the required quality and standard**
- **Lead the design** and lead the **implementation of remediation plans** with the support from the Data Protection Office
- **Communicate the progress of remediation plan and escalate challenges** directly to the **Data Protection Office** through the progress update meetings
- **Maintain and update RoPAs** of own Business Group where needed
- **Initiate and/or update** the drafts of **documents related to the personal data** for the Legal Team's review
- **Roll out and maintain the documents related to the personal data** such as privacy statements and consent forms for each type of data subject, DPAs, DSAs, policies and procedures, etc.





## Heads of DP and DP Champions (2/2)

- **Guide and work closely** with the Business Units of own Group in responding to the **data subjects' requests**
- **Investigate and mitigate the risks associated with data protection.** This includes coordinating handling of **breach incident, conduct of Personal Data by Design and DPIA** with the support from the Data Protection Office
- **Investigate and mitigate the risks associated with data protection.** This includes coordinating handling of **breach incident, conduct of Personal Data by Design and DPIA** with the support from the Data Protection Office
- **Initiate, maintain, review and adjust security measures** for personal data to mitigate potential data protection risks
- **Ensure** that all **documents** related to the personal data are **properly signed** according to the data protection laws and Minor Group's internal policy
- **Provide support on training contents to the Data Protection Office,** including **coordinating with HR to roll out** relevant training programs within own Business Group and **monitoring progress** in order to **provide updates** to the Data Protection Office
- Extensively **equipped with the knowledge of data protection laws and business operations** of own Business Group
- **Provide support and cooperation to the Data Protection Office** with any inquiries from various data supervisory authorities



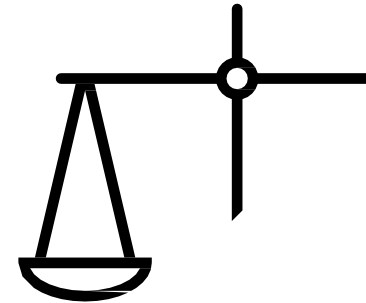
## Representatives from each property/brand/function

- **Report progress and challenges** to and **receive directions and approvals** from the **DP Champion**
- Fully **support** the DP Champion in the **creation and implementation of remediation plans**
- **Report** the **progress** of remediation plan directly to the **DP Champion**
- **Participate in** activities to **update RoPAs** of own BU/Brand where needed
- Work closely with the DP Champion in order to **proceed with the data subjects' requests**
- **Investigate and mitigate the risks** associated to the Data Protection Program according to the DP Champion's guidance. This includes a **handling of breach incident, conduct of Personal Data by Design and DPIA**, where needed
- **Ensure** that all **documents** related to the personal data **are properly signed** according to the data protection laws and Minor Group's internal policy
- **Act based on** the **directions** from the DP Champion



# Head of Legal and Legal Team

- **Monitor and update** all stakeholders on any **new regulations or changes to the data protection laws**, and **assess applicability to Minor Group**
- **Ensure** that the **documents** related to the personal data are **complying with the data protection laws**
- **Review and provide comments to the documents** related to the personal data that are sent to Minor Group to sign e.g. DSA, DPA, etc. This includes Minor Group's templates which require revisions from and/or negotiations with third parties
- **Advice and support** the Data Protection Office in **designing remediation plans**
- **Provide input on training contents** to the Data Protection Office and Business Group Level
- **Provide support and cooperation to the Data Protection Office** with any inquiries from various data supervisory authorities
- **Communicate progress and escalate challenges** to the Data Protection Office and **align directions with the Data Protection Office**



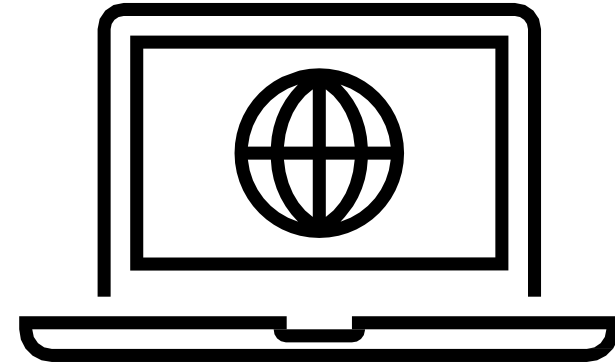
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## Head of HR and HR DP Champion

- **Lead the Data Protection Program within HR (corporate level) and provide guidance to the Heads of DP/DP Champions** on getting and staying compliant with the data protection laws, including **being a point of contact** for all data protection matters and inquiries regarding HR
- **Communicate progress and escalate challenges** to the Data Protection Office and **align directions with the Data Protection Office** regarding the Data Protection Program for HR (corporate level)
- **Lead the design and implementation of remediation plans for HR (corporate level)** with the support from the Data Protection Office
- **Communicate the progress of remediation plan and escalate challenges** directly to the Data Protection Office through the progress update meetings
- **Investigate and mitigate the risks** associated with data protection. This includes coordinating **handling of breach incident, conduct of Personal Data by Design and DPIA** with the support from the Data Protection Office
- **Initiate, maintain, review and adjust security measures** for personal data to mitigate potential data protection risks
- **Provide support on training contents** to the Data Protection Office, including **rolling out relevant training programs within Minor Group and monitoring progress** in order to **provide updates** to the Data Protection Office
- Extensively **equipped with the knowledge of data protection laws and HR operations**
- **Provide support and cooperation** to the Data Protection Office with any inquiries from various data supervisory authorities

## Head of IT and IT Team (1/2)

- **Guide and work closely with the Business Groups** from an IT technical perspective in relation to all **data protection matters, including data subjects' requests**
- **Facilitate the design and deployment of systems with measures embedded** to comply with requirements from relevant data protection laws
- Maintain an updated view of **Technical & Organizational Measures** for all IT systems that capture personal data
- **Initiate, maintain, review and adjust the security measures** for the personal data in electronic forms to be suitable for possible risks when necessary
- **Review our business partners'/vendors' IT infrastructures/systems and questionnaire responses (Technical Organizational Measures, or TOMs, of IT systems), and communicate and escalate IT risks** associated with such infrastructures/systems and responses to the Data Protection Office



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## Head of IT and IT Team (2/2)

- **Investigate and mitigate the risks** associated to the Data Protection Program on Minor Group's IT infrastructure and applications/systems. This includes **being the focal point on breach and incident management**, which should be handled in accordance with the relevant data protection laws, e.g. timeline for investigation and reporting of breaches
- **Communicate progress and escalate challenges** to the Data Protection Office and **align directions** with the **Data Protection Office**
- **Advice and support** the Data Protection Office in **designing remediation plans**
- **Provide input on training contents** to the Data Protection Office and Business Groups
- **Provide support and cooperation** to the Data Protection Office when any data supervisory authority requires any information and/or investigation

