

Privacy Policy for Customer, Supplier and Visitor

1. Introduction

The Personal Data Protection Act B.E.2562 (the "PDPA") came into force (in parts) in Thailand on the 28th of May 2019. As part of our implementation, === Company A === (the "Company") are obliged to provide our individual customer and/or suppliers, directors of corporate customer and/or suppliers, operators, employee and staff of customers and/or suppliers and/or visitors including contractor, vendor and its employees ("Customer, Supplier and Visitors") with a privacy policy.

2. Purpose of the Privacy Policy for Customer, Supplier and Visitors

This is aimed at notifying the Customer, Supplier and Visitors about:

- a) What Personal Data that the Company will collect from its Customer, Supplier and Visitors,
- b) Why it is required and how Customer, Supplier and Visitors' personal data will be used and
- c) The purposes that the Company holds personal data

3. This Privacy Policy applies to:

All Customer, Supplier and Visitors of === Company A ===

4. Definition:

Company	== Company A ==
Personal Data	Any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) and the information of the deceased persons. Personal Data or Personal Information includes any information, such as individual Customer, Supplier and Visitors' name, address, title, photographs, email addresses, telephone numbers, fax numbers, educational background, work history, qualifications, bank account number.
Data Controller	a person or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the Personal Data;

Data Processor	A person or a juristic person who operates in relation to the collection, use, or disclosure of the Personal Data pursuant to the orders given by or on behalf of a Data Controller, whereby such person or juristic person is not the Data Controller;
Data Processing	Any operation or set of operations performed upon Personal Data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Data Subject	The individual which Personal Data is collected. In the case of this Privacy Policy, the data subject is the individual Customer, Supplier and Visitors or its personnel.
Sensitive Personal Data	Personal Data that, if lost, compromised, or disclosed, could result in substantial harm, embarrassment, inconvenience, or unfairness to a Data Subject, such as religion, health, allergies, blood group, drug test result, criminal record, etc..

5. Data Protection Principles

In order to comply with personal data protection law, the Personal Data which the Company collects, use or discloses about the Customer, Supplier and Visitors must be:

- a) Used lawfully, fairly and in a transparent way.
- b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- c) Relevant to the purposes that the Company has informed the Employee about and limited only to those purposes.
- d) Accurate and kept up to date.
- e) Kept only as long as necessary for the purposes that the Company informed the Customer, Supplier and Visitors.
- f) Kept securely.

6. Customer, Supplier and Visitors' s Personal Data Processing

The types of Customer, Supplier and Visitors' Personal Data, that the Company collects (from Customer, Supplier and Visitors directly or from public source or third party information sources), uses and discloses depends on the nature of Customer, Supplier and Visitors' transaction with the Company and the requirements of applicable laws in a relevant jurisdiction. This Personal Data processed may include, but not limited to:

Group of Personal Information	Details of Personal Information
Personal details and identifiers	The Company may collect Customer, Supplier and Visitors' personal details for performance of the contractual obligation, including but not limited to date of birth, ID card and ID number, passport and passport number, occupation, position, air ticket information, social security, ability to drive vehicles, driving license, vehicles, insurance information, time attendance records, duration of work, overtime, absence, and leave. This includes photos and motion pictures.
Contact details	Contact information, email address, telephone number, mobile number, office address, social media account, instant messaging account, emergency contact information,
Information as a visitor in the Company's visitor records system	Personal information of Customer, Supplier and Visitors as a visitor, such as name, surname, telephone number, email, identity card information or other similar proof of identity and registration number of the vehicle.
License, permit, professional license	Specific license is required for performance of specific service.
Bank account information	Account number, holder name, and bank name/country/city), payment method.
Financial information	Financial status, payment history, banking and other relevant financial details required for credit evaluation.
Transaction records	Invoices, purchase orders, contracts, date and time of payment for services
Training record and related information	such as name, surname, age, address, contact number, email, online chat, social media account, instant messaging account, occupation, working history, education background, religious, food allergies.
Information about your participation in the Company activities	Information for registration and participation in activities, history of activities, photographs taken during the participation.
Information for our security purposes	Images or motion picture of Customer, Supplier and Visitors may be captured as part of the CCTV operation, however the Company only views images where an incident has occurred. In addition, will display signage to notice about the areas where CCTV are in operation.
Information regarding Customer, Supplier and Visitors' complaint	Interview, Investigation report, evidence of complaint, Information regarding whistleblowing

Copy of documents issued by government agencies	Copy of documents that can be used to identify the Customer, Supplier and Visitors such as an ID card, passport, household registration, driver's license and other documents issued by government agencies;
Information technology and computer systems	Information about the Customer, Supplier and Visitors' usage and access to the Company's website and applications.
Sensitive Personal Data collection	The Company will collect and process Sensitive Personal Data only where necessary and only with your explicit consent, unless exempted by law (e.g., protecting legal rights, compliance with legal obligations).
personal data of individuals under 20 years old	The Company does not intentionally collect Personal Data of individuals under the age of 20. If it is necessary to process such data, the Company will obtain consent from the legal guardian in accordance with the PDPA

The above examples provided are not all-inclusive, and the Company also may collect similar or related Customer, Supplier and Visitors' Personal Data.

Except for certain information that is required by law or by the Company's policies, Customer, Supplier and Visitors' decision to provide any Personal Data to the Company is voluntary. The Customer, Supplier and Visitors will therefore not be subject to adverse consequences if Customer, Supplier and Visitors do not wish to provide the Company with Customer, Supplier and Visitors' Personal Data. However, please note that if Customer, Supplier and Visitors do not provide certain information, the Company may not be able to accomplish some or all of the purposes outlined in this Privacy Policy, and the Customer, Supplier and Visitors may not be able to be provided the services or permission or to perform a contractual obligation which requires the use of such Personal Data.

The Company does not use automated decision-making or profiling that produces legal or significant effects on of Customer, Supplier and Visitors.

7. Purpose of Collecting Personal Data

The Company shall solely collect Customer, Supplier and Visitors' Personal Data for use and/or disclosure in compliance with the following objectives and any one of the following legal basis as the specified case may be:

Legal Basis for processing of General Personal

- for compliance with the agreement or entering into an agreement.
- for the legitimate interest of the Company, Customer, Supplier and Visitors, or other third person.
- for compliance with the law enforced on the Company.

Legal Basis for processing of Sensitive Personal Data

- to establish rights to a legal claim, compliance, or exercise of rights to claim as permitted by law; or for dispute allegations.
- for the necessity of legal compliance to achieve the objectives required by law.
- request for explicit consent.

In the case of necessity where the Company is required to collect additional Personal Data or use Personal Data for other purposes apart from the stipulated objectives within this Notice, the Company is obliged to inform Customer, Supplier and Visitors on the Personal Data collection and/or notify the new objectives respectively. If required by laws, the Company may request for additional consent on collecting, using, or disclosing of Personal Data according to Personal Data Protection Act B.E.2562 (PDPA).

Purpose of Collection of Personal Data

- For communication and other proceedings for negotiation prior to entering into a contract with you; or a person or a juristic person which you are either representing, or acting on behalf, or being an employee thereof such as contact for offer for sales, meeting appointment, issuing quotations, making purchase orders prior to entering into a contract, negotiations for entering into the contract and agreeing on the scope of contract.
- For entering into a contract including processing and reviewing necessary documents and performing the contract that the Company entered into, such as registration of Customer, Supplier and Visitors on the Company's database, business communication, proceeding with the received purchase order, providing services according to the contract, delivery of goods or providing services according to the contract, and tracking of the result of the goods sold, tracking of goods or services requested, proceeding for delivery and receiving of goods or service, payment process for goods or service, etc.; including disclosing Customer, Supplier and Visitors' personal data to third person, such as, delivery personnel, contractors, outsourced service providers or professional service providers, other Customer, Supplier and Visitors' of the Company, banks, government agencies, for the aforementioned purposes. This shall include performing problem solving on production process and manufactured/ assembled products including disclosing Customer, Supplier and Visitors' personal data to the Company's relevant Customer, Supplier and Visitors' to process the Customer's claims. Nonetheless, the purpose of collection and disclosure may vary depending on the type of the subject products or services. In addition, entering into a contract or performing the contract in this item

shall include liaising with you in other matters relevant to the contract such as a change in condition and other details, contract renewal.

- For collecting fee on the goods or service, issuing receipt and any undertaking for debt collection in the case a Customer defaulted on payment of goods or services; or the Customer, Supplier and Visitors, or natural person or juristic person who are the Customer, Supplier and Visitors' of the Company in which you are either representing, or acting on behalf, or being an employee thereof, defaulted on the delivery of goods or services.
- For preparing and shipping products according to purchase order via offline and online platform
- For organization management and business operation of the Company, for instance, quality control or development of goods and services, system and database management, requesting for permission to operate business with government agents, audit, internal audit, requesting for advice from business consultants, disclosing Customer, Supplier and Visitors personal data to a financial institution to request for credit facility to the Company, sale and acquisition of business, merger and acquisition of business and business restructuring. This shall include reporting the customers' information to the parent company for international business contact and management of affiliated organization.
- For compliance with laws enforced on the Company such as bookkeeping, retaining and disclosing accounting documents to auditors or government offices in compliance with the laws and orders of competent authorities, issuing tax invoices, etc.
- For retaining Customer, Supplier and Visitors contact information on the Company's database for future business contact, including disclosing Customer, Supplier and Visitors data to other companies within affiliated group for communication and for future business opportunity.
- For customer relation management such as receiving complaints and feedbacks for improvement of the Company's products and services, etc.
- For protecting the legitimate rights of the Company or dispute allegations against the Company such as legal action, initiation of legal proceeding, litigation, alternative dispute resolution and other proceedings to protect the legitimate rights of the Company or dispute allegations against the Company as permitted by law.

Each purpose listed above is processed under one of the lawful bases described in this Privacy Policy, depending on the specific activity. The lawful basis applicable to each purpose includes: contractual necessity, legal obligation, legitimate interest, or explicit consent (where required for sensitive or marketing-related data)

8. Disclosure of the Customer, Supplier and Visitors' Personal Data

- The Company may disclose or transfer Customer, Supplier and Visitors' Personal Data only to the Company's affiliates or business partners (e.g. joint venture companies).
- The Company may provide Customer, Supplier and Visitors' Personal Data to government agency, court or other third party such as but not limited to, the police, the financial supervisory authorities, the revenue department and social security agencies, SET, SEC, courts, where the Company believes that the disclosure is a legal requirement or to exercise, establish or defend the Company's legal rights.
- The Company may disclose Customer, Supplier and Visitors' Personal Data personal data to:
 - The Company's third party vendors or service providers the Company's distributor or dealer, transport and logistics service providers, postal service providers, data processing service providers, marketing service providers, sub-supplier, sub-contractors, financial service providers (such as banks, payment companies service provider, credit providers) and insurers.
 - The Company's IT service providers (such as providers of cloud services, blockchain systems, data analytics, SMS, or emails), IT developers, programmers, and partners who provide data processing services to us (e.g. IT platform management or support services, infrastructure and application services, data analytics, security agents).
 - The Company's auditors, consultant, advisors, legal representatives and similar agents in connection with the advisory services they provide to the Company for legitimate business purposes and under contractual prohibition of using the Personal Data for any other purpose.
- The Company will request persons receiving Customer, Supplier and Visitors' Personal Data to take precautions to allow access to Personal Data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the personal data for any other purpose.

9. Transferring Personal Data Overseas

The Company may transfer Customer, Supplier and Visitors' Personal Data to the Company's affiliates, parent company or third party vendors, contractors, service providers and consultants operate around the world, and other persons in a foreign country if it is necessary in order for the Company.

The Company will take appropriate safeguards to require that Customer, Supplier and Visitors' Personal Data will remain protected in accordance with this Privacy Policy. These include implementing data transfer clauses with our third party vendors, contractors and consultants and binding corporate rules for transfers of Personal Data within the Company's affiliates.

10. Retention periods of Personal Data

The Company will collect and retain the Personal Data for no longer than ten (10) years after the end of the legal relationship with Customer, Supplier and Visitors or the persons which Customer, Supplier and Visitors are representing or acting on behalf. In the event that the Company collects Customer, Supplier and Visitors' Personal Data but does not enter into any legal relationship with, or the persons which are representing or acting on behalf, the Company will retain Personal Data for a period of not more than ten (10) year after collecting the Personal Data. Nonetheless, the Company may retain all or part of Personal Data for a duration beyond the period specified above for compliance with the law, any undertaking for debt collection, and to protect the legitimate rights of the Company, or to rebut any allegations made against the Company. In such case, the Personal Data may be retained for as long as it is necessary for the Company to abide with the specified objectives and/or for the duration stipulated by law.

11. Customer, Supplier and Visitors' Rights as a Data Subject

Under the Personal Data Protection Act B.E.2562 (PDPA), the Customer, Supplier and Visitors, as a Data Subject, have the following rights with regards to Customer, Supplier and Visitors' Personal Data;

Right on withdrawal of consent of Customer, Supplier and Visitors' Personal Data for the collection, use, and disclosure at any time throughout the period the Company keeps the Personal Data. Notwithstanding, the withdrawal of consent shall not affect the completeness or accuracy of the collection, use, or disclosure of Personal Data by the Company that you have already given consent prior to the withdrawal

Right to be informed about the processing of the Customer, Supplier and Visitors' Personal Data

Right to rectification if Customer, Supplier and Visitors' Personal Data is inaccurate or incomplete (requests to amend data will normally have to be processed at least in 1 month)

Right of access to Customer, Supplier and Visitors' own Personal Data and supplementary information, and the right to confirmation that 9. Customers and Suppliers' own personal data is being processed

Right to be forgotten by having Customer, Supplier and Visitors' own Personal Data deleted or removed on request where there is no compelling reason for an organization to continue to process it again

Right to restrict processing of Customer, Supplier and Visitors' Personal Data

Right to data portability of Customer, Supplier and Visitors' own Personal Data for their own purposes

Right to object to the processing of Customer, Supplier and Visitors' Personal Data for direct marketing, scientific or historical research, or statistical purposes

Right to lodge a complaint of Customer, Supplier and Visitors' Personal Data with the Office of the Personal Data Protection Committee (PDPC).

Any future changes or additions to the processing of Customer, Supplier and Visitors' Personal Data as described in this Privacy Policy will be notified to the Customer, Supplier and Visitors in advance through the Company's usual communication channels (e.g. by email or via the Company's websites).

12. Contact Person: Data Protection Officer

If the Customer, Supplier and Visitors have any questions or wish to inquire about the processing of Personal Data or exercise their rights related to Personal Data as outlined in this Privacy Notice, you can contact us using the details provided below;

Data Protection Officer;

e-mail	
Phone	
Address	

13. Applicable law

You acknowledge that this Privacy Notice is governed by and subject to enforcement and interpretation under Thai law. Any disputes that may arise shall be within the jurisdiction of the Thai courts.