

## Privacy Notice for Customers and Activity Participants

HaadThip PCL., and its Subsidiaries (hereafter called “the company”) are aware of and respect privacy and personal data protection of customers, service providers and activity participants (**thereafter called “You”**). Thus, the company has prepared this personal data protection notice so as to notify details of collection, utilization or disclosure of your personal data (overall called “assessment”) in accordance with the Personal Data Protection Act 2012.

### 1. Objectives of Personal Data Assessment

The company shall evaluate your personal data with the following main objectives.

Objectives of Personal Data Assessment		Assessment Bases
(1)	To consider approving purchase orders, services, identity confirmation check, authorization check, assignation, delegation of authority, compliance with internal processes of the company, in order for contract preparation, duty performance as per the contract, product delivery, service provision as well as contact and coordination, collection expenses, relevant document delivery etc.	<ul style="list-style-type: none"> <li>- Contract compliance.</li> <li>- Requirement for legal benefits.</li> </ul>
(2)	To apply for access of electronic system or validation of access rights or internet usage or other available electronic systems.	<ul style="list-style-type: none"> <li>- Requirement for legal benefits.</li> </ul>
(3)	To communication about products and/or services of the company, customer registration, complaint response and search for guidelines to remedy about products or services of the company, compliance with the requests you have the rights to your personal data possessed by the company, management of relationship between the company and you or your business, maintenance and updating your contact details, activity arrangement for customers etc.	<ul style="list-style-type: none"> <li>- Compliance with contract, law and requirements for legal benefits.</li> </ul>
(4)	For marketing and business development, communication about analyzed marketing activities that match with your requirements through various channels, including e-mail, telephone, messages social media, letter or face to face communication so as to develop marketing activities.	<ul style="list-style-type: none"> <li>- Requirement for legal benefits.</li> </ul>

Objectives of Personal Data Assessment		Assessment Bases
(5)	To assess, improve and develop products and service delivery and sales promotion activities of the company, including surveying the company's product and service satisfaction to make it appropriate, meet your requirements and may be of your interest.	- Requirement for legal benefits.
(6)	To represent details and supporting documents to deal with banks, financial institutions, Department of Business Development, the Revenue Department, Excise Department, the Stock Exchange of Thailand, the Securities and Exchange Commission and other relevant external agencies.	- Requirement for legal benefits.
(7)	To circulate promotions via various channels, for example, internal e-mails within the company and its subsidiaries, website, social media (Facebook - LINE -YouTube) or other online medias of the company, other medias like television, publication with consent already given.	- Requirement for legal benefits. - Consent.
(8)	To make plans, reports and business forecasts, risk management as well as internal audit by the internal audit office and internal management of the organization, including for the benefits of internal operations within the company, regarding disbursement of the Accounting and Finance Department.	- Requirement for legal benefits.
(9)	To proceed with transfer of rights, duties and other benefits, for example, merger and acquisition, legal separation or transfer of business.	- Requirement for legal benefits.
(10)	To be database for stakeholders of the company and/or to use data to manage relationship or coordinate other matters related to the company.	- Requirement for legal benefits.
(11)	To investigate in case of an internal complaint, protection of corruption or operations of other legal processes, including investigating and managing complaints and allegations related to the company's operations or other concerned parties in order for transparency and fairness of every party.	- Requirement for legal benefits.

Objectives of Personal Data Assessment		Assessment Bases
(12)	To open for applications or consider for participations in various projects and activities of the company, for example, study visits, company visits, donation, seminars, training and other projects or which the company cooperates with external parties or Government Sector etc., including other operations related to activity participation, for example, quiz, gift delivery and gift exchange via points.	– Requirement for legal benefits.
(13)	For safety within premises, territories the company is responsible for, exchange of National ID card, video image recordings of visitors, buildings, premises and branches, using CCTV.	– Requirement for legal benefits.
(14)	To establish legal rights, assignation and delegation of authority, legal compliance or right exercise, fight for legal claims, judicial proceedings as well as enforcement action	– Requirement for legal benefits. – Legal compliance
(15)	To comply with laws, summons, books or orders of agencies, independent organizations or staff responsible and authorized legally, for example, compliance with summons, writs, orders of courts, police, public prosecutors, Government Sector together with reports or disclosure to shareholders, Government Sector or independent organizations, for example, Energy Regulatory Commission, the Revenue Department, the Department of Lands, Office of the Auditor General, the Office of the National Counter Corruption Commission etc. This is to comply with the related laws.	– Legal compliance
(16)	To comply with the law, regarding public health interest, for example, health protection from communicable or epidemic which may infect and spread in the Kingdom.	– Legal compliance
(17)	To manage your health and safety.	– Protection or suppression of danger to life or health of individuals

Objectives of Personal Data Assessment	Assessment Bases
<ul style="list-style-type: none"> <li>■ In case the company shall evaluate your personal data for other purposes apart from the aforementioned, the company may request you for additional personal data in advance and to seek your consent on a case-by-case basis (depending on cases).</li> </ul>	

## 2. Stored Personal Data

In general, the company shall collect your personal data through direct inquiries with you. However, in some cases, the company may collect your personal data from other sources, for example, Government Sector or other sources with your personal data clearly shown to the public, including online data disclosure. In such cases, the company shall opt to collect only your personal data you chose to the public. Types of your personal data the company is to evaluate are as follows.

2.1 When you purchase products or use services of the company.

Personal Data	Details of Stored Data
1) Personal data	First – Last Name, Date of Birth, Marital Status, Address, Details on National ID Card or Passport.
2) Contact details	E-mail Address, Tel. No., Mailing Address, Social Media Channels.
3) Details of product purchase and/or service usage	Purchase History, History on Demand for the Company to be Responsible for Product Defects, History on Service Usage, Complaints, Recommendations.
4) Financial data	Details of Bank Accounts, Credit Cards, Debit Cards, Income, Benefits, Payment History.

2.2 When you visit and/or purchase products online or visit website or application, including membership registration of the company's website, application or privilege card.

Personal Data	Details of Stored Data
1) Registration	First – Last Name, Date of Birth, e-mail address, mobile phone number, log in, password, (Personal Identification Number: PIN, mailing address, social media channels
2) Technical Data You Opt to Use	IP address, Web Beacon, Log, Device ID, Model and Type of Device, Network, Data Connection, Single sign-on (SSO), Login log, Login Time, Duration spent on the company’s website, cookie, Access Data, Search History, Browsing Data, Type and Version of Browser, Time Zone Setting and Location, Type and Version of Plugged – in Browser, Operating System and Platform and Other Technologies on devices used to access the platform.
3) Data Usage	Your data usage on the website, platform, product and service usages.

2.3 When you participate in the company’s activities either organized by the company or organizers or activities the company is in operation with others or activities the company provides support to others who are the event organizers or enter the territories the company is in charge of.

1. Personal Data for Registration Participation in activities and contact, for example, first – last name, age, address, tel. no., e-mail address, online social media.
2. Photo and/or Sound Both still and moving images at the activity venue.
3. Data on past activities or situations you used to participate in or register.

2.4 When you contact the company through Customer Relation Center or other service centers.

Personal Data	Details of Stored Data
1) Personal data	Personal Data Protection.
2) Contact details	E-mail Address, Tel. No., Mailing Address, Social Media Channels.
3) Others	History on product purchases/service usage, places of purchase and service usage, product quantity purchased.

2.5 The above personal data stored is the necessary data for the company so as to comply with the contract or respond to your requests before preparing the contract. If you do not provide such

necessary personal data, the company shall not be able to proceed with anything relevant to transactions or manage as per the contract with you (depending on cases).

### **3. Sensitive Personal Data**

3.1 The company may be required to evaluate your personal data that is sensitive as specified by the Personal Data Protection Act so as to use in accordance with the objectives notified in this Personal Data Protection Notice or other objectives the company has further notified you or as per your consent you have given to the company on a case-by-case basis as follows.

- 1) When the company is required to use such data for benefits of maintaining the company's safety, for example, biological data, data on duplicated face images, data on duplicated fingerprints, in order to use to identify your identity.
- 2) The company may keep your sensitive personal data even though products and services may not be relevant to your sensitive personal data directly, for example, the company is required to use the stated religion on your National ID card to identify your identity.
- 3) Health information the company is required for your benefits, for example, food allergy information, congenital diseases, medical history in case you can reimburse expenses from the company in order to run activities, to proceed with the activities you participate in or for public health benefits, for example, prevention of spread of contagious diseases or epidemics.

3.2 In evaluating your sensitive personal data, the company shall seek clear consent from you on a case-by-case basis and shall set up a sufficient security measure in order to protect your sensitive personal data.

### **4. Cookie**

In case you have logged in electronic sources of the company, for example, application, website, IT system and cyber, the company makes use of cookies to collect your personal data as specified in the Cookie Usage Notice.

### **5. Consent Withdrawal and Possible Impact from the Withdrawal**

5.1 In case the company has evaluated personal data with your consent, you have the right to withdraw the consent given to the company at all times and such withdrawal will not affect the personal data evaluation carried out by the company before you withdraw your consent.

5.2 In withdrawing your consent or refuse to provide some data, it may cause the company to be unable to achieve some or all objectives notified in this Personal Data Protection Notice or other objectives the company has additionally notified you or as per consent given the company occasionally.

## **6. Personal Data of Others**

6.1 In case you have provided your personal data to the company, you will be responsible for:

- 1) Notifying such individual details as per Personal Data Protection Notice of the company as well as requesting for his or her consent (In case a consent required).
- 2) To proceed as deemed necessary to enable the company to legally evaluate personal data of such individual.

6.2 Personal Data of other persons that the company may use to evaluate, including sensitive personal data, for example, First – Last Name, Date of Birth, Address, Sex, Details on National ID Card or Passport, Nationality, E-mail Address, Tel. No., Occupation, Position, Workplace, Financial Documents, Relationship with you, contact channels in the social media.

## **7. Personal Data of Youth and Incompetent Person**

7.1 In case the company is required to have a consent to evaluate personal data of youth, disabled or incompetent person, the company shall evaluate personal data of the aforementioned person when the company has got the consent from a legal guardian with authority to act on behalf of youth, curator or an authorized person to give consent on behalf of such person in accordance with the Personal Data Protection Act (depending on cases).

7.2 In case the company is unaware of whilst the evaluation that the personal data owner is youth, disabled or incompetent person, until afterwards, the company has already evaluated the personal data of such person without consent from the legal guardian with the authority to act on behalf as stated on 7.1, the company shall delete or terminate the personal data or make it unable to identify identity of the youth, disabled or incompetent person, except in the case that the company can legally evaluate the personal data without any consent.

## **8. Duration of Personal Data Storage**

8.1 The company shall store your personal data for a necessary period in accordance with the objectives of such personal data evaluation, except that the law permits for a longer period of duration. In the case that the company is unable to specify a clear duration of storage, the company shall store your

personal data for an anticipated period as per storage measure, taking consideration business practices for each type of personal data.

8.2 The company shall store your personal data obtained from CCTV recordings for the following periods.

- 1) In a normal situation, the company shall store your personal data for 90 days from the date of recordings.
- 2) In a necessary situation, for example, use for investigation evidence or prosecution or in case of your request, the company shall keep your personal data beyond the specified period after the date of recordings, the company shall delete or terminate the personal data or make it unable to identify your identity when it is, in accordance with the objectives, completely processed.

8.3 In case the company evaluates your personal data with your consent, the company shall evaluate your personal data until you withdraw your consent and the company has completely processed your request. However, the company shall still store your personal data sparingly so as to record that you have withdrawn your consent to allow the company to respond to your future request.

## **9. Disclosure of Your Personal Data**

9.1 The company may disclose your personal data to its subsidiaries, authorized personal data evaluators and/or Data Protection Officers, consultants, financial institutions, financial service providers, internal and external auditors, Rating Agencies, business partners, service providers, contractors, outsources, relating to the company's business operations with regard to the personal data, business alliances, cooperating with the company in Co-branding, individuals, and/or other juristic persons with relations or juristic relations with the company, interested persons to assign rights and responsibilities of the company, persons who wish to merge business with the company in any forms, organizations related to sustainability index, hospitals and/or emergency rescuers (in emergency cases to protect your benefits), Government Sectors, regulatory agencies, authorized persons by law to ask the company to disclose your data and/or as per legal contract between you and the company and/or other persons or juristic persons resided either in Thailand or abroad (including employees, management directors, shareholders, representatives and consultants the company or such recipients of the data). This is to enable the company to operate its business and provide services to you, including operating in accordance with the personal data evaluation objectives of this Personal Data Protection Notice or other objectives additionally notified by the



company or as per your consent given to the company on an occasional basis and/or comply with the law.

9.2 The company shall specify that the recipients of your data arrange appropriate personal data protection measure and evaluate your personal data only required. This also includes operations to prevent persons from accessing or disclosing the personal data without any authorities.

9.3 The company shall demand the recipients of your data to keep your personal data as confidential and not use your personal data for objectives other than the personal data evaluation objectives of this Personal Data Protection Notice or as per your consent given to the company on an occasional basis and/or comply with the law.

## **10. Delivery or Transfer of Personal Data Abroad**

In general, the company shall not deliver or transfer your personal data abroad but in the case, the company is required to do so, including keeping your personal data on a data base in the systems abroad. The company shall control the recipients of your data or service providers to maintain the data at its destinations or maintain the data with personal data protection measure and sufficient safety in accordance with the rules of the Protection Data Protection Act of the country the recipients reside (if any).

In case, the recipients of your data or service providers maintain the data with sufficient safety in accordance with the rules of the Protection Data Protection Act of the country the recipients reside, the company shall necessarily and appropriately proceed so that the transferred data to such country is protected at the same level as the company protects your personal data.

## **11. Measure of Personal Data Security Maintenance**

11.1 The company shall strictly specify rights of access, usage, alteration or disclosure of personal data, including confirmation of identity of individuals who have access or use the personal data under the Measure of Personal Data Security Maintenance specified by the Personal Data Protection Law.

11.2 The company shall arrange for an appropriate technical means to prevent unauthorized access to the IT system, containing personal data.

11.3 In case the company has disclosed your personal data to other parties, the company shall do whatever necessary to prevent them from wrongly using or disclosing the personal data with no authorities and shall only necessarily use your personal data and in accordance with

the objectives the company has notified you and/or has received your consent on an occasional basis.

11.4 The company shall arrange for an examination system so as to delete or terminate the personal data from the storage system once the duration of personal data storage is expired or the personal data is no longer related or beyond necessity according to the evaluation objectives or you ask to withdraw your consent.

11.5 In case there is a violation of the company's Measure of Personal Data Security Maintenance, causing the violation of your personal data, the company shall promptly report the incident to an authorized department as per the Personal Data Protection Act, except the such violation does not appear to have any risks to affect your right and liberty. In case the violation contains a high risk and affect your right and liberty, the company shall promptly notify you of the violating incident together with a remedy in accordance with the criteria and methods of personal data specified by law.

11.6 The company shall record details in writing as per specification of Personal Data Protection Act or in electronic in order to allow the data owners or authorized departments to make an investigation.

## 12. Rights of Data Owner

12.1 As the personal data owner, you have the rights to deal with your personal data under the company's responsibilities, according to the Personal Data Protection Act as follows.

- 1) Requests for access right or for copies of personal data or for disclosure of sources of the personal data without your consent.
- 2) Receivable personal data in electronic mean or transferrable data to others.
- 3) Objection of collection, usage or disclosure of your personal data under the rules specified by the Personal Data Protection Act.
- 4) Request to delete or terminate your personal data or disable your data to identify your identity under the rules specified by the Personal Data Protection Act.
- 5) Request to withhold usage of your data under the rules specified by the Personal Data Protection Act.
- 6) Request to rectify, update and complete your personal data without causing any misunderstandings.

- 7) Withdrawal consent given to the company unless there is a limitation of the right to withdraw by law or juristic contract that is beneficial to you.
- 8) You can make a complaint to the authorized agency that the management of your personal data is not in accordance with the Personal Data Protection Act.

12.2 You can contact the person specified at the end of this notice. The company may reserve the right to turn down your request to exercise your right either wholly or partly when the company has an appropriate reason and in accordance with the law, for example, such proceeding may cause an unnecessary responsibility, is beyond practice and in contradictory with the law. Your right exercise has or may have an effect on right and liberty of others or in case the company has a legal authority to collect your personal data without having to seek your consent.

### **13. Notice or Personal Data Protection Policy of other websites or application**

In case you use the company's website or application and press other links on such website or application in order to access other websites or applications whether or not such websites or applications belong to the company. You will need to study and comply with this Notice or Personal Data Protection Policy of other websites or applications and the company shall not be responsible for content or measure of the Personal Data Protection of the website or the application. If you have given your personal data to owners of other websites or applications, you acknowledge and well understand that the company has no relation with the owners of other websites or applications with regard to your personal data evaluation.

### **14. Change and Rectification of this Privacy Notice**

The company may consider improving, rectifying or changing this notice as deemed appropriate and shall notify you through the company's website with the latest updated date shown at the end. However, the company would like to advise you to regularly check in order to acknowledge a new notification, especially before you disclose data to any persons.

### **15. Contact Channels**

The company has appointed a Data Protection Officer to provide an assistance in managing your personal data. If you have inquiries or recommendations about the company's practice of personal data management or wish to exercise your rights as the data owner, you can contact the company through the following channels.

- Data Protection Officer

- Tel. : 074 210008 ext. 1188
- E-mail : [dpo@haadthip.com](mailto:dpo@haadthip.com)
- Mailing address: No. 87/1 Karnjanavanich Rd., T.Banpru Hatyai, Songkhla 90250 Thailand
- Online at [www.haadthip.com](http://www.haadthip.com) (contact us)

HaadThip and Subsidiaries