



## Privacy Notice for processes related to customer of Jatco (Thailand) Co., Ltd.

### 1. General

In order to comply with the Personal Data Protection Act B.E. 2562 and relevant secondary laws including any future amendments to the law. (“**Personal Data Protection Law**”), Jatco (Thailand) Co., Ltd. (“**Company**”) realizes the importance of personal information and other information related to you. Therefore, the Company provides this Privacy Notice ( “**Notice**”) to explain to you on processes which the Company will take on information which can identify your personal or could be able to identify your personal, either directly or indirectly, according to the law on personal data protection (“**Personal Data**”), such as methods of collection, use, disclose and/or any actions with your personal data whether or not by automated means e.g. recording, organizing, storing, copying, changing or modifying, retrieving, transmitting, transferring, distributing or making accessible or available by any means, such as arranging, gathering, restricting or prohibiting of access, deletion or destruction (“ **Processing**”); and to inform you the purpose and legitimate grounds for the processing, period of retention of your personal data as well as your rights as the owner of personal data. In this regard, the company recommends that you read and understand the terms stipulate hereunder which details are as follows:

### 2. Types of persons the Company collect personal information

Under this notice which is a privacy notice for the processes related to the Company's customers, collecting and processing personal data therefore covers persons purchased products/services and/or may purchase products/services from the Company or any other persons with similar characteristics. This shall also cover those who are interested in joining a business project or a participant in a business project; those who are interested in investing or co-investing; participants in marketing activities such as an exhibition of the company's products in relatd events; person s who contact for information about the company and its products ; and respondents on questionnaires related to satisfaction on products/services of the company and on the Company’s event or other related activities they attended, etc. It shall also include related persons or representatives of a customer who is juristice person and those whose personal data appears in documents related to the relevant processes. Please see more details in Privacy Notice for processes related to the company's customers.

### 3. Sources for collecting and receiving your personal data

3.1 The company collects and receives your personal data through the following channels:

- When you communicate and ask for information through the company 's website, Apps in social media, telephone, email, electronic media, direct meeting with company employees, or by any other means
- When you are interested and enter into business negotiation with the Company or other procedures before entering into a contract with the Company.
- When you show your intention to purchase products from the company and enter into a contract with the company
- when you participate in marketing activities at the event or other related activities of the Company



- When you fill out information in the form of the company such as questionnaires on the satisfaction of the company's products/services, questionnaire on satisfaction in attending events or related, etc.
  - Collecting data from various service providers of the company such as information service providers and product sales statistics services.
  - In some cases, the company may collect your personal information from public sources whether you are the person who discloses personal data yourself or has given consent to anyone else to disclose your personal data.
- 3.2 In some cases, the Company may collect your personal information automatically through various means such as the use of cookies (cookies) or other similar technologies. More details please see Cookie Policy.
- 3.3 In collecting your personal data, you will be notified of the details specified in this notice, including but not limited to objectives and legal basis for processing personal data or if it is the case where the Personal Data Protection Law requires that the processing of any personal data requires your consent, the Company will request your explicit consent.
- 3.4 In the event that the Company collect your personal data prior to the effective date of the Personal Data Protection Laws relating to the collection, use and disclosure of personal data, the Company will continue to collect and use your personal information according to the original purpose which the Company has informed you on the collection of personal information which you have the right to revoke your consent by contacting the company according to the contact details specified in Article 13 of this notice. However, the Company reserves the right to consider your request to withdraw your consent and proceed in accordance with the Personal Data Protection Law.

#### 4. Personal Data Collected

Your personal data that is collected and processed under this notice, whether it is personal data that you directly provide to the company or personal data that the company automatically collected from you or personal information that the company received from outsiders, including:

- 4.1 General personal data which is identity information or used for identifying the identity such as title, first name, last name, middle name, nickname, ID card number, passport number, rank, position photo signature etc.
- 4.2 Contact information such as addresses on ID cards, maps, workplaces, delivery locations, invoice location, phone number, fax number, email address, social media contacts such as user ID for LINE application and/or messenger, emergency contact information and information of reference persons, etc.
- 4.3 Information related to transactions with the Company, such as customer codes, order details (e.g. desired product, quantity and quality), details of desired product (e.g. product code, product name, tax benefits), detail of complaint made on the products (e.g. date of purchase, product type, branch, relevant quantity and problems encountered), temporary product receipt number, delivery details (e.g. number of delivery cycles and delivery service company), etc.



- 4.4 Information related to payments or financial information such as amounts, credit limits, payment terms, account numbers, personal information appearing on invoices, tax invoices, cheque and cheque stubs, payment voucher, receipt, receipt voucher and bank account debit slips, etc.
- 4.5 Information used as evidence for transactions or juristic acts, personal information that appears in the copy of the national ID card, passport copy, copy of house registration, copy of the name and last name changed certificate, receipts, invoices, bills, debit and credit notes, etc.
- 4.6 Technical information such as computer traffic data (Log), computer serial number (IP Address) and information that the company collected through cookies (Cookies) or other similar technologies, etc.
- 4.7 Other information such as buying behavior or trends and/or use services from the Company, recorded audio and/or text conversations via telephone, recorded conversations via various social media such as Line and/or Messenger applications and recorded still images and movies through CCTV (CCTV), screening information according to epidemic prevention measures, etc.

**5. Objectives and legal basis for personal data processing**

5.1 The company will process your personal data for various purposes under the following legal basis (together referred to as "Specified objectives")

Number	Specified objectives	Legal basis for processing
( a ) Objectives related to the sale of products/services to customers as well as other related operations		
(1)	For membership registration or open a customer account	<p><b>Contractual basis:</b> The processing of the customer's personal data is necessary for the fulfillment of the customer's request for registering as a new membership or opening a customer account.</p> <p><b>Legitimate interest basis:</b> In case the customer is a legal entity, the processing of personal data of persons related to customers is necessary for legitimate interest of the Company's business operations.</p>
(2)	For execution of the contract for trading products / services	<p><b>Contractual basis:</b> Processing of the customer's personal data is necessary for entering into a contract and other processes related to entering into a contract.</p>



		<p><b>Legitimate interest basis:</b> In case the customer is a legal entity, the processing of personal data of persons related to customers is necessary for legitimate interests of the Company's business operations, such as contract management, customer identity verification, and consideration of customer qualifications, etc.</p>
(3)	<p>For management of order from customers, prepare products/services, and take any other related actions.</p>	<p><b>Contractual basis:</b> the processing of the customer's personal data is necessary for the performance of the sales and/or service contract to which the customer is a party, such as arranging delivery of goods, billing, confirming outstanding balances, and delivery of receipts to customers, etc.</p> <p><b>Legitimate interest basis:</b> In case the customer is a legal entity, the processing of personal data of persons related to customers is necessary for the legitimate interests of the Company's business operations.</p>
(4)	<p>For amendments of customer details and receiving complaints</p>	<p><b>Legitimate interest base:</b> The processing of the customer's personal data is necessary for the legitimate interests of the Company in facilitating the customer in changing the details of customers to be accurate, updated, completed and not to cause any misunderstandings as well as to improve the service quality of the Company related to complaints or suggestions received from customers.</p>
(5)	<p>to evaluate the suitability before making decision to enter into a transaction</p>	<p><b>Legitimate interest basis:</b> The processing of personal data is necessary for the legitimate interests of the Company in evaluating suitability or verifying qualifications before making a decision to enter into a transaction or considering the risks of entering into related transactions.</p>



( b ) Objectives relating to communications and marketing activities		
(1)	For communicating with you	<p><b>Legitimate interest basis:</b> The processing of personal data is necessary for the legitimate interests of the Company in communicating with you such as talks, meetings, business discussion on products/services, activities, or other projects of the company, including a memo or a summary recorded from the communication relating to the sale of products/services of the company</p>
(2)	For public relations and marketing activities of the Company	<p><b>Consent basis:</b> To carry out any marketing activities, such as sending you emails regarding marketing communications; asking for a still or photo shoot of your movements to process images and publicize marketing activities through various media channels, the company will proceed with your consent.</p>
( c ) Objectives related to data analysis and product / service quality improvement of the Company		
(1)	For analyzing data and exploring customer behavior or any other person with similar characteristics	<p><b>Consent basis:</b> In interviewing and observing the customer's behavior in order to collect of personal information or purchase personal information of customers from third parties regarding data and customer behavior analysis, the Company will proceed with the consent obtained from the customer or any other person with similar characteristics.</p>
(2)	For analysis of your usage of website, social media application or other channels	<p><b>Legitimate interest basis:</b> Processing of your personal data from the use of the website, social media applications or other channels as necessary for the legitimate interests of the Company in business operations and development of service quality of the Company</p> <p><b>Consent basis:</b> In the event that the Company processes your personal data for behavioral analysis and targeting advertisement based on your behavior, the Company shall proceed with your consent.</p>



( d ) Objectives relating to the performance of duties in accordance with laws related to or applicable to the Company and establishment of legal claims		
(1)	For compliance with laws relating or applicable to the Company	<b>Legal basis:</b> To comply with the laws applicable to the Company, such as the Personal Data Protection Act. tax law, labor law, social security law, civil and commercial law, public company limited Law and the law on securities and exchange, etc.
(2)	For establishment of legal claims and perform other related tasks	<b>Legitimate interest basis:</b> The processing of personal data is necessary for the establishment of legal claims, complying with or exercising legal claims or raising it against the Company's claims in any legal procedures such as investigations and interrogations by government officials, case preparation, litigation and defense in court, etc.
( e ) Objectives related to security		
(1)	for monitoring and maintaining peace and security of persons and property of the Company and of the general public	<p><b>Legitimate Interest Bases:</b> The processing of personal data is necessary for legitimate interests. To inspect the peace and order and security of the company's property. And of the general public, such as the use of recorded images from CCTV ( CCTV) to prevent loss. or damage to the company's property and general public etc.</p> <p><b>On the basis of prevention or suppression of harm to a person's life, body or health:</b> the processing of personal data is necessary for the purpose of investigating, preventing or suppressing any event that may harm a person's life, body or health.</p>



( f ) take any action necessary and beneficial to you and other purposes		
( 1 )	To take any action necessary and beneficial to you or directly related to any of the purposes set out above.	<b>Legitimate interest basis:</b> The processing of personal data is necessary for the legitimate interests of the Company in carrying out any necessary acts of the Company and/or beneficial to you or directly related to the purposes set out above. If it is the case where the Personal Data Protection Law requires that the processing of any personal data requires your consent, the Company will request your explicit consent.
( 2 )	For other purposes that the Company will notify you .	The Company will notify you of any other objectives that cause the Company to have to process your personal data in addition to the objectives set out above or when the company changes the original purpose that was set. If it is the case where the Personal Data Protection Law requires that the processing of any personal data requires your consent, the Company will request your explicit consent.

5.2 Due to your personal data that the company will carry out the processing for the purposes set out in clause 5.1 above having connection with the performance of a law or contract or necessary for entering into a contract with you, is necessary information to achieve that objective. If you do not wish to provide such personal information to the Company which may have legal implications or may cause the Company inability to perform duties under the contract entered into with you or unable to enter into a contract with you (depending on the case), in such cases, the Company may have to refuse to enter into a contract with you. or cancel the trade and/or providing services related to you or refuse to provide welfare or benefits related to you whether in whole or in part

5.3 In the event that the Company processes your personal data in a manner and/or for purposes that are inconsistent with the objectives specified above, the Company will provide additional policies or announcements regarding the protection of personal data. and/or have written to you explaining the processing of such data. You should read the related policies or announcements together with this notice and/or the said letter. (as the case may be)



## 6. Disclosure of Personal Information

6.1 The company may disclose your personal data under the specified objectives and in accordance with the rules prescribed by law to the following persons and agencies:

- (a) Jatco group of companies, both domestic and international, including executives, directors, employees, employees and/or internal personnel of such company which is relevant and necessary for the processing of your personal data;
- (b) Business partners and/or service providers which is a processor of personal data that the Company assign or hire to manage the processing of personal data for the Company in providing services such as information technology services, telephone service, internet Service, digital ID service, social media services data logging service, storage services (such as cloud document storage), payment services, postal service, parcel delivery service, printing service, insurance service, data analysis service, research service, marketing service or any other services that may benefit you or related to the business operations of the Company, such as commercial banks, non-life insurance companies, etc.
- (c) Company's advisors such as legal advisors, lawyers, auditors, actuary, marketers or any other professionals, both inside and outside the company, etc.
- (d) A government agency having regulatory duties or requesting disclosure of personal information by virtue of law or in connection with legal process or permission by relevant laws such as the Revenue Department, Department of Business Development, Department of Intellectual Property, Industrial Estate Authority of Thailand, Customs Department, Office of the Board of Investment, Automotive Institute, Office of the Personal Data Protection Commission, Office of Trade Competition Commission, National Police Agency, Office of the Attorney General, Court and the Legal Execution Department, etc.
- (e) Customers, business partners, contract parties of the Company whom you are a communicator or in connection with your duties or position or any other person with similar characteristics
- (f) Any other person or entity that you have given your consent to disclose your personal data to, for example, disclosure of the image processing of activities through the Company's various media channels to the public.

6.2 Disclosure of your personal data to others shall be conducted under particular objectives or other purposes as specified by law only. In the event that the law requires your consent, the Company will request your explicit consent.

6.3 In disclosing your personal data to other people, the company will provide appropriate measures to protect the disclosed personal data and to comply with the standards and duties of personal data protection as required by the law regarding personal data protection

However, in the event that the company Forwarding or transferring your personal data abroad, the company will take steps to ensure that the destination country, international organization, or the overseas recipient has adequate personal data protection standards or ensure that the forwarding or transferring of your personal data abroad will comply with the rules stipulated by the Personal Data Protection Laws. In some cases, the Company may request your consent for the forwarding or transferring of your personal data to such foreign countries.





## 7. Period of retention of personal data

The Company will retain your Personal Data for the period necessary to achieve the purposes set forth in the processing of that Personal Data. The retention period for Personal Data is subjected to change depending on the purpose of processing. In addition, the Company will retain personal data for certain period as required by relevant laws (if any), taking into account, the statute of limitations for potential legal proceedings or involving with documents or data personal which the company collected and taking into account the Company's practices and relevant business sector for each type of personal data is important.

The Company will retain your personal data for a period not exceeding 10 years from the date on which the legal relationship between you and the Company ends. However, the Company may retain your personal data for a period beyond that period, if permitted by law or the retention of such personal data is necessary for the establishment of legal claims of the Company, for example, in the event of dispute, exercise of rights or lawsuits relating to your personal data. The Company reserves the right to keep such data until the dispute has a final order or judgment.

After the expiration of the period and your personal data is no longer necessary for the purposes mentioned above, the Company will delete or destroy such personal data from the storage or system of the company and of other people who provide services to the company (if any) or make your personal information a data that can no longer identify you according to the form and standard of erasing personal data that the committee or the law will announce or according to international standards.

For more details on the retention period of your personal data, you can contact the company according to the contact details specified in Clause 13 of this notice.

## 8. Your rights regarding personal data

As a personal data owner, you have various rights in relation to your personal stipulated herein under the rules, procedures and conditions under the law on personal data protection. You can contact the company according to the contact details in Article 13 of this notice.

- 8.1 Right to request access to personal data: You have the right to access your personal data and request the Company to make a copy of such personal data for you in accordance with the law on personal data protection.
- 8.2 Right to Transfer Personal Data: You have the right to obtain personal information related to you in a form that can be read or generally used by automated tools or devices and to use or disclose personal data by automated means. Including having the right to request the Company to forward or transfer your personal data in such form to another data controller or yourself, unless technically unable to do so. The exercise of this right must be in accordance with the law on personal data protection.
- 8.3 Right to object to the processing of personal data: You have right to object to the processing of your personal data in the event that the law on personal data protection is required, unless the company has legitimate grounds for refusing the request (For example, the Company demonstrates that there are more legitimate grounds for processing your personal data or to establish legal claims, to comply with or exercise of legal claims or defences against legal claims, etc.)



- 8.4 Right to erasure of personal data: You may request the Company to delete, destroy or otherwise make your personal data non-identifiable to the person who owns it in accordance with the law on personal data protection for the following cases:
- (a) When your personal data is no longer necessary for retention in accordance with the purposes for which the company set out in the processing of personal data
  - (b) When you request to withdraw your consent to the processing of your personal data and the Company has no legal power to continue processing that personal data
  - (c) When you request an objection to the processing of your personal data in accordance with Clause 8.3 and the Company may not reject the objection request or the processing of such personal data is unlawful.
- 8.5 Right to rectify personal data: You have the right to request that your personal information be corrected. If your personal information is incorrect, not up to date, not completed, or may cause misunderstandings.
- 8.6 Right to suspend the use of personal data: You have the right to request the Company to suspend the processing of your personal data in accordance with the law on personal data protection in the following cases:
- (a) When the Company is in the process of verifying your request to correct the personal data according to clause 8.5
  - (b) When your personal data is unlawfully collected, used and disclosed
  - (c) When your personal data is no longer necessary for the purpose of keeping as the Company set out in the processing of personal data but you want the company to keep it for use in exercising legal rights.
  - (d) When the Company is in the process of proving more significant legitimate grounds or the establishment of legal claims, complying or exercising of legal claims or defence against legal claims in the event that you exercise your right to object under clause 8.3
- 8.7 Right to withdraw consent: In the event that the company relied on your consent to process your personal data (whether such consent was given before or after the law on personal data protection pursuant to the Personal Data Protection Act B.E. 2562 comes into force), you have the right to withdraw your consent to the processing of personal data at any time during the period in which your personal data is retained by the Company, unless there is a restriction by law for the Company to continue to keep the information or there is still a contract between you and the company, provided that the revocation of such consent may result in your inability to purchase products and/or receive services and/or conduct transactions with the Company under the contract entered into with you or unable to enter into a contract with you (as the case may be)
- 8.8 Right to lodge a complaint: If you have concerns or questions about the Company's practices on your personal information, please contact the company via the contact details in Clause 13 of this notice. In case of doubts that the Company has violated the law on personal data protection, you have the right to submit a complaint to an expert committee appointed by the Personal Data Protection Committee in accordance with the rules and procedures prescribed by the Personal Data Protection Law. In this regard, the company reserves the right to consider your request to exercise your rights and take action in accordance with the law on personal data protection.



## 9. Provision of services by third parties or subservices

The Company may assign or procure third parties. (Personal Data Processor) to process personal data on behalf of or on behalf of the Company which such third parties may offer services in various ways, such as being a caretaker (Hosting), receiving sub-services (Outsourcing) or being a cloud service provider (Cloud Computing Service Provider), information technology system service provider or work in other form of employment.

Assigning third parties to process personal data on behalf of the Company as a processor of that personal data The Company will arrange for an agreement that specifies the rights and obligations between the Company and persons of the Company assign, which includes detailing the types of personal data that the Company assigned to process including objectives, scope of processing of personal data and other relevant agreements. The personal data processor is responsible for processing personal data only to the extent specified in the agreement and in accordance with the instructions of the company. It cannot be processed for other purposes.

Where a personal data processor has assigned a subprocessor (Subprocessor) to process personal data for or on behalf of that personal data processor, the Company will direct the personal data processor to provide a documented agreement between the personal data processor and sub-processor in a form with standard not lower than the agreement between the Company with the personal data processor

## 10. Security of Personal Information

The company has measures to protect personal information. By limiting the right of access to personal data to only be able to be accessed by specific officers or persons with authority or assignments who need to use such data only for the purposes that have been notified to the data subject. Such persons must adhere to and strictly comply with the Company's personal data protection measures, as well as have a duty to maintain the confidentiality of personal information they have learned from the performance of their duties. The Company has Information security measures, both organizational or technical, that meet international standards And in accordance with the announcement of the Personal Data Protection Committee.

In addition, when the Company has forwarded, transferred or disclosed personal information to third parties. Whether for providing services according to missions, contracts, or other forms of agreement, the Company will set appropriate measures to protect personal data and confidentiality in accordance with the law. To confirm that the personal information that the company collects will always be safe and secure.

and in the event that the company has assigned or procured a third party (sub-processor) to process personal data on behalf of the Company Keep personal information confidential and maintain the security of such personal information as well as preventing personal data from collecting, using or disclosing for any other purpose that is not in accordance with the scope of employment or against the law

## 11. Sending or Transferring Personal Data Overseas

In some cases, the Company may as deem necessary send or transfer your personal data abroad in order to perform the purpose of providing services to you, for example, sending data to a group of affiliated



Companies, sending personal data to cloud system with platform or server abroad to support information technology systems located outside Thailand, depending on the company's services that you use or are involved in by activity.

However, while creating this policy, Personal Data Protection Committee has not announced the list of destination countries that have sufficient personal data protection standards. Therefore, when the company needs to send or transfer your personal data to the destination country, the company will take steps to provide personal data sent or transferred to have adequate personal data protection measures in accordance with international standards or proceed according to the conditions to send or transfer that information according to the law, which shall include the following matters:

- 1) It is in compliance with the law that requires the company to send or transfer personal data abroad.
- 2) The company has notified you and obtained your consent in the event that the destination country has insufficient standards of personal data protection. This is according to the list of countries announced by the Personal Data Protection Committee.
- 3) It is necessary to comply with the contract which you are a party to the company or according to your request before entering into that contract.
- 4) It is to comply with agreement of the company with other persons or juristic persons for your benefit.
- 5) It is to prevent or suppress a danger to your life, body or health or that of another person when you are unable to give consent at that time.
- 6) It is necessary to carry out important public interest missions.

## 12. Governing Law

This Governing Law shall be governed and construed in accordance with the laws of Thailand and that the courts of Thailand shall be the court having jurisdiction over the disputes that occur.

## 13. How to contact the company

If you have any questions, suggestions or concerns about the collection, use and disclosure of personal information of the company or about this policy or you want to exercise your rights under the personal data protection law as specified in this Notice, you can contact us via our data protection officer (DPO), who will be coordinator on personal data protection of the Company, contact detail as follows:

- 1) Contact address : 700/999 Moo 3 , Amata City Chonburi Industrial Estate, Nong Kakha Subdistrict, Phan Thong District, Chonburi 20160
- 2) Mail : [JTLDPO@jatco.co.th](mailto:JTLDPO@jatco.co.th)
- 3) Phone : 038-930000



#### 14. Changes to this Notice

The company may change the Notice from time to time as to comply with any changes in relation to the processing of your personal data and as required by the law on personal data protection or other relevant laws. The company will notify you of any important changes to this notice together with the revised version of this notice through appropriate channels. It is recommended that you examine the changes of this Notice from time to time.

Please be informed accordingly.

on 21 November 2022

Jatco (Thailand) Co., Ltd.

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