



Privacy Notice
for processes related to business partner 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 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 whom the Company collect personal data and the source of personal data

Under this Notice, the types of persons the Company collect and process personal data and the source of such personal data include:

2.1 Personal data about business partners This means a person who offers to sell products. and/or provide services to the Company or have any other similar relationship with the Company such as middlemen, service providers, consultants, experts, academics, lecturers, participants, or those interested in participating in business projects, contractors or any other persons with similar characteristics, etc. And it shall include natural persons involved or representatives of trade partners who are juristic persons and whom the personal data appears in the documents related to the relevant process. Please see more details in Notice on the protection of personal data (Privacy Notice) for processes related to the Company's business partners

3. Sources for collecting and receiving your personal data

3.1 When you fill out various forms through the company's website or other channels as follows

- When you provide information in products or services offering to the Company
- When you enter into a contract with the company and deliver various documents containing your personal data to the Company
- When you ask for information, give comments or feedback, or submit complaints to the Company by telephone, e-mail or any other means.
- When you communicate and inquire via the company's website, application in social media, telephone, e-mail, electronic media, direct meeting with company employees or by any other means
- When you attend various activities and recorded a still image, moving image and sounds in activities



- 3.2 When you are recorded still images or moving images by CCTV, which is under the supervision of the Company while you enter the company's website whether intentionally or not
- 3.3 In some cases, the Company may collect your personal data from public sources. Information about your business or commercial information sources, whether you are the person who discloses personal data yourself or has given consent to anyone else to disclose your personal data.
- 3.4 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.
- 3.5 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.
- 3.6 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 identification cards house registration address place of delivery invoice delivery location Phone number, fax, e-mail, user ID for Line application (Line ID) , information of who can be contacted in case of emergency and information of reference persons, etc.
- 4.3 Business information such as details about the company, factories, customer branches such as name, registration number, location and contact information, vehicle registration number, type of car, personal data appearing in the copy of the commercial registration, copy of title document, map, location and trade conditions, etc.
- 4.5 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.
- 4.6 Information used as evidence for transactions or juristic acts, personal data that appears in the copy of the ID card. passport copy, copy of house registration, copy of name change certificate. copy of factory operation license, registration form, copy of the land title deeds, application for opening a customer account, documents certifying non-connected persons, power of attorney, copies of company



certificates, copies of Phor Phor 09 or Phor Phot 20, maps, collateral documents (e.g. title deeds, bank guarantees, personal guarantees), sales contracts or any other contracts related to transactions, delivery notes, copies of lawyer license and copies of professional or business licenses, copies of bank accounts, employment contracts, directorship agreements, and power of attorney, etc.

4.7 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.

4.8 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 procurement and selection of business partners or any other person with similar characteristics	<p>Contractual basis: the processing of personal data is necessary in order to fulfill the bidding partner's request or any other person with similar characteristics before entering into a trading contract, service contract or any other contracts related to the Company's procurement</p> <p>Legitimate interest basis: The processing of personal data is necessary for the legitimate interests of the Company's conducting of business and implementation of procurement policy.</p>
(2)	For registering new partners or any other person with similar characteristics	<p>Contractual basis: the processing of personal data is necessary in order to fulfill the request of the prospective partner or any other person with similar characteristics in order to proceed with registration of a new partner as well as any other related actions</p> <p>Legitimate interest basis: In case the partner is a juristic person, the processing of personal data of persons related to business partners is necessary for the legitimate interests of the Company's business operations.</p>



(3)	For the preparation and management of contracts between the companies with any counterparty	<p>Contractual basis: The processing of a party's personal data is necessary for the fulfillment of that party's request who have expressed their intention to enter into a contract with the Company</p> <p>Legitimate Interest Basis: Processing of Personal Data of Parties (or of any related person or agent of the parties, in case the counterparty is a juristic person, is necessary for legitimate interests in the preparation and management of the Company's contracts</p>
(4)	For the performance of contractual duties which entered into with partners or any other person with similar characteristics	<p>Contractual basis: The processing of personal data is necessary for the performance of a contract which entered into with partners or any other person with similar characteristics, such as ordering products or services, setting up debts and paying for goods or services, and receiving goods or services, etc.</p>
(5)	to evaluate the suitability before making decision to enter into a transaction	<p>Legitimate interest basis: 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		
(1)	For communicating with you	<p>Legitimate interest basis: 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>Consent basis: 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>Consent basis: 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>Legitimate interest basis: 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>Consent basis: 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) 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.	<p>Legitimate interest basis: 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.</p>



(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, service providers and personal data processors that the Company assign or hire to manage/process personal data for the Company. To provide services such as health checks of personnel by business partners. information technology services data, logging service, payment service, postal service, parcel delivery service, printing service, insurance service, data analysis service, research, marketing or other services that may be interest to 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 will operate under the specified objectives or other purposes specified by law only. In the event that the law requires your consent, the company will ask for your consent beforehand.

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.

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 data 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 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 about you. Including the right to request that your personal data be sent or transferred to another data controller or yourself, unless it is unable under specific condition, in accordance with the law on personal data protection.
- 8.3 Right to object to the processing of personal data: You have the right to object to the processing of your personal data in cases where it is required by the Personal Data Protection Laws.
- 8.4 Right to erasure of personal data: You may request the Company to delete, destroy or make your personal information which is non-personally identifiable as required by the Personal Data Protection Laws.
- 8.5 Right to suspend the use of personal data: You have the right to request the Company to suspend the processing of your personal data as required by the Personal Data Protection Laws.
- 8.6 Right to correct personal data: You have the right to request that your personal information be corrected, if your personal information is incorrect, not updated, not completed or cause misunderstandings
- 8.7 Right to withdraw consent: In the event that the company relying on your consent to the processing of your personal data, you have the right to revoke your consent to the processing of your personal data that you have given consent to the company.
- 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 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).

- 1) Contact address : 700/999 Moo 3 , Amata City Chonburi Industrial Estate, Nong Kakha Subdistrict, Phan Thong District, Chonburi 20160
- 2) Mail : JTLDP@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.