

Personal Data Protection Policy (General Policy)

This announcement sets the Company's code of conduct in collecting, using, and disclosing of Personal Data in accordance with the Personal Data Protection Act B.E. 2562 (A.D. 2019). This announcement applies to the general public of KYORITSU ENGINEERING (THAILAND) COMPANY LIMITED and its Subsidiaries ("the Company"), the general public are kindly advised to thoroughly read all the provisions contained herein.

1. DEFINITION

"Personal Data" under this announcement means any data relating to a person, which can identify such person directly or indirectly, including all identifiable information, including but not limited to names, identification numbers, address information, online data, identity information: physical, psychological, mental, social, economic, or cultural, or any other data identifying a person.

"Company" means KYORITSU ENGINEERING (THAILAND) COMPANY LIMITED and its Subsidiaries.

"Subsidiaries" means the companies that KYORITSU ENGINEERING (THAILAND) COMPANY LIMITED holding shares of not less than 50 % of the total shares.

2. PERSONAL DATA WE COLLECT

2.1 GENERAL PERSONAL DATA

The Company needs to collect, use, and disclose your Personal Data including but not limited to:

- Name – Surname
- Date of Birth
- Age
- Users' Social Media Accounts: Facebook, Google, Instagram, Twitter, and LINE; username and Password, IP Address, and Cookie
- Photo
- Health and Disability Information
- Nationality and Race
- Religion

- Gender
- Marital Status
- Address, House Registration, Domicile Information
- Identification Card or Passport
- Phone Number
- Mobile Number
- Email
- Tax Identification Number
- Car Registration Book
- Travelling Information
- Payment information: Credit Card, Debit Card, and Bank Account
- Occupation and Place of Work
- Contact Person Information
- Financial Information and Salary

2.2 SPECIAL CATEGORY DATA

The Company collects your special category data according to Section 26 of the Personal Data Protection Act B.E. 2562 (A.D. 2019): such as racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any data which may affect the data subject in the same manner. The Company will access, collect, use, disclose, or control Personal Data with caution within the scope specified by law. The Company will inform you the details of collecting, using, or disclosing special category data before or while the Company is collecting data from you under the conditions required by law.

2.3 PERSONAL DATA RELATING TO VIOLATION OF LAWS

You acknowledge that in the case of violation of laws, either civil, criminal, or other laws, the Company has the right to collect or use your data relating to the violation of laws. In this regard, the Company will access, collect, disclose, or control such Personal Data with caution and within the scope specified by law.

2.4 THE COMPANY COLLECTS, PROCESSES, USES THE FOLLOWING PERSONAL DATA FROM THIRD PARTIES

You acknowledge and give a consent to the Company to collect, process, use the Personal Data including but not limited to:

- Information from public sources, such as information you disclose on social medias or public medias (Facebook, Instagram, Twitter) and public information that has your name, occupation, and contact information.
- Information relating to name, surname, identification card number, social media account such as Facebook and LINE, including e-mail linked to user's account, IP Address, address, date of birth, gender, age, photo, email, bank account number. credit and debit card numbers, and phone number that the Company may receive from financial institutions, agents, or business partners of the Company.
- Information relating to your health within the scope specified by law, the Company may collect information relating to your health from hospitals or medical personnel.

The Company would like to inform you that to protect and maintain the general public's safety and to protect the Company's interests, the Company has installed CCTV for the purpose of security within the Company's area. The Company or third-party service providers may collect, use, or process information from your images or videos and your Personal Data that you use and bring to the Company's area.

The Company may record telephone conversation for service improvement and development, including for public relations.

3. DATA THAT THE COMPANY PROCESSES

The Company processes Personal Data collecting directly from you or collects Personal Data from third parties as specified in Clause 2. in providing service, fulfilling contracts, and complying with laws, for the Company's legitimate interests or for the purposes specified in Clause 4.

The Company uses automatically decision-making procedures to process your information via computer systems in certain cases; for example, the Company may assess your Personal Data relating to providing other services. You may inquire more information by contacting the Company's officer.

4. PURPOSES AND LAWFUL REASONS IN COLLECTING, USING, AND DISCLOSING YOUR PERSONAL DATA

The Company collects, uses, and discloses Personal Data for the following purposes:

- To identify or verify your identity.
- To deliver, present and advertise our products and services tailored to your interest through different channels such as Social Media platforms, email, phone call, etc.
- To enhance, develop and improve business relationship between you and the Company.
- To consider, process, evaluate, or analyze your interests to ultimately enhance, develop and improve our services to meet your interests and needs.
- To analyze your usage of the service and to benefit in recommending products and/or services according to your interests.
- To train, control, or guarantee our employees and quality which may involve in coordinating or contacting you through different channels.
- To manage, solve, inquire, and analyze problems which may arise from using our products or services. The Company will use your Personal Data only in necessity.
- To manage, reply, or response to your communication, service claims, or suggestions.
- To clarify, inform, or notify the format modifications or information relating to the Company's services.
- To detect, protect, or prevent any undue actions, violations, misconducts or violations of laws, regulations, rules, and any other Company's conditions.
- To enhance and publicize advertising activities and promotional activities under the Company's conditions.
- To manage invoice issuance, debt collection, refunds, and payments.
- To manage or facilitate in servicing customers.

- To comply with laws, statutes, orders, and any other relating announcements;
- To comply with terms and condition in any contract between the Company and you, or to use in responding your service request before entering into the contract with the Company;
- To comply for the purpose of the Company's public interests or comply with the duty in exercising government powers given to the Company;
- To be the legitimate interest of the Company and other people; and
- For benefit the Company's business operation.

Incidentally, if the Company has necessity in collecting, using, and disclosing personal information for the purpose of performing the contract between the Company and you, or performing as per your service request before entering into a contract with the Company. In the case that you do not provide your personal information to the Company, the Company may not be able to perform the contract or provide services to you accurately and completely as stipulated in the contract.

The Company may need to collect, use, and disclose Personal Data to comply with laws. In the case of the special category data, including (1) information revealing a particular race or ethnic origin, political opinion, religious or philosophical beliefs or union membership, (2) biometrics, and (3) information about your health, sexual orientation, the Company shall collect, use, process, and disclose your special category data, whether (1) because the Company has obtained your consent to do so; or (2) because the Company has to establish legal claims, compliance or the exercise of legal claims; or (3) for important public interests.

You can obtain additional information by contacting the Company's officers. When the Company collects, uses, and discloses your special category data that you have given consent, you may withdraw your consent at any time by contacting the Company's officers. If you revoke your consent, the Company may need to process Personal Data in compliance with law or to protect Company's interests. The Company will explain to you at the time of revoking your consent that there is information in which the Company still has a duty to collect or process Personal Data for the purpose of complying with laws.

In addition, the Company collects, uses, and discloses Personal Data for other purposes in accordance or in correspondence with the purposes stated above including the purposes of history research, statistical or scientific research; for the purpose of information archives, and for the purpose of common interests. In

any feasible case, the Company will not use personally identifiable data for the purposes mentioned above, or the Company will follow the procedures to limit the scope of Personal Data usage for research or data backup, including the Company may use pseudonymous information to avoid the use of your personal information.

5. RECIPIENT OF YOUR PERSONAL DATA

The Company realizes the importance of safety in ensuring your Personal Data sufficiently and endeavor to restrict the access to your Personal Data to only the person(s) who needs to access to such data to perform the duties. Our employees, personnel, Subsidiaries, business partners, as well as external parties have service agreements with the Company regarding collecting, using, and disclosing of Personal Data mentioning above. Also, for any third party, having service agreement in collecting, using, and disclosing of your Personal Data, the Company will only disclose such Personal Data on a necessary basis, in order to process such Personal Data to provide services to you, to perform the contract between the Company and you in order to fulfill your request to use the service before entering into a contract with the Company, to perform duties for the Company's public interests, or to perform duties in exercising state powers granted to the Company and/or to protect the Company or other' interests. The Company agrees to protect your Personal Data from unauthorized use, access, or disclosure. You may contact our data protection officer for additional information regarding the type of service providers that we may disclose your Personal Data. The Company may disclose your contact information in our address book to our employees and others. However, you are entitled to request the deletion of your Personal Data from our database under the criteria, conditions, and within the period specified by the Company.

The Company may provide your Personal Data to any other companies or any agencies, such as public agencies, government agencies, service supervisory agencies, or Company's supervisory authorities or government agencies dealing with immigration matters, taxes, national security, and crime according to law, to operate the Company's business or Company's activities, traveling, organizing events, connecting to/relating to professional affiliations, and research.

Moreover, you agree to give consent to the Company to disclose or transfer your Personal Data to our Subsidiaries, agents, or business partners for the purpose of our business operation in order to provide

services to you, to perform the contract between the Company and you in order to process your request to use the service before entering into a contract with the Company, to perform duties in the Company's public interests, or to perform duties in exercising state powers granted to the Company and/or to protect the Company or others' interests or comply with other announcements on a case-by-case basis.

6. CROSS-BORDER TRANSFER OF YOUR PERSONAL DATA

The Company may transfer your Personal Data across border for the purpose of our business operation as necessary. In this regard, you agree and authorize the Company to transfer your Personal Data across border to a person or an organization in other countries or under the jurisdiction of other countries, whether that countries' Personal Data Protection law has the minimum standard of Thai Personal Data Protection law. In this regard, the Company will comply with the appropriate procedures to protect the safety of your Personal Data on the same level as Thai Personal Data Protection law.

7. RETENTION PERIOD

The Company will collect your Personal Data according to necessity and in the timeframe specified by laws. You may find further information about retention period that the Company keeps your Personal Data by contacting the Company's officers.

8. YOUR RIGHTS AS A DATA SUBJECT

At any time, you have the following rights regarding your Personal Data:

- Right to access your Personal Data held by the Company, including right to request for editing your incorrect or incomplete information.
- Right to obtain the copy of your Personal Data in an electronic form, in which you may directly transfer or request the Company to transfer such information to a third party.
- Right to object the processing of your Personal Data for marketing purposes and other purposes as mentioning in laws.

- Right to request deletion of your Personal Data once your Personal Data is unnecessary for the purposes given upon the collection of such data, including right to restrict the scope of processing Personal Data in the case where deletion is not possible.
- Right to request the data controller to suspend the use of your Personal Data.
- Right to request the Company to keep your Personal Data correctly, up-to-date, completely, and not misleading
- Right to file a complaint to regulating agency in the case that you believe there is any breach of your rights.

In this regard, you need to exercise your right under the regulations, announcements, and rules according to the Data Protection law, including the Company's Data Protection policy, and other criteria as specified by the Company. To exercise the rights mentioning above, you must submit the request in writing to the Company's personal data protection officer according to the details provided in Clause 9. in this announcement, and the right to consider those requests is the Company's absolute discretion. The Company's decision relating to the requests to exercise your right is final.

However, in case that you request us to delete, destruct, or limit the collection, usage, procession, or disclosure of Personal Data, suspension the usage temporarily, conversion unidentifiable Personal Data, or withdrawal the consent, the request may obstruct us in performing transactions and providing services to you.

9. PERSONAL DATA PROTECTION OFFICER

If you wish to use your rights as described in Clause 8. or have any inquiries regarding the collection, usage, or disclosure of Personal Data, please contact the Company's personal data protection officer; details are provided below:

Personal Data Protection Officer

Address ___301/100 Nonthaburi Rd.,_____

 ___A.Muang Nonthaburi, Nonthaburi_____

Tel. ___0-2967-0911 Ext.102_____

Email ___chittinan@kyoritsu.co.th_____

10. WITHDRAWAL OF CONSENT

If you no longer wish the Company to collect, use, process, or disclose your Personal Data, you may withdraw your consent by submitting a request to our data protection officer.

In this regard, the said withdrawal is subject to conditions, provisions, announcement, or rules mentioning in the data protection law, as well as the Company's Privacy Policy and the Company's other criteria.

11. MODIFICATION

The Company reserves the right to modify this Privacy Policy for any reasons that we see as appropriate, as well as to comply with laws, governmental policies, rules, announcements, orders, or other relating clauses. In case of modification, we will announce such modification on our website or via e-mail with will immediately become effective once we announce and we deem that you have acknowledged and agreed to comply with all modified privacy policies. You should review and read the details of the Company's Privacy Policy that is announced on the website on a regular basis.

QR code : Download Privacy Policy

Kyoritsu Engineering (Thailand) Co.,Ltd.

