

Privacy Notice

Dated 6/1/2022

Company: Sithiporn Associates Co.,Ltd.

Address: 451-451/1 Sirinthorn Road, Bangbunru, Bangplud Bangkok Thailand 10700

Phone Number: 02-433-8331

Email: center@sithiphorn.com

This privacy notice (“**Privacy Notice**”) aims to give you information on how Company and its affiliates/group companies as listed in the Appendix (collectively as “**we, us, our**”) process your personal data through your use, either on behalf of yourself or your company, of our products and/or services and/or website. This includes the information provided by you, as our customer or our customer’s representative/related person, on our website or upon the application or use of our products and/or services. You will be explained on what kind of personal data we collect and why we collect it; this includes what you tell us about yourself and what we learn by having you as a customer, how we process your personal data, who we disclose your personal data to, how long we keep your personal data, and what your privacy rights as a data subject and how the law protects you.

Our website is not intended for children under 20 years old and we do not knowingly collect data relating to children under 20 years old.

What type of information we collect

We currently collect and process the following information:

Identity data: this includes but not limited to your first name, last name, title, date of birth, personal identification number, passport number, tax identification number, nationality, username or similar identifier.

Contact data: this includes but not limited to your billing address, residential address, email address, telephone numbers and social media accounts.

Transaction data: this includes but not limited to details about payments to and from you, your bank accounts and payment card details, your correspondence with us and details of products or services you have purchased from us.

Market research & feedback: any information that you voluntarily share with us about your experience of using the products and/or services offered by us, such as your needs and interests, information and opinions expressed when participating in a market research and/or survey, or contact information that you provide to us in order to receive news and updates from us.

Profile data: this includes your login details, purchases or orders made by you, your interests or preferences, feedback or survey responses.

Our customer support services: any communications with our officers, such as record of contact, complaints and/or disputes, emails or letters you send to us, record of your feedback, and record of advice that we may have given you.

Details of others provided by you: these include any information that you have provided us about other persons with whom we may or may not have direct legal relationship, such as their identity data and contact data

We do not collect, use or store any sensitive personal data about you which includes details about your race or ethnicity, religious or philosophical beliefs, sexual behavior, political opinion, trade union information, health information, disability, genetic and biometric data, criminal records and any data which may affect the data subject in the same manner, as prescribed by law.

Where we collect the information from

We collect your information from various sources as follows:

information that you provide to us: such as the information filled out in the forms on our website, order forms or application forms provided by us.

information that we generate about you: this includes marketing and sales information, such as details of the products and/or services that you receive and your preferences, and audio-visual information, such as recordings from surveillance videos on our premises or recordings of phone or video or chats with our staff.

information we collect from other sources: this includes the information received from our business partners and any information that you share publicly on a third party social network.

If you do not provide the necessary data or consent to the collection, use or disclosure of data, which we indicate to you is mandatory, we may not be able to provide you with the products and/or services you require, or meet all our obligations we have with you, enter into a contract with you, or fulfil legal duties imposed on us by law. In such cases, our service to you may be limited, restricted, suspended, cancelled, prevented or prohibited, as the case may be.

If you give us personal data of other persons, or you request us to share their personal data with third parties, you confirm that such persons understand the information in this Privacy Notice about how we will use their personal data and that you have the rights to share their personal data to us.

What we do with the data we have

We may only collect, use and share (collectively “**process**”) personal data fairly and lawfully and for specified purposes provided by law (“**lawful basis**”).

The lawful basis for processing available under the applicable data protection law vary depending on the nature and purpose of the processing activities and the types of data being processed.

We will rely on one or more of the following lawful basis when processing personal data:

- when it is necessary to fulfil a contract or perform obligations we have with you or to act upon your request before entering into any contractual relationship with you;
- when it is our legal duty;
- when it is in our legitimate interest; and
- when you consent to the processing of your personal data.

Some processing activities may fall under more than one lawful basis. In such case, we may rely on any of the applicable basis for our processing activities.

The purposes for which we may process personal data, subject to the applicable law, and the legal bases on which we may perform such processing includes:

Purposes of Personal Data Processing	Lawful Basis
Provision of Products and/or Services	
<ul style="list-style-type: none"> • to verify and authenticate your identity; • to deliver our products and/or services to you; • to manage our relationship with you or your business; • to proceed with your orders or instructions; • to collect monies owed to us, if any; • to study how you use products and/or services from us and other organizations; • to provide service notifications or reminders of your benefits; and • to communicate with you about our products and/or services; 	<ul style="list-style-type: none"> • when it is necessary to fulfil a contractual duty or perform obligations that we have with you or to act upon your request before entering into any contractual relationship with you; or • when it is in our legitimate interest
Customer Support	
<ul style="list-style-type: none"> • to respond and manage customer requests; and • to manage fees, charges, or interest due on customer accounts, if any. 	<ul style="list-style-type: none"> • when it is necessary to fulfil a contractual duty or perform obligations that we have with you or to act upon your request before entering into any contractual relationship with you; or • when it is in our legitimate interest.

Purposes of Personal Data Processing	Lawful Basis
Marketing Activities	
<ul style="list-style-type: none"> • to conduct targeted advertising; • to personalize marketing messages sent to you; • to give you information about our and/or our group’s products and/or services that you may be interested in; • to let social media platforms send you information about our products and/or services that you may be interested in; • to communicate with you via any means (including via email, telephone, text message, social media, post or in person); and • to maintain and update your contact information where appropriate. 	<ul style="list-style-type: none"> • when you consent to the processing of your personal data; or • when it is in our legitimate interest.
Sharing Your Personal Data to Our Business Partners for Their Marketing	
<ul style="list-style-type: none"> • to allow our business partners to offer you their products and/or services 	<ul style="list-style-type: none"> • when you consent to the processing of your personal data
Business Improvement	
<ul style="list-style-type: none"> • to understand and develop products/services to meet our customers' needs and to improve our business performance; • to test, research, analyze and develop new features, products and/or services; • to plan improvements to existing products and/or services; • to manage your complaints, if any; • to do statistical reports or market research; • to do internal audits and reports; and • to conduct surveys or to hear from you about our products and/or services. 	<ul style="list-style-type: none"> • when it is necessary to fulfil a contractual duty or perform obligations that we have with you or to act upon your request before entering into any contractual relationship with you; or • when it is in our legitimate interest.

Purposes of Personal Data Processing	Lawful Basis
Fulfilment of Our Legal Obligations	
<ul style="list-style-type: none"> to verify and authenticate your identity; and to comply with applicable laws and regulations. 	<ul style="list-style-type: none"> when it is our legal duty to process your personal data
Security and Risk Management	
<ul style="list-style-type: none"> to prevent crimes and manage the security of our premises (for example, we may use closed circuit television (CCTV) in and around our premises , which may collect photographs, videos or voice recording of you and the individuals connected to you or your business) 	<ul style="list-style-type: none"> when it is in our legitimate interest.
Other relevant processing activities	
<ul style="list-style-type: none"> to conduct any processing activities in relation to the purposes set out in this table. 	<ul style="list-style-type: none"> same as the lawful basis applicable to such activities

Parties we share the data with

We may share your personal data or personal data relating to the individuals connected to your business with third parties where it is lawful to do so, including where we or they:

- need to have access to your personal data in order to provide you with the products and/or services you have requested (e.g. fulfilling a payment request);
- have a public or legal duty to do so (e.g. to assist with detecting and preventing frauds or tax evasion);
- need have access to your personal data for the purpose of regulatory reporting, litigation or to assert or defend their or our legal rights and interests;
- have a legitimate business reason for doing so (e.g. to manage risk, verify identity, enable another company to provide you with services you have requested, or assess your suitability for products and/or services);
- need to prevent harms to your life, body, or health; and/or
- have asked you or the individuals connected to your business for the permission to share the personal data, and you (or they) have agreed.

Some disclosure activities may fall under more than one lawful basis. In such case, we may rely on any of the listed basis for our disclosure activities.

We may share your personal data or personal data relating to the individuals connected to your business for these purposes with others, including:

- our group companies;
- any sub-contractors, agents or service providers who work for us or provide services to us;
- remarketing service providers;
- our business partners;
- financial institutions and/or payment processors;
- law enforcement, government, courts, dispute resolution bodies, regulators, fraud prevention agencies, tax agencies and auditors; and
- any other person with whom we have been instructed by you to share your personal data.

Under some circumstances, the recipients of your personal data listed above may be located outside of Thailand. We will ensure that the cross-border transfers of your personal data comply with related provisions in this Privacy Notice.

There may be instances which we may share your personal or non-personal data to third parties, such as advertising identifiers or one-way coding (cryptographic hash) of a common account identifier (such as a contact number or email address) to enable the conduct of targeted advertising.

We will not use personal data for any other purpose other than for the purposes as described to you. Should we intend to collect or use additional data, which is not described in this Privacy Notice; we will notify you and/or obtain your consent prior to the collection, use or disclosure in order to comply with relevant data protection laws.

Transfers of Personal Data Outside of Thailand

Your personal data may be transferred to and processed in other countries where our group companies or our service providers have established a business presence or have to meet compliance obligations. We will take all steps that are reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Notice as well as with the applicable data protection laws, including, where relevant, by entering into applicable standard contractual clauses (or equivalent measures) with parties outside of Thailand.

How we store your data

Your data is securely stored in secured locations. We keep your data for as long as it is necessary to carry out the purposes for which it was collected and/or compliance with applicable laws.

We may keep your data for up to 10 years after your relationship with us is stopped or terminated to ensure that contractual disputes can be processed within that time. However, for legal, regulatory or technical reasons, we may keep your data for longer than 10 years. If we do not need to retain personal data any longer, we will destroy, delete or anonymize your personal data.

Your Data Subject Rights

Under the applicable data protection law, you have rights including:

- **Right to Withdraw Consent:** This enables you to withdraw consent that you have already given to us. The withdrawal of your consent will not affect any processing of your personal data carried out prior to your withdrawal being effective.

Where your consent is not mandatory, the withdrawal thereof may partially or completely impede our ability to provide you with full benefits or experience relating to the products and/or services you receive.

Where your consent is mandatory, the withdrawal thereof may render our service limited, restricted, suspended, cancelled, prevented or prohibited, as the case may be.

For either case, we will not be liable to you for any losses incurred, and our legal rights are expressly reserved in respect of such limitation, restriction, suspension, cancellation, prevention or prohibition.

- **Right of Access:** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to Rectification:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Right to Deletion:** This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to the processing of your personal data (see below).

- **Right to Object to Processing:** This enables you to object to the processing of your personal data where we are relying on a legitimate interest (or that of a third party) and your particular circumstances justify your objection to processing on this basis. You also have the right to object where we are processing your personal data for direct marketing purposes.
 - **Right to Restriction of Processing:** This enables you to ask us to suspend the processing of personal data about you; for example, you may want us to restrict the use of your personal data which is under our correction process.
 - **Right to Portability:** You have the right to ask that we transfer the information you gave us to another organization, or to you, in certain circumstances.
- Right to Complain:** You may lodge a complaint with the local data protection authority if you believe that we have not complied with the applicable data protection laws.

Please complete the relevant form as provided by us to exercise your rights. Please also note that we will ask you to provide a proof of identity to us before responding to any requests to exercise your rights. We will respond to your request to exercise such rights without delay; we will notify you in advance if we require more time to process your request.

For any processing activities relying on your consent obtained before 1 June 2022, we will maintain and continue processing your personal data based on such consent. If you wish to withdraw your such consent, you may contact us and we will process your request accordingly.

Please note that the abovementioned rights are not absolute, as they should be balanced against legal requirements and our legitimate interest.

Security of Your Personal Data

We value your privacy; therefore, we place great emphasis on ensuring the security of your personal data. We regularly review and implement reasonable and appropriate physical, technical and organizational security measures when processing your personal data.

Our employees are trained to handle the personal data securely and with respect, failing which they may be subject to disciplinary actions.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on the date written above and historic versions can be obtained by contacting us. We may, from time to time, revise this privacy notice in order to comply with relevant and applicable guidelines and/or laws and/or our services. We will notify you of the revised privacy notice via our communication channels.

Please keep us informed of any changes of your personal data, if any, during your relationship with us to allow us to hold the current and accurate personal data of you.

Appendix

List of Affiliates/Group Companies of Sithiporn Associates Co.,Ltd.

Company's Name	Address and Contact Details
S.A. (Chiangmai) Company Limited	<p>Address: 418/26-27 Chiang Mai-Lampang Rd. Tumbol Nongpakhrang, Amphoe Mueang, Chiang Mai 50000</p> <p>Tel: 053-247 897</p> <p>Email: sales@sa-chiangmai.com, office@sa-chiangmai.com</p>
S.A. (KhonKaen) Company Limited	<p>Address: 555/28 Kasikorn Thung Sang Rd. Tumbol Nai Mueang, Amphoe Mueang, Khon Kaen 40000</p> <p>Tel: 043-238 500-1</p> <p>Email: sales@sa-khonkaen.com, office@sa-khonkaen.com</p>
S.A. (Maptaphut) Company Limited	<p>Address: 333/2 Moo 1 Tumbol Noenphra, Amphoe Mueang, Rayong 21000</p> <p>Tel: 033-062 124</p> <p>Email: sales@sa-maptaphut.com, office@sa-maptaphut.com</p>