



## Tozen Industrial Company Limited

### Privacy Notice

Tozen Industrial Company Limited (“Company”) has recognized the importance of your personal data and other data relating to you (“Personal Data”) and are committed to protecting the integrity of your Personal Data and privacy to assure you that the Company uses, discloses, or transfers your Personal Data with transparency and accountability in accordance with the Personal Data Protection Act, B.E. 2562, and other relevant laws. The Company has prepared this Privacy Notice to inform you about collection, use, disclosure, or transfer of your Personal Data. Details of the Privacy Notice are summarized as follows.

#### **Personal Data**

“Personal Data” means any information relating to a Person, which enables the identification of such Person, whether directly or indirectly, but not including the information of the deceased Persons in particular.

“Sensitive Personal Data” means Personal Data pertaining to racial, ethnic origins, political opinions, cult, religious or philosophical beliefs, sexual orientation, criminal records, health data, disability, trade union information, genetic data, biometric data (such as fingerprints or facial recognition data) or of any data which may affect the data subjects in the same manner, as prescribed by the Personal Data Protection Committee.

#### **Types of Personal Data that Company collects**

The Company may collect your Personal Data as follows.

1. Personal Data to identify and verify your identity including, name and surname, the date and place of birth, gender, and information contained in an individual’s citizen identity card, passport, and photos.
2. Contact information including, address, telephone number, email, social media identification such as Line ID and Facebook ID.
3. professional data such as occupation, positions, and workplace.
4. Security data such as data obtained from closed-circuit television cameras.
5. Data related to electronic systems access and usage such as IP Address, Browsers, Cookies, and chat history in various applications.
6. Financial data such as bank account numbers and billing information
7. Other data provided to the Company during company events in which you participated.

#### **Resource which Company collects your Personal Data**

The Company may collect your Personal Data from resources as follows.

1. Directly collects from you as following channels.
  - When you register to use our service or apply the right with the Company.
  - From a survey on the use of company's products or services or correspondence via email or other communication channels between you and the Company.
2. The Company website such as tracking the behavior of entering website by using of Cookies or from software on your device, etc.
3. Other sources of publicly disclosed information and/or from other persons, in this case the Company will comply with the Personal Data Protection Act strictly.



### **Purposes for the collection Personal Data**

The Company collects your Personal Data for the following purposes.

1. For the procurement or sales of products and providing or employing services in various forms.
2. For the performance of financial transactions and taxation in compliance with the company's contractual obligations.
3. For maintain and update information about your personal data including documents referred to you.
4. For recording of personal data processing as required by Personal Data Protection Act.
5. For analyzing and monitoring of the Company's website services and for investigating difficulty of use issues.
6. For Identity Verification Authenticate and verify information when you contact with company.
7. For access control, preventing life-threatening situations and incidents that may harm the health or cause bodily injury to yourself or others, as well as prevent and control contagious diseases, and security control of the Company's buildings and premises.
8. For participating various activities of the Company.

However, if there is a change in the purpose for collecting Personal Data after the Personal Data collection, the Company will notify you and take other actions as required by law including providing additional records of the amendments as evidence.

### **Processing of your Personal Data**

The Company may collect Personal Data as necessary for lawful purposes by obtaining your consent before or while collecting your personal data. The exception without consent in the following purposes.

1. For the legitimate interests of the Company and of another person such benefits are no less important than the fundamental rights of personal data subjects.
2. To protect the vital interest: danger to life, body, or health of a person
3. To perform the contract or take necessary action as you are the party of our contract.

Collection of Sensitive Personal Data, The Company shall obtain your consent before or while collecting such sensitive personal data in accordance with the rules prescribed by the Company that shall not be contrary to the law.

Collection of Personal Data of minors, incompetent person and quasi-incompetent people, the Company considers protecting of Personal Data of such persons to the utmost in accordance with the rules prescribed by the Company that shall not be contrary to the law.

### **Disclosure of Personal Data**

The Company may disclose your Personal Data as necessary to Government agencies or third parties as follows.

1. Tozen Group of companies
2. Cloud Service Vendor in foreign country and Tozen Server in Japan.
3. Government agencies which have legal powers and duties such as the Social Security Fund Office, The Revenue Department, the Legal Execution Department, the Court, the Royal Thai Police, the Consular Department.

### **Transfer of Personal Data Abroad**

In some case the Company may send or transfer of Personal Data to abroad, the Company will strictly comply with the Personal Data Protection Act and having adequate level of international standards.



### **The Personal Data retention period**

The Company will retain your Personal Data only for the necessary duration, and will collect, use and disclose your Personal Data, as defined in this Policy, in accordance with the duration criteria, namely the period during which you are still related to the Company, and may still retain your Personal Data as long as needed for legal compliance or as per legal prescription, for the establishment of legal claims, legal compliance or exercise of legal claims, or defense of legal claims, or for other purposes in accordance with policies and the internal regulations of the Company.

If it is not possible to specify the Personal Data retention period, the Company will retain the Personal Data as may be expected per data retention standards (such as the longest legal prescription of 10 years).

### **Your Rights as a Data Subject**

You have the rights as follows.

- (1) Right to access: you have the right to request for an access to and the request for the copy of your Personal Data, including to request Company to disclose the acquisition of such data that you have not given consent to us.
- (2) Right to rectification: you have the right to request the Company to correct inaccurate or add incomplete of your personal data.
- (3) Right to erasure: you have the right to request the Company to delete your Personal Data for some reason.
- (4) Right to restriction of processing: you have the right to request the Company to restrict the use of your Personal Data for some reason.
- (5) Right to object: you have the right to object the Processing of your Personal Data for some reason.
- (6) Right to withdraw consent: you have the right to have the right to withdraw the consent for the Processing of your Personal Data that has already given to us throughout the period your Personal Data is with us.
- (7) Right to data portability: you have the right to request to transfer your Personal Data that you have given to us to other data controller or yourself with some reason.

You can contact the Data Protection Office (DPO) to submit a request for action in accordance with the above rights (Contact channel as below). You do not need to pay any fees. In carrying out the above rights we will consider and notify you of the result of your request within 30 days from the date we receive the request.

### **Amendment of this Privacy Notice**

The Company will review this Privacy Notice on regular basis to ensure that we comply with relevant regulations and laws. If there is an amendment of this Privacy Policy, we will keep you posted through Tozen Websites as soon as possible.

### **Contact channels**

If you have question or require further details concerning the protection of your personal data, please contact us as per the following channels:

#### **Data Controller**

Tozen Industrial Company Limited

Contact Place: 3388/62 Sirinrat Building 18th Floor, Rama 4 Road, Klongton, Klongtoey, Bangkok

Telephone: 02-0290100

#### **Data Protection Officer (DPO)**

Contact Place: 3388/62 Sirinrat Building 18th Floor, Rama 4 Road, Klongton, Klongtoey, Bangkok

Telephone: 02-0290100



Email: [pdpa.ti@tozen.com](mailto:pdpa.ti@tozen.com)  
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