

IVICT (Thailand) Company Limited

Privacy Notice

IVICT (Thailand) Company Limited and data privacy

IVICT (Thailand) Company Limited (**ITH**) are committed to protecting and respecting your privacy and comply with the Personal Data Protection Act B.E. 2562 ("PDPA"), relevant laws and regulations.

The privacy notice sets out the basis on which we will process any personal data that we may collect about you as a visitor to our website or premises or a contact at one of our customers, suppliers or other business partners.

The personal data that we collect about you

We may collect and process the following personal data about you:

- **Personal data that you give us:** This is information about you that you give to US when visiting our website, giving US a business card (or similar), filling in forms that we ask you to complete or corresponding with US by telephone, post, email or otherwise. It may include, for example, your name, address, email address and telephone number; information about your business relationship with ITH; and information about your professional role, background, and interests.
- **Personal data that our website and other systems collect about you:**
 - If you visit our website, it will automatically connect some information about you and your visit, including the Internet protocol (IP) address used to connect your device to the Internet and some other information such as your browser type and version and the pages on our site that you visit via cookies, Google Analytics, and other analytics tools.
 - If you exchange emails, telephone conversations or other electronic communications with our employees and other staff members, our information technology systems will record details of those conversations, sometimes including their content.
 - Some of our premises have closed circuit TV systems which may record you if you visit our premises, for security and safety purposes.
- **Other information:** We may also collect some information from other sources. For example:
 - If we have a business relationship with the organization that you represent, your colleagues or other business contacts may give US information about you such as your contact details or details of your role in the relationship.

- o We sometimes collect information from third party data providers or publicly available sources for anti-money-laundering, background checking and similar purposes, and to protect our business and comply with our legal and regulatory obligations.

The uses that we make of your personal data

We may only collect, use, or disclose your personal data where it is necessary or there is a lawful basis for collecting, using, or disclosing it. This includes where we collect, use, or disclose your personal data based on the legitimate grounds of legal obligation, performance of contract made by you with US, our legitimate interests and other lawful basis. Purposes for collecting, using, or disclosing are provided below:

- to operate, manage, develop and promote our business and, in particular, our relationship with the organization you represent (if any) and related transactions - this includes, for example, billing/payment purposes;
- to operate, administer and improve our website and premises and other aspects of the way in which we conduct our operations;
- to protect our business from fraud, money-laundering, breach of confidence, theft of proprietary materials and other financial or business crimes; and
- to comply with our legal and regulatory obligations and bring and defend legal claims.

We may from time-to-time review personal data about you held in our systems - including the contents of and other information related to your email and other communications with US - for compliance and business-protection purposes as described above. This may include reviews for the purposes of disclosure of personal data relevant to litigation and/or reviews of records relevant to internal or external regulatory or criminal investigations. To the extent permitted by applicable law these reviews will be conducted a reasonable and proportionate way and approved at an appropriate level of management. They may ultimately involve disclosure of your personal data to governmental agencies and litigation counterparties as described below. Your emails and other communications may also occasionally be ordinary business management purposes (for example, where necessary when a staff member is out of the office or has left ITH).

We will only process your personal data as necessary so that we can pursue the purposes described above, and then only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes. In exceptional circumstances we may also be required by law to disclose or otherwise process your personal data. We will tell you, when we ask you to provide personal data about yourself, if provision of the requested personal data is necessary for compliance with a legal obligation or, on the other hand, if it is purely voluntary and there will be no implications if you decline to provide the personal data. Otherwise, you should assume that we need the personal data for our business or compliance purposes (as described above).

Disclosure and international transfer of your personal data

We may disclose personal data about you, where reasonably necessary for the various purposes set out above:

- to the parent company, affiliates or subsidiaries of ITH;
- to your colleagues within the organization that you represent;
- to service providers who host our website or other information technology systems or otherwise hold or process your information on our behalf, under strict conditions of confidentiality and security;
- to a person who takes over our business and assets, or relevant parts of them; or
- in exceptional circumstances:
 - to competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory; or
 - where we are required by law to disclose.

These disclosures may involve transferring your personal data overseas. You should be aware that this may include transfers to countries outside Thailand, which do not have similarly strict data privacy laws. In those cases, where we transfer personal data to the parent company, affiliates, subsidiaries of ITH or our service providers, we will ensure that our arrangements with them are governed by data processing agreements or data transfer agreements, designed to ensure that your personal data is protected. Please [Contact us](#) (see below) if you would like to know whether any such agreements are in place or, if so, to see a copy.

Retention and deletion of your personal data

We will delete the personal data that we hold about you when we no longer need it.

Note that we may retain some limited personal data about you even when we know that you have left the organization that you represent, so that we can maintain a continuous relationship with you if and when we are in contact with you again, representing a different organization.

Your rights

Under the PDPA, **you have the rights to:**

- **Request access** to your personal data and obtain a copy of your data on request.
- **Request correction** of your personal data that is incorrect or incomplete.
- **Request erasure** of your personal data where the data is no longer necessary for the purposes of processing.

- **Object to processing** of your personal data where we are relying on our legitimate interests as the legal ground for processing.
- **Request the restriction** of collecting and using your personal data.
- **Request the transfer** of your personal data to another party.
- **Right to withdraw the consent.** In circumstances where you have provided your consent to the collection, processing, and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

Contact us

We welcome questions, comments and requests regarding this privacy statement and our processing of personal data. Please send them to:

IVICT (Thailand) Company Limited
968, 24th Floor, U-Chuliang Foundation Building, Rama 4 Road, Silom, Bangrak, Bangkok
10500, Thailand. Telephone: +66(0) 2-632-4115

You can also lodge a complaint about our processing of your personal data with the Office of the Personal Data Protection Committee (pdpc@mdes.go.th).

Changes to this policy

Any changes we make to this privacy statement in the future will be posted to our website (at <https://ivict.co.th>). Please check back frequently to see any changes.

Issue Date: July 1, 2022