

Privacy Notice



SIS Distribution (Thailand) Public Company Limited (the Company) is committed to protecting your personal data. This Privacy Notice is prepared to inform you of the principles, methods, and purposes for which personal data is collected, used, and disclosed, as well as your legal rights, in compliance with the Personal Data Protection Act B.E. 2562 (2019) and relevant international standards, as follows:

1. Personal Data

“Personal Data” refers to any information that identifies or may identify you, whether directly or indirectly.

2. Limited Collection of Personal Data

The Company will collect personal data for clear purposes, within a limited scope, and by lawful and fair means. Only necessary data relevant to the Company’s purposes will be collected, such as for product sales, service provision, or other electronic services under the objectives stated in this Notice.

Prior to collecting data, the Company will ensure the data subject is informed and consents through appropriate channels such as documents, electronic media, or SMS, as specified by the Company to ensure efficient use of the data in line with its objectives.

The Company will obtain consent before collecting personal data, unless such collection is for

2.1 Compliance with the law: e.g., the Personal Data Protection Act, Electronic Transactions Act, Telecommunications Business Act, Anti-Money Laundering Act, Civil and Commercial Code, and Civil and Criminal Procedure Codes, etc.

2.2 Investigation or litigation: Disclosure for criminal investigations or judicial proceedings.

2.3 For the benefit of the data subject: in cases where obtaining consent is not possible at that time or where the processing is carried out for the benefit of the data subject.

2.4 For the legitimate interests of the Company or other persons: the disclosure of personal data is necessary for the legal interests of the Company or of another person or legal entity other than the Company.

2.5 To Prevent Harm: The disclosure of personal data is necessary to prevent or suppress danger to an individual’s life, body, or health.

2.6 Contractual Compliance: The disclosure of personal data is required for the performance of a contract to which the data subject is a party, or to take steps at the request of the data subject prior to entering into a contract.

2.7 Public Interest or Research: The disclosure of personal data is for the purpose of creating historical records or archives for the public interest, or for academic research or statistical purposes, provided that appropriate safeguards are in place.



3. Data Security and Quality Measures

3.1 The Company acknowledges the importance of safeguarding personal data security and has implemented appropriate technical and organizational measures to ensure confidentiality, integrity, and accuracy of personal data. These measures also aim to prevent unauthorized or unlawful loss, access, modification, destruction, use, or disclosure. The measures include the following:

3.1.1 The use of data encryption technologies and access control mechanisms to ensure that only authorized personnel can access the data.

3.1.2 Regular reviews, audits, and maintenance of security systems.

3.1.3 Strict adherence to the Company's Information Technology (IT) Security Policy.

3.1.4 Secure storage of data in high-security systems with reliable backup solutions.

3.1.5 Retention of data only for the period necessary to fulfill the specified purposes.

3.1.6 Providing data subjects with the ability to access, correct, or delete their personal data in accordance with their legal rights.

In addition, the Company regularly verifies the accuracy of personal data to ensure that the information is correct, up-to-date, and effectively used within the defined purposes and appropriate scope.

3.2 Discontinuation of Use or Removal of Personal Data: Once the purpose for processing personal data has been fulfilled, the Company will discontinue the use or remove the personal data from its storage systems, provided that further retention is not necessary. The data will be handled using appropriate methods in accordance with applicable legal standards such as deletion techniques that ensure the data cannot be retrieved or reused.

3.3 Irreversible Data Deletion: When personal data is deleted, it will be permanently erased and rendered irrecoverable. The deletion process will follow established standards to ensure that the deleted data cannot be restored or reused in the future, with full consideration of confidentiality and data security.

4. Purposes for the Collection, Storage, and Use of Personal Data

The Company collects, stores, and uses your personal data for specific and limited purposes, as outlined below:

4.1 For the purpose of product sales or service provision: Personal data is collected in order to deliver various services to you, such as promotional activities, payment channel services, or other services you may be interested in. This also includes the development and provision of digital services related to you.

4.2 Market research and offering of benefits: Personal data may be used for market research, database development, and the provision of benefits or services tailored to your interests such as analyzing and recommending products or services that suit your preferences.

4.3 For Legal or Regulatory Compliance: Personal data is used to comply with applicable legal or regulatory requirements imposed on the Company, such as the preparation of reports mandated by law or the fulfillment of obligations under orders issued by government authorities.

4.4 To Improve Service Efficiency: Personal data is collected to enhance the efficiency of current and future services, including improving customer experience and optimizing service management.



4.5 For the purpose of transmission, transfer, and/or disclosure of personal data: The Company may send, transfer, and/or disclose your personal data to (1) affiliated companies within the Company group, (2) business partners, (3) external service providers or data processors, (4) Cloud computing service providers, (5) individuals or legal entities intending to receive the transfer of rights or to be the recipients of the rights transfer, (6) agencies, organizations, or individuals involved in service agreements. Such transmission or disclosure may occur both domestically and internationally.

4.6 Data Storage and Protection: The Company will store personal data in high-security systems and protect this data from unauthorized access. Personal data will be retained only for as long as necessary to fulfill the specified purposes.

5. Restrictions on the Use and/or Disclosure of Personal Data

5.1 Use and Disclosure of Personal Data: The Company will use and disclose your personal data based on the consent obtained and within the scope of the purposes stated in this notice. The Company will ensure that employees, officers, or any individuals do not use or disclose personal data beyond the authorized limits.

However, the Company may disclose personal data without obtaining consent from the data subject in cases where it aligns with the exceptions specified in Section 2 of this notice.

5.2 Use of External Service Providers: The Company may engage external information service providers to store personal data. These providers must have security measures in place to protect personal data and are prohibited from collecting, using, or disclosing personal data beyond the scope defined by the Company in the agreement.

5.3 Disclosure of Data Upon Government Request: In cases where the Company receives a request from a government agency that necessitates the disclosure or transfer of personal data, the Company will notify the data subject in advance, unless restricted by law or an order from the relevant authority prohibiting such notification. This ensures that the data subject can exercise their legal rights.

6. Your Rights Regarding Personal Data

6.1 You have the right to manage your personal data as permitted by law and under the applicable provisions, as follows:

6.1.1 Right to Withdraw Consent: You have the right to withdraw any consent you have given to the Company for the collection, use, or disclosure of your personal data if you no longer wish the Company to use your data.

6.1.2 Right to Access or Request Disclosure on Source of Information Obtained Without Consent: You have the right to access your personal data the Company has collected and request a copy of this data, including requesting the Company disclose how it obtained personal data from sources where consent was not provided.

6.1.3 Right to Receive or Transfer Data: You have the right to request the Company send or transfer your personal data to another data controller, in accordance with applicable laws, contracts, or the rights and freedoms of others.



The Company has implemented various measures related to personal data protection, which include adhering to the Company's Privacy Notice covering the collection, use, and disclosure of personal data. This also includes establishing guidelines for ensuring the security of personal data, controlling access to data, preventing data breaches, and creating a privacy notice that informs you about your rights as a data subject. The notice also provides information on the data collected by the Company and how that data is used.

9. Data Protection Officer

The Company has complied with the Personal Data Protection Act B.E. 2562 (2019) by appointing a Data Protection Officer (DPO) to oversee and monitor the Company's activities related to the collection, use, and disclosure of personal data in accordance with the Personal Data Protection Act and other relevant laws.

The responsibilities of the DPO include ensuring that the Company follows the personal data protection policy correctly and transparently. The DPO also provides advice on compliance with laws related to personal data protection, educates employees about data protection, manages the Company's internal personal data management systems, and regularly reviews and audits practices related to personal data.

10. Contact Information for the Data Protection Officer

If you have any inquiries regarding the collection of personal data, exercising your rights concerning personal data, or filing a complaint about a personal data breach, you can contact the Data Protection Officer at:

- **Data Protection Officer**

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| 1. Ms. Varapa Intakorn-Udom | Tel: 02-020-3291 |
| 2. Mr. Apisak Polsen | Tel: 02-020-3090 |
| 3. Mr. Pichit Polpinit | Tel: 02-020-3299 |
| 4. Ms. Areerat Khuanpadung | Tel: 02-020-3060 |
| 5. Ms. Sirinun Leelapeeraphun | Tel: 02-020-3316 |
| 6. Ms. Nittaya Srivaranon | Tel: 02-020-3552 |

- E-mail: DPO@sisthai.com
- Address: SiS Distribution (Thailand) Public Company Limited
9 Pakin Building, 9th Floor, Room No.901, Ratchadaphisek Road, Din Daeng, Bangkok 10400
- Working Hours: Monday to Friday (excluding public holidays), 09:00 - 18:00 hrs.