

Personal Data Protection Policy



SiS Distribution (Thailand) Public Company Limited (“the Company”) is acutely aware of the importance of effectively personal data protection to grant the data owner to protect their own personal data. Therefore, the Company has established this Personal Data Protection Policy to outline the procedures and practices that the Company adheres to regarding the personal data of relevant parties, ensuring the security, stability, and transparency of the data such as data collection, storage, usage, disclosure including the rights of personal data owners. This policy encompasses the handling of both existing data and any data that the Company may develop or acquire in the future as described below.

1. Personal Data

“Personal Data” means data that can identify an individual, whether through direct or indirect means.

2. Restricted Personal Data Collection

The collection and storage of personal data collection by the Company will be performed with specific purposes and scopes, and by methods that comply with legal and ethical standards. The collection and storage will be limited to the extent necessary for product sales, services provision or any other electronic services for the Company's purposes. The Company shall seek for acknowledgment and consent from the data owner via an electronic means, short message or any alternate means specified by the Company for the benefits of product or service sales and purchase. Prior to performing the aforementioned actions, the Company shall request the consent from data owner unless:

- 2.1 It is required by applicable laws, such as the Personal Data Protection Act, the Electronic Transaction Act, the Telecommunications Business Act, the Anti-Money Laundering Act, the Civil and Criminal Code, the Civil and Criminal Procedure Code, etc.
- 2.2 It is carried out for the benefit of facilitating investigations by investigating officers or for the court's consideration and judgment.
- 2.3 It is carried out for the benefit of the personal data owner and requesting consent cannot be done at that time.
- 2.4 It is necessary for the Company's lawful benefits or the benefits of other individuals or legal entities other than the Company.
- 2.5 It is necessary for the prevention or avoidance of any events harmful to an individual's life, body, or health.
- 2.6 It is necessary to comply with any agreement to which the personal data owner is a party or respond to any requests of personal data the owner prior to entering into such agreement.
- 2.7 It is carried out to achieve the objectives related to the compilation of historical documents or annotations, for the public benefit, or for educational, research, and statistical purposes, provided that appropriate safeguards are in place.

3. Data Security and Quality Protective Measure

- 3.1 The Company realizes the importance of maintaining the security of personal data of all stakeholders. Therefore, appropriate measures have been established to ensure the security of personal data and to comply with data confidentiality in order to prevent loss, unauthorized access, destruction, use, alteration, or disclosure of personal data without legal rights or consent, as outlined in the Information Technology (IT) Security Policy.
- 3.2 Personal data that can identify an individual, such as name, age, address, phone number, ID Card number, and financial information etc. which the Company has obtained and are accurate, and up-to-date shall only be used for the purpose of the Company's operations. The Company shall implement the appropriate measures to protect the rights of the personal data owners.



4. Objectives for Personal Data Collection, Storage, and Usage

The Company collects, stores, and uses personal data from stakeholders for the following purposes.

- 4.1 For the benefit of buying or providing goods and services to the data subject, including services that the data owner may be interested in, such as sales promotion activities, payment channel services, digital services, market research etc.
- 4.2 For the purpose of establishing databases and utilizing information to offer benefits based on the interests of the data owner.
- 4.3 For the benefit of analyzing and presenting services or products of the service provider and/or individuals who are distributors, dealers, or have affiliations with the service provider and/or other individuals.
- 4.4 For any other lawful purposes and/or to comply with laws or regulations applicable to the service provider, or to enhance efficiency in providing various services, both currently and in the future.
- 4.5 To grant permission for the Company to transmit, transfer, and/or disclose personal information to the business group of the Company, business partners, external service providers, data processors, interested parties for rights transfer, transferees, any entity/organization/ juristic person having a contract with the Company or a relevant relationship, and/or Cloud computing service providers. The consent allows the Company to transmit, transfer, and/or disclose such information both domestically and internationally. The Company will retain the aforementioned information only for the duration necessary for the purposes stated.

5. Restrictions on Usage and/or Disclosure of Personal Data

- 5.1 The Company shall use and disclose personal data in accordance with the consent of the data owner, strictly for the purposes of data collection, storage, and usage by the Company only. The Company shall oversee its employees, officers, or operators to not use and/or disclose personal data for any purposes other than the collection of personal data and disclosure thereof to third parties unless.
 - a) It is required by applicable laws, such as the Personal Data Protection Act, the Electronic Transaction Act, the Telecommunications Business Act, the Anti-Money Laundering Act, the Civil and Criminal Code, Civil and the Criminal Procedure Code, etc.
 - b) It is carried out for the benefit of facilitating investigations by investigating officers or for the court's consideration and judgment.
 - c) It is carried out for the benefit of the personal data owner and requesting consent cannot be done at that time.
 - d) it is necessary for the Company's lawful benefits or the benefits of other individuals or legal entities other than the Company.
 - e) It is necessary for the prevention or avoidance of any event harmful to an individual's life, body, or health.
 - f) It is necessary to comply with any agreement to which the personal data owner is a party or respond to any requests of the personal data owner prior to entering into such agreement.
 - g) It is carried out to achieve objectives related to the compilation of historical documents or annotations, for the public benefit, or for educational, research, and statistical purposes, provided that appropriate safeguards are in place.



5.2 The Company may use the information services of external third-party providers to manage and store personal data, provided that those service providers shall have adequate security measures in place and are prohibited from collecting, using, or disclosing personal data for any purposes not stipulated by the Company.

6. Rights Concerning Personal Data of the Data Owner

6.1 Personal data owners are entitled to request access and copy of their personal data based on the criteria and methods prescribed by the Company or may request the Company to disclose how their personal data is acquired. However, the Company may refuse the request in accordance with the applicable laws or court orders.

6.2 Personal data owners are entitled to request the correction or modification of their personal data if it is inaccurate or incomplete and to update their own data.

6.3 Personal data owners are entitled to request the deletion or destruction of their personal data, except in cases where the Company is required to comply with the law applicable to such data storage.

7. Respecting the Privacy of the Data Owner

The Company places great importance on respecting privacy. The data owners are entitled to refuse to receive any marketing or public relations information from the Company through various communication channels. Upon such refusal, the customer shall remain to receive the information concerning services.

8. Disclosures Concerning Operations, Practices, and Policies Related to Personal Data

The Company has policy to adhere to the laws and announcements on telecommunication service client right protection concerning personal data, privacy rights, and freedom to communicate with others via telecommunication, including the laws regarding personal data. The Company has also established client data protective measures on the Company's website.

9. Personal Data Protection Officer

The Company has complied with the Personal Data Protection Act B.E. 2562 by appointing the Data Protection Officer (DPO) to oversee the Company's operations related to personal data collection, usage, and disclosure to be consistent with the Personal Data Protection Act B.E. 2562 including any laws relevant to personal data protection. Additionally, the Company has established the rules and orders for the relevant parties to perform consistently to enable the smooth operations of the personal data protection policy. This is in alignment with the Company's IT Security policy.

10. The Company's Communication Channel

SiS Distribution (Thailand) Public Company Limited
9 Pakin Building, 9th Floor, Room No. 901, Ratchadaphisek Road, Din Daeng, Bangkok 10400
Tel: 02-020-3000
Data Protection Officer Email: dpo@sisthai.com

11. Enforcement

To ensure compliance with this policy, the Company has established the Personal Data and IT Security Committee ("the Committee"). This Committee is responsible for the management and protection of personal data by setting guidelines, procedures, as well as amending, and improving data management practices, with approval from the Management Director, to define the data protection guidelines between the Company and all stakeholders.



This Personal Data Protection Policy has been approved by the Board of Directors in the Board of Directors' meeting of No. 7/2023 held on November 21st, 2023.

This policy shall be effective from January 1st, 2024, onwards.