

Daiwa Seiko (Thailand) Co., Ltd.

External Personal Data Protection Policy

1. Purpose

Daiwa Seiko (Thailand) Co., Ltd. (“Company”, “we”) respects your privacy and values the relationship we have with you. Accordingly, the Company has adopted this External Personal Data Protection Policy (the “Policy”) to protect your rights in relation to the processing (as defined below) and management of Personal Data (as defined below) by the Company, and will take all reasonable and necessary measures to safeguard Personal Data in accordance with the Personal Data Protection Act, B.E. 2562 (2019) and other applicable Personal Data protection laws and regulations (collectively, the “Law”), and to uphold good data protection practices.

2. Scope

This Policy shall be effective as of 1 January 2024 and is subject to further changes or revisions (which shall be notified to you.) The Company shall continue to review the effectiveness of this Policy from time to time.

This Policy applies to the processing of Personal Data by the Company within Thailand but may also apply to processing outside Thailand in limited circumstances, such as offshore cloud storage or remote access by our employees. Any breach of the Law or this Policy will be taken very seriously, and disciplinary action may be taken.

This Policy shall supersede all prior Personal Data protection policies and protocols belonging to the Company which apply to external parties, if any, unless specified otherwise by the Company.

This Policy works in tandem with the applicable consent form (if any) which you may have signed or may later sign. Please study such consent form carefully to understand how we use your Personal Data under consent basis. For clarity, this Policy applies when the Company acts as a data controller of Personal Data only. In case that the Company is a data processor or service provider in any activities, a data subject may check the details of such processing activities from the privacy policy or notice of processing of a company or an organization who is a data controller for those activities directly.

3. Personal Data and Definition

“Personal Data” means any data about an individual which can be used to trace back to any such individual, whether by such data alone or in combination or in conjunction with other data available for any particular processing, but excludes data of a deceased person.

“Processing” and all of its derivatives mean any type of treatment of Personal Data, including collection, storage, transfer, disclosure, use, etc.

“Sensitive Personal Data” means personal information about race, ethnicity, political opinions, religion, philosophy, sexual behavior, criminal records, medical information, disability information, trade union information, genetic information, biological information (e.g., finger scans, face scanning, etc.) or any other information that affects the data subject in a similar way as announced by the Personal Data Protection Committee.

#### 4. Collection of Personal Data

Depending on purposes of use and requirement of the officers in processing Personal Data, we may collect various types of your Personal Data including:

- (1) **Identification information** such as name, username, password, date of birth, identification number, telephone number, address, copy of public servant identification card, copy of identification card, copy of passport, photo, voice, and video;
- (2) **Contact information** such as address, phone number, and email address;
- (3) **Personal characteristics** such as age and gender;
- (4) **Information relating to your works (if you are an employee of our trade partner)** such as work position, job description and performance, contact information, etc.;
- (5) **Location information** such as IP Address, GPS, or your current location;
- (6) **Website/application service usage history** such as any history and/or records created during the services, data automatically collected via our website including website usage behavior, log-file, your interests, devices information and your IP address, setting information, Mobile App and/or Website adjustment, date or location that you use our website, including your preference and information that you provide when using our products/services, purchase history, order number, usage situation, communication environment, and information of purchasing channels;
- (7) **Product and service usage history** such as any history and/or records created during the course of our brand-customer relationship, including products and services purchased, product and service inquiry/request, product and service complaint, marketing-related data, etc.;
- (8) **Other information** such as personal data that you provide when communicate with us via the website, and other communication channels.

Unless we specifically request it, we ask that you not send us, and you not disclose to us, any sensitive Personal Data (as defined above.) Otherwise, we will redact that information before processing your Personal Data.

#### 5. Purposes of Collection and Uses of Personal Data

We will process your personal data to: (i) perform contractual obligations as a party to the contract, (ii) comply with legal obligations, (iii) for the legitimate interest, (iv) for vital interest, or (v) for the preparation of the historical documents or the archives for public interest, or for the purpose relating to research or statistics. Please note that in some instances, if you do not provide the requested Personal Data, we may not be able to provide our services to you.

We will collect and use your Personal Data for the abovementioned purposes and scope, including the following purposes:

- (1) Undertake our operation with your respective organization;
- (2) Provide customer support service regarding the use of our products/services;
- (3) Properly respond to your requests for maintenance/improvement of usage environment of our products/services;
- (4) Respond to your inquiries and requests with our Data Protection Officer (See **Section 9 – Contact Us** below);
- (5) Respond to your inquiries regarding purchasing;
- (6) Fulfill our contractual obligations whether directly or indirectly;
- (7) Carry on business of the Company;
- (8) Support the stability and security of the Company;
- (9) Assess and manage your requests;

- (10) Prevent and investigate forgery and questionable transactions;
- (11) Inspect, analyze, and prepare documents upon request of governmental organizations and regulatory bodies; and
- (12) Comply with applicable laws.

## 6. Transfer and Sharing of Your Personal Data

- (1) The Company may transfer your Personal Data to the Company's subsidiaries or related companies in the Globberide Group or external service providers in Thailand so these service providers can perform certain tasks on our behalf, such as for cloud and non-cloud storage, payment management, analytics, and general assistance, or when there is legal obligation or legitimate interest to do so, such as for audits and corporate sale or restructuring. We will rely on the same basis as notified or consented by you for these domestic transfer and processing activities. In such cases, we will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Law and our standards.
- (2) The Company may transfer your Personal Data to the Company's subsidiaries or related companies in the Globberide Group (including its affiliates situated overseas such as in Australia, Germany, Hong Kong, Indonesia, Japan, Malaysia, South Korea, Singapore, Taiwan, UK, USA, Vietnam) or external service providers throughout the world so these service providers can perform certain tasks on our behalf, such as for cloud and non-cloud storage, payment management, analytics, and general assistance, or when there is legal obligation or legitimate interest to do so, such as for audits and corporate sale or restructuring. Some countries will be recognized by the Personal Data Protection Commission of Thailand (PDPC) as providing an adequate level of data protection according to standards set by the PDPC. If we have contract basis for any such processing, we will also rely on such for offshore transfer or processing. In general, for future transfers from Thailand to countries not considered adequate by the PDPC, we have put in place adequate measures, such as standard contractual clauses which meet the requirement set by the PDPC, to protect your Personal Data.

**Note:** for more details regarding Globberide Group, please visit this [link](#).

## 7. Data Security Measure and Retention Period

- (1) We adopt the high-standard security system in both technology and procedures to prevent any possible data theft and other types of unlawful access. We place emphasis on retention of high security standards. We make substantial investments and effort, and provide substantial human resources to ensure that we maintain high-standard measures and your personal data remains safe. We implement various measures to protect our computer system such as Firewall.
- (2) Your Personal Data will be retained for period(s) as are necessary to meet the Company's legal and/or business purposes, and the Company will cease to retain your Personal Data as soon as it is reasonable to assume that the purpose for collection such Personal Data is no longer being served by such retention, and such retention is no longer necessary for legal and/or business purposes. Our current policy is to retain certain Personal Data of you for up to ten (10) years after they cease to be necessary, subject to the applicable anonymization procedures and at all times in accordance with our document retention and disposal policy, and applicable laws and regulations.
- (3) We will notify you if there is any change in policy or specific retention of any of your Personal Data that is not in line with the current policy, or is in any way relevant and warrants your special attention.

## 8. Data Subject's Rights

In accordance with the data protection law, you, as a data subject has the following rights (which may be amended pursuant to any regulations of the data protection law) which are exercisable in compliance with applicable laws:

- (1) To access personal data;
- (2) To rectify personal data;
- (3) To erase or destroy personal data;
- (4) To restrict the use of personal data;
- (5) To object the collection, use and disclosure of personal data;
- (6) To data portability; and
- (7) To withdraw the consent.

In case you consider that we fail to comply with your request to exercise your right as a data subject, or that we fail to comply with the Law, you may contact the Personal Data Protection Committee (PDPC). Nevertheless, we would appreciate the opportunity to address your complaint in the first instance.

In case where you have given the consent for the processing of personal data to the Company (where the consent is not required by other applicable laws), you shall have the right to withdraw the consent at any time. Should a withdrawal of any consent affect any transactions or provision of services, you will be informed at the time of withdrawal request.

## 9. Contact Us

In case you would like to contact us to exercise the rights of Personal Data or have any inquiries in relation to this Policy, please kindly contact us by the given information below.

- (1) Daiwa Seiko (Thailand) Co., Ltd.  
Address: No. 217-218, Soi Chalongkrung 31, Lat Krabang Industrial Estate, Chalongkrung Road, Lamplatiw, Lat Krabang, Bangkok 10520  
Email: [dpo@daiwaseiko.co.th](mailto:dpo@daiwaseiko.co.th)  
Tel: 02-739-4200
- (2) Globberide Group's Data Protection Officer (DPO)  
Address: 3-Chome, 14-16, Maesawa, Higashikurume-shi, Tokyo, Japan  
Email: [groupdpo@globberide.co.jp](mailto:groupdpo@globberide.co.jp)