

## PRIVACY NOTICE FOR EXTERNAL PARTIES

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Pursuant to the Personal Data Protection Act B.E. 2562 and other related laws (“**PDPA**”), **LHT ASIA Sales & Marketing Co., LTD.** hereby provides this Privacy Notice (“**Notice**”) to inform you of the details of the Company’s collection, use and disclosure of your Personal Data. This Notice shall apply to you as you fall into one of the following categories:

- (1) Business Partners of the Company and Relevant Persons of Business Partners of the Company
- (2) Relevant Persons of customers in category of Distributor/Dealer of the Company
- (3) Customers in category of End-Users of the Company’s products and/or services and the Relevant Persons of the End-Users of the Company’s products and/or services, including users of Website and/or Platform of the Company
- (4) Visitors who enter the Company’s place of businesses for any purposes with the Company or any persons related to the Company

### DEFINITION

“**Company**” means **LHT ASIA Sales & Marketing Co., LTD.** which proceeds with any Personal Data processing under the objectives of this Notice.

“**Personal Data**” means any information relating to a natural person, which enables the identification of such person, whether directly or indirectly, but not including the information of the deceased persons.

“**Sensitive Personal Data**” means Personal Data pertaining to racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any data which may engender the unfair discrimination against the data subject or affect the data subject in the same manner as prescribed by data protection laws.

“**Legal Basis**” means the justifiable ground to collect Personal Data as prescribed in the PDPA.

“**Cookies**” means an industry standard technology for the identification of your computer on a web server and enable more convenient use when accessing the Website on subsequent occasions. Cookies can store information such as IP addresses, navigational data, server information, data transfer times, user preferences.

“**Website**” means the Company’s websites, including but not limited to the following websites:

- (1) <https://tostemasia.com/>
- (2) <https://tostemasia.com/TADA>
- (3) <https://tostem.com>
- (4) <https://www.tostemindia.com/>
- (5) <https://www.tostemindonesia.com>
- (6) <https://tostemthailand.com/>
- (7) <https://tostemphilippines.com/>
- (8) <https://tostemvietnam.com/vi/>

**“Platform”** means an online operating system created to collect and present information of products or services of the Company. This shall include the Company's online platforms such as websites and applications developed by the Company as well as the websites or platforms developed by third-party service providers such as Facebook Page, Line Official Account, Instagram, YouTube Channel etc.

**“Website and/or Platform User”** means a person who uses or visits any Website or Platform.

**“Business Partner”** means a person who sells or may sell goods and/or services to the Company or is in a similar relationship but shall not include the customers of the Company.

**“Relevant Person of Business Partner”** means a person representing a Business Partner e.g. executive, shareholder, employee, representative or any person representing or acting on behalf of a Business Partners.

**“Distributor/Dealer”** means a person who is the customer of the Company, and who buys products and/or services from the Company and resell those products to the End-Users, as well as other person of similar nature e.g., person contacting us for information to become the distributor or the dealer of the Company, etc.

**“Relevant Person of Distributor/Dealer”** means a person relevant or representing Distributor/Dealer e.g. executive, shareholder, employee, representative or any persons representing or acting on behalf of Distributor/Dealer.

**“End-User”** means a person who is a consumer of the Company’s products, regardless of whether the products are for the own use of such person or for the installation at properties for further use by residents or other persons, such as real estate developer, property project owner, architect, designer, house owner, and other end-consumers who attend marketing activities held by the Company, etc., and whether such person has brought or may buy the Company’s products directly from the Company at the customer care service center, or through the Company’s distributors and dealers, or through other channels. This shall include other persons of similar nature, e.g. person contacting us for after-sale service,

person contacting us for information of the Company's products or requesting for services from the Company, and the Website and/or Platform Users.

**"Relevant Person of End-User"** means a person representing a corporate End-User e.g. executive, shareholder, employee, representative or any natural persons representing or acting on behalf of the corporate End-User.

**"Visitor"** means a person who visits the Company's place to contact with the Company or person related to the Company for any purposes.

## CATEGORIES OF PERSONAL DATA WHICH THE COMPANY COLLECTS

The Company shall collect all or part of your Personal Data as specified in this Privacy Notice.

- **Personal identification information** such as prefix, name, surname, nickname, age, sex, date of birth, nationality, picture, identification card number, passport number, signature etc.
- **Personal contact information** such as address, personal phone number, personal email address, Line ID, Facebook account, username for using the Website or Platform, information on contact persons, etc.
- **Information regarding work** such as position, department, workplace and work email address specifying your name etc.
- **Information contained in documents** such as business card, copy of identification card, copy of passport, copy of tax identification card, purchase order, quotation, invoice, affidavit, VAT certificate, contracts, agreements, distributor/dealer agreement, service request form, service receiving confirmation form, etc.
- **Sensitive Personal Data** such as religious, blood group as appeared on copy of identification card, health information e.g., illness, underlying disease, food allergy and body temperature etc.
- **Cookies data and technologies alike collected from usage of the Company's Website or Platforms** such as, Logfile to identify server problems, IP address, Click-stream data and other technologies used for tracking your usage of our Websites or Platforms, etc.
- **Other information** such as visual and video records through CCTV, date and time for visiting the Company, travel history and contact with the infected people, recording of conversation in system of Call Center, comment and complaint of the End-User regarding Company's products or service, etc.

## SOURCE OF PERSONAL DATA

The Company will collect your Personal Data directly and indirectly from the following sources:

- From you, through **verbal communication** such as through face-to-face interactions, or through telephone calls, via **documents** for instance business card, contracts, agreements, affidavits, quotations, purchase orders, forms, or other documents etc. This shall include any **communication channel** such as email, fax, the Website or Platform, e.g., message box, newsletter subscription forms, Platforms such as Facebook Messenger, comment boxes on Facebook page, and direct messages to the Company's Instagram account, etc. or via **other technologies** installed on the Website or Platform of the Company e.g., Cookies, Google Analytics, Facebook Custom Audience, Customer Data Platform, or other type of tracking code technologies, etc.
- From other sources or third parties such as your employers, persons who recommend your goods/service to the Company, Business Partners, public sources (e.g. websites), or by referral from the affiliates of the Company, Distributors / Dealers, or other End-Users, etc.

## PURPOSE OF COLLECTING PERSONAL DATA

The Company shall collect your Personal Data for use and/or disclosure in compliance with the objectives and the legal basis under this Notice. The Company will inform you if it needs to collect additional Personal Data or use Personal Data for purposes not stated within this Notice.

The Company has classified the purposes of collecting your Personal Data into two groups - one applies to the collection of Personal Data based on the type of Data Subject ("**Specific Purposes**"), and the other applies to the collection of Personal Data of all types of Data Subject ("**General Purposes**").

### 1. SPECIFIC PURPOSES

#### 1.1 Business Partners and Relevant Persons of Business Partners

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
<p>1. Communicating, negotiating entering into, and performing a contract, including processing and reviewing relevant documents such as sale contract, service contract, quotation and other documents etc. This includes liaising with you on other matters relevant to the contract such as a change in condition and other details, contract renewal.</p>	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For compliance with the agreement (where you are the direct contracting party).</li> <li>- For the legitimate interest of the Company and the Business Partners (where you are either representing, or acting on behalf of the Business Partner).</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
<p>2. Creating vendors/suppliers accounts including registering data into IT system, e.g. SAP system, for administration and approval pertaining to the purchase of goods or services by the Company. This shall include disclosing your Personal Data to financial and accounting service providers of the Company for the aforesaid purpose.</p>	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
<p>3. Performance of the contract, including tracking of goods or services requested as well as disclosing Personal Data to customers or End-Users where necessary; paying service fees, and verifying the identity of the person receiving payment.</p>	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For compliance with the agreement (where you are the direct contracting party).</li> <li>- For the legitimate interest of the Company and the Business Partners (where you are either representing or acting on behalf of a Business Partner).</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
<p>4. Conduct bookkeeping, prepare accounting and tax documents, conduct audits including disclosing Personal Data to third parties such as the Company's service providers, consultants, auditors,</p>	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> <li>- For compliance with the Company's legal requirements.</li> </ul>

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
relevant government offices e.g., Revenue Department, etc.	<b>Sensitive Personal Data</b> <ul style="list-style-type: none"> <li>- For compliance with the Company's legal requirements.</li> <li>- Request for explicit consent</li> </ul>
5. Marketing and public relation activities of the Company e.g., photographing event participants and posting photographs on the Company's channels e.g., Company's intranet, social network, interview, and press release etc.	<b>General Personal Data</b> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> <li>- Request for explicit consent (in case of posting on social network if it may be unexpected by the participant)</li> </ul>

## 1.2 Relevant Persons of Distributors/Dealers

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
1. Communicating, negotiating, entering into and performing a contract with the Distributor/Dealer which you are either representing, or acting on behalf, or being an employee thereof, such as meeting appointment, product pitching, issuing quotations, negotiations, receiving payment of products/service, delivery and installation of products, providing aftersales care, disclosing your Personal Data to third parties such as delivery agents, product installers, outsourced service providers to provide service under the contract with the Distributor/Dealer.	<b>General Personal Data</b> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company and the Distributor/Dealer.</li> </ul> <b>Sensitive Personal Data</b> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
2. Creating a customer account including register data into IT system, e.g. SAP system, in order to manage the purchase	<b>General Personal Data</b> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company</li> </ul> <b>Sensitive Personal Data</b>

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
order, providing service, and the Company's account.	- Request for explicit consent.
3. Communication for presenting products to the End-Users and supporting the Distributor/Dealer in sales with End-Users or increasing sales opportunity for the End-Users to buy the Company's products, including to support sales activity, installation, maintenance, and after-sales service to the End-Users who purchase products from the Distributor/Dealer.	<b>General Personal Data</b> - For the legitimate interest of the Company and the Distributor/Dealer.
4. Logistics management including creating shipment request, verification of your identity in the event of picking up the product at the Company's site or warehouse or delivering the product to the Distributor/Dealer's site. This shall include disclosing your Personal Data to delivery service provider to carry out the abovementioned purposes.	<b>General Personal Data</b> - For the legitimate interest of the Company and the Distributor/Dealer. <b>Sensitive Personal Data</b> - Request for explicit consent.
5. Internal disclosure for marketing purposes, such as arranging sale campaign, sale promotions to the End-Users.	<b>General Personal Data</b> - For the legitimate interest of the Company and the Distributor/Dealer.
6. Marketing and public relation activities e.g., photographing event participants and posting the same on the Company's channels e.g., Company's intranet, social network, interview, and press release etc.	<b>General Personal Data</b> - For the legitimate interest of the Company. - Request for explicit consent (in case of posting on social network if it may be unexpected by the participant)
7. Arrange training for the Distributors/Dealers' staff, and related purposes.	<b>General Personal Data</b>



PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
	<ul style="list-style-type: none"> <li>- For the legitimate interest of the Company and the Distributor/Dealer.</li> </ul>
8. Conduct bookkeeping, prepare accounting and tax documents, conduct accounting and tax audit including disclosing your personal data to service providers such as finance, accounting and bookkeeping companies, warehouse service provider, consultants, auditors, relevant government offices e.g., Revenue Department, etc.	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> <li>- For Company's compliance with the laws.</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- For Company's compliance with the laws.</li> <li>- Request for explicit consent</li> </ul>

## 1.3 End-Users and Relevant Persons of the End-Users (including Website and/or Platform Users)

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
1. Communication and other proceedings for purposes related to the selling of the Company's products, either through the Distributors / Dealers, or retail selling.	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For compliance with the agreement or entering into the agreement. (In case that End-User buy the products directly from the Company)</li> <li>- For the legitimate interest of the Company, Distributors / Dealers. (In case that End-User buy the products from the Distributors / Dealers)</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
2. Entering into a contract or performing the contract with the End-User, such as business communication, proceeding with the received purchase order/request for service, receiving payment of	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For compliance with the agreement or entering into the agreement. (In case that End-User buy the products directly from the Company)</li> </ul>



PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
<p>products/service, delivery and installation of products at the End-User's site or other place designated by the End-User, including providing aftersales service such as providing repair and maintenance services for products to the End-User who buys product from the Company, Distributors/Dealers, receiving complaint or claim request from the End-User, and to provide assistance and suggestion to resolve problems etc. This shall include disclosing your Personal Data to third parties such as Distributors / Dealers, delivery agents, product installers, outsourced service providers to satisfy the abovementioned purposes.</p>	<ul style="list-style-type: none"> <li>- For the legitimate interest of the Company, Distributors / Dealers. (In case that End-User buy the products from the Distributors / Dealers)</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
<p>3. Creating customer account including register data into IT system, e.g., SAP system, in order to manage the purchase order, providing service, and the Company's account.</p>	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
<p>4. Communication for presenting products to the End-User and supporting the Distributors / Dealers in increasing sale opportunities. In this regard, the Company may disclose your Personal Data to the Distributors / Dealers.</p>	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company, Distributors / Dealers.</li> </ul>
<p>5. Collecting queries, claims and complaints on the products or services of the Company through various channels such as call center, Websites, Platforms (e.g., Facebook, Line) or through Distributors / Dealers, and third-party service providers hired by the Company, including responding to the questions or taking actions on the complaints and opinions of the End-Users or Website and/or Platform</p>	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> <li>- For compliance with the laws enforced on the Company in order to establish rights to a legal claim, compliance or exercise of rights to claim as permitted by law; or for dispute allegations.</li> </ul>

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
<p>Users regarding Company's products or services or the usage of the Company's Website or Platform for the improvement and development of the Company's products and services. In this regard, the Company may disclose your Personal Data to service providers as well as the Company's affiliates both located in Thailand and overseas to carry out the aforementioned purposes.</p> <p>The Company may record the voice data of any conversation with you made via the call center for the abovementioned purposes, and may use the recording as evidence in the event of a claim which could possibly lead to the request for payment of damages from the Company or by the Company.</p>	
<p>6. Marketing and public relation activities such as advertising information about the Company's products and services to the Website and/or Platform users; arranging for marketing events; sending of the Company's newsletters and product catalogues via post or e-mail; marketing research; photographing event participants and publishing the same through the Company's channels e.g., Company's intranet, social network, interview, and press release etc. In this regard, the Company may disclose the collected Personal Data to marketing service provider and the affiliates of the Company.</p>	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> <li>- Request for explicit consent (in case of posting of participant's photo on social network if it may be unexpected by the participant, collection of Personal Data for sending news and updates to the users, and targeted marketing)</li> </ul>
<p>7. Arrange domestic or overseas trips as rewards for the End-User, including</p>	<p><b>General Personal Data</b></p>

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
disclosing your Personal Data to external organizations, e.g. to book hotel or air ticket as well as to facilitate the visa application in case of overseas trips.	<ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> <li>- Request for explicit consent.</li> </ul> <b>Sensitive Personal Data</b> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
8. Conduct bookkeeping, prepare accounting and tax documents, conduct accounting and tax audit including externally disclose to outsource service provider such as finance, accounting and bookkeeping companies both in Thailand and oversea, warehouse service provider, consultant, auditor, relevant government offices e.g., Revenue Department, etc.	<b>General Personal Data</b> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> <li>- For the Company's compliance with the laws.</li> </ul> <b>Sensitive Personal Data</b> <ul style="list-style-type: none"> <li>- For the Company's compliance with the laws.</li> <li>- Request for explicit consent</li> </ul>

## 1.4 Visitors who enter the Company's place of businesses

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
1. Record and store information captured by the Company's CCTVs.	<b>General Personal Data</b> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> </ul>
2. Investigations, prevention of crime or other emergency incidences including the preservation of evidence and disclosures to the police, other relevant persons, to protect the Company's legitimate rights, or for the purposes of legal proceedings, or as permitted by law.	<b>General Personal Data</b> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company or third persons.</li> </ul> <b>Sensitive Personal Data</b> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
3. Recording of your health data such as your temperature, etc. to prevent infectious disease or epidemics. This shall include disclosing such data to external	<b>General Personal Data</b> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> </ul>

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
organizations such as the Department of Disease Control, medical institutions, and other relevant government agencies.	<ul style="list-style-type: none"> <li>- For the Company's compliance with the laws.</li> <li>- For preventing and suppressing danger to life, body and health of a person.</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> <li>- For preventing or suppressing danger to your life, body or health in the event where you are unable to give consent.</li> <li>- For the necessity of legal compliance to achieve the objectives required by law (in the event there is a legal requirement e.g. law regarding public interest in respect of public health).</li> </ul>

## 2. GENERAL PURPOSES

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
1. Retaining your contact information on the Company's database for future business contact, including disclosing your data to the Company's affiliates (both within Thailand and overseas) for their use of the same.	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company and its affiliates.</li> </ul>
2. Management of the business operation and structure of the Company.	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent</li> </ul>

PURPOSE OF COLLECTION, AND HOW WE WILL USE AND DISCLOSE YOUR PERSONAL DATA	LEGAL BASIS
3. Protect the legitimate rights of the Company or dispute allegations against the Company, as permitted by law.	<b>General Personal Data</b> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> </ul> <b>Sensitive Personal Data</b> <ul style="list-style-type: none"> <li>- To establish rights to a legal claim, compliance or exercise of rights to claim as permitted by law; or for dispute allegations.</li> </ul>
4. Collecting your information regarding food allergy and underlying disease to prepare meal for you as the participant of the event hosted by the Company.	<b>Sensitive Personal Data</b> <ul style="list-style-type: none"> <li>- Request for explicit consent</li> </ul>

## IMPACT FROM THE REFUSAL IN PROVIDING PERSONAL DATA

- **Personal Data of the Business Partners and Relevant Persons of Business Partners, Relevant Persons of Distributors/Dealers, End-Users and Relevant Persons of End-Users**

In the event you do not provide your Personal Data to the Company, the Company may not be able to perform or fulfill the relevant contracts entered into by the Company. Moreover, in some situation, the Company also collects, uses and discloses your Personal Data to comply with relevant legal requirements, and the Company's ability to comply with legal requirements may be impacted by your refusal.

- **Personal Data of the Company's Website and/or Platform Users.**

### ❖ **Cookies data**

In the event that you do not consent to the use of Cookies or you disable certain types of Cookies, your use of the Website and Platform may be affected and incomplete and/or you may not be able to access certain areas of the Website and Platform.

### ❖ **Personal Data collected via other technologies for tracking users of the Company's Website and Platform**

In the event you do not consent to this means of collection, you may not be able to receive certain information about the Company's products and services which may be useful for you.

## ❖ Contact information and contact message

In the event that you do not provide us with Personal Data, the Company may not be able to contact or respond to your inquiries or proceed with any actions requested.

## ➤ Personal Data of the Visitor who enter the Company's place of businesses

In the event you refuse to provide Personal Data, the Company may refuse you entry into the Company's premises.

## DISCLOSING, SENDING OR TRANSFERRING PERSONAL DATA TO A FOREIGN COUNTRY

To achieve the objectives stated in this Notice, the Company may be required to disclose your Personal Data to persons or organizations including but not limited to the following:

- Service providers and agents who have been hired by the Company, for instance, service providers of IT systems, security systems, marketing and media management, analytics, auditors, accounting and bookkeeping service provider, warehouse service providers, legal consultants, business consultants or other external expertise consultants, customers or other Business Partners of the Company;
- The Company's affiliates, and their customers, business partners, external service providers, consultants, and agents;
- Distributors / Dealers;
- End-Users;
- Government agencies;
- Commercial banks and the Bank of Thailand;
- Police officers, courts, arbitrators, lawyers, and persons or organizations associated with the judicial process and dispute resolution; and
- Law enforcers under any applicable laws e.g., Computer-related Crime laws, etc.; and
- Persons associated with the sale/acquisition of business, merger/acquisition of business and/or business restructuring.

In some circumstances, it may be necessary for the Company to send or transfer your Personal Data to service providers or other affiliated companies located overseas for the objectives specified above. If so, the Company will comply with the relevant provisions of the PDPA.

## RETENTION PERIOD OF PERSONAL DATA

➤ **Personal Data of Business Partners and Relevant Persons of Business Partners**

The Company will collect and retain your Personal Data for no longer than 10 years after the end of the legal relationship with you or the persons which you are representing or acting on behalf. In the event that the Company collects your Personal Data but does not enter into any legal relationship with you or the persons which you are representing or acting on behalf, the Company will retain your Personal Data for a period of not more than 3 years.

➤ **Personal Data of Relevant Persons of Distributors/Dealers**

The Company will collect and retain your Personal Data for no longer than 10 years after the end of the legal relationship with the Distributor/Dealer which you are representing or acting on behalf. In the event that the Company collects your Personal Data but does not enter into any legal relationship with the Distributor/Dealer which you are representing or acting on behalf, the Company will retain your Personal Data for a period of not more than 3 years.

➤ **Personal Data of the End-User and the Relevant Person of the End-User (including the Company's Website and/or Platform Users)**

The Company will retain your Personal Data in accordance with the following period:

- In case that the Company has entered into a legal relationship with you or the End-User which you are representing, the Company will collect and retain your Personal Data for no longer than 10 years after the end of the legal relationship with you or the End-User which you are representing or acting on behalf.
- In the event that the Company collects your Personal Data but does not enter into any legal relationship with you or the End-User which you are representing or acting on behalf, the Company will retain your Personal Data for a period of not more than 3 years.
- In terms of the Call Center voice recordings, the Company will retain such data for a period of not more than 10 years.
- In case of data collected from the usage of Website and/or Platform of the Company, the Company will collect and retain your Personal Data as necessary to achieve each specified purpose/objective. However, the Company shall retain the collected Personal Data for the period of not exceeding 10 years from the date of collection.

➤ **Personal Data of the Visitor who enter the Company's place of businesses**

The Company will collect and retain your Personal Data for a duration not exceeding 1 year from the date when you entered into the place of business of the Company.



## ➤ **Personal Data collected via CCTV (for all categories of Data Subject)**

For motion picture or still images recorded by the closed-circuit television cameras managed by the Company or any third-party hired by the Company, the Company will collect and retain your Personal Data for not exceeding 3 months from the date of collection.

Nonetheless, the Company may retain all or part of your Personal Data for a duration beyond the period specified above as required by law, for the purposes of debt collection, to protect the legitimate rights of the Company, or to rebut any allegations made against the Company. In such case, the Personal Data may be retained for as long as it is necessary for the Company to abide with the specified objectives and/or for the duration stipulated by law.

## **RIGHTS OF DATA SUBJECT IN THE PROCESSING OF PERSONAL DATA**

You have the following legal rights to your Personal Data collected by the Company:

1. **Right to withdraw consent** - You may withdraw some or all of your given consent for the collection, use, and disclosure at any time throughout the period the Company keeps the Personal Data. Notwithstanding, the withdrawal of consent shall not affect the completeness or accuracy, or the collection, use, or disclosure of Personal Data by the Company prior to the withdrawal;
2. **Right to access and request for a counterpart of Personal Data** – you are entitled to request access to and obtain a copy of your Personal Data, or to request the disclosure of the acquisition of the Personal Data obtained without your consent;
3. **Right on the portability in sending or transferring of Personal Data** – you have the right to request the Company send or transfer your Personal Data to another person pursuant to the conditions prescribed by law;
4. **Right to object on the collection, use or disclosure of Personal Data** – you are entitled to object to the collection, use or disclosure of your Personal Data by the Company pursuant to the conditions prescribed by law;

5. **Right on the erasure of Personal Data** – you have the right to request the Company to erase, destroy or anonymize the Personal Data to become anonymous data pursuant to the conditions prescribed by law;
6. **Right to restrict processing of Personal Data** – you have the right to request the Company restrict the use of your Personal Data pursuant to the conditions prescribed by law;
7. **Right on rectification of Personal Data** – you have the right to request the Company rectify or amend any of your incorrect Personal Data;
8. **Right to complaint** – you are entitled to file a complaint with the personal data protection committee in the event that the Company, its employees, or contractors violate or do not comply with the PDPA.

You can exercise your rights by notifying the Company in writing to the Company's contact information below. Where the Company refuses your request, the Company shall provide a reason for its refusal.

## AMENDMENT OF THE PRIVACY NOTICE

The Company reserves the right to rectify this Notice as appropriate. This Notice was last updated on 7<sup>th</sup> May 2024.

## CHANNEL AND CONTACT INFORMATION OF THE COMPANY

Data Protection Officer (DPO)  
LHT ASIA Sales & Marketing Co., LTD.  
Rangsit Branch: 1/6 Moo1, Phaholyothin Road KM.32,  
Klong-Neung, KlongLuang, Pathumthani 12120, THAILAND  
T: + 66-2901-4455  
E-mail: [yollada.thabkumpang@lixil.com](mailto:yollada.thabkumpang@lixil.com)