

Privacy Policy for Business Contacts

Thai Optical Group Public Company Limited and its affiliated companies place importance on the protection of personal data. This Privacy Policy describes the practices relating to the collection, use, and disclosure of personal data, including the rights of data subjects, in accordance with applicable personal data protection laws.

Collection of Personal Data

We collect personal data that is obtained directly from you through the following channels:

- Registration
- Telephone
- Email

We may also collect your personal data from other sources accessible to us, such as search engines, social media platforms, government agencies, and other third parties.

Types of Personal Data Collected

The types of personal data we collect include:

- Personal information, such as name and surname
- Contact information, such as address, telephone number, and email
- Identification documents, such as copies of national identification cards or passports
- Other information, such as photographs, video recordings, and any other data considered personal data under applicable personal data protection laws

Minors

If you are under 20 years of age or have limited legal capacity, we may be required to obtain consent from your parents or legal guardian prior to collecting, using, or disclosing your personal data, unless otherwise permitted by law.

If we become aware that personal data has been collected from a minor without proper consent, we will delete such data from our systems.

Retention of Personal Data

We retain your personal data in both physical and electronic forms. Your personal data is stored as follows:

- On the Company's servers located in Thailand
- With service providers' servers located in Thailand

Processing of Personal Data

We collect, use, or disclose your personal data for the following purposes:

- For internal administration within the Company
- For compiling suggestions and feedback
- For compliance with whistleblowing procedures
- For compliance with applicable laws and regulations of government authorities

Disclosure of Personal Data

We may disclose your personal data to third parties with your consent or where permitted by law, as follows:

Internal Administration

We may disclose your personal data within the Company on a need-to-know basis for the purposes of improving management efficiency, developing our products or services, complying with internal policies, applicable laws, rules, regulations, and guidelines, including investigations relating to whistleblowing, misconduct reporting, complaints, fraud prevention, or other unlawful activities.

Service Providers

We may disclose certain personal data to our service providers as necessary for business operations, such as SMS distribution or document delivery services. Such service providers are required to have their own privacy policies and appropriate data protection measures.

Legal Compliance

Where required by law or upon request from government authorities, we may disclose your personal data to relevant authorities, such as courts or regulatory bodies.

Retention Period of Personal Data

We retain your personal data for as long as necessary during the period in which you maintain a relationship with us, or for as long as required to fulfil the purposes set out in this Privacy Policy.

Thereafter, we will retain your personal data only for the period required by applicable laws. Once such period has expired, we will delete, destroy, or anonymise your personal data so that it can no longer be used to identify you.

Rights of Data Subjects

Under applicable personal data protection laws, you are entitled to the following rights:

- **Right to Withdraw Consent**

Where you have provided consent for the collection, use, or disclosure of your personal data, whether before or after the effective date of the applicable personal data protection laws, you have the right to withdraw such consent at any time.

- **Right of Access**

You have the right to access your personal data under our responsibility and to request that we provide you with a copy of such data, including disclosure of how we have obtained your personal data.

- **Right to Data Portability**

You have the right to receive your personal data in a format that is readable or usable by automated tools or devices, where we have made such data available in such format. You also have the right to request that we transmit or transfer your personal data in such format to another data controller, where technically feasible, and to request that we send or transfer such data directly to another data controller, unless this is not technically feasible.

- **Right to Object**

You have the right to object to the collection, use, or disclosure of your personal data at any time where such processing is carried out on the basis of our legitimate interests or those of another person or legal entity, except where such interests override your fundamental rights, or where the processing is necessary for the performance of a task carried out in the public interest.

- **Right to Erasure / Destruction**

You have the right to request the deletion, destruction, or anonymisation of your personal data where you believe that such data has been collected, used, or disclosed unlawfully, or is no longer necessary for the purposes set out in this Privacy Policy, or where you have exercised your right to withdraw consent or object as described above.

- **Right to Restriction of Processing**

You have the right to request the restriction of the use of your personal data on a temporary basis in cases where we are in the process of verifying your request to rectify your personal data, or your objection, or where there are other circumstances in which we are required to delete or destroy your personal data under applicable laws, but you instead request restriction of use.

- **Right to Rectification**

You have the right to request the correction of your personal data to ensure that it is accurate, up-to-date, complete, and not misleading.

- **Right to Lodge a Complaint**

You have the right to lodge a complaint with the competent authority under applicable laws if you believe that the collection, use, or disclosure of your personal data is unlawful or does not comply with applicable laws.

You may exercise your rights as a data subject by contacting our Data Protection Officer using the contact details provided at the end of this Privacy Policy. We will notify you of the outcome within 30 days from the date we receive your request, in accordance with the prescribed forms or procedures.

If we are unable to comply with your request, we will inform you of the reasons for such refusal through appropriate communication channels, such as SMS, email, telephone, or written correspondence.

Marketing and Communications

For the purpose of improving our products and services, we may use your personal data to analyse and enhance our offerings, as well as to conduct marketing activities through platforms such as Google, Facebook, pixel tracking codes, and other similar technologies. We use such data to ensure that our products and services are relevant to your interests.

We do not rely solely on automated decision-making without human involvement, nor do we engage in profiling in a manner that produces significant effects on you.

We may send information or marketing communications to your email address in order to present products or services that may be of interest to you. If you no longer wish to receive such communications, you may click “unsubscribe” in the email or contact us directly.

Cookies

To enhance your experience and improve the efficiency of our services, we use cookies and similar technologies to improve access to our products and services, deliver relevant advertisements, and monitor your usage of our website.

We use cookies to identify and track users of our website and their access to our services. If you do not wish to allow cookies to be stored on your device, you may configure your browser settings to refuse cookies before using our website.

Data Security

We maintain the security of your personal data in accordance with the principles of confidentiality, integrity, and availability (CIA), in order to prevent loss, unauthorised access, use, alteration, correction, or disclosure.

In addition, we implement appropriate security measures covering administrative safeguards, technical safeguards, and physical safeguards, including access control measures, to ensure the protection of personal data.

Personal Data Breach Notification

In the event of a personal data breach, we will notify the Office of the Personal Data Protection Committee without undue delay and, where feasible, within 72 hours from the time we become aware of the breach.

Where the breach is likely to result in a high risk to your rights and freedoms, we will notify you without undue delay, together with appropriate remedial measures, through appropriate communication channels such as our website, SMS, email, telephone, or written correspondence.

Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. You may review the updated terms and conditions through our website.

This Privacy Policy was last updated and became effective on 1 February 2022.

Third-Party Websites

This Privacy Policy applies only to the offering of our products and services and the use of our website.

If you access third-party websites through links on our website, the protection of personal data will be subject to the privacy policies of such third-party websites, for which we are not responsible.

Contact Details

If you have any enquiries regarding this Privacy Policy, including requests to exercise your rights, you may contact us as follows:

Data Controller

Thai Optical Group Public Company Limited and its group companies

15/5 Moo 6, Bang Bua Thong – Suphan Buri Road, Laharn, Bang Bua Thong, Nonthaburi 11110

Email: data.privacy@thaiopticalgroup.com

Website: www.thaiopticalgroup.com

Tel: +66 02-1941145