

(Translation)

I.C.C. International Public Company Limited

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**Privacy Notice for Customers, Vendors and Visitors
I.C.C. International Public Company Limited**

I.C.C. International Public Company Limited ("Company") has full awareness of the vital importance of the personal data protection, and in order to comply with the Personal Data Protection Act B.E. 2562, this Privacy Notice for Customers, Vendors and Visitors has been developed to clarify details and methods of handling and processing of personal data received from you, objectives of collection, use, disclosure and processing, as well as the period of personal data retention and your rights as a data subject with the following details:

1. Definitions

"Company" means I.C.C. International Public Company Limited.

"You" means the data subject whose personal data is processed by I.C.C. International Public Company Limited, including but not limited to customers, vendors, representatives, contractors, visitors and any person involved in the activities and operations of the Company.

"Personal Data" means any information relating to a person which enables the identification of such person, whether directly or indirectly, but not including the information of deceased persons in particular.

"Sensitive Personal Data" means any personal data relating to race; ethnicity; political opinion; belief in a creed, religion, or philosophy; sexual behavior; criminal record; health information; disability; labour union information; genetic information; biological information or any other information affecting the data subject similarly, as prescribed by the Personal Data Protection Committee.

"Personal Data Controller" means any natural or juristic person, who has the authority to make decision about the collection, usage or disclosure of personal data.

"Personal Data Processor" means any natural or juristic person performing the collection, usage or disclosure of personal data by the order or in the name of the personal data controller.

"Personal Data Protection Law" means Personal Data Protection Act B.E. 2562 and related subordinate laws, including any future amendments to the laws.

2. Channels and Sources of Personal Data

The Company collects, uses or discloses your personal data obtained through the following channels:

2.1 Personal data given directly to the Company: You may provide personal information directly to the Company when you intent to enter into a contract, purchase a product or use services of the Company, or when you send a document containing your personal data to the Company, or when you inquire for information, or when you obtain a visitor pass before entry, including online channel platforms, social media and other channels, such as ICC Shopping, Shopee, LAZADA, JD Central, Central Online, Lacoste Store Website, His&Her, SahaGroupfair Online, Facebook Fan Page, Line, Instagram (IG), Call Center, etc.

2.2 Personal data collected automatically by the Company: The Company may obtain your personal data automatically through closed-circuit television (CCTV), Call Center, etc.

3. Personal Data Collected

3.1 The personal data collected by the Company under this Privacy Notice is the personal data of the data subject in the following categories:

1. Customers, contractual parties and people involved in the business operations of the Company, such as natural persons who are contractual parties or are involved in any contract with the Company, which includes customers, vendors, sellers, suppliers, service providers, workers, contractors, consultants and other people of similar nature.

2. Visitors and other third parties, such as visitors, people entering the building, transporters, and other people requesting information or asking for services from the Company, whether personal data is obtained directly or indirectly.

3. Other people, such as witnesses in the agreements, assignees, car owners, etc.

3.2 Your personal data collected under this Privacy Notice, whether given directly to the Company or obtained from third party, including:

1. Information of customers, contractual parties or people involved in the business operations of the Company

1.1 General information of customers including first name, last name, email, telephone number, address, identification number or passport number, signature and any tax information, as well as other personal data used for making a contract, such as copy of identification card, copy of passport, power of attorney, copy of certificate of incorporation, etc.

1.2 General information of vendors and contractual parties including first name, last name, identification number, birth date, nationality, address, email, telephone number, identification number, passport number, as well as other personal data used for making a contract, such as copy of identification card, copy of passport, P.P. 20, certificate of incorporation, power of attorney, etc.

1.3 Closed-circuit television (CCTV), still images, motion pictures, including your related assets, such as vehicles for entering the place, building or any area of the Company through CCTV system and equipment which are installed at the main points of the various areas of the building, such as entry points, hallways, elevator doors, etc.

2. Information of visitors and other third parties

2.1 Pick-up drivers, including first name, last name, address, identification number, image of identification card (saved only the first name, last name, identification number and image)

2.2 Visitors, including first name, last name, address, identification number, image of visitor, image of identification card (saved only the first name, last name, identification number and image)

2.3 Closed-circuit television (CCTV), still images, motion pictures, including your related assets, such as vehicles for entering the place, building or any area of the Company through CCTV system and equipment which are installed at the main points of the various areas of the building, such as entry points, hallways, elevator doors, etc.

3. Information of other people: The Company shall collect the information of witnesses in the agreements, assignees or car owners in some cases. In the event that you provide other people's personal data to the Company, you certify that you have obtained consent and have notified the data subject of the collection, use and disclosure of personal data stated in this policy.

4. Sensitive Personal Data: Identification documents may contain sensitive personal data, such as race, religion, blood group, which the Company has no purpose in collecting such information; therefore, please cross out or cover such information before sending the document to the company. If you fail to do so, the Company might cross out or cover such information. In the event that the Company has to collect the sensitive personal data, the Company shall implement appropriate security measures and obtain consent before collection unless the exemptions to the requirement of consent apply, such as labour protection, social security, life-threatening prevention, public health benefits, compliance with laws or other exemptions as required by the personal data protection law.

4. Objectives and legal basis for collection, use and disclosure of personal data

4.1 The Company shall process your personal data for the following objectives (collectively referred to as the "Designated Objectives") and under the following legal basis:

4.1.1 To enable the Company to operate the business according to its objectives (Contract): To perform the contract that you are a contractual party with the Company, to process your request before entering into a contract, to accomplish the business of the Company, such as lease agreement, service payment, request to entry for decoration, or compliance with any contract which you are a contracting party with the Company.

4.1.2 To perform duties in accordance with applicable or governing laws (Legal Obligation): To comply with laws related to the Company or to comply with orders of relevant authority, such as foreign employment law, computer law, taxation law, revenue code (issuance of tax invoice, receipt, invoice) court order, prosecutor or other laws related to the operations of the Company.

4.1.3 To perform necessary tasks under legitimate interest without exceeding the extent expected reasonably by the data subject (Legitimate Interest): To collect information of pick-up drivers or visitors through CCTV; visitor pass before entry; visitor records for building entry and security of the Company, personnel, people, property and information of the Company; to collect information of tenants, guests or contractual parties for data processing of contract management or execution; to verify the identification documents of the contractual parties; to receive the complaints; to request for repair; and to use for communicating with you, etc.

4.1.4 To perform necessary tasks in the public interest of the Company (Public Task): or to perform duties in exercising state authority given to the Company.

4.1.5 To prevent or suppress the dangers to a person's life, body or health (Vital Interest): To prevent or suppress the dangers to a person's life, body or health, such as emergency contact, disease control and prevention, etc.

4.1.6 Consent: When the Company cannot rely on exemption or refer to legal basis as stated above, the Company shall obtain your specific consent and shall process the personal data according to the informed objectives with your consent. In the event that the Company processes the sensitive personal data, the Company shall take action as required by law or with your explicit consent.

4.2 As your personal data to be processed by the Company for the designated objectives stated in clause 4.1 above in connection in relation to compliance with the laws or contracts, or it is required to enter into a contract with you; the Company has to process your personal data which is required to achieve the objectives. If you fail to provide such personal data to the Company, it may have legal implications or the Company may not be able to perform its duties under the contract entered with you or cannot enter into the contract with you (as the case may be). In such a case, the Company may have to refuse to enter into the contract with you or cancel the services related to you, whether in whole or in part.

4.3 In the event that the Company uses your personal data for objectives other than those stated above, the Company shall provide additional privacy notice in order to explain the use of data for such objectives and notify you in advance.

5. Disclosure of Personal Data

5.1 The Company may disclose your personal data under the designated objectives and in accordance with the rules required by law to the following offices and individuals:

5.1.1 Government offices and regulatory organizations, including Revenue Department, Ministry of Commerce, Department of Business Development, banks.

5.1.2 Agencies requesting disclosure of information by virtue of law, including requesting information for litigation or legal proceedings or in connection with legal process from the Royal Thai Police, Department of Special Investigation, Office of the Attorney General, courts, police officers, Office of the Personal Data Protection Committee, etc.

5.1.3 Partners, business partners, service providers, service receivers and personal data processors assigned by the Company to be responsible for providing services or managing personal data, including insurance companies (if the decoration cost is higher than the specified amount), improving or maintaining the security standards of work systems and information technology systems, accounting auditing, internal auditing, consulting, etc.

5.1.4 Internal departments in the Company: In order to carry out your objectives, the Company may disclose your personal data to the Accounting and Finance department, sales Department, Marketing Department and other department concerned.

In the event that the Company discloses your personal data to others, the Company may implement appropriate measures in order to protect the disclosed personal data in compliance with the standards and obligations prescribed by the personal data protection law.

In the event that the Company transmits or transfers your personal data abroad, the Company shall ensure that the personal data transmitted or transferred to destination countries, international organizations or overseas receivers having appropriate personal data protection standards. In some cases, the company may obtain your consent for transmission or transfer of personal data overseas, as prescribed by the personal data protection law.

6. Duration of Personal Data Retention

6.1 The Company shall retain personal data for the necessary period in order to achieve the designated objectives for processing personal data. The Company may retain your personal data for a longer period permitted by law; or the retention of such personal data is required for the establishment of the Company's legal claims, for example, in accordance with accounting and tax law, immigration law or other relevant laws; or until the case is solved if the Company is in the legal process. At the end of such period, the Company shall immediately delete, dispose or make personal data non-identifiable.

6.2 The Company shall retain the closed-circuit television (CCTV) within 30 days. At the end of such period, the data shall be deleted automatically (auto delete). However, if it is required for inquiry, investigation or prosecution, the Company will save the data until the case is solved.

7. Rights of the Data Subject

As a data subject, you have the following rights under the criteria, methods and conditions prescribed by the personal data protection law. In this respect, if you wish to exercise your rights, you may use the Data Subject Right Request Form and contact the Company as stated in clause 9.

7.1 Right to withdraw consent: If you give the Company consent to collect, use and/or disclose personal data (whether the consent is given by the data subject before or after the effective date of the personal data protection law), you have the right to withdraw consent at any time throughout the period of personal data being held by the Company unless there is a limitation of rights by law or there is a contract that benefits you, and the Company shall inform you of the possible consequences of withdrawing such consent.

7.2 Right of Access: You have the right to request access or obtain a copy of your personal data under the responsibility of the Company, and request the Company to disclose the acquisition of such personal data acquired without your consent; however, the Company has the right to refuse the request if the accessing or obtaining the copy affects the rights and freedoms of other people or if you have no right of access.

7.3 Right to Data Portability: You have the right to obtain personal data if the Company has made such personal data in a format that is readable or usable by way of automatic tools or devices and can use or disclose personal data by automated means. Furthermore, the data subject has the right to request the Company to transmit or transfer personal data in such format to another data controller when it can be done by automated means and has the right to obtain personal data transmitted or transferred by the Company in such format to another data controller directly unless it cannot be processed due to technical issues.

The above personal data must be obtained with your consent for the Company to collect, use and/or disclose, or it is the personal data that the Company has to collect, use and/or disclose in order to be able to perform the contract as desired, or it is other personal information as stipulated by a relevant authority.

7.4 Right to Object to the Collection, Use and Disclosure of Personal Data: You have the right to object to the collection, use and disclosure of personal data at any time if it is the personal data collected for direct marketing purposes, or for scientific or statistic research purposes. The Company may deny the request due to tasks carried out in the public interest of the Company, or the Company has more important legitimate grounds, or for the purposes of establishment, exercise of claims, and compliance with the law.

7.5 Right to Erasure of Personal Data: You have the right to request for personal data to be erased, destroyed or anonymized if you believe that the personal data is collected, used and/or disclosed unlawfully, or are of the opinion that the Company does not have to keep the data for the objectives of this policy, or when the data subject exercises the right to withdraw the consent or exercises the right to object as stated above. In this respect, the Company may deny the request if the personal data must be retained for the period required by law or it is required for the business operation of the Company.

7.6 Right to Restrict Processing: You have the right to restrict processing temporarily during the process of reviewing the request for rectification or objection, or any other case where the Company does not have to retain the data according to the objectives of personal data collection and have to erase or destroy the personal data, but you request for data to be restricted.

7.7 Right to Rectification: You have the right to request for personal data to be rectified if your data is incorrect, out-of-date, incomplete or misleading.

7.8 Right to Lodge a Complaint: In the event that the Company violates or fails to comply with the personal data protection law, you have the right to lodge a complaint to the Office of the Personal Data Protection Committee. The Company will endeavor to the best of the capabilities of the relevant systems to facilitate and process your request without delay unless the facts appear that the processing of the request causes an unreasonable burden to the Company or may violate the protection of personal data of others, or is against the law, or if it is impossible to comply with the request.

8. Security of Personal Data Retention

The Company has established and/or selected a personal data collection system with the appropriate mechanisms and techniques, and have security measures as prescribed by the personal data protection law and other relevant laws. Furthermore, the Company has limited access to your personal data from its employees and representatives in order to prevent your personal data from being used, disclosed, destroyed or unauthorized access.

9. Contact Channels

In case of queries, please contact:

Customer Relations Center, I.C.C. International Public Company Limited
Address : 530 Sathupradit 58, Bangpongpan, Yannawa, Bangkok 10120
Telephone : 02-294-4999
Business Hours : Monday-Friday 8.00 - 17.00 hrs. except public holidays
Email : service@icc.co.th

10. Changes in Privacy Notice

The Company may change this Privacy Notice from time to time in order to be consistent with any changes relating to the processing of your personal data and to be consistent with any changes in the personal data protection law or other relevant laws. The Company shall notify you of any significant changes through appropriate channels.

Announced on Wednesday 1st June, 2022.

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(Mr. Thamarat Chokwatana)
Chairman