

**PERSONAL DATA PRIVACY NOTICE**

**FOR PROCESSES RELATED TO VENDORS OF IPS INTERNATIONAL CO., LTD.**

**1. General Provisions**

For the purpose of complying with the Personal Data Protection Act B.E. 2562 (2019) and subordinate laws issued thereunder, including any amendments which may be made thereto, (“**Laws on Personal Data Protection**”) IPS International Co., Ltd. (“**Company**”) has prepared this personal data privacy notice for processes related to vendors of IPS International Co., Ltd. (“**Privacy Notice**”) to inform you regarding how the Company handles information which can or may identify you, whether directly or indirectly, according to the Laws on Personal Data Protection (“**Personal Data**”), for instance, the methods by which Personal Data is collected, used, disclosed or dealt with, whether by manual or automated means, such as recording, organization, storage, adaptation or alteration, retrieval, sending, transfer, disclosure or making available by any means, alignment, combination, prohibition of access or restriction, erasure or destruction (“**Processing**”, “**Process**”, “**Processes**” or “**Processed**”), as well as to notify you of the purposes for such Processing, the retention period of Personal Data, and your rights as the data subject. In this regard, the Company recommends that you read and understand the following terms under the Privacy Notice:

**2. Groups or Categories of Persons from whom the Company Collects Personal Data**

Under this Privacy Notice, groups or categories of persons from whom the Company collects and Processes Personal Data are as follows:

2.1 **Vendors** which means persons who may become vendors or have registered as vendors with the Company, both in the case where such persons have declared intention to enter into a contract or provide quotations for products and/or services to be sold to the Company or have any other relationships of a similar nature with the Company, and in the case where the Company collects Personal Data on its own initiative, such as principal of products, service providers, consultants, experts, academics, trainers, participants in a business project, contracting parties or any other persons having similar characteristics, etc.; and

2.2 **Persons in relation to vendors** which means natural persons who are related to or act as representatives of the juristic persons who may become vendors or have registered as vendors with the Company, such as directors, employees, manager, representatives, or personnel of vendors who are juristic persons, emergency contact, including those whose Personal Data appears in various documents in connection to relevant processes, such as witnesses, managers, purchasers, consignees, and cheque payers, etc.

**3. How the Company Collects and Receives your Personal Data**

3.1 The Company collects and receives your Personal Data via the following methods:

**(a) Personal Data which you directly provide to the Company**

You may directly provide your Personal Data to the Company, such as

- When you engage in communications or make enquiries, provide comments or feedbacks, or send complaints to the Company, regardless of whether in written or oral communications by face-to-face interaction or by any other means such as telephone, fax, e-mail, mail, website, application, or social media, etc.
- When you provide quotations for products or services to the Company, enter into a contract with the Company, or deliver documents containing Personal Data to the Company; and
- When you participate in marketing activities, lucky draws, events, or any other activities organized by or on behalf of the Company, etc.

**(b) Personal Data which the Company automatically collects from you**

The Company may collect your Personal Data by automated means, such as the use of Cookies or other similar technologies. For more details, please see [www.ips-international.co.th](http://www.ips-international.co.th)

**(c) Personal Data which the Company receives from third parties**

The Company may receive your Personal Data from third parties, such as

- When the Vendors are juristic persons, the Company may collect your Personal Data from the coordinator, representatives, or personnel of juristic persons of your affiliation
- Various business partners or service providers of the Company, Various business partners or service providers of the Vendors
- Company's affiliates
- Government agencies such as the Department of Business Development, and
- In some cases, the Company may collect your Personal Data from public data sources, data sources containing information relating to your business, or sources containing information relating to trades, etc.

3.2 In collecting your Personal Data, you will be informed of the details as set out in this Privacy Notice, including but not limited to, the lawful basis for the collection, use, disclosure and/or Processing of Personal Data in accordance with the lawful purposes, or in the event that the Laws on Personal Data Protection require your consent for any Processing of Personal Data, the Company will request your explicit consent.

3.3 Where the Company has previously collected your Personal Data before the Laws on Personal Data Protection have become effective, the Company will continue to collect and use your Personal Data in accordance with the original purposes of collection. In this regard, you have the right to withdraw your consent by contacting the Company using the contact details set out in Clause 9 of this Privacy Notice. However, the Company reserves the right to consider your request for the withdrawal of consent and proceed in accordance with the Laws on Personal Data Protection.

#### **4. Collected Personal Data**

Your Personal Data that is collected and Processed under this Privacy Notice, regardless of whether such Personal Data was directly provided by you to the Company or automatically collected from you by the Company, or was provided to the Company by third parties, includes the following:

- 4.1 **Personal information**, such as first name, last name, date/month/year of birth, age, sex, national identification number, nationality, photograph, education information, working experience, skills, abilities and signature, etc.
- 4.2 **Contact information**, such as address, telephone number, fax number, e-mail, Line ID, and details of person who may be contacted, etc.
- 4.3 **Business information**, such as company name, department, position, map, latitude and longitude of the company, car number plate, and type of car, etc.
- 4.4 **Information concerning sale and purchase transaction**, such as vendor code, details of the wish listed product details (for example, the net weight, dampness, and quality of raw materials), the number of the temporary product receipt, details of delivery and raw materials, number for tracking (traceability system), account number, and amount of money, etc.
- 4.5 **Information that is used as supporting evidence in the Company's vendor registration or execution of transactions**, such as Personal Data which appears in a copy of national identification card, copy of passport, copy of Visa, copy of Work permit, copy of change of name certificate, copy of house registration book, copy of driving license, copy of vehicle registration manual, copy of vehicle insurance, copy of carrier liability insurance, copy of power of attorney, copy of company affidavit, copy of PhorPor 20, Quotation, invoice, receipt, cheque and cheque stub, payment voucher, copy of lawyer license, copy of professional or business license, sales agreement, distributorship agreement, etc.
- 4.6 **Sensitive Personal Data**, such as race, religion, blood group, criminal record, health information including narcotic test result, etc.
- 4.7 **Technical information**, such as log file, IP Address, information that the Company collects through the use of Cookies, and location data (e.g. Global Positioning System (GPS)) or other similar technologies, etc.
- 4.8 **Other information**, such as voice recording of conversations, and photo and video recording by means of CCTV, accommodation and travel information for epidemic surveillance and prevention, etc.

**5. Purposes and Lawful Basis for the Collection, Use, Disclosure and Processing of Personal Data**

5.1 The Company Processes your Personal Data for the following purposes under lawful basis (collectively, the “**Purposes**”):

No.	Purposes	Lawful basis of the Processing
(a)	For the purpose of collection of the list of names of prospective vendors or Persons in relation to vendors	<input type="checkbox"/> <b>Contractual basis:</b> Where the prospective vendors wish to enter into a sales or service agreement with the Company by being the parties submitting request or providing Personal Data to the Company.  <input type="checkbox"/> <b>Legitimate interest basis:</b> The Processing of Personal Data is necessary for the legitimate interests of the Company in its business operation, such as the collect Personal Data from your disclosure on website or public sources for business contact, etc.
(b)	For the purpose of verification of the identity of Vendors or Persons related to vendors	<input type="checkbox"/> <b>Legitimate interest basis:</b> The Processing of Personal Data of Vendors or Persons related to vendors is necessary for the legitimate interests of the Company for verification of the identity of Vendors or Persons related to vendors.  <input type="checkbox"/> <b>Consent Basis:</b> The Processing of sensitive Personal Data as presented on Vendors or Persons related to vendors’ ID, such as religious and blood group, the Company will be undertaken by relying on the consent received from Vendors or Persons related to vendors.  In case that Vendors or Persons related to vendors not desire to provide a consent, the Company reserves the right to take any necessary actions to erase or prevent sensitive Personal Data from being displayed before processing other Personal Data on Vendors or Persons related to vendors’ ID.

No.	Purposes	Lawful basis of the Processing
(c)	For the purpose of procurement and selection of vendors	<p><input type="checkbox"/> <b>Contractual basis:</b> The Processing of Personal Data is necessary for carrying out requests for quotation by Vendors, or Persons related to vendors, before entering into a sales agreement, service agreement, or any other agreement relating to procurement by the Company.</p> <p><input type="checkbox"/> <b>Legitimate interest basis:</b> The Processing of Personal Data is necessary for the legitimate interests of the Company in its business operations and for compliance with the Company's procurement policy, such as the verification of information and qualifications of vendors, or Persons related to vendors, etc.</p> <p><b>Consent Basis:</b> The Company may collect the criminal record of the Vendors or Persons in relation to vendors such as the consideration of qualifications of vendors, before selection of vendors or procurement, or compliance with the Company's policy, the Company will be undertaken by relying on the consent received from Vendors or Persons related to vendors.</p>
(d)	For the purpose of execution and management of agreements between the Company and any other contractual parties	<p><input type="checkbox"/> <b>Contractual basis:</b> The Processing of Personal Data of the contractual party is necessary for carrying out the request of such party who has expressed the intention to enter into an agreement with the Company, enter into an agreement with the Company and/or performing obligations under agreements, such as receiving products, payment, payment for promotion expenses, issuing invoices or receipts.</p> <p><input type="checkbox"/> <b>Legitimate interest basis:</b> The Processing of Personal Data of the contractual party (or any person related to the contractual party, in the event where the contractual party is a juristic</p>

No.	Purposes	Lawful basis of the Processing
		<p>person) is necessary for the legitimate interests of the Company in the execution and management of the Company's agreements, such as the coordination, the verification of identity and qualifications of contractual party, etc.</p> <p><input type="checkbox"/> <b>Consent Basis:</b> Where the Company may collect the health information, narcotic test result of Vendors or Persons in relation to vendors for consideration of suitability and/or compliance with the Company's policy, such as the collect of health information, or narcotic test result of Persons in relation to vendors, the Company will be undertaken by relying on the consent received from Vendors or Persons related to vendors.</p>
(e)	<p>For the purpose of preparing the database, internal auditing, and data analysis is necessary for the business operations of the Company</p>	<p><input type="checkbox"/> <b>Legitimate interest basis:</b> The Processing of Personal Data is necessary for the legitimate interests of the Company in its business operations, such as management of IT systems, service planning, etc.</p>
(f)	<p>For the purpose of complying with relevant laws which are applicable to the Company's business and legitimate orders of government agencies and relevant officials</p>	<p><input type="checkbox"/> <b>Legal basis:</b> To act in compliance with laws which are applicable to the Company, such as taxation laws, Laws on Personal Data Protection, Laws on Computer-related Crime, Laws on Contagion, Laws on skill development, Laws on Safety Health and Environment, and legitimate orders of government agencies and relevant officers, such as Department of skill development, Revenue Department, Office of the Personal Data Protection Commission ( PDPC Office), etc.</p> <p><input type="checkbox"/> <b>Compliance with the law to achieve objectives for the public health interest basis:</b> Where the</p>

No.	Purposes	Lawful basis of the Processing
		<p>processing of sensitive personal data is necessary for the Company accordance with the laws to achieve objectives for the public health interest, such as collection of health information or body temperature of Vendors or Persons in relation to vendors which contact or services in the area of Company.</p>
(g)	<p>For the purpose of establishment, compliance, exercise or defense of legal claims, in various stages according to the laws</p>	<p><input type="checkbox"/> <b>Legitimate interest basis:</b> The Processing of Personal Data is necessary for the establishment, compliance, exercise or defense of legal claims in various stages according to the law, such as, investigation and/ or inquiry by government officials, case preparation, prosecution, and/ or pursuit of the case in court, etc.</p>
(h)	<p>For the purpose of monitoring, protecting and ensuring the security of persons and properties of the Company</p>	<p><input type="checkbox"/> <b>Legitimate interest basis:</b> The Processing of Personal Data is necessary for the legitimate interests of the Company in monitoring, protecting and ensuring the security of properties of the Company. For example, the CCTV footages can be used to prevent loss or damages to the Company's properties or to track properties or claim damages in case where the properties of the Company are lost or damaged, etc.</p> <p><input type="checkbox"/> <b>Preventing or suppressing danger to a person's life, body, or health basis:</b> The Processing of Personal Data is necessary for the benefit in monitoring, preventing, or suppressing any circumstances which may be dangerous to a person's life, body, or health.</p>
(i)	<p>For any transaction that is necessary and beneficial to you or those which are directly related to the purposes set forth above.</p>	<p><input type="checkbox"/> <b>Legitimate interest basis:</b> The Processing of Personal Data is necessary for the legitimate interests of the Company in carrying out any transactions which are necessary for the</p>

No.	Purposes	Lawful basis of the Processing
		<p>Company and/ or beneficial to you or directly related to the purposes set forth above.</p> <p>In this regard, where the Laws on Personal Data Protection require your consent for any Processing of Personal Data, the Company will explicitly request the consent from you.</p>
(j)	For other purposes that the Company will notify you of	<p><input type="checkbox"/> The Company will notify you of any other purposes that cause the Company to Process your Personal Data other than the purposes set forth above or when the Company changes the original purposes that were set forth.</p> <p>In this regard, where the Laws on Personal Data Protection require your consent for any Processing of Personal Data, the Company will explicitly request the consent from you.</p>

5.2 Your Personal Data, which the Company will Process for the Purposes set forth in Clause 5.1 above that relate to the compliance with laws or contracts or are necessary for entering into contracts with you, is the data which is necessary for the achievement of the said Purposes. If you do not intend to provide such Personal Data to the Company, there may be legal implications or the Company may not be able to perform its duties pursuant to the contract which has been entered into with you or may not be able to enter into a contract with you (as the case may be). In such event, it may be necessary for the Company to decline to enter into the contract with you or to cancel the sale and purchase or the provision of any relevant services to you, whether in whole or in part.

5.3 In the event that the Company will Process your Personal Data in a manner and/or for purposes which are not consistent with the Purposes set forth above, the Company will put in place additional policies or notifications for the protection of Personal Data and/or send a notice to you to provide explanations concerning such Processing of Personal Data. In this regard, you should review such additional policies or notifications in conjunction with this Privacy Notice (as the case maybe).



**6. Disclosure of Personal Data**

6.1 The Company may disclose your Personal Data in accordance with the Purposes and the rules prescribed under the laws to the following entities and persons:

- (a) Company's affiliates, both in and outside Thailand, including executives, directors, staff, employees and/or relevant in-house personnel, and as necessary on a need-to-know basis for the Processing of your Personal Data.
- (b) Business partners, service providers, and data processors designated or hired by the Company to perform duties in connection with the management/Processing of Personal Data for the Company in the provision of various services, such as information technological services, data recording services, payment services, mailing services, delivery services, printing services, data analysis services, research services, marketing services, or any other services which may be beneficial to you or relevant to the Company's business operations.
- (c) Advisors of the Company, such as legal advisors, lawyers, auditors, or any other internal and external experts of the Company, etc.
- (d) Relevant governmental agencies which have supervisory duties under the laws or which have requested the disclosure pursuant to their lawful powers or relevant to the legal process or which were granted permission pursuant to applicable laws, such as Revenue Department, Ministry of Commerce, Office of the Personal Data Protection Commission, Office of Trade Competition Commission, Royal Thai Police, Office of the Attorney General, and court, etc.
- (e) Any persons or any other entities that you have given consent to disclose your Personal Data to.

6.2 The disclosure of your Personal Data to third parties shall be in accordance with the Purposes or other purposes permitted by law, provided that if the law requires your consent to be provided, the Company will request your prior consent.

6.3 In the event that the Company discloses your Personal Data to third parties, the Company will put in place appropriate safeguards to protect the Personal Data that has been disclosed and to comply with the standards and duties relating to the protection of Personal Data as prescribed by the Laws on Personal Data Protection. Where the Company sends or transfers your Personal Data outside Thailand, the Company will ensure that the recipient country, the international organization or such overseas recipient has a sufficient standard for the protection of Personal Data. In some cases, the Company may request your consent for the transfer of your Personal Data outside Thailand, subject to the requirements under Laws on Personal Data Protection.

## **7. Retention Period**

The Company will retain your Personal Data for the period necessary to fulfil the Purposes for which the Personal Data was Processed, whereby the retention period will vary depending on the Purposes for which such Personal Data was collected and Processed. The Company will retain Personal Data for the period prescribed under the applicable laws (if any) by considering the statute of limitations under the laws for any legal proceedings that may occur from or in relation to the documents or Personal Data collected by the Company and having regard to the Company's business practices and relevant business in relation to each category of Personal Data.

In this regard, the Company will retain your Personal Data for a period not exceeding 10 years, starting from the date your legal relations/transactions with the Company come to an end. However, the Company may retain your Personal Data for a longer period of such time prescribed if the laws permit or such retention of Personal Data is necessary for the establishment of the right of claim of the Company.

After the period of time set forth above has expired, the Company will delete or destroy such Personal Data from the storage or system of the Company and other persons providing services to the Company (if any) or anonymize your Personal Data, unless in the event that the Company can continue to retain such Personal Data as prescribed by the Laws on Personal Data Protection or other applicable laws. In this regard, for additional details regarding the retention period of your Personal Data, you can contact the Company by using the contact details set out in Clause 9 of this Privacy Notice.

## **8. Your Rights in relation to Personal Data**

As the data subject, you have the following rights in relation to your Personal Data, subject to the rules, methods and conditions under the Laws on Personal Data Protection. In this regard, if you wish to make a request to exercise your rights, you can contact the Company by using the contact details set out in Clause 9 of this Privacy Notice.

### **8.1 Right of Access**

You have the right to access your Personal Data and may request that the Company provide you with a copy of such Personal Data in accordance with the requirements under the Laws on Personal Data Protection.

### **8.2 Right to Data Portability**

You have the right to obtain your Personal Data, including to request that your Personal Data is transmitted to another data controller or to you, except where it is technically unfeasible, in accordance with the requirements under the Laws on Personal Data Protection.

**8.3 Right to Object**

You have the right to raise an objection to the Processing of your Personal Data in certain circumstances prescribed under the Laws on Personal Data Protection.

**8.4 Right to Erasure**

You may request that the Company delete, destroy or anonymize your Personal Data in certain circumstances prescribed under the Laws on Personal Data Protection.

**8.5 Right to Restriction**

You have the right to request that the Company restrict the Processing of your Personal Data in certain circumstances prescribed under the Laws on Personal Data Protection.

**8.6 Right to Rectification**

You have the right to request that your Personal Data be rectified if the Personal Data is inaccurate, not up-to-date, incomplete, or may cause a misunderstanding.

**8.7 Right to Withdraw Consent**

If the Company relies on your consent as the lawful basis for Processing your Personal Data, you have the right to withdraw such consent which has been provided to the Company at any time.

**8.8 Right to Lodge a Complaint**

If you have any concerns or questions about any aspect of the Company's practices in relation to your Personal Data, please contact the Company using the contact details set out in Clause 9 of this Privacy Notice. Where there is reason to believe that the Company is in breach of Laws on Personal Data Protection, you have the right to lodge a complaint to the expert committee appointed by the Personal Data Protection Committee in accordance with the rules and methods prescribed under the Laws on Personal Data Protection.

However, the Company reserve the right to consider your request to exercise your rights and act in accordance with the requirements under the Laws on Personal Data Protection.

**9. How to Contact the Company**

The Company has designated IPS International Co., Ltd. as the coordinator for matters relating to the Company's Personal Data protection. If you have any questions or would like to exercise your rights as set out in this Privacy Notice, you may contact the Company using the contact information provided below:

**IPS International Company Limited**

36 Ramintra Road, Minburi, Minburi, Bangkok 10510

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**IPS International Co., Ltd.**

E-mail: 02-035-5506

Address: 36 Ramintra Road, Minburi, Minburi, Bangkok 10510

**Data Protection Officer**

E-mail: 02-035-5506

Address: 36 Ramintra Road, Minburi, Minburi, Bangkok 10510

**10. Changes to This Privacy Notice**

The Company may make changes to this Privacy Notice from time to time to reflect any changes to our Processing of your Personal Data and to comply with the changes to the Laws on Personal Data Protection or any applicable laws. In this regard, the Company will notify you of any significant changes to the Privacy Notice and the amended Privacy Notice through appropriate means. The Company encourages you to review such communication in order to be aware of any changes made to this Privacy Notice from time to time.

This Privacy Notice shall be effective from June 1, 2022.

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