



Policy and Guidelines Regarding

Personal Data Protection (Privacy Notice)

of Ditto (Thailand) Public Company Limited and its subsidiaries

Introduction

In order to comply with the Personal Data Protection Act B.E. 2562 (2019) and related secondary laws, including those related to the Personal Data Protection Act B.E. 2562 (2019) to be amended in the future, Ditto (Thailand) Public Company Limited and its affiliates, namely Siam TC Technology Company Limited, therefore, establish this Policy and Guidelines regarding personal data protection (Privacy Notice) for processes related to operations related to personal data of data subjects in order to explain to the personal data subjects on methods and purposes of processing, including retention period of the personal data, as well as your rights as an owner of personal data, which Ditto (Thailand) Public Company Limited and its subsidiaries, namely Siam TC Technology Company Limited, treat the data that can identify the personal data subject or possibly identify the personal data subject, whether directly or indirectly, according to the law on personal data protection. And Ditto (Thailand) Public Company Limited and its affiliates, namely Siam TC Technology Company Limited, may revise or amend the Policy and Guidelines, whether in whole or in part, to be consistent with operating approach and legal criteria that may change in the future.

1. General provisions

Ditto (Thailand) Public Company Limited and its affiliates, namely Siam TC Technology Company Limited, would like you and/or the personal information subject to read and understand the requirements according to this Policy and Guidelines, including following up on the Policy and Guidelines of Ditto (Thailand) Public Company Limited and its subsidiaries, namely Siam TC Technology Company Limited, at all times. By publishing, updating or amendments to this Policy and Guidelines, the Company Ditto (Thailand) Public Company Limited and its subsidiary, Siam TC Technology Company Limited, will publish it on the website: [www.dittothailand.com](http://www.dittothailand.com) and/or the channels that you and/or the personal data subject have informed.

2. Definition

Law on Personal Data Protection means the Personal Data Protection Act B.E. 2562 (2019) and related secondary laws, including those related to the Personal Data Protection Act B.E. 2562 (2019) to be amended in the future.

Ditto means Ditto (Thailand) Public Company Limited and its subsidiaries, namely Siam TC Technology Company Limited.



Policy and Guidelines mean the Policy and Guidelines Regarding Personal Data Protection (Privacy Notice) of Ditto (Thailand) Public Company Limited and its subsidiaries, namely Siam TC Technology Company Limited

Personal data means information about an individual from which that individual can be identified, whether directly or indirectly, and whether the information is in paper or digital form, intended to be used for further processing, and includes information that cannot be linked or used to identify an individual but if used together, they can be linked or used to identify an individual, without necessity to consider if the data that cannot be linked or used to identify individuals coexist or have already been together. But it does not specifically include information about the deceased. The personal data in the Policy and Guidelines is divided into two types: general personal data and sensitive personal data.

Processing means that Ditto Will collect, use, disclose or take any action on personal data whether by automated means or not, such as recording, storing, organizing, adjusting or modifying, retrieving, sending, transferring, publishing or making it accessible or available by any means, arrangement, combination, restriction or prohibition of access, deletion or destruction, etc.

Data subject means a natural person to whom the personal data is specified and those who are still alive, excluding juristic persons established by law such as companies, associations, foundations or any other organizations.

Data Controller means a natural person or legal entity who determines the purposes and methods for processing personal data. The personal data controller, according to the Policy and Guidelines, is Ditto. Details of the contact process and personal data controller appear as per Article 12 in the Policy and Guidelines.

Data Processor means a person or legal entity who processes data on behalf of the data controller by order or on behalf of the data controller. The person or juristic person who does so must not be the personal data controller.

Ditto's Personal Data Control Officer means a person or group of persons or legal entity who coordinates and/or take any action according to the wishes of the data subject and cases related to the law on personal data protection as required by law. Details of Ditto's Personal Data Control Officer and contact procedures appear as per Article 12. in The Policy and Guidelines.

Activity means any operation of the personal data controller and personal data processor, which is an operation where personal data is processed both according to the purpose and/or according to the order of the personal data controller.



### 3. Group or type of persons involved with personal data which Ditto is processing

Under the Policy and Guidelines, the group or type of data subject, whose personal data will be processed by Ditto includes:

Partner means a person related to or representative of a person or juristic person who agrees to be a contractual party with Ditto and from entering into a legal contract and/or memorandum of understanding with Ditto and includes persons bidding to sell products and/or provide services to Ditto and person who accepts bids to purchase products and/or receive services from Ditto or have registered as a partner with Ditto or have a relationship that is similar in nature to the above details with Ditto, such as manufacturers, customers, middlemen, service providers, consultants, experts, academics, lecturers, franchise business operators, business project participants, contracting parties, employers, employees, or persons with similar characteristics to the above details, etc.

Persons who are expected to be business partners, which means people who may become business partners with Ditto both in the case that such person has expressed intent to enter into a contract and/or will register as a partner of Ditto in the future and in the case that Ditto collects personal data by Ditto's own decision, such as manufacturers, customers, middlemen, service providers, interested parties, consultants, experts, academics, lecturers, people interested in participating in business projects, contracting parties, or people with similar characteristics to the above details, etc.

Persons related to business partners or a person who is expected to be a business partner, which means a natural person related to or representative of a person who is expected to be a business partner or business partner, such as a director, employee, agent, or personnel of those who are expected to be business partners or business partners who are juristic persons and shall include persons whose personal data appears in various documents related to the relevant processes, such as managers, purchasers, recipients and/or deliverers of goods and documents, buyer or seller representative, document certifier and the payer of the check, etc.

### 4. Ditto's methods to collect and obtain personal data through various channels are as follows:

#### 4.1 Personal data that you provide directly to Ditto.

You or the person in Article 3 in the Policy and Guidelines may provided personal data directly to Ditto, such as information obtained from your documents and identification, other information you provide to Ditto during contact with Ditto or according to Ditto's request and with consent for use in Ditto's operations or data available at Ditto from using the service, contacting, visiting, searching through digital channels, telephone communication, communication via electronic mail, email, fax, postal mail, or various social media, including contact via fax and



post or any other channels or when you will enter into or enter into a legal contract or memorandum of understanding with Ditto, when delivering documents and copies of various documents to Ditto, when sending documents digitally to Ditto, when repaying debt to Ditto, when offering a price for products or services to Ditto, when filling out various forms via the website <https://www.dittothailand.com> or from the application or various programs in which personal data appears or is provided to Ditto, including when asking for information, giving an opinion or critique or sending complaints to Ditto via telephone, mail, e-mail, fax, by post or application, etc.

#### 4.2 Personal data which Ditto collects from you automatically

Ditto may collect personal data of you or other persons according to Article 3 in the Policy and Guidelines automatically through various channels such as coming to contact at Ditto's office, recording of Ditto's CCTV, recording work hours, use of cookies, electronic transmission, Ditto's document management system or other similar technologies, etc.

#### 4.3 Use of cookies

Cookies means small pieces of data that the website, [www.dittothailand.com](http://www.dittothailand.com), sent to be stored on Ditto's server by recording data on surfing or using the website by the personal data subject who visits the website, [www.dittothailand.com](http://www.dittothailand.com), in order to facilitate memorizing, filling out forms, entering personal data recorded by the cookies, etc. You may accept or not accept the cookies. In the case where you choose not to receive or delete cookies, the website may not be available or may not be displayed properly.

Ditto creates the cookies for the purpose of compiling usage statistics to monitor and improve the quality of our services and adjust the presentation of our website to suit the device you use, including presenting content and advertisements that are relevant to your interests and customizing offers to suit your needs.

#### 4.4 Personal data which Ditto received from third parties

Ditto may receive personal data of you or other persons according to Article 3 in the Policy and Guidelines from a third party, where a third party means a person or juristic person who is not the data subject, such as collecting personal data through Ditto's contract parties or middlemen. Or in some cases, Ditto may collect personal data of you or other persons according to Article 3 in the Policy and Guidelines from public sources, government agencies or state enterprises, information sources about your business or commercial information sources, etc.

#### 4.5 Collection of personal data in other ways

In collecting your personal data or those of persons according to Article 3 in the Policy and Guidelines, you have the right to be informed of the details as specified in the Policy and Guidelines, including but not limited to the purpose and legal basis for collection, use, disclosure, or any other actions to be taken on personal data. Or if it is



the case that the law on personal data protection requires that any personal data processing must obtain a consent from you or the person according to Article 3 in the Policy and Guidelines, Ditto will request your express consent.

In the case that Ditto collects personal data of you or persons according to Article 3 in the Policy and Guidelines before the date of the law on personal data protection regarding collection, use, disclosure, or any other action taken on personal information becomes effective, Ditto will continue collecting and using your personal data or those of persons according to Article 3 in the Policy and Guidelines according to the original purpose of Ditto informed you about the collection of personal data and you or the person according to Article 3 in the Policy and Guidelines have the right to revoke the consent by contacting Ditto according to the contact details specified in Article 11 of the Policy and Guidelines. However, Ditto reserves the right to consider your request to revoke your consent or that of the person in Article 3 of the Policies and Guidelines and proceed as required by the law on personal data protection.

## 5. Scope of personal data collected

Personal data of you or the person according to Article 3 in the Policy and Guidelines that are collected under the Policy and Guidelines, whether provided to Ditto directly or automatically or received from outsiders, include

### 5.1 Data that is general personal data, for example:

5.1.1 First and last name or nickname

5.1.2 National identification number, passport number, social security card number, driver's license number, taxpayer ID, bank account number, credit card number, etc.

5.1.3 Picture or copy of identification card, passport, social security card, driver's license, tax payer ID card, bank account, credit card, etc.

5.1.4 Address, map, electronic mail, email, telephone number, user ID for the LINE application (Line ID) or other applications, etc.

5.1.5 Device or tool information such as IP address, MAC address, Cookie ID, etc.

5.1.6 Biometric information such as facial images, fingerprints, x-ray films, iris scan data, voice identity information, genetic information, etc.

5.1.7 Information identifying a person's property, such as license plate number, land title deed, etc.

5.1.8 Information that separately cannot be linked or used to identify an individual, but if used together, they can be linked or used to identify an individual, such as birth date and place of birth, race, nationality, weight, height, location information, medical information, educational information, financial information, employment information, etc.



5.1.9 Reference number stored on microfilm, which even though unable to identify an individual but if used in conjunction with another index system can identify an individual.

5.1.10 Work evaluation information or the employer's opinion on the employee's performance.

5.1.11 Various record data used to monitor the activities of individuals, such as log files.

5.1.12 Information that can be used to search for other personal information on the internet.

5.2 Information that is not general personal information (Non-Personal Data) for example:

5.2.1 Company registration number

5.2.2 Non-personally identifiable business contact, such as workplace telephone or fax numbers, office address, email and electronic mail used in work, company electronic mail, etc.

5.2.3 Anonymous data or pseudonymous data refers to data or data sets that are made unable to identify an individual by technical means.

5.2.4 Information about the deceased

5.3 Sensitive Personal Data, for example:

5.3.1 Nationality

5.3.2 Race

5.3.3 Political opinions

5.3.4 Belief in the cult, religion or philosophy

5.3.5 Sexual behavior

5.3.6 Criminal history

5.3.7 Health, disability, or mental health information

5.3.8 Labor union information

5.3.9 Genetic information

5.3.10 Biological data

5.3.11 Any other information which affects the data subject in the same way as announced by the Personal Data Protection Committee.



## 6. Processing of your personal data and/or those of the personal data subject

Under the provisions of the law on personal data protection, Ditto will carry out any activities and process personal data of you or persons according to Article 3 in the Policy and Guidelines, both general personal data and sensitive personal data according to the objectives in Article 7 in the Policy and Guidelines and legal base as shown in details of the legal base as follows.

6.1 General personal data processing base: Ditto will process general personal data of you or individuals according to Article 3 in the Policy and Guidelines according to any activity when there is any of general personal data processing bases or multiple bases in a combination as follows.

### A) Contract

Ditto processes general personal data based on contracts when it is necessary to perform debt repayment according to the contract, performance of the contract, entering into a contract, providing services according to contract or performance of the contract agreed upon or specified in the contract and memorandum of understanding. This is in the normal course of operations in accordance with the contract, such as processing data for the performance of that contract, processing data for debt repayment or receiving debt payment according to that contract, processing transaction data to calculate interest or penalty according to the contract or bank interest, processing for sending a letter to perform or refrain from performing or terminating the contract to the contracting party, processing of your data or those of persons according to Article 3 in the Policy and Guidelines before or while or after entering into a contract, such as a sales contract, joint business contract, joint venture contract, service contract, hire of work contracts, labor contract, co-investment contract, etc.

### B) Vital Interest

Ditto processes general personal data based on the vital interest when it is necessary to protect the vital interests of you or a person according to Article 3 in the Policy and Guidelines, including suppressing dangers to the body, life, and health, such as travel information in order to prevent the spread of infection and communicable diseases, information of parents to prevent serious harm that may occur to the health and life of their children or to help patients with emergencies or those encountering accidents who need urgent treatment, etc.

### C) Legal Obligation

Ditto processes general personal data based on the legal obligations when it is necessary to perform duties or as required by law or according to orders of government agencies or government officials, such as complying with court judgments or orders, disclosing data to the Revenue Department, sending data and money according to a legal execution warrant or a notification from the Legal Execution Department, etc. In addition, you



or the person according to Article 3 in the Policy and Guidelines do not have the right to delete or transfer data or object to processing on the legal obligation base of Ditto according to Article 11 in the Policy and Guidelines.

D) Public Task Base

Ditto processes general personal data based on the public tasks when it is necessary to carry out state missions for the public benefit as specified by law or act according to the authority empowered by the state.

E) Scientific or Research Base

Ditto processes general personal data according to the scientific or research base when it is necessary for Ditto's legitimate interests or those of outsiders. However, such action must not violate the basic rights of you or any person according to Article 3 in the Policy and Guidelines and you or the person according to Article 3 in the Policy and Guidelines also can expect that this will be done, for example, estimation of increases or decreases in the value of goods or services, estimation of employee salary increases, collection of statistics without using information that identifies you or persons according to Article 3 in the Policy and Guidelines, recording by CCTV in public places, etc.

F) Legitimate Interest:

Ditto processes general personal data based on legitimate interest when it is necessary for the operation of Ditto's legitimate interests and those of other persons without exceeding the scope which you or the person according to Article 3 in the Policy and Guidelines can reasonably expect or when the benefits are greater compared to the impacts or it is basic rights, such as protection from crime and fraud, forwarding within the company for internal management that does not include sending abroad, system and network security, assisting government officials in carrying out their duties in a manner that does not conflict with the duty of confidentiality, following up on inquiries, exercising the right to file a lawsuit, execution of court orders or judgments, compliance with necessary foreign laws, etc.

G) Consent

Ditto will process general personal data according to Article 6.1 in the Policy and Guidelines according to the objectives in Article 7 in the Policy and Guidelines upon receiving consent from you or the person according to Article 3 in the Policy and Guidelines in writing or as an electronic document before, during or after processing.

You or the person according to Article 3 in the Policy and Guidelines may choose to or not to give your consent to Ditto.





Requesting consent after processing general personal data may be from reasons such as: The data was obtained from a person other than the personal data subject or requesting consent may be inconvenient or cannot be done during processing or there are amendments or additions to the law regarding general personal data after receiving consent. In this case, Ditto will request consent from you or the person according to Article 3 in the Policy and Guidelines without delay but not more than 30 days from the date it is aware of or should be aware of or receives a notice from you or the person according to Article 3 in the Policy and Guidelines.

#### 6.2 Base for processing sensitive personal data

Processing of sensitive personal data of you or other persons according to Article 3 in the Policy and Guidelines, etc. according to any activity, Ditto will use one or multiple bases in combination to process general personal data according to Article 6.1 in the Policy and Guidelines. In processing sensitive personal data, one or multiple bases in combination for processing sensitive personal data will be considered and used. The details are as follows.

##### A) Consent-Extra effort

Ditto will process sensitive personal data for the purposes in Article 7 of the Policy and Guidelines according to proportion and necessity only and must receive consent from you or the person according to Article 3 in the Policy and Guidelines expressly in writing or electronically before or during processing or after processing. It must be processed according to the purposes that are originally stated. And an explicit consent must be requested every time. Requesting explicit consent after processing the sensitive personal data may be from various reasons such as: The data is derived from a reason other than the personal data object or obtaining explicit consent may be inconvenient or impossible during processing or unable to obtain consent at that time or there is an amendment or addition to the law regarding the sensitive personal data after obtaining consent. In these cases, Ditto will request express consent from you or the person according to Article 3 in the Policy and Guidelines without delay, but not more than 30 days from the date it is aware of or should be aware of or receives a notice from you or the person according to Article 3 in the Policy and Guidelines.

##### B) Preventing or stopping dangers to life, body, and health (Vital interest)

In the case of you or the person according to Article 3 in the Policy and Guidelines are in a situation that is dangerous to life, body, and health and clearly that you or the person according to Article 3 in the Policy and Guidelines are unable to give consent by physical or legal means, such as a person's ability or for any reason, such as an emergency and the case you become unconscious, Ditto or the rescuer may request your health information from the person close to you, or a hospital may provide medical history to another hospital to help the patient becoming unconscious in an accident, etc.



C) Lawful activity with appropriate protection of non-profit foundations, associations, or organizations (Social protection and non-profit)

It is a lawful activity with appropriate protection of non-profit foundations, associations, or organizations that have objectives related to politics, religion, philosophy or labor unions to members, former members or those who have regular contact with the non-profit foundations, associations, or organizations according to the said purpose without disclosing that personal data outside of the non-profit foundations, associations, or organizations.

D) Database that is made public with the express consent of you or the person according to Article 3 in the Policy and Guidelines (Made public by the data subject).

It is personal data disclosed by you or the person according to Article 3 in the Policy and Guidelines and personal data subject to the public with explicit consent, such as posting health messages on Facebook and setting the status to public, etc.

E) Establishment, Exercise or Defense of Legal Claims

Complying with or exercising legal claims or raising legal claims to defend rights or proceeding with the judicial process, such as receiving legal advice, collecting data for preparing complaints to file lawsuits, etc.

F) Health or Social Care base

It is for health and social care, such as preventive medicine or occupational medicine, evaluating the work ability of employees, medical diagnosis, providing health or social services, medical treatment or social welfare systems and services, etc.

G) Public in the area of public health

It is for the public benefit of public health, such as surveillance and collection of public health statistics, national vaccination planning, dealing with new diseases or threats or reviewing standards of clinical practice, etc.

H) Legal compliance base to achieve objectives regarding employment and social security and social protection

Under operations as specified or provided by law regarding operations to achieve objectives on employment and social security and social protection, national health insurance, welfare regarding medical treatment of persons with legal rights, protection of car accident victims, such as asking employees about their health when exercising sick leave rights or disbursements according to social security rights, etc.

I) Archiving purposes in the public interest, scientific or historical research purposes or statistical purposes



Diagnoses and statistics that are for public benefit or have a wide impact on society, not an act for commercial purposes, such as for the development of technology that creates new knowledge or benefits that are sufficiently widespread, etc.

J) Substantial public interest

Substantial public benefits, such as the performance of duties of the Legislative Assembly, actions to create equality, prevention of terrorism or insurance, etc.

#### 7. Purposes for processing personal data

Ditto processes personal data of you or persons according to Article 3 in the Policy and Guidelines in each activity according to the following objectives

(1) For the purpose of preparing and managing contracts between Ditto and any contracting parties, including Ditto's operations according to the contract.

(2) For procurement purposes or registration of new contracting parties or any other person with similar nature as well as proceeding with various requests from contracting parties or any other persons with similar natures.

(3) To record establishment of creditors of Ditto, issuing invoices, issuing a tax invoice, applying for Credit Bureau's examination by Ditto, disbursing money, including various financial transactions and accounting operations of Ditto.

(4) For the purpose of confirming or identifying you in the case of accessing various services, entering into a contract, performing duties according to the contract to ensure that the said services, including all Ditto's communications, are secure and confidential.

(5) For the purpose of communicating or coordinating the operations or missions of Ditto to third parties, contractors, or contracting parties.

(6) for the purpose of complying with laws relevant to Ditto's operations and legal orders of government agencies and related officials, such as registering various businesses with the Department of Business Development, notification of registration of personnel or related persons according to law, preparing tax reports to submit to the Revenue Department, accounting audit by auditor, etc.

(7) For the purpose of publicizing information, news, and activities of Ditto such as Ditto's training, meetings, seminars, and projects, organizing activities to build relationships, organizing social activities, etc.

(8) To prepare a database of activity participants, project participants, training attendees or seminar participants of Ditto, including analyzing data and surveying the behavior of such people.



(9) For the purpose of managing health, occupational health and safety of contractors, providing annual health examinations in both general health examination and occupational health examination (health examination according to risk factors), health insurance and health readiness assessment, including using it as information for reporting, investigating, analyzing causes or developing preventive health management and determining measures to correct and prevent various incidents that occur.

(10) To protect health from dangerous infectious diseases that may spread into Ditto by screening those entering and leaving the premises, including tracking and reporting travels that may pose a risk of disease spread.

(11) For inspection and security within the building or premises of Ditto and safety risk assessment, including entering and exiting to work at Ditto's premises, exchanging cards for a pass to Ditto's buildings or locations and recording data of entering and exiting Ditto's premises and recording images inside buildings or ditto etc. or the surrounding area with closed-circuit television cameras (CCTV).

(12) For establishment of legal claims, complying with or exercising legal claims or raising legal claims, prosecuting various cases, as well as taking steps to enforce the law, such as investigation and/or interrogation by government officials, case preparation, prosecution and/or fighting the case in court, etc.

(13) For internal audit of DITTO to ensure compliance with operating standards and compliance with relevant regulations or laws.

(14) For management of information within Ditto and surveillance of security in Ditto's system

(15) For supporting to advertisement, public relations, bidding, electronic bidding, submitting bids, selling, purchasing products and/or services of Ditto, including sales promotions, giveaways, sweepstakes, and arranging promotions or discounts of Ditto.

(16) To engage in receiving, sending, installing, fixing, repairing, modifying or changing products and/or services of Ditto, including after-sales service or during service of Ditto.

(17) To assist in submitting proposals, bidding on prices, and submitting a bid, participating in bidding, entering bids to government agencies, state enterprises, and private companies.

## 8. Disclosure of personal data

In disclosing your personal data or those of persons according to Article 3 in the Policy and Guidelines to other persons, Ditto will provide appropriate measures to protect the personal data disclosed and to comply with the standards and duties of personal data protection as specified by the law on personal data protection.

In the case that Ditto sends or transfers your personal data or those of persons according to Article 3 in the Policy and Guidelines abroad, Ditto will take steps to ensure that the destination country, international organization



or the data recipient abroad has an adequate standard of personal data protection or to ensure that the transmission or transfer of your personal data or those of persons according to Article 3 in the Policy and Guidelines abroad is in accordance with the rules stipulated by the law on personal data protection. In some cases, Ditto may ask for your consent or that of the persons according to Article 3 in the Policy and Guidelines for sending or transferring your personal data or those of persons according to Article 3 in the Policy and Guidelines to such foreign countries.

#### 9. Persons and/or agencies that Ditto may reveal personal data

Ditto may disclose personal data of you or other persons according to Article 3 in the Policy and Guidelines under the legal basis according to Article 6 and according to the objectives specified in Article 7 in the Policy and Guidelines and according to the rules specified by laws to the following individuals and agencies:

##### 9.1 Affiliates of Ditto (Thailand) Public Company Limited

This shall include executives, directors, employees, staff, agents and/or internal personnel of the said companies, as far as relevant and necessary for processing of your personal data or those of persons according to Article 3 in the Policy and Guidelines.

##### 9.2 Business partners

Persons expected to be a business partner, persons related to partners or prospective partners, service providers, and personal data processors whom Ditto assigns or hires to manage/process the personal data for Ditto in providing various services such as information technology services, data recording service, payment service, postal service, parcel delivery service, printing service, data analysis service, research services, marketing or any other services that may be beneficial to you or the person according to Article 3 in the Policy and Guidelines or related to Ditto's business operations.

##### 9.3 Ditto's advisors

For example, legal advisors, lawyers, auditors or any other experts inside and outside of Ditto etc.

##### 9.4 Government agencies with legal regulatory duties

or those who request the disclosure of personal data by virtue of law or related to legal proceedings or as permitted by relevant laws, such as the Revenue Department, Ministry of Commerce, Office of the Personal Data Protection Commission, Office of the Trade Competition Commission, Royal Thai Police, Office of the Attorney General and the Court, etc.



#### 9.5 Any other person or agency

that you or the person according to Article 3 in the Policy and Guidelines give consent to disclose your personal data to.

#### 10. Retention of personal data and retention period of personal data

Ditto will retain personal data of you or persons according to Article 3 in the Policy and Guidelines both in document form and in digital file form or in electronic document form within the headquarters and branches of Ditto and will store it on the server which Ditto can access, with appropriate security measures provided for personal data to protect the personal data disclosed and to comply with personal data protection standards and duties as specified by the law on personal data protection.

Ditto will retain personal data of you or persons according to Article 3 in the Policy and Guidelines for a period necessary to achieve the specified purpose of processing that personal data. The retention period for personal data may vary depending on the specified purpose of processing personal data. In addition, Ditto will retain personal data for a period of time as specified by relevant laws, taking into account the legal statute of limitations for legal action that may arise from or relate to documents or personal data collected by Ditto in each item and taking into account Ditto's guidelines and those of the relevant business sector for each type of personal data.

In this regard, Ditto will retain personal information of you or persons according to Article 3 in the Policy and Guidelines for a period not exceeding 10 years from the date the legal relationship between you or the person according to Article 3 in the Policy and Guidelines and Ditto ends. However, Ditto may retain the personal data of you or the person according to Article 3 in the Policy and Guidelines beyond such period if permitted by law or retention of such personal data is necessary for the establishment of Ditto's legal claims.

After the above period expires, Ditto will delete or destroy such personal data from Ditto's storage or system and of other persons who provide services to Ditto (if any) or make personal data of you or the person according to Article 3 in the Policy and Guidelines unable to identify you or the person according to Article 3 in the Policy and Guidelines, unless it is the case Ditto can continue retaining such personal data as required by the Personal Data Protection Act or other related laws.

#### 11. Your rights and/or those of personal data subject

You can exercise your rights under the provisions of laws and policies that are currently established or that will be amended in the future, as well as the rules set by Ditto and you can contact the Personal Data Control Officer of Ditto to proceed with submitting a request to exercise your rights in the topic "Contact Procedures" in Article 12 of the Policy and Guidelines. You do not need to incur any expenses in exercising your rights above. We will



consider and notify you of the results of your request within 30 days from the date we receive the request as shown in the following rights

#### 11.1 Right to be informed

You have the right to be informed of the name, address, and contact information of the data controller, purpose and processing base, data retention period, rules for data use, forward data to others, details of the sending country, including adequate measures, original source of data which Ditto received both directly and through other means and being notified in the event of subsequent amendments or changes to objectives that are different from the original. You can exercise your rights according to the contact procedures as specified in Article 12 in the Policy and Guidelines.

#### 11.2 Right to withdraw consent

You can withdraw your consent to the processing of personal data that you or the person according to Article 3 in the Policy and Guidelines has given to Ditto throughout the period that personal data is with Ditto. You can exercise your rights according to the contact procedures as specified in Article 12 of the Policy and Guidelines. The withdrawal of consent does not affect the processing of data which the consent has been given before.

#### 11.3 Right of access to personal data

You have the right to access your personal data, including accessing and requesting a copy of your personal data under responsibility of Ditto or request disclosure of the acquisition of such data to which you did not give consent. You can exercise your rights according to the contact procedures as specified in Article 12 in the Policy and Guidelines. However, Ditto may refuse the requests according to the rights in this Article as required by law or court order or in case that your request according to the rights in this Article affects the rights and freedoms of other people.

#### 11.4 Right to rectification of your personal data

You have the right to request that your personal data be corrected or request to make addition to the incomplete personal data or to prevent misunderstandings or make personal data non-identifiable to the person who owns the personal data for some reasons as specified by law. You can exercise your rights according to the contact procedures as specified in Article 12 in the Policy and Guidelines.

#### 11.5 Right to erase or destroy personal data

You have the right to request that your personal data be deleted or destroyed or request to make your personal data impossible to identify you for some reasons as specified by law. You can exercise your rights according to the



contact procedures as specified in Article 12 in the Policy and Guidelines. However, Ditto can reject the requests according to the rights in this Article as required by law or court order or for the case that it is freedom of expression or is information related to research, statistics, archives or for public benefit or exercising legal rights of Ditto or is the processing of data based on legal duties or legitimate interests.

#### 11.6 Right to restriction

You have the right to request that the processing of your personal data be suspended for certain reasons as specified by law. Ditto can reject requests according to this right as specified by law or court order or for you not intending to truly exercise the right or exercising the rights in excess or for expenses arising from the exercise of rights to an extent that is unreasonable or for the processing of data based on legal duties or legitimate interests.

11.7 Right to data portability. You have the right to request to portage your personal data that you gave to Ditto to other data controllers or to yourself for certain reasons as required by law. However, paper data cannot be exercised. You can exercise your rights only on data that a computer can read and process. And Ditto can reject the requests for rights in this Article as required by law or court order or for you not intending to truly exercise the right or exercising the rights in excess or for expenses arising from the exercise of rights to an extent that is unreasonable or for the processing of data based on legal duties or legitimate interests.

#### 11.8 Right to object

You have the right to object to the processing, collection, use or disclosure of personal data relating to you at any time for some reasons as specified by law unless it is a case exempted by law. In this regard, Ditto can reject the request according to the rights in this Article as determined by law or court order or for you not intending to truly exercise the right or exercising the rights in excess or for expenses arising from the exercise of rights to an extent that is unreasonable or for the processing of data based on legal duties or legitimate interests.

### 12. Contact Procedures

In the event that you wish for Ditto to take any action or have any questions or want to exercise your rights as specified in Article 11 in the Policy and Guidelines. You can contact Ditto following the procedures and contact channels or contact the data controller or personal data control officer of Ditto directly, as detailed herein.

12.1 Send a letter to the address number 235/1-3, Rat Phatthana Road, Rat Phatthana Sub-district, Saphan Sung District, Bangkok 10240; or





12.2 Send an electronic letter or email to E-MAIL: [law@dittothailand.com](mailto:law@dittothailand.com); or

12.3 Contact telephone number 02-517-5555 ext. 1305 to report your request to the Personal Data Control Officer of Ditto that sends you a letter or e-mail to confirm your request as stated to Ditto and for further consideration of Ditto's operations.

Details of the data controller include:

Name : Ditto (Thailand) Public Company Limited and its subsidiaries

Contact location : 235/1-3 Rat Phatthana Road, Rat Phatthana Sub-district, Saphan Sung District, Bangkok  
10240

Telephone : 02-517-5555, 086-075-9390

Website : [www.dittothailand.com](http://www.dittothailand.com)

Email : [law@dittothailand.com](mailto:law@dittothailand.com)