

Privacy Policy

IT CITY Public Company Limited and its subsidiaries (collectively referred to as the "Company") engage in the distribution of computer products, peripherals, computer components, televisions, mobile devices, and related products through both online and retail channels. The Company also provides after-sales services, including repair, maintenance, and technical support (collectively referred to as the "Products and Services"). In the course of its business operations, the Company may collect and process personal data relating to you ("Personal Data"), obtained directly or indirectly from customers, business partners, and other individuals.

The Company recognizes the importance of protecting your Personal Data and is committed to processing such data in a lawful, fair, transparent, and secure manner. Accordingly, the Company has established this Privacy Policy ("Policy") to explain the principles and practices governing the collection, use, disclosure, and other processing of Personal Data ("Processing"). The Company will process Personal Data in accordance with this Policy and applicable personal data protection laws and regulations, and will regularly review and update its policies, procedures, and safeguards to ensure continued compliance and the effective protection of Personal Data.

1. Definitions

1.1 Personal Data

"Personal Data" means any information relating to an individual that enables the identification of that individual, whether directly or indirectly. Examples include, but are not limited to, first name, surname, nickname, address, telephone number, national identification number, passport number, social security number, driver's license number, taxpayer identification number, bank account number, credit card number, email address, vehicle registration number, land title deed number, IP address, Cookie ID, social media account, voice recordings, and similar information.

However, the following information is not considered Personal Data, including information relating to deceased persons, data of legal entities, business contact information that does not identify an individual (such as company name, company address, company registration number, business telephone number, work email address, or other business contact details), Anonymous Data, or Pseudonymized Data that cannot be used to identify an individual by technical means.

1.2 Sensitive Personal Data

"Sensitive Personal Data" means Personal Data that is particularly sensitive and may give rise to the risk of unfair discrimination against an individual, including data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health information, disability, trade union membership, genetic data, biometric data, or any other sensitive personal data as prescribed by the applicable personal data protection laws or the Personal Data Protection Committee.

1.3 Data Subject

"Data Subject" means a natural person to whom the Personal Data relates. A Data Subject does not include a person who owns, creates, or collects such Personal Data. The term Data Subject refers

only to a natural person and does not include a juristic person, such as a company, association, foundation, or any other legal entity established under applicable law.

1.4 Personal Data Controller

"Personal Data Controller" means a person, company, or other juristic person that has the authority to make decisions regarding the collection, use, or disclosure of Personal Data.

1.5 Personal Data Processor

"Personal Data Processor" means a person, company, or other juristic person that processes Personal Data on behalf of, or under the instructions of, the Personal Data Controller.

1.6 Data Protection Officer (DPO)

"Data Protection Officer (DPO)" means a person or a committee appointed by the Company to perform duties in accordance with the Personal Data Protection Act B.E. 2562 (2019).

2. Categories of Personal Data

The Company processes Personal Data relating to individuals, including but not limited to customers who use the Company's products and services, service recipients, business partners, contact persons, event participants, job applicants, contractors, employees, interns, and other individuals who have a relationship with the Company. The categories of Personal Data processed by the Company include, but are not limited to, the following:

2.1 General Personal Data

- 1) Personal Information, such as first name, last name, age, date of birth, marital status, national identification number, and passport number.
- 2) Contact Information, such as registered address, current address, workplace address, mobile phone number, home telephone number, household registration information, emergency contact information, and business card information.
- 3) Online Account Information, such as email address, Facebook profile, LINE ID, Twitter profile, YouTube profile, online marketplace profiles, and other similar online account information.
- 4) Government-Issued Identification Information, such as national identification card, driver's license, passport, or other official documents used for identity verification.
- 5) Product and Service Information, such as information relating to product purchases, use of products and services, repair services, product exchanges and/or returns, and warranty registration details.
- 6) Financial Information, such as credit information, payment history, investment information, income, bank account number, credit card number, debit card number, account balance, deposit amount, interest, financial history, asset information, and bankruptcy information.
- 7) Anti-Money Laundering (AML) Information, including photographs, voice recordings, video recordings, and information collected when you enter the

Company's premises through Closed-Circuit Television (CCTV) systems or when you participate in activities organized by the Company.

- 8) Marketing and Customer Engagement Information, including Personal Data provided through marketing activities, inquiries, identity verification, application forms, promotional campaigns, previous participation records, surveys, customer needs assessments, customer satisfaction surveys, analysis of product and service preferences, information relating to the use of products and services, and responses provided via email or other communication channels.
- 9) Website and Online Activity Information, including Personal Data collected through the purchase of products and services via the Company's website, social media account information (Social Media Handle), and information automatically collected through the Company's information systems, such as IP address, browser type, operating system, referring website, pages visited, websites linked from the Company's website, duration of website visits, search activities on the Company's website, as well as real-time geolocation data collected from your mobile device or computer through Location-Based Services (LBS). Such services may utilize Global Positioning System (GPS) signals, Bluetooth, public Wi-Fi hotspots, cellular network towers (Cell Towers), and other technologies to determine the approximate location of your device, where technically feasible.
- 10) Personal Data of Third Parties, including information that you provide to the Company relating to other individuals, such as their name, surname, address, telephone number, relationship with you, occupation, status as a senior executive, authorized representative of a juristic person, attorney-in-fact, director, shareholder, employee, worker, owner, co-owner, or any other Personal Data relating to such individuals. You represent and warrant that you have obtained the necessary consent from those individuals, where required by applicable law, to disclose their Personal Data to the Company and to allow the Company to process such Personal Data in accordance with this Privacy Policy.

2.2 Sensitive Personal Data

- 1) Where necessary, the Company may collect and process your Sensitive Personal Data based on your explicit consent or another lawful basis as permitted under applicable personal data protection laws. The Company will implement appropriate security measures to protect such data and will process it only for the purposes notified to you or as otherwise permitted by law.
- 2) If you participate in activities organized by the Company, either currently or in the future, where additional Sensitive Personal Data (such as health information) may be collected, such information will be collected solely for the purpose of facilitating the activity and ensuring your safety and convenience. In such cases, the Company will obtain your explicit consent prior to collecting and processing your Sensitive Personal Data, unless otherwise permitted by applicable law.

- 3) Except for the processing of certain categories of employee Personal Data, the Company does not intend to collect, use, or disclose your Sensitive Personal Data, such as information relating to race, ethnicity, religion, or religious beliefs, even if such information appears on your national identification card, household registration, or other documents submitted to the Company.

If the documents or information you submit contain Sensitive Personal Data, you are requested to redact such information before submitting them to the Company. Where you have redacted such information, the Company will consider that you have authorized the Company to process the documents without the Sensitive Personal Data, and the submitted documents shall be deemed complete and valid under the Personal Data Protection Act B.E. 2562 (2019).

If the Company is unable to redact such Sensitive Personal Data due to technical limitations or other reasons, the Company will collect such Sensitive Personal Data only to the extent necessary as part of your identity verification documents.

3. Sources of Personal Data

The Company may collect your Personal Data from the following sources:

- 3.1 Personal Data provided directly by you, through the Company's affiliates, or otherwise made available to the Company in connection with the purchase of products or services, membership registration, service requests, inquiries, visits, searches, or through digital channels, the Company's website, authorized representatives, or other channels, including:
 - 1) Customer identity verification, registration, signing to receive products or services, completion of forms prescribed by the Company, submission of supporting documents for conducting transactions with the Company or its stores, and the submission of complaints or service requests.
 - 2) Contacting the Company through various communication channels, such as telephone, email, or other communication channels.
 - 3) Completing surveys or questionnaires, participating in activities or promotional campaigns, or engaging in other similar activities.
 - 4) Security measures, such as presenting your national identification card before entering the Company's premises.
- 3.2 The Company may obtain your Personal Data from you, the Company's customers, other data controllers or data processors, and/or other persons whom the Company reasonably believes have the legal authority to process your Personal Data and disclose it to the Company.
- 3.3 The Company may collect or obtain your Personal Data from sources other than you directly, such as insurance companies, logistics service providers, government authorities, companies within the financial business group, financial institutions, financial service providers, credit information companies, and data service providers. The Company will collect such Personal Data only where your consent has been obtained, where required by applicable law, or where otherwise permitted by law, including:

- 1) Government authorities and regulatory agencies, such as the Royal Thai Police, the Anti-Money Laundering Office (AMLO), the National Credit Bureau Co., Ltd., and other competent authorities.
- 2) Information collected automatically through computer systems, including IP address, browser type, operating system, web pages visited, referring websites, and information obtained from internet searches or social media platforms.

4. Purposes of Processing Personal Data

The Company collects and processes your Personal Data, including your Sensitive Personal Data, only to the extent necessary and on lawful bases for the performance of contracts between you and the Company, compliance with legal obligations, and other purposes as set out in this Privacy Policy, depending on the nature of your relationship and interactions with the Company, including the following:

- 4.1 To establish evidence, verify your identity, authenticate your information, assess and approve your requests, enter into contracts, conduct transactions with the Company, provide warranty services, repair, exchange and/or return products, process membership applications, and facilitate the purchase of products and the use of the Company's services, whether in connection with transactions or contractual relationships with the Company, companies within the Company's group, the Company's business partners, the Company's business associates, other relevant service providers, or Personal Data Processors.
- 4.2 To provide services to customers and service recipients, including the creation of electronic signatures, digital identity verification (e-KYC/KYC), and the prevention and detection of fraud, money laundering, terrorist financing, and other unlawful activities.
- 4.3 To process your requests prior to entering into a contract, perform contractual obligations, procure products or services, arrange procurement, inspect, receive, deliver, track, transport, exchange products and services under the contract, process payments for products and services, manage the Company's relationship with you, and administer all matters relating to the performance of the contract. Failure to process your Personal Data for these purposes may affect the Company's ability to perform its contractual obligations or provide services to you in a continuous and effective manner.
- 4.4 To manage and mitigate risks in accordance with contractual terms and conditions, including resolving disputes arising from contractual relationships, monitoring contract performance, assigning rights, obligations, and benefits under contracts, transferring or assigning receivables, transfers resulting from the transfer of assets or securities lawfully carried out, and pursuing claims arising from breaches of contract.
- 4.5 To establish, exercise, defend, or enforce the Company's legal rights, comply with or respond to legal claims, fulfill legal obligations, and enforce applicable laws.
- 4.6 To comply with legal and regulatory requirements, including reporting information to government authorities such as the Revenue Department, or in response to subpoenas, seizure orders, or lawful requests issued by police officers, government authorities, or courts.

- 4.7 To support the Company's internal operations, including receiving and delivering documents, communicating with customers, disclosing information to agents, contractors, subcontractors, and service providers for operational purposes, as well as risk management, internal audit, internal administration, and the performance of contractual obligations between you and the Company.
- 4.8 To support business planning, reporting, statistical analysis, business forecasting, and customer relationship management, including complaint handling, providing benefits where no direct marketing purpose is involved, conducting investigations, and carrying out other legal proceedings.
- 4.9 To conduct analysis, research, statistical analysis, evaluation, and the improvement and development of the Company's products, services, and platforms to better meet customer needs and preferences, as well as to conduct questionnaires, customer surveys, satisfaction assessments, and to notify you of prizes or the results of participation in the Company's activities.
- 4.10 To carry out marketing and advertising activities, including direct marketing, providing news and updates, offering privileges and sales promotions, recommending products and services, special promotions, value-added services, and other promotional offers, inviting you to participate in events and activities, conducting public relations activities, and sending notifications regarding the Company's current and future products and services, as well as those of the Company's business partners.
- 4.11 To maintain the security of the Company's headquarters and business premises, including visitor registration prior to entry and the recording of visitors' images through Closed-Circuit Television (CCTV) systems.
- 4.12 To protect the life, physical safety, and health of you or other individuals, including emergency contact, disease prevention and control, and other health and safety measures.
- 4.13** To analyze customer and website visitor usage patterns and interests, and the use of the Company's products, or for other purposes relating to technical support and the security of the Company's websites, products, and computer systems. This includes the collection and analysis of usage information, such as Customer Journey Maps, the number and types of reports accessed, features and functions used, and User IDs. The Company may also monitor activities within its products to verify authorized use, respond to customer inquiries, conduct market research, and improve product design, features, and functionality. In addition, the Company may collect information about customers' companies or industries to better understand the types of organizations and industries using the Company's products and services, and to further enhance product quality.

5. Processing of Personal Data

In processing Personal Data, the Company implements appropriate technical and organizational security measures to protect your Personal Data in accordance with confidentiality requirements and applicable laws, and to prevent loss, unauthorized access, use, alteration, modification, disclosure, or destruction. The Company, or third parties authorized by the Company, may process your Personal Data under the following conditions:

5.1 Collection of Personal Data

- 1) The Company may collect and process your Personal Data in documentary and/or electronic form, and store such data on secure servers and/or cloud-based systems with appropriate access controls. Personal Data will be collected lawfully, fairly, and only to the extent necessary for the purposes specified by the Company.

Where required by applicable law, the Company will obtain your consent through electronic means, SMS, or other methods prescribed by the Company before collecting your Personal Data.

Where the Personal Data requested is necessary for the Company to comply with legal obligations or to perform a contract with you, the Company may be unable to sell products, provide services, or perform certain or all of its obligations if you do not provide the requested Personal Data.

- 2) The Company may collect your Personal Data relating to your interests and the services you use. Prior to such collection, the Company will obtain your consent unless:
 - a) it is necessary for compliance with applicable laws;
 - b) it is required for the investigation by an inquiry official or for the adjudication of a court;
 - c) obtaining consent is not possible at the relevant time;
 - d) it is necessary for the legitimate interests of the Company or of another person or juristic person, provided that such interests do not override your fundamental rights and freedoms;
 - e) it is necessary to prevent or suppress a danger to the life, body, or health of any person;
 - f) it is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract; or
 - g) it is necessary for archiving purposes in the public interest, scientific or historical research, statistical purposes, or other purposes permitted by law, provided that appropriate safeguards are implemented.
- 3) The Company may collect and process your Sensitive Personal Data for the purpose of providing services where your explicit written consent has been obtained, where you have chosen to make such information publicly available, or where the processing is otherwise permitted under applicable personal data protection laws.
- 4) Where the Data Subject is a minor, an incompetent person, or a quasi-incompetent person, the Company will process Personal Data in accordance with applicable personal data protection laws while ensuring the highest level of protection for such Personal Data, as follows:
 - a) A minor who is legally permitted to conduct business or other activities, or who is employed under an employment contract in connection with such business or activities, shall be deemed to have the same legal capacity as a person of full age for those purposes. In such cases, the Data Subject may give consent on his or her own behalf, except where applicable law requires consent to be obtained from the person exercising parental authority or legal guardianship.
 - b) A quasi-incompetent person means a person who has been adjudged by a court to be quasi-incompetent due to a physical or mental disability, habitual

intemperance, chronic alcoholism, substance addiction, or other similar conditions, to the extent that the person is unable to manage his or her own affairs or may cause detriment to his or her own property or that of the family. In such cases, consent shall be obtained from the person's legal guardian (curator) before processing Personal Data, unless otherwise permitted by applicable law.

- c) An incompetent person means a person who has been adjudged by a court to be incompetent due to a mental disorder. In such cases, consent shall be obtained from the person's legal guardian before the processing of Personal Data.

5.2 Use of Personal Data

- 1) The Company will use and disclose your Personal Data only for the purposes for which it was collected. If the Company intends to collect, use, or disclose your Personal Data for additional purposes or to change the purposes of processing, the Company will notify you before proceeding, unless otherwise required or permitted by applicable law.
- 2) The Company shall use your Personal Data appropriately and implement appropriate security measures to protect it, including controls over the access, use, and disclosure of Personal Data. The Company shall require its employees, officers, and personnel not to use or disclose your Personal Data beyond the purposes for which it was collected or disclose it to any third party, except where:
 - a) such use or disclosure is required by applicable law, including the Personal Data Protection Act, the Electronic Transactions Act, the Civil and Commercial Code, the Civil Procedure Code, or other applicable laws;
 - b) such use or disclosure is necessary for an investigation conducted by an inquiry official or for judicial proceedings before a court;
 - c) obtaining your consent is not possible at the relevant time;
 - d) such use or disclosure is necessary for the legitimate interests of the Company or another person or juristic person, provided that such interests do not override your fundamental rights and freedoms;
 - e) such use or disclosure is necessary to prevent or suppress a danger to the life, body, or health of any person;
 - f) such use or disclosure is necessary for the performance of a contract to which you are a party, or to take steps at your request prior to entering into a contract; or
 - g) such use or disclosure is necessary for archiving purposes in the public interest, scientific or historical research, or statistical purposes, provided that appropriate safeguards are implemented.
- 3) The Company may engage third-party service providers to support the processing of Personal Data. Such service providers shall implement appropriate security measures to protect Personal Data and shall not collect, use, or disclose Personal Data for any purpose other than those specified by the Company.

5.3 Disclosure of Personal Data

The Company may disclose your Personal Data or other information relating to you that the Company currently holds or may collect in the future to its business partners, customers,

individuals, or juristic persons, within the scope of the purposes previously notified to you. The Company shall ensure that recipients of such information implement appropriate measures to protect your Personal Data and process it only to the extent necessary. Appropriate measures shall also be taken to prevent unauthorized use or disclosure of your Personal Data.

The Company may disclose your Personal Data to the following persons or organizations to support its business operations. The Company shall require such recipients, through contractual obligations, to use your Personal Data solely for the purposes of the disclosure and to return or securely destroy the Personal Data when it is no longer required for those purposes.

- 1) The Company may disclose your Personal Data to recipients in support of its business operations, including financial institutions, banks, credit card service providers, insurance companies, credit information companies, companies within the Company's group, affiliated companies, vendors or service providers participating in procurement processes, and other third parties to whom you have given your consent. The Company may also disclose your Personal Data to other third parties where reasonably necessary, including auditors, legal counsel, professional advisors, service providers, and outsourced service providers who require access to or process Personal Data on the Company's behalf. The Company shall require such recipients, through contractual obligations, to use the Personal Data solely for the purposes for which it has been disclosed and to return or securely destroy the Personal Data when it is no longer required for such purposes.
- 2) In the event of a merger, acquisition, sale of all or part of the Company's business, transfer of assets, corporate restructuring, or business combination, the Personal Data collected by the Company may be transferred as part of the relevant transaction. This includes the disclosure of Personal Data to prospective or actual purchasers, assignees, or other relevant parties involved in such transactions, as well as to any other persons to whom the Company is required to disclose such information for the purposes of completing the transaction.
- 3) The Company may disclose your Personal Data to government authorities and public agencies that are legally authorized to request such information, including the Royal Thai Police, courts, the Office of the Attorney General, inquiry officials, and other competent government authorities, in accordance with applicable laws, court orders, warrants, legal proceedings, regulatory requirements, or other legal processes. The Company may also disclose Personal Data in response to requests made by regulatory authorities or other legally authorized agencies involved in legal proceedings, or where disclosure is reasonably necessary to enforce the Company's terms and conditions of use.
In responding to such requests, the Company will disclose Personal Data only where:
 - a) the disclosure is necessary to protect national security, the public interest, or for law enforcement purposes; or

- b) the disclosure is required or expressly authorized by applicable laws, governmental regulations, or a court judgment.
- 4) The Company may disclose your Personal Data only to the extent necessary to its employees and service providers who require access to such Personal Data in the performance of their duties. This includes the Company's business partners and third parties engaged by or acting on behalf of the Company as Personal Data Processors in connection with the provision of the Company's products and services, such as insurance companies, logistics service providers, repair, maintenance and product improvement service providers, product suppliers, in-store sales personnel, telecommunications operators, payment service providers, sponsors, dealers, and service providers responsible for the Company's invoicing and electronic tax invoice systems.
- 5) The Company's Business Partners that use the Company's information as part of the services they provide, including technology service providers, software and IT system providers, online communication service providers (through secure platforms), or external advertising agencies that display advertisements relating to the Company's products and services. External advertising providers may use your online activity information to deliver advertisements that are relevant to your interests.
- 6) Organizations using the Company's products and services, or third parties authorized by the Data Subject to permit the Company to disclose Personal Data to a Personal Data Processor, where such access is necessary for the performance of the processor's duties. In such cases, the Personal Data Processor shall process Personal Data only in accordance with the Company's instructions and the terms of the Data Processing Agreement entered into between the Personal Data Controller and the Personal Data Processor.

6. Legal Bases for Processing Personal Data

The Company processes your Personal Data based on one or more of the following legal bases, as applicable:

- a) Consent – where you have given your consent to the processing of your Personal Data;
- b) Contract – where processing is necessary to take steps at your request prior to entering into a contract, or for the performance of a contract to which you are a party;
- c) Legal Obligation – where processing is necessary for the Company to comply with its legal obligations;
- d) Legitimate Interests – where processing is necessary for the legitimate interests of the Company or a third party;
- e) Vital Interests – where processing is necessary to prevent or suppress a danger to the life, body, or health of any person; and/or
- f) Public Interest – where processing is necessary for the performance of a task carried out in the public interest, the exercise of official authority, or

on any other legal basis permitted under applicable personal data protection laws.

The Company will process your Personal Data in accordance with the legal basis applicable to each processing activity as described below.

6.1 Consent

The Company may process your Personal Data where you have provided your consent. Details of such processing will be communicated to you as set out in this Policy, the applicable Privacy Notice, and the terms and conditions governing each of the Company's products and services.

For marketing, advertising, and Direct Marketing purposes, the Company may use your Personal Data to present products and services, or related advertisements, that are tailored to your interests, enabling you to receive products and services that better meet your needs and preferences. The Company may also provide you with promotional offers, privileges, special benefits, recommendations, news, notifications, and information regarding products and services that are similar to those you have previously obtained from the Company or that may be of interest to you.

The Company will process your Personal Data for such purposes only where it has obtained your consent, whether directly from you or where you have authorized the Company through its customers, business partners, agents, distributors, or other third parties associated with the Company, in accordance with applicable personal data protection laws.

6.2 Legitimate Interests

The Company may process your Personal Data where such processing is necessary to comply with applicable laws and regulatory requirements, including, but not limited to, securities and exchange laws, tax laws, anti-money laundering laws, computer-related laws, bankruptcy laws, and other applicable laws and regulations of Thailand and other jurisdictions, as well as subordinate regulations, notifications, and rules issued thereunder.

The Company may disclose your Personal Data to competent authorities, government agencies, regulatory authorities, or officials legally authorized to request such information, including the Revenue Department, the Office of the Consumer Protection Board (OCPB), the Royal Thai Police, the Office of the Attorney General, and the courts, as required by applicable law.

6.3 Legal Obligation

The Company may process your Personal Data where such processing is necessary for the legitimate interests pursued by the Company or a third party, provided that such interests do not override your fundamental rights and freedoms. Details of such processing are set out in this Policy and the applicable Privacy Notice.

Under this legal basis, the Company may process your Personal Data for purposes including:

- providing products and services for your benefit;
- analyzing the overall performance of the Company's products and services;
- providing after-sales support and product repairs;

- improving the quality of products and services;
- conducting customer satisfaction surveys before and after the use of products or services;
- preparing internal reports, management reports, research, and statistical analyses for the Company's business operations;
- producing public relations materials and corporate communications;
- using cookies and other technologies necessary for the operation of the Company's websites;
- recording telephone conversations with the Call Center;
- capturing photographs, video recordings, and audio recordings;
- operating and maintaining CCTV systems;
- managing visitor registration and access control at Company premises;
- handling complaints and resolving customer issues;
- conducting customer satisfaction assessments;
- performing risk management, compliance monitoring, auditing, and internal administration;
- sharing Personal Data with companies within the Company's group where necessary for legitimate business purposes;
- anonymizing Personal Data to create Anonymous Data for statistical, analytical, or research purposes;
- preventing, detecting, responding to, and mitigating fraud, cyber threats, and other security incidents; and
- contacting you, recording activities, organizing events or training sessions, and managing registrations for such activities.

6.4 Contract

The Company processes your Personal Data where such processing is necessary for the sale of products, the provision of services, or the performance of obligations and conditions set out in a contract. The Company may collect and process certain categories of your Personal Data where necessary to enter into or perform a contract between you and the Company, or between you and the Company's customers.

Processing under this legal basis includes, but is not limited to, entering into and performing contracts, selling products and providing services upon your request, responding to inquiries, verifying your identity for the use of products and services, conducting customer relationship management, carrying out sales promotion activities, conducting customer needs and satisfaction surveys, and analyzing data relating to the Company's products and services.

If you do not provide the Personal Data required for these purposes, the Company may be unable to enter into or perform the relevant contract, or provide certain products or services to you.

6.5 Vital Interests

The Company may process your Personal Data where such processing is necessary to protect your life, body, or health, particularly where you are unable to provide your consent. Such processing may include health screening and disease prevention measures during infectious disease outbreaks, processing health information to provide first aid when you suffer an injury while under the Company's care or on the Company's premises, and arranging emergency medical treatment or transportation to a hospital where necessary or where there is a threat to life.

7. Your Personal Data Protection Rights

- 7.1 The Company respects your rights relating to your Personal Data and provides you with options to control how the Company contacts you and processes your Personal Data. The Company will respond to your requests in accordance with applicable laws to promote transparency, maintain the accuracy and quality of your Personal Data, and comply with contractual and legal obligations.

Please note that where the processing of your Personal Data is necessary for the performance of a contract or compliance with legal obligations, your refusal to provide consent or Personal Data, where required, may prevent the Company from properly performing the contract or fulfilling its obligations under the agreements, terms, and conditions between you and the Company.

7.2 Your Rights under Personal Data Protection Laws

You are entitled to exercise the following rights under applicable personal data protection laws:

1) Right to Withdraw Consent

Where you have given your consent for the processing of your Personal Data (whether before or after the applicable personal data protection law came into effect), you have the right to withdraw your consent at any time for as long as your Personal Data is retained by the Company.

The Company will inform you that the withdrawal of consent will not affect the lawfulness of any processing carried out based on your consent before its withdrawal. However, your right to withdraw consent may be subject to limitations imposed by law or where consent cannot be withdrawn due to contractual obligations between you and the Company, or where such withdrawal would prevent the Company from achieving one or more of the purposes described in this Policy.

Please note that withdrawing your consent may affect your ability to receive certain services or benefits, such as promotional offers, special privileges, personalized products or services, or information that may be relevant to you. Accordingly, you

should carefully consider the potential consequences before exercising your right to withdraw consent.

2) Right of Access

You have the right to request access to your Personal Data under the Company's responsibility and to request a copy of such Personal Data. You also have the right to request that the Company disclose how your Personal Data was obtained.

The Company may refuse your request where permitted by applicable law, a court order, or where complying with your request would adversely affect the rights and freedoms of other individuals.

3) Right to Data Portability

You have the right to receive your Personal Data in a structured, commonly used, and machine-readable format where the Company has made such Personal Data available in a format that can be read or used by automated tools or devices. You also have the right to request that the Company transmit or transfer such Personal Data in that format to another Personal Data Controller, where technically feasible, or to request that the Company transfer such Personal Data directly to another Personal Data Controller, unless such direct transfer is not technically feasible.

This right applies where your Personal Data has been provided to the Company based on your consent or where the processing is necessary for the performance of a contract to which you are a party, for the provision of the Company's products or services, for taking steps at your request prior to entering into a contract, or where otherwise required by applicable law.

4) Right to Object

You have the right to object, at any time, to the processing of your Personal Data where such processing is based on the legitimate interests pursued by the Company or a third party, or where the processing is carried out for the performance of a task in the public interest, unless the Company can demonstrate compelling legitimate grounds for the processing that override your fundamental rights and freedoms, or where the processing is necessary for the establishment, exercise, or defense of legal claims.

You also have the right to object to the processing of your Personal Data where such processing is carried out for direct marketing purposes or for scientific or historical research, or statistical purposes, subject to applicable laws.

5) Right to Erasure or Destruction

You have the right to request that the Company erase, destroy, or anonymize your Personal Data so that it can no longer be used to identify you, where you believe that your Personal Data has been processed unlawfully or where the Company no longer has a lawful basis or a legitimate purpose to retain your Personal Data for the

purposes specified in this Privacy Policy. This right may also be exercised where you have withdrawn your consent or successfully exercised your right to object to the processing of your Personal Data, subject to the conditions and limitations prescribed by applicable law.

6) Right to Restriction of Processing

You have the right to request that the Company temporarily restrict the processing of your Personal Data while the Company is verifying your request to exercise your rights, considering your objection to the processing, or in any other circumstances where the Company would otherwise be required to erase or destroy your Personal Data under applicable law but you instead request that the Company restrict the processing of such Personal Data.

7) Right to Rectification

You have the right to request that the Company rectify or update your Personal Data to ensure that it is accurate, current, complete, and not misleading.

Where your request relates to correcting information concerning your image or likeness, the Company will make such corrections only to the extent necessary and legally permissible. If the rectification results in costs being incurred, the Company reserves the right to charge you such reasonable costs, where permitted by applicable law.

If you believe that your Personal Data is inaccurate, incomplete, or outdated, you may notify the Company to request that it be corrected, updated, or amended, including any Sensitive Personal Data where applicable. If the Company refuses your request, it will record the refusal together with the reasons for such refusal as evidence.

8) Right to Lodge a Complaint

You have the right to lodge a complaint with the competent supervisory authority or any authority designated under applicable personal data protection laws if you believe that the Company's collection, use, or disclosure of your Personal Data violates or fails to comply with applicable personal data protection laws.

7.3 Exercising Your Rights

Any request to exercise your rights described above must be submitted in writing or through the electronic channels provided by the Company on its website, in accordance with the Company's prescribed procedures. The Company will make every reasonable effort to process your request within a reasonable period and in any event within the timeframe required by applicable law.

However, the Company reserves the right to refuse your request where an exemption under applicable law applies, where compliance with the request would prevent the Company from fulfilling its contractual obligations or adversely affect the performance of such obligations,

where it would prevent the Company from providing certain rights, benefits, or welfare to which you may otherwise be entitled, where the refusal is required pursuant to a court order, or where complying with the request would likely prejudice the rights and freedoms of other individuals.

The Company will record, review, and respond to your request within a reasonable period. The Company also reserves the right to charge a reasonable fee for processing your request, where permitted by applicable law and in accordance with the Company's fee schedule.

7.4 Verification of Identity

In certain circumstances, the Company may require you to verify your identity before processing your request to exercise your rights in order to protect your Personal Data and ensure the security of your information. Certain rights may also be subject to limitations under applicable law. Where the Company is unable to comply with your request, it will notify you accordingly and provide the reasons, where required by law.

7.5 Limitations on the Exercise of Rights

Where the Company processes your Personal Data on the basis of contractual necessity, legitimate interests, or legal obligation, the Company may refuse your request to exercise certain rights, including requests to access, restrict, or object to the processing or disclosure of your Personal Data, or requests to erase or destroy your Personal Data, where such refusal is permitted under applicable law.

The Company may also refuse your request where it is necessary to continue retaining your Personal Data for purposes permitted or required by applicable law, including but not limited to compliance with legal obligations, the establishment, exercise, or defense of legal claims, the performance of contractual obligations, or other lawful purposes.

- 1) To carry out activities consistent with the purposes for which the Company collected your Personal Data, including providing the products or services you have requested, conducting activities reasonably necessary within the scope of the business relationship between you and the Company, or performing the Company's contractual obligations to you.
- 2) To investigate incidents relating to information security, prevent harassment, fraud, deception, or other unlawful activities, and to establish, exercise, or defend legal claims against persons responsible for such acts.
- 3) To monitor the performance of the Company's services and to identify, investigate, and rectify errors or technical issues that may affect the normal operation of products or services.
- 4) To conduct scientific, historical, or statistical research, whether by the Company or by qualified researchers, for the public interest, provided that such processing is carried out in accordance with applicable ethical standards and personal data protection laws, and where the erasure of the Personal Data would seriously impair or render impossible the achievement of the research objectives.

- 5) To carry out internal operational activities that are reasonably necessary, consistent with your reasonable expectations arising from your relationship with the Company, and compatible with the purposes for which your Personal Data was originally collected.
- 6) To comply with applicable laws, regulations, rules, and other legal requirements.

8. Retention Period for Personal Data

8.1 The Company will retain your Personal Data only for as long as necessary to fulfill the purposes of processing set out in this Privacy Policy, as follows:

- 1) Where you provide Personal Data to the Company in your capacity as a customer or contracting party, the Company will retain your Personal Data for as long as necessary to provide the requested products or services throughout the contractual period and for ten (10) years after the expiration of the contract or the termination of your relationship with the Company, unless a longer retention period is required or permitted by applicable law, or where retention is necessary for the processing of specific categories of Personal Data, or to comply with applicable laws, regulations, or lawful orders issued by competent government authorities.
- 2) The Company will retain your Personal Data in accordance with the category of activity and the purposes of processing specified in the applicable Privacy Notice.
- 3) Where you provide your Personal Data to the Company in your capacity as a member, the Company will retain your Personal Data for as long as you remain a member of the Company.
- 4) Where your Personal Data is collected through the Company's application, the Company will retain such data until you delete your user account.
- 5) Where the Company processes your Personal Data based on your consent, the Company will continue to process and retain such Personal Data until you withdraw your consent and the Company has completed the actions necessary to process your withdrawal request.
- 6) In all other cases, the Company will retain your Personal Data only for as long as reasonably necessary to fulfill its legal and business obligations and the purposes set out in this Privacy Policy. Where a specific retention period cannot be determined, the Company will retain your Personal Data in accordance with generally accepted retention standards (for example, up to ten (10) years, where permitted by applicable law). Where legal proceedings are ongoing, your Personal Data may be retained until such proceedings have been concluded, together with any additional period necessary to fulfill the relevant purposes. Upon expiry of the applicable retention period, your Personal Data will be securely deleted or anonymized, unless further retention is required or permitted by applicable law.

8.2 Data Retention and Disposal

Upon expiry of the applicable retention period, the Company will securely delete, destroy, anonymize, or otherwise dispose of your Personal Data so that it can no longer be used to identify you, in accordance with applicable personal data protection laws and regulations.

Notwithstanding the foregoing, the Company may retain certain Personal Data beyond the specified retention period where such retention is required to comply with applicable laws, lawful orders of competent authorities or government agencies, or where retention is necessary for legitimate business purposes or other lawful grounds.

9. Cookies

9.1 Cookies

Cookies are small text files that a website stores on the device of a visitor when they access the website. Cookies enable the website to recognize and remember the user's preferences and settings, such as the selected language, login status, or other personalized preferences. When you revisit the website, these cookies allow the website to recognize your device and provide a more efficient and personalized user experience. Cookies will remain on your device until they expire, are deleted by you, or you configure your browser or device settings to reject or disable cookies.

9.2 Use of Cookies

The Company uses cookies to record information such as your login, logout, and other information generated during your use of the Company's website. Cookies are used to improve the functionality, performance, content, and marketing effectiveness of the Company's website, and to enhance the quality of the services provided based on your preferences and interests.

Cookies also enable the Company to analyze website usage, including the date and time of visits, pages viewed, navigation paths, referring websites, and visitor behavior. They also help detect and prevent unauthorized or prohibited activities.

For certain services, the Company may offer you the option to save your username or password in cookies, so that you do not need to re-enter your credentials each time you visit the Company's website. In addition, the Company may use Flash Cookies (or similar technologies) to display website content in a manner tailored to your individual preferences and usage characteristics.

When you subscribe to the Company's services, register to receive newsletters or email notifications, complete online forms, or participate in surveys, the Company may collect browser information and combine information obtained through cookies and other online technologies with other Personal Data already held by the Company, where permitted by applicable law and for the purposes described in this Privacy Policy.

9.3 Cookie Preferences

You may manage your privacy preferences by choosing whether to accept or reject cookies. However, if you choose to reject or disable cookies, certain features or services on the Company's website may not function properly or at full capacity. As a result, your access to certain functions or your overall user experience may be limited or less convenient.

10. Cross-Border Transfer of Personal Data

10.1 The Company may transfer your Personal Data to its affiliates or to third parties located outside your country where such transfer is necessary:

- to perform a contract to which you are a party;
- to take steps at your request prior to entering into a contract;
- to perform a contract between the Company and another individual or legal entity for your benefit;
- to protect the vital interests of you or another person;
- to comply with applicable laws; or
- where necessary for reasons of substantial public interest.

10.2 The Company may store your Personal Data on servers or cloud infrastructure operated by third-party service providers and may utilize third-party software or applications, including Software-as-a-Service (SaaS) and Platform-as-a-Service (PaaS) solutions, for the processing of your Personal Data. The Company will ensure that unauthorized persons are not permitted to access your Personal Data and will require all such service providers to implement appropriate technical and organizational security measures to safeguard your Personal Data in accordance with applicable data protection laws.

10.3 Where the Company transfers your Personal Data to a foreign country, the Company will comply with applicable personal data protection laws and implement appropriate safeguards to ensure that your Personal Data remains adequately protected and that you are able to exercise your rights in accordance with applicable law. The Company will require recipients of your Personal Data to implement appropriate technical and organizational measures to safeguard your Personal Data, process such data only to the extent necessary for the specified purposes, and prevent any unauthorized access, use, disclosure, alteration, or processing.

11. Information Security

The Company recognizes the importance of protecting your Personal Data and has implemented appropriate technical and organizational security measures consistent with applicable data protection laws and internationally accepted information security standards. These measures are designed to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, or any other unlawful form of processing.

The Company applies access controls and the principle of least privilege, ensuring that only authorized personnel with a legitimate business need are permitted to access or process your

Personal Data. Such measures are intended to preserve the confidentiality, integrity, and availability of your Personal Data and to prevent unauthorized use or disclosure.

11.1 Information Security Measures

The Company implements appropriate technical, physical, and organizational security measures to protect Personal Data against unauthorized access, use, disclosure, alteration, destruction, or other unlawful processing, taking into account the nature of the Company's business operations, applicable legal requirements, and generally accepted industry standards.

The Company provides regular training to its employees on personal data protection and information security to ensure that Personal Data is handled securely and in compliance with applicable laws and internal policies.

In addition, the Company requires its vendors, contractors, and service providers to implement appropriate safeguards when processing, transferring, managing, or storing Personal Data on the Company's behalf. The Company also conducts periodic reviews and assessments of these security measures and continuously improves them as necessary to ensure compliance with applicable legal, regulatory, and industry standards, and to maintain an appropriate level of protection for Personal Data.

11.2 Information Security Governance and Controls

The Company establishes policies, procedures, operational guidelines, and security controls to ensure the secure management of Personal Data and to prevent unauthorized access, use, disclosure, alteration, or destruction. These measures include the following:

- 1) Establishing clear policies and operational procedures for the protection and secure management of Personal Data in compliance with applicable data protection laws and regulations.
- 2) Prohibiting the sale, transfer, or disclosure of Personal Data to any unauthorized third party. Personal Data will only be disclosed to authorized Data Processors or recipients as permitted by applicable law or under contractual arrangements.
- 3) Restricting access to Personal Data by implementing role-based access controls and ensuring that employees may access Personal Data only to the extent necessary for the performance of their duties.
- 4) Preventing unauthorized access through appropriate security controls, including data encryption, identity verification, authentication mechanisms, and malware detection technologies, where appropriate.
- 5) Conducting due diligence on business partners and service providers, and requiring them to comply with applicable data protection laws and contractual obligations governing the processing, transfer, management, and protection of Personal Data, including appropriate restrictions on the use of such data.

- 6) Monitoring and reviewing the Company's websites and information systems through personnel or units responsible for personal data protection and information security to identify and mitigate potential security risks.
- 7) Providing regular training and awareness programs on personal data protection and information security for employees, staff members, and other personnel to ensure compliance with the Company's policies and applicable legal requirements.
- 8) Regularly evaluating and reviewing the effectiveness of the Company's personal data protection practices, data management processes, and information security measures to ensure continual improvement and ongoing compliance with applicable laws, regulations, and recognized industry standards.
- 9) The Company shall implement procedures to securely delete, destroy, or anonymize Personal Data once the applicable retention period has expired, or when such Personal Data is no longer relevant or necessary for the purposes for which it was collected and processed.
- 10) The Company shall implement appropriate technical, physical, and organizational security measures to protect Personal Data against unauthorized access, use, disclosure, alteration, destruction, or other unlawful processing by unauthorized persons or individuals without a legitimate need to know. Such measures shall be proportionate to the Company's business operations and aligned with generally accepted security standards. The Company shall also periodically review and update its information security controls to ensure they remain effective and appropriate in response to evolving technologies, emerging threats, and changes in the business or regulatory environment.

12. Links to Third-Party Websites and Services

The Company's website may contain links to third-party websites or services. Such third parties may collect information regarding your use of their services, including your Personal Data. The Company does not control and is not responsible for the privacy practices, security measures, or content of any third-party websites or services.

You are encouraged to review the privacy policies of any third-party websites or services before providing your Personal Data or using such websites or services, as those privacy practices are governed solely by the respective third parties.

13. Continued Use of Personal Data for the Original Purpose

The Company may continue to collect, use, and process your Personal Data that was collected prior to the effective date of the applicable Personal Data Protection Law, provided that such processing remains consistent with the original purposes for which the Personal Data was collected.

If you no longer wish the Company to continue collecting, using, or processing your Personal Data for those original purposes, you may withdraw your consent at any time through the communication channels designated by the Company, subject to applicable legal requirements and any lawful basis permitting the continued processing of your Personal Data.

14. Contact Information

If you believe that the Company's processing of your Personal Data does not comply with the Personal Data Protection Act B.E. 2562 (2019) or other applicable data protection laws, you may contact the Company's Data Protection Officer (DPO) using the details below:

Data Protection Officer (DPO)

IT CITY Public Company Limited

Head Office

555 The Palladium World Shopping, Floors B1, B2 and 5

Ratchaprarop Road, Makkasan, Ratchathewi,

Bangkok 10400, Thailand

Email: dpo@itcity.co.th

Telephone: +66 (0)2 656 5030

15. Changes to this Privacy Policy

The Company may revise, amend, or update this Privacy Policy from time to time to ensure compliance with applicable laws, regulatory requirements, and evolving business practices. Where material changes are made, the Company will notify you through the Company's website and/or other communication channels deemed appropriate.

To ensure that you are informed of the Company's current privacy practices, you are encouraged to review this Privacy Policy whenever you access the Company's website or use the Company's products or services.