

## **Privacy Notice For Business Partners, Contracting Parties and Related Persons**

Matching Maximize Solution Public Company Limited and group of companies (hereinafter collectively referred to as the “the Group”) pledges to protect the personal data of business partners, partners, contract parties and related persons (hereinafter collectively referred to as “You”) in accordance with the Personal Data Protection Act 2019.

This notice is to inform that the Group is designated as a “data controller” under the Personal Data Protection Act 2019, whereby it collects, uses, or discloses personal data; and to inform the personal data subjects of the purpose of the legal data collection, the collection period, disclosure of the personal data, information about the controller of the personal data, and the rights of the data subject, in accordance with the Personal Data Protection Act 2019. The Group therefore issues this privacy protection policy notice to inform its business partners, other partners, contract partners, or related persons of the nature and reasons for collecting, using, and disclosing personal data.

This privacy protection policy notice is issued in accordance with Section 23 of the Personal Data Protection Act and is published by Matching Maximize Solutions Public Co. Ltd. and the companies listed in the attachment to this notice, with the exception of any company that has published its own privacy protection policy notice in accordance with Section 23 of the Act, in which case the details of such policy will be in accordance with said notice.

The Group may make amendments to this notice as deemed appropriate and will announce any such revisions or changes. This policy notice is effective from the date of its announcement.

### **1. Personal data that the Group will collect**

Personal data means any information about an individual that makes it possible for said individual to be identified, whether directly or indirectly, excluding any information about deceased persons. The Group collects your personal data as follows:

### 1.1 Personal data is:

- (1) The Group collects your personal data when business partners, other partners, contract partners or related persons contact us, sell products, provide services, or enter into any transactions with the Group, such as:
  - (a) Information that can be used to verify identity, such as name, surname, number and information contained on Identification Card, photographs, and other information that can verify identity.
  - (b) Specific contact information including information contained on name cards, for example first name, surname, job title, telephone number, email address, work address, social media contacts.
  - (c) Information about your work operations, such as historical and operational information, information about your employment, and management of your safety, health, and work environment, including accounting and financial information such as compensation and bank account numbers.
- (2) When you contact, or have any transactions with, the Group, certain personal data may be collected, as follows:
  - (a) Personal data such as name, surname, date of birth, photographs, identification car number, drivers' licence number, passport number.
  - (b) Contact information such as email address, telephone number, address or social media information.
  - (c) Information about participation in activities such as records of participation.
- (3) When you enter the premises of the Group where closed circuit cameras are installed ("CCTV cameras"), the Group may collect your image from the CCTV cameras. However, the Group does not collect audio data from the CCTV cameras, and will post signs informing that closed circuit TV cameras operate in the area of the Group. (This applies only to companies within the Group that have installed CCTV cameras).
- (4) In the event that you use the Wi-Fi service of the Group, you may be required to register with personal data to use the service, and such information may be collected by the Group, such as name, surname, phone number, email address, search history, etc.

## 1.2 Sensitive data is

- (1) The Group may be required to collect and process sensitive personal data in accordance with the law. Protection of personal data stipulates that it may be used for the purposes stated by the Group in this notice, such as:
  - (a) In some cases, the Group may collect sensitive personal data, for example the Group may need to use your Identification Card, which contains information about your religion and blood group, in order to verify your identity, or to process tax payments or contracted price.
  - (b) When the Group needs to use such information for security purposes, such as taking fingerprints for identification purposes.
  - (c) Health information, such as food allergies for use in relevant activities (if applicable).
- (2) Where necessary, the Group will process your sensitive data only with your express consent or for other purposes as required by law. In such cases, the Group will use its best efforts to provide adequate security measures to protect your sensitive personal data.

## 2. Purpose of processing personal data

2.1 To be used to process requests from business or other partners, contracted parties or other relevant persons before entering into a contract; or to fulfill a contract or transaction with business or other partners, contracted parties, or relevant persons as the case may be.

2.2 For the legal interests of the Group, such as:

- (1) To fulfill the execution of a contract between you and the Group, whereby the Group processes your sensitive personal data to meet its contractual duties, procurement, inspection, payment of goods and services, auditing, and evaluating the performance of the terms as set forth in the contract or other relevant documents.
- (2) For the legal interests of the Group such as for the internal management of the Group, development and operational management to facilitate business operations. This includes

- the management and development of products and/or services (including websites and applications); research, such as surveys and interviews; fraud detection and investigation of crimes; and maintenance of information systems.
- (3) For safety reasons, such as security measures. This includes IT systems and information such as entering the Group's premises, and logging in to the Group's websites or applications.
  - (4) For marketing research and providing news or information via pamphlets, email, SMS, applications, social media, phone calls, and direct mail.
  - (5) For legal claims.
- 2.3 To protect and minimize danger to the life, person or health of you or others, such as emergency contacts, and the control and prevention of communicable diseases.
- 2.4 To comply with the law, such as to comply with legal provisions, regulations, and orders of those with legal authority.
- 2.5 For the performance of duties for the public benefit or in exercising powers granted to the Group by the state.
- 2.6 In the event that you give your consent, the Group will process your personal data according to the objectives as outlined in each item of consent as follows:
- (1) In order for the Group to process your personal data in addition to the aforementioned, the Group may collect additional personal data for which the Group will contact you to request your consent from time to time.
  - (2) You can check the details of consent in Article 4.

### **3. Changes in the purpose of processing personal data**

The Group will use your personal data only for the purposes for which it was collected. In the event that the Group needs to use your personal data for other purposes it will notify you as soon as possible.

#### **4. Asking for consent and possible effects of withdrawing consent**

4.1 In the event that the Group collects and processes your personal data with your consent, you have the right to withdraw such consent at any time. Such withdrawal of consent will not affect any information collected, used, disclosed, or processed prior to consent being withdrawn.

4.2 If you withdraw the consent previously given to the Group or refuse to provide certain information, this may affect the Group's ability to fulfill some or all of the purposes as described in this Privacy Policy.

#### **5. How your personal data is collected**

The Group collects your personal data from the information submitted by you for the purposes of selling products, providing services, or any other transaction with the Group; or through its websites or social media; or via telephone. The Group collects information about your use of its websites via cookies (please refer to the Cookies Policy of each company within the Group whose website you accessed).

#### **6. Disclosure of your personal data to others**

6.1 The Group may disclose and share your personal data with:

- (1) Companies within the Group as listed in the attachment, and
- (2) Other persons and juristic persons that are not companies within the Group ("Other Persons") for the purposes of collecting and processing personal data as outlined in this Privacy Policy, such as distributors, dealers, transportation service providers (eg. post office), data processing service providers, marketing service providers, contractors, transaction and financial service providers (eg. banks, bill payment service providers), technology service providers (eg. cloud systems, blockchain systems, SMS service providers), data analytics service providers, auditors, insurance companies, consultants, government agencies (eg. Revenue Department, Anti-Money Laundering Commission), and other persons necessary to enable the Group to operate its business and provide services to you, including any action for the purposes of collecting and processing personal data as described in this Privacy Policy.

6.2 The Group requires that any persons receiving information from the Group take the necessary measures to protect your personal data; and only process such data as required, taking the necessary steps to prevent the unauthorized use or disclosure of personal data.

## **7. Transfer of personal data abroad**

7.1 The Group may transmit or transfer your personal data to a company within the Group located in a foreign country to comply with the terms of any contract to which you are a signatory; or in accordance with a contract between the Group and an individual or juristic person for your benefit; or for the processing of a request from you prior to entering into a contract; or to protect or minimize danger to the life, person or health of you or others; or to comply with the law; or as is necessary to meet the needs of the public interest.

7.2 The Group may retain your data on computer servers or cloud services provided by third parties, and may use the programmes or applications of third parties in the form of software or platform services to process your personal data. However, the Group will not allow unrelated persons to access your personal data, and will require the third party service providers to maintain adequate security measures.

7.3 To protect your personal data sent overseas, the Group has established a policy to protect data sent or transferred overseas by sending it to the personal data controller or personal data processor employed by the Group located overseas.

## **8. Personal data security**

8.1 The Group has implemented technical security measures to protect personal data. It prevents personal data being accidentally lost, accessed, disclosed, or altered unlawfully or without the necessary authority.

8.2 The Group provides appropriate security measures. Access to your personal data by employees, representatives, contractors, or third parties is limited. The Group will only allow persons who need access to be able to perform their duties to access the information. In any case where a third party needs to process your personal data, it will be processed in accordance with directions from the Group, and the Group will assign such third parties to be responsible for protecting your personal data and for complying with applicable data privacy protection laws.

## **9. Period of personal data collection**

- 9.1 The Group will retain your personal data for the period of time necessary to achieve the purposes for the relevant category of personal data unless the law allows it to be retained for a longer period. In the event that the period of time cannot be specified, the Group will retain the data for a period that may be reasonably expected in accordance with accepted standards (eg. the general legal practices of up to 10 years).
- 9.2 In the case of closed circuit TV cameras, the Group will retain the data (1) in normal circumstances for a maximum period of 60 days; (2) in cases where necessary, such as where the data is required as evidence in an investigation or litigation, or where the personal data subject requests it, the personal data may be retained for a period of more than 60 days, and the Company will delete the data when the objectives have been met.
- 9.3 The Group has established an auditing system to delete or destroy the personal data after the retention period has expired or is no longer necessary for the purposes for which the personal data was collected.
- 9.4 In the event that the Group uses your personal data with your consent, the Group will process the information until such time as you request to cancel your consent and the Group has completed your request. However, the Group will keep your personal data to the extent necessary to keep a record that you have withdrawn consent, so that the Group may respond to your future requests.

## **10. Rights of the personal data subject**

- 10.1 According to the conditions outlined in the Personal Data Protection Act 2019, you have the following rights:
- (1) The right to request to withdraw consent that you have given to the Group to process your personal data.
  - (2) The right to request access to, and to obtain a copy of, your personal data which is the responsibility of the data controller, or to request disclosure of the acquisition of your personal data.
  - (3) The right to send or transfer personal data in electronic format to another personal data controller, in accordance with the Personal Data Protection Act.

- (4) The right to object to the collection, use, or disclosure of your personal data.
- (5) The right to request that the personal data controller delete, or destroy, or make anonymous your personal data.
- (6) The right to request that the personal data controller suspend the use of your personal data.
- (7) The right to request that the personal data controller ensure that your personal data is correct, up-to-date, complete, and not be a possible cause of misunderstanding.
- (8) The right to complain to the Personal Data Collection Committee in the event that the Group or the personal data processor, including employees or contractors of the Group, violates or fails to comply with personal data protection laws. The Group will consider the request to exercise such rights and notify the result of their consideration within 30 days of receipt of such request in accordance with the Personal Data Protection Act and related laws.

10.2 You can exercise your legal right by filling in the relevant information and your request in the Request Form, or Withdrawal of Consent Form, on the Group's websites. You may begin to exercise your rights when the section of the personal data protection laws apply to the Personal Data Controller.

## **11. Information about the data controller or Personal Data Protection Officer**

In the event that you have questions about the collection, use, or disclosure of your personal data, you can contact the personal data controller or Personal Data Protection Officer (DPO) via the following channels:

11.1 Personal Data Controller, Matching Maximize Solutions Public Co. Ltd.

Contact address: 305/12 Soi Sukhothai 6, Sukhothai Rd., Dusit sub-district, Dusit district, Bangkok. Tel: 02 669 4200. Email: [dpo@mmsbangkok.com](mailto:dpo@mmsbangkok.com)

11.2 Personal data controllers of each Company within the Group as per the details in the attachment to this policy notice.

Announced on 1 August 2021



## Attachment

### Companies in the Group and Data Controllers

<b>Company and Personal Data Controllers</b>	<b>Contact details for Data Controllers and personal data protection officers</b>
Matching Maximize Solutions Public Co. Ltd.	305/12 Soi Sukhothai 6, Sukhothai Rd., Dusit sub-district, Dusit district, Bangkok. Tel: 02 669 4200
Gearhead Co. Ltd.  -Branch office	999 Moo 2, Bang Bo sub-district, Bang Bo district, Samut Prakan. Tel: 02 940 0787-90 779/34 Pracha Uthit Rd., Samsen Nok sub-district, Huay Kwang district, Bangkok. Tel: 02 691 6394-97
The Studio Park (Thailand) Ltd.  -Branch office	305/12 Soi Sukhothai 6, Sukhothai Rd., Dusit sub-district, Dusit district, Bangkok. Tel: 02 669 4200 999 Moo 2, Bang Bo sub-district, Bang Bo district, Samut Prakan. Tel: 02 940 0787-90