



## MKS Jewelry International Co., Ltd.

### Data Privacy Protection Policy

MKS Jewelry International Company Limited (hereinafter referred to as the "Company" or "we") recognizes the importance of protecting the personal data (Data Privacy) of data subjects, including personnel, employees, and job applicants. The right to privacy is a fundamental human right that must be safeguarded and complied with in accordance with applicable laws and regulations. To uphold this commitment, the Company has implemented strict and systematic controls to ensure that personal data is secure and that any data collection, use, or disclosure is carried out transparently and in line with the standards set by the relevant regulatory authorities.

This Privacy Policy is intended to inform data subjects of how the Company handles their personal data—including its collection, use, and disclosure—as well as to explain the rights of the data subjects. This policy applies to all activities carried out by the Company that involve the processing of personal data.

#### 1. Definitions

In this Privacy Policy, the following terms shall have the meanings assigned below:

**"Company"** refers to MKS Jewelry International Company Limited.

**"Person"** means a natural person.

**"Personal Data"** means any information relating to a person that enables the identification of that person, whether directly or indirectly, but does not include information of deceased persons.

**"Sensitive Personal Data"** (Sensitive Data) refers to personal data that poses a risk of unfair discrimination, including but not limited to: race, religion, sexual behavior, criminal records, health data, disability, genetic data, biometric data, or other data as specified by law.

**"Incapacitated Persons"** means minors, incompetent persons, or quasi-incompetent persons as defined under the Civil and Commercial Code.

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

**"Data Subject"** means any natural person who is personnel, employee, job applicant, or related individual; customer or service user; business partner; website or mobile application visitor; company executive; or any person having a legal relationship with the Company. In this policy, the term may be referred to simply as the "Data Subject."

**"Website"** means the Company's official website, owned or operated by the Company.

**"Application"** means any application provided by the Company. This Privacy Policy also applies to any parts of the application that are modified, updated, or upgraded, except where separate terms and conditions apply.

**"Data Controller"** refers to the Company, which has the authority to make decisions regarding personal data—such as receiving personal data from the data subject, providing services to the data subject, or performing obligations under a contract with the data subject, either directly or indirectly.

**"Data Processor"** means a natural or juristic person who processes personal data on behalf of or under the instructions of another person or entity.

**"Data Collection"** refers to the act of acquiring or obtaining personal data.



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**“Data Processing”** means any operation performed on personal data, whether by automated means or not, such as collection, recording, organization, storage, use, disclosure, alteration, making available, merging, deletion, or destruction.

### **2. Objectives**

This Privacy Policy is established to protect the personal data of data subjects who conduct transactions with, use the services of, have a vested interest in, or are otherwise involved with the Company. The objectives are as follows:

2.1 To define the roles and responsibilities of departments, management, and personnel involved in personal data matters.

2.2 To establish procedures and security measures, or any other appropriate measures, to protect personal data in accordance with applicable laws.

2.3 To provide operational guidelines for personnel involved in the processing of personal data or any related activities.

2.4 To build trust and confidence in the Company’s personal data protection practices among individuals, customers, partners, service users, and all other stakeholders involved with personal data.

### **3. Collection of Personal Data**

The collection, use, or disclosure of personal data by the Company shall be carried out in accordance with personal data protection principles, which include the following (1) Lawfulness, Fairness, and Transparency – Personal data shall be collected, used, or disclosed lawfully, fairly, and in a transparent manner that is verifiable. (2) Purpose Limitation – Personal data shall be collected, used, or disclosed only within the scope and for the purposes specified by the Company and shall not be used or disclosed beyond those purposes. (3) Data Minimization – The collection, use, or disclosure of personal data shall be limited to what is adequate, relevant, and necessary in relation to the specified purposes. (4) Accuracy – Personal data shall be accurate and, where necessary, kept up to date. (5) Storage Limitation – Personal data shall be retained only for as long as necessary for the purposes for which it was collected. (6) Integrity and Confidentiality – Personal data shall be processed with appropriate security measures to ensure its integrity and confidentiality.

The retention period for personal data shall be in accordance with the duration specified in contracts, legal prescription periods, or other periods as required by law, quality standards, or Company regulations. The collection of personal data shall be limited to what is necessary and directly related to the stated purposes. The Company shall notify data subjects before or at the time of collection, including the following details:

3.1 The Company collects personal data for the following purposes: (1) To provide services, improve service quality, support sales and marketing activities, conduct data analysis, and enhance overall service efficiency; (2) For the benefit of the data subject, including offering promotions or privileges tailored to their interests; (3) For procurement, human resources, and related operational purposes; (4) To comply with legal obligations. Should there be any changes in the purposes for which personal data is collected, the Company will promptly notify the data subjects.

3.2 The Company may collect personal data such as: full name, address, date of birth, gender, education history, phone number, email address, national identification number, credit/debit card information, bank account details or other banking/payment information, IP address, service numbers, cookies, MAC address, user account information, service usage records, communication logs between the data subject and the Company, and any other information that may arise during the course of service usage. Personal data will be retained only for as long as necessary to fulfill the specified processing purposes and as required by applicable laws. Once the



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retention period has expired or the Company no longer has a lawful basis to retain or process such data, the Company will securely destroy the personal data in a manner compliant with legal requirements.

3.3 In cases where the provision of personal data is required by law, a contract, or for entering into a contract, the Company will inform the data subject of the potential consequences of not providing such data.

3.4 The Company may disclose personal data to individuals or entities such as government agencies or service providers when required by law, for security purposes, or to facilitate service provision. Any such disclosure will be limited strictly to what is necessary.

3.4.1 Service request forms or procedures for submitting requests to exercise data subject rights

3.4.2 Questionnaires or email correspondence

3.4.3 Through the Company's website or mobile application

3.4.4 Via short message service (SMS)

3.4.5 Other communication channels between the data subject and the Company, as determined by the Company's procedures

3.5 Some of the personal data collected by the Company may include sensitive personal data, for which the Company will obtain explicit consent from the data subject in advance. Examples of such data include race, religious beliefs, health information, criminal records, and labor union membership. The Company will collect such data only when necessary to comply with applicable laws and regulations. Consent will be obtained prior to or at the time of collection, use, or disclosure of the sensitive personal data, except in the following circumstances:

(1) For research or statistical purposes, and only when necessary to protect the rights and freedoms of the data subject

(2) To prevent or suppress danger to the life, body, or health of the data subject or another person

(3) To fulfill contractual obligations or to take steps at the request of the data subject prior to entering into a contract

(4) To perform a task carried out in the public interest or in the exercise of official authority

(5) For legitimate interests related to the Company's operations

(6) To comply with a court order or a legal obligation, such as those under the Communicable Disease Act, Computer Crime Act, Cybersecurity Act, or the Anti-Money Laundering Act

(7) Where the data has already been lawfully made public

3.6 In cases where a data subject provides the Company with personal data of third parties—such as a spouse, family members, or friends (e.g., for use as emergency contact information)—the data subject must confirm and warrant that such individuals have given their consent for the collection, use, and disclosure of their personal data in accordance with this Privacy Policy.

3.7 In cases where the Company relies on consent—or explicit consent—as the legal basis for collecting, using, or disclosing personal data, such consent must be obtained explicitly. The Company will obtain this consent in writing or through an electronic system, unless the nature of the situation prevents it from doing so.

When requesting consent, the Company will clearly inform the data subject of the purpose for which their personal data is being collected, used, or disclosed. The request for consent must be separated from other content, be presented in an accessible and understandable format, use clear and simple language, and must not be deceptive or misleading in a way that could confuse the data subject regarding the actual purpose of consent.



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In obtaining consent, the Company will respect the data subject's autonomy and ensure that the giving of consent is entirely voluntary. The Company shall not impose consent as a condition for entering into a contract or receiving services if the personal data in question is not necessary or relevant to that contract or service.

Data subjects have the right to withdraw their consent at any time, and such withdrawal shall be as easy to perform as the act of giving consent—unless limited by law or a contract that benefits the data subject. A withdrawal of consent shall not affect the lawfulness of the data processing that was based on consent prior to the withdrawal. However, if the withdrawal may have consequences or affect the data subject's rights or services in any way, the Company will inform the data subject of such potential impacts.

For consent involving the collection, use, or disclosure of personal data of minors who are not legally of age through marriage or do not have the legal capacity equivalent to adults as prescribed under Section 27 of the Civil and Commercial Code—including incompetent or quasi-incompetent persons—or for the withdrawal of consent by such individuals, the Company shall act in strict compliance with the requirements under the Personal Data Protection Law.

### **4. Use or Disclosure of Personal Data**

The use or disclosure of personal data shall be in accordance with the specified purposes or when necessary for a purpose that is directly related to the original purpose of data collection. The Company may disclose personal data to individuals or external entities when necessary, such as: The Department of Labor Protection and Welfare, The Legal Execution Department, The Student Loan Fund, The Technology Crime Suppression Division, National security or law enforcement agencies. Such disclosures will be conducted only to the extent necessary and strictly for the purpose of complying with legal obligations.

### **5. Purposes of Personal Data Processing**

The Company processes personal data based on specified purposes and lawful grounds as follows:

#### **5.1 Processing based on Contractual Grounds**

Examples include:

5.1.1 When customers, contractual parties, or service users contact the Company for service proposals or contract execution, they are required to provide personal data to enable the Company to process such data for service delivery, contract fulfillment, communication, and performance tracking.

5.1.2 When personnel apply for employment or conduct business-related transactions with the Company via various channels, they are required to provide personal data for processing in relation to recruitment, hiring decisions, payroll calculations, employee benefits, communications, and notifications regarding entitlements, changes in employment terms, inquiries, and updates.

#### **5.2 Processing based on Consent**

Examples include:

The Company may process personal data of customers, contractual parties, and service users based on their consent—for example, in cases where sensitive data such as religious affiliation appears on identification documents used for identity verification. The Company may also process sensitive data of employees for emergency assistance, health-related support, life insurance facilitation, or medical claims. The Company will not process such personal data without first obtaining explicit consent from the relevant individuals.



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If customers, contractual parties, service users, or employees wish to withdraw their consent for any of the above purposes, they may contact the Company to do so at any time.

### **5.3 Processing based on Legitimate Interest of the Data Controller**

Examples include:

The Company may process personal data of customers, contractual parties, and service users for business operations and relationship management, including but not limited to invoice issuance, internal recordkeeping, audits, internal reporting, data submissions, data processing, or similar activities. The Company may also process employee personal data for internal reporting, system maintenance, quality control, tax management, risk management, audits, data submissions, or other relevant or similar operational purposes.

### **5.4 Processing based on Legal Obligation**

The Company may process personal data of customers, contractual parties, and service users to comply with applicable legal obligations, including lawful orders or mandatory disclosures under relevant laws or regulatory frameworks. Likewise, the Company may process employee personal data in compliance with employment and corporate laws such as:

- Labor Protection Act B.E. 2562 (2019)
- Student Loan Fund Act B.E. 2560 (2017)
- Provident Fund Act B.E. 2530 (1987)

and other applicable laws that require the Company to report or submit personal data.

## **6. Personal Data Security Measures**

The Company will maintain and protect personal data appropriately, regardless of whether the data is in physical documents, electronic files, or systems, including any tools or platforms used by the Company. All personal data will be safeguarded in compliance with applicable laws to ensure confidentiality, accuracy, integrity, and availability. These measures are in place to prevent loss, unauthorized access, misuse, alteration, or disclosure of personal data without lawful authority.

To this end, the Company has established and implemented the following personal data security measures:

6.1 The Company implements strict authentication, authorization, and accounting measures to control access, use, disclosure, and processing of personal data, in line with the Company's information security protocols.

6.2 If the Company transfers or transmits personal data to another country—including storing such data on foreign-based databases or platforms—such transfers shall be made only to jurisdictions with adequate data protection standards equivalent to this policy, unless otherwise permitted by law or with the explicit consent of the data subject.

6.3 In the event of a breach of the Company's security measures that results in a personal data breach or public exposure, the Company will promptly notify the affected data subjects and provide a remediation plan, especially if the breach arises from Company negligence and impacts the rights and freedoms of the data subject. However, the Company shall not be liable for any damages arising from the use or disclosure of personal data by third parties, or from failure to log out or negligence on the part of the data subject or any person acting with the data subject's consent.

6.4 The Company has established internal regulations requiring that all personnel adhere to strict protocols regarding access to personal data of customers, contractual parties, service users, and employees. Only



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personnel who require access for the performance of their duties—such as HR staff or those managing contracts—will be granted such access.

6.5 The Company conducts regular reviews and assessments of its computer systems to ensure the continued effectiveness of its personal data protection measures in accordance with prescribed standards.

### **7. Roles, Duties, and Responsibilities**

The Company requires all personnel and departments involved in handling personal data to treat such responsibilities with utmost importance and to strictly comply with the Company's Personal Data Protection Policy and related practices. The following individuals or departments are assigned to oversee and ensure that the Company's operations align with this Policy and the applicable personal data protection laws:

**7.1 Board of Directors** The Board is responsible for:

7.1.1 Establishing the Company's personal data protection and privacy policies and practices

7.1.2 Overseeing the implementation of such policies to ensure practical and effective execution

**7.2 Executives at All Levels** Executives are responsible for:

7.2.1 Establishing procedures and security measures for personal data management appropriate to the context of each business unit and aligned with the Company's policy, legal requirements, and international standards

7.2.2 Appointing responsible personnel or departments to oversee compliance with such procedures

7.2.3 Ensuring that, in cases where the Company hires individuals or entities to process personal data, there is a proper selection process and that data protection standards are in place

7.2.4 Supervising compliance with policies, practices, and procedures while continuously seeking improvements to ensure more effective implementation, including ensuring performance reporting aligned with the policy and operational standards

**7.3 Departments or Individuals Assigned to Collect, Use, or Disclose Personal Data** These responsible parties shall:

7.3.1 Operate and oversee all processes related to data processing, including notifications, obtaining consent, collection, use, or disclosure of personal data in compliance with the Company's procedures and applicable laws

7.3.2 Implement and oversee appropriate security measures to prevent unauthorized or unlawful loss, access, use, alteration, or disclosure of personal data, and report any data breaches to the Data Controller

7.3.3 Delete or destroy personal data once the retention period has expired, or if the data is no longer relevant or necessary for the purposes for which it was collected, or upon request by the data subject

7.3.4 Review and maintain the accuracy and currency of personal data under their responsibility

7.3.5 Immediately report any data breach or unauthorized disclosure to the Data Protection Task Force

7.3.6 Monitor and control the logging and reporting of data-related activities under their responsibility

7.3.7 Assess the risks associated with personal data under their control and implement risk management measures accordingly



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**7.4 PDPA Working Group** The PDPA Working Group is responsible for:

7.4.1 Providing guidance to the Data Controller, Data Processor, and relevant employees regarding compliance with the Personal Data Protection Act

7.4.2 Monitoring the operations of the Data Controller or Data Processor concerning the collection, use, or disclosure of personal data to ensure legal compliance

7.4.3 Coordinating and cooperating with the Office of the Personal Data Protection Committee (PDPC) in the event of issues related to the collection, use, or disclosure of personal data by the Data Controller or Data Processor

7.4.4 Maintaining the confidentiality of personal data obtained or accessed in the course of performing duties

### **7.5 Data Protection Officer (DPO)**

The Data Protection Officer (or equivalent title) is responsible for:

7.5.1 Providing advice on various aspects of personal data protection to Company executives, personnel, and business partners

7.5.2 Monitoring the operations of the Data Controller and Data Processor to ensure compliance

7.5.3 Coordinating and cooperating with the Office of the Personal Data Protection Committee (PDPC) in the event of issues related to the collection, use, or disclosure of personal data involving the Company, its customers, business partners, or other relevant parties

## **8. Rights of Data Subjects**

The Company provides appropriate channels and facilitates the exercise of rights by data subjects or their authorized representatives in accordance with the Personal Data Protection Law. Data subjects are entitled to the following legally recognized and protected rights:

### **8.1 Right of Access**

The right to access and obtain a copy of their personal data held by the Company, or to request disclosure of the source of the data in cases where consent was not given.

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

The right to receive their personal data in a structured, commonly used, and machine-readable format, where such data is processed by automated means. This also includes the right to request the transfer of such data to another data controller, where technically feasible, or to receive a direct transfer of such data from the Company to another data controller, unless technical limitations prevent it.

### **8.3 Right to Object**

The right to object to the collection, use, or disclosure of their personal data.

### **8.4 Right to Erasure**

The right to request the Company to delete, destroy, or anonymize their personal data so that it can no longer identify the data subject.

### **8.5 Right to Restriction of Processing**

The right to request the Company to temporarily suspend the use of their personal data.

### **8.6 Right to Rectification**



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The right to request that the Company correct inaccurate, outdated, incomplete, or misleading personal data.

These rights are subject to the provisions of the applicable law. The Company reserves the right to deny the exercise of such rights where doing so would be contrary to the law.

### **9. Amendment, Review, or Revision of the Privacy Policy**

The Company may amend, review, or revise this Privacy Policy, in whole or in part, from time to time as deemed necessary to align with the Company's operational practices and to ensure compliance with applicable laws, official announcements, or regulatory orders issued by competent authorities.

### **10. Enforcement of the Privacy Policy**

This Privacy Policy applies to all personal data collected, used, and disclosed by the Company. By accepting this policy, the data subject agrees that the Company has the right to collect and process their personal data already collected (if any), as well as personal data currently or subsequently collected by the Company, in accordance with the scope and purposes stated in this Privacy Policy.

### **11. Engagement of Personal Data Processors**

The Company has established the following guidelines for entering into data processing agreements with external individuals or juristic persons who act as personal data processors:

11.1 Before engaging any data processor, the Company must assess the processor's personal data protection systems and practices. If the processor does not have adequate safeguards in place, the contract must require the processor to comply with the Company's policies or directives related to data protection.

11.2 The processing contract must clearly specify the purpose of processing, data collection methods, data subject notifications, use, transmission, transfer, and data destruction or deletion procedures.

11.3 The contracting party must sign a Data Processing Agreement (DPA) in compliance with applicable legal requirements and the Company's internal policies.

11.4 Upon engaging a data processor, the Company shall monitor and control the processor's operations to ensure they are performed in accordance with the agreed scope and applicable data protection guidelines.

11.5 Upon the expiration of the data retention period, the Company shall ensure that the processor deletes, destroys, or anonymizes the personal data so that it can no longer identify the data subject, in accordance with the Company's policies or mutually agreed terms.

### **12. Training**

The Company places great importance on providing training and raising awareness regarding compliance with personal data protection laws for executives and employees at all levels. It is the duty of all supervisors to ensure that any personnel under their supervision who are involved with personal data must attend such training sessions. Supervisors are also responsible for evaluating and monitoring training outcomes to ensure that personnel are able to perform their duties accurately and fully in accordance with personal data protection laws.





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### **13. Privacy Policy of Other Websites**

This Privacy Policy applies only to the services provided by the Company and to the use of the Company's official website. If customers, contracting parties, service users, or employees click on links that lead to other websites (even if accessed via the Company's website), this Privacy Policy—along with the Company's terms and conditions—will no longer apply. Customers, contracting parties, service users, and employees are advised to read and comply with the privacy policies applicable to those external websites. The Company is not responsible for the content or activities of such third-party websites, as the Company does not operate or control them.

### **14. Responsibilities of Individuals**

The Company requires all personnel or departments involved with personal data to place importance on and take full responsibility for the collection, use, or disclosure of personal data in strict compliance with this Privacy Policy. All operations must align with this policy, relevant procedures, manuals, and applicable laws. Any intentional or negligent act, omission, failure to give instructions, or action in violation of this Privacy Policy and its related guidelines, which leads to a breach or causes damage, may result in disciplinary action in accordance with the Company's regulations. The individual may also be subject to legal penalties under the relevant laws. If such violations cause damage to the Company and/or any other party, the Company reserves the right to pursue legal action for compensation.

### **15. Contact Us**

If you discover or suspect a personal data breach, wish to lodge a complaint, exercise your rights as a data subject under this Policy or under the Personal Data Protection Act B.E. 2562 (2019), or have any inquiries, please contact:

PDPA Working Group

Phone: (+66) 2 727 0150-5

FAX: (+66) 2 727 0160-1

EMAIL: [PDPATeam@mksjewelry.com](mailto:PDPATeam@mksjewelry.com)

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Mr. Majid Abdulreza Algouneh

CEO

MKS Jewelry International Co., Ltd.

Announce on 1<sup>st</sup> JUNE, 2022



## **MKS Jewelry International Co., Ltd.**

### **Privacy Notice – Corporate Customers**

MKS Jewelry International Co., Ltd. (hereinafter referred to in this notice as the “**Company**” or “**we**”) places great importance on the protection of your personal data. This applies to: (1) Individual customers who use the Company's products, goods, and services—whether as former, current, or potential future customers; (2) Employees, personnel, officers, representatives, shareholders, authorized persons, directors, contacts, agents, and other individuals associated with the Company's corporate clients (collectively referred to as “**Corporate Customers**”); and (3) Any individual whose personal data has been obtained by the Company (e.g., emergency contacts, spouses, parents, descendants, relatives, children, employers, agents, beneficiaries, or referees). Individuals under (1)–(3) are collectively referred to as “**you**,” and individuals in (1) and (2) are collectively referred to as “**customers**.” The Company understands that you are concerned about and value how your personal data is collected, used, disclosed, transferred, and/or transmitted internationally. We will use the information you provide to us in order to supply products, goods, and services that meet your needs and fulfill other necessary purposes in an appropriate manner.

This **Privacy Notice** applies to all Company products, goods, and services offered to customers through retail outlets, websites, mobile applications, sales representatives, event booths, customer call centers, social media platforms, online communication channels, product/service registration systems, and other channels through which the Company collects your personal data. Please read and understand this Privacy Notice alongside the terms and conditions applicable to the relevant services you engage with. The Company reserves the right to amend this Privacy Notice from time to time. We encourage you to regularly review any updates. All amendments will take effect immediately upon being posted on the Company's website or mobile application.

#### **1. Personal Data Collected by the Company:**

The Company may collect various types of your personal data directly from you or indirectly from other sources or from the Company itself or its business partners, depending on your communication with the Company and your interest in its products, goods, and services. Examples of the types of personal data that the Company may collect, use, disclose, and/or transfer abroad include, but are not limited to, the following:

1. **Personal Information** – such as title, full name, age, occupation, date of birth, company name, job title, salary, employment history, work-related information (e.g., type of organization, workplace, position, years of service, department, profession, employer or shareholder information), political status, gender, nationality, marital status, educational background, qualification, photograph, audio recordings, telephone conversation recordings, signature, CCTV footage, shareholding ratio, customer complaints, your feedback on the Company's products, goods, and services, and questions submitted via social media.
2. **Contact Information** – such as registered address, residence address, business address, mailing address, telephone number, business phone number, mobile number, fax number, email address, postal code, social media account details (e.g., LINE ID, Facebook account, and contact hours), and other electronic contact information.
3. **Government-Issued Identification Data** – such as national ID number, passport number, taxpayer identification number, social security number, and data from driver's licenses, house registration, or company certificates (including names of company directors), or similar documentation.



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4. **Demographic Information** – such as number of children, their ages, number of family members, education level, and household income.
5. **Behavioral Information** – such as purchasing behavior and data obtained through the use of the Company's products, goods, and services.
6. **Financial Information** – such as purchase prices, service fees, payment methods (e.g., cash or credit card), cash card/debit card/credit card numbers and details, PromptPay data, bank account numbers and types, bank account history, deposit/withdrawal transactions, current assets, sources of income, payment details, credit scores, monthly income, and application data submitted via mobile applications.
7. **Transactional Information** – such as purchase history, purchase amounts, purchasing behavior, and/or usage of the Company's products, goods, and services, including preferences, interests, and search queries.
8. **Information Collected from Your Electronic Devices** – such as IP address, web beacons, logs, device ID, GPS location data, device model and type, network and connection data, access logs, Single Sign-On (SSO) usage, login records, access time, time spent on the Company's web pages, cookies, login history, search history, browsing data, browser type and version, time zone settings and location, browser plug-in types and versions, operating systems and platforms, and other technologies on the devices used to access the platform.
9. **Vehicle Service Information** – such as vehicle registration numbers (including temporary red license plates), vehicle identification number (VIN), chassis number, model, model year, year of manufacture, engine size, standard equipment, maintenance history, mileage, fuel or battery status, fuel/energy refill history, electrical system performance, transmission condition, and other issues or information about your vehicle. This includes vehicle performance data from visits to gas stations or FIT Auto services, as well as booking and service appointment details (date, time, and location).
10. **Marketing and Communication Preferences** – such as your preferences regarding receiving marketing information from the Company, your preferred contact methods for receiving information about the Company's products, goods, and services, records of your interaction with the Company, other communication channels you are interested in, correspondence details between you and the Company, and marketing information such as responses to surveys, feedback forms, or participation in research activities.
11. **Profile Information** – such as account identifiers, usernames and passwords, and PIN ID codes used for purchasing products, goods, and services from the Company.
12. **Usage Information** – such as your usage behavior on the website or platform, how you use the Company's products, goods, and services, and how you interact with the Company's advertisements (including content viewed, links clicked, and other related data).
13. **Customer Relationship Management Data** – such as customer account registration, operational management, payment, dispute resolution, processing and reporting activities on behalf of the customer. This may include personal data such as your signature and records of communication with the Company.
14. **Other Information** – such as relationship history and other relevant details you have with the Company, including information provided through contracts, registration forms, applications,



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surveys, research, or data collected when you attend business events, seminars, training sessions, or the Company's social activities.

If you provide personal data (such as name, surname, address, and contact information) of other individuals—such as emergency contacts, spouse, parents, descendants, relatives, children, employers, agents, beneficiaries, or referees (in the case of individual customers), or employees, shareholders, directors, or related persons within your organization (in the case of corporate customers)—to the Company, you must ensure that you have the right and/or authority to provide such personal data and to allow the Company to use it in accordance with this Privacy Notice. You are also responsible for informing those individuals of this Privacy Notice and/or obtaining their consent, if necessary, and/or relying on other legal grounds.

The Company does not knowingly collect personal data of minors (those who have not reached the age of majority, i.e., under 20 years old or not legally emancipated through marriage), persons of unsound mind, or legally incompetent persons, and does not permit such individuals to register for or purchase the Company's products or services, unless valid consent has been obtained or another legal basis applies. If the Company becomes aware that it has inadvertently collected personal data from such individuals without consent or without relying on any other legal grounds, the Company will promptly delete such personal data upon becoming aware of the situation, and may be required to discontinue services to those individuals—unless the Company can rely on other legal bases apart from consent.

### **2. Purposes and Legal Bases for the Processing of Personal Data**

2.1. Purposes for which the Company collects, uses, or discloses your personal data based on your explicit consent

(1) Marketing and Communications: For marketing purposes, communications, sales, special offers, promotions, discounts, privileges, notifications, and updates related to the Company's products, goods, and services, either from the Company itself or its business partners—where no other legal basis is applicable.

(2) Purposes requiring the use of sensitive personal data, which must be processed with your explicit consent. These include the collection, use, disclosure, and/or international transfer of the following types of sensitive data:

(3) Sensitive data appearing on government-issued documents (e.g., religion on a national ID card or ethnicity on a passport), used for identity verification during membership registration, service or product provision, and record-keeping—when no other legal basis is available.

(4) Health data (e.g., underlying medical conditions) for purposes such as food allergy prevention or safeguarding your health and safety.

(5) Criminal records, to verify the identity and assess qualifications of individuals such as drivers or other personnel related to the customer.

(6) Biometric data (e.g., facial recognition or fingerprints) for identity verification at warehouses or service locations.

The Company will only collect, use, and/or disclose such sensitive personal data with your explicit consent or if permitted by applicable law.



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2.2. Purposes for collecting, using, or disclosing your personal data based on other legal grounds The Company may rely on one or more of the following legal bases: (1) Contractual necessity – to initiate, enter into, or perform contractual obligations with you. (2) Legal obligations – to comply with applicable laws. (3) Legitimate interests – to serve the Company's lawful interests or those of third parties. (4) Vital interests – to prevent or mitigate harm to your life, body, or health. (5) Public interest – to carry out tasks in the public interest or for the exercise of official authority. Or other legal bases permitted under the Personal Data Protection Act, as applicable. Based on the above, the Company may process your personal data for the following purposes:

(1) To provide products, goods, and services to you, including responding to pre-contractual requests, entering into and managing contracts with you, issuing quotations, delivering services, monitoring and improving service quality, facilitating your requests, and conducting related activities. This includes account management, financial transactions (e.g., payments, refunds, receipts, invoices), and handling order processing, deliveries, returns, or cancellations.

(2) For registration and identity verification, including verifying your identity during account setup or service access.

(3) For customer qualification screening, such as customer status checks, background verification, risk assessment, blacklist screening, suitability evaluations, and qualifications for bidding or quotation processes, including contract execution with you or your organization.

(4) For communication and coordination, including customer service interactions, marketing outreach, promotional offers, notifications, and updates on products and services. It also includes handling inquiries, requests, feedback, complaints, disputes, or claims; providing technical support; communicating issue resolutions; and conducting customer satisfaction surveys. Additionally, it involves maintaining and updating customer records (e.g., customer name lists) and storing relevant documentation where your data may be referenced.

(5) Marketing and Communication: To conduct marketing activities, communications, sales, promotion or special offer proposals, discounts, privileges, as well as notifications and updates regarding the Company's products, goods, and services and/or those of its business partners—based on your expressed interest or previous usage. This also includes related products, goods, and services based on your preferences and usage history (direct or indirect), in order to invite you to participate in campaigns, promotional events, seminars, competitions, lucky draws, prize contests, booth events, and brand meet-ups, as well as other sales promotions and relevant advertising services. The goal is to facilitate your participation in the Company's events, collaborate with the Company's various brands, and process and manage your user account registration—ultimately maximizing customer benefit.

(6) Customer Interest and Behavioral Profiling & Data Analytics: To better understand the products, goods, and services you receive and may be interested in; to process your personal data, such as types of products you use, preferred communication channels, and satisfaction surveys. The Company collects data on your usage to conduct statistical analysis, behavior tracking, and segmentation by product group, customer location, and market trends. These activities aim to enhance marketing strategies, support new product development, address issues with existing products and services, and improve overall business operations.

(7) Product and Service Improvement: To assess, manage, enhance, and develop the Company's products, goods, services, systems, business operations, and performance. This includes improving marketing strategies, auditing, reporting, risk management, statistical analysis, trend analysis, planning, data retention, business analytics, and market research. The Company also aims to study and improve product quality, safety, and security, as well as develop new products and services.



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(8) Conducting Training Programs: To provide training activities, whether in-person or via electronic means (e-learning), and/or to issue training certificates to you.

(9) IT Management: For the administration of the Company's IT operations, internal communications, IT systems, communication platforms, and cybersecurity systems. This includes system access control, monitoring, hardware/software tracking, and internet usage.

(10) Website, Mobile App, and Platform Operations: To maintain, operate, monitor, and manage websites and platforms, ensuring smooth, efficient, and secure performance. This helps improve content and usability to better serve users.

(11) Personalization: To understand your needs and customize the Company's products, goods, and services to better suit your individual preferences.

(12) Legal and Government Compliance: To comply with laws, legal procedures, or government orders (including foreign authorities). The Company may need to cooperate with courts, regulators, or enforcement agencies when legally required. This includes internal investigations, crime or fraud prevention, or establishing legal claims.

(13) Business Transfers or Transactions: In cases of organizational restructuring, mergers, acquisitions, sales, investments, transfer of rights, changes in ownership, or similar transactions, the Company may disclose your personal data to transferees as part of the transaction. The Company will respect and adhere to this Privacy Notice during such processes.

(14) Protection of Company Interests and Related Parties: To maintain business security, safeguard the Company and its stakeholders, assert rights and protect interests, detect and prevent fraud, IP infringement, legal violations, property loss, policy enforcement, and internal rule compliance. This includes CCTV usage for premises monitoring, crime prevention, safety assurance, internal reporting, and contract enforcement.

(15) Fraud Detection: To verify identity, ensure legal and regulatory compliance (e.g., AML and anti-corruption laws), conduct internal audits, manage assets, maintain fraud databases, and support internal control systems.

(16) Vital Interest Protection: To prevent or mitigate danger to a person's life, body, or health.

If you choose not to provide your personal data to the Company, it may affect you in the following ways: the Company may be unable to fulfill your requests or contractual obligations, and may not be able to offer or provide some or all of its products, goods, or services to you. As a result, you may experience inconvenience, failure to receive contractual services, or loss/damage of certain opportunities. In some cases, your refusal to provide such data may also impact compliance with legal obligations applicable to either you or the Company, which could result in legal penalties.

### **3. Disclosure or Transfer of Your Personal Data**

The Company may disclose or transfer your personal data to third parties as outlined below, who collect, use, or disclose your personal data for the purposes specified in this Privacy Notice. You may also be subject to the privacy policies of those third parties. Therefore, the Company recommends that you read the privacy notices of such third parties to understand how they collect, use, or disclose your personal data.



## **MKS Jewelry International Co., Ltd.**

### **3.1. Service Providers**

The Company may engage other companies, agents, or contractors to provide services on its behalf or to facilitate the delivery of its products and services to you. Accordingly, the Company may disclose your personal data to third-party service providers or vendors, including but not limited to: (1) Infrastructure, internet, and website developers, and IT service providers (2) Logistics and delivery service providers (3) Data analytics service providers (4) Communication agencies, advertising media, market research, and marketing firms (5) Data storage and cloud service providers (6) Training and seminar providers (7) Tour service providers (8) Oil-related service providers (9) Payment and payment system service providers (10) Document storage and/or destruction service providers (11) Printing service providers

These service providers may have access to your personal data in order to perform their services. However, the Company will provide only the necessary personal data required for their services and will instruct them not to use the data for any other purpose.

### **3.2 Business Partners**

The Company may disclose and/or transfer your personal data to its business partners for business and service purposes related to banking, finance, e-wallets, insurance, loyalty programs, and other service providers and vendors who offer products, goods, and services to you. Such data shared or transferred will be subject to the privacy notices of those third parties, not this Privacy Notice.

### **3.3 External Parties**

In certain cases, the Company may be required to disclose and/or transfer your personal data to government agencies, law enforcement authorities, courts, officials, regulatory bodies, or other parties where there is a reasonable belief that such action is necessary to comply with legal obligations, to protect the rights of the Company or others, to ensure individual safety, or to detect, prevent, or manage fraud, security, or safety issues.

### **3.5. Assignees of Rights and/or Obligations**

In the event of a business restructuring, merger, sale, acquisition, joint venture, transfer of rights, change in business ownership, disposal of business, assets, or shares, or any similar transactions — whether in whole or in part — any assignee of the Company's rights and/or obligations will be required to adhere to this Privacy Notice in order to respect and protect your personal data.

## **4. Cross-Border Transfer of Your Personal Data**

The Company may disclose or transfer your personal data to third parties or service providers located overseas. The destination country may have data protection standards that are higher or lower than those in Thailand. In cases where it is necessary to transfer your personal data to a country with lower data protection standards, the Company will implement appropriate procedures and safeguards to ensure that your data is adequately protected. The recipient must have suitable data protection standards as required by law. Where necessary, the Company may request your consent for such international data transfers if required by law.



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### **5. Retention Period of Your Personal Data**

The Company will retain your personal data only for as long as necessary and appropriate for the purposes specified in this Privacy Notice and to comply with legal and regulatory obligations. In some cases, the Company may retain your personal data for a longer period if required or permitted by applicable law.

### **6. Your Rights as a Data Subject**

You have rights under the Personal Data Protection Law. The Company respects these rights and will act in accordance with relevant laws, rules, or regulations concerning the processing of your personal data. These rights include:

#### **6.1 Right to Withdraw Consent**

If the Company processes your personal data based on your consent, you have the right to withdraw that consent at any time. However, the Company may continue to process your data if another lawful basis exists.

#### **6.2 Right of Access**

You have the right to request a copy of your personal data held by the Company.

#### **6.3 Right to Rectification**

You have the right to request that any of your personal data be corrected, updated, or completed.

#### **6.4 Right to Erasure**

You have the right to request that the Company delete, destroy, or anonymize your personal data when there is no longer a valid reason for processing it. This right may be exercised alongside your right to object. However, this right does not allow for deletion of all data indiscriminately, and the Company will carefully consider each request under applicable laws.

#### **6.5 Right to Object**

You have the right to object to the processing of your personal data based on the Company's legitimate interests. You may also object to the use of your data for direct marketing or profiling purposes.

#### **6.6 Right to Restriction of Processing**

You may request the Company to temporarily suspend processing your data, such as while data is being corrected or the legal basis for processing is being verified.

#### **6.7 Right to Data Portability**

In certain cases, you may request the transfer of your personal data in a structured, commonly used, machine-readable format to another data controller. This applies to data you provided to the Company and that is processed based on your consent or a contract.





## **MKS Jewelry International Co., Ltd.**

### **6.8 Right to Lodge a Complaint**

You have the right to file a complaint with the relevant government agency, including the Personal Data Protection Committee, if you believe the Company, its employees, or its service providers have violated or failed to comply with the Personal Data Protection Law or related regulations.

You may exercise your rights at any time by contacting the Company through the communication channels provided in Section 8.

The Company may need to request specific information from you to verify your identity and ensure your right to access your personal data (or exercise any other rights). This is part of our security measures to ensure your personal data is not disclosed to unauthorized individuals.

The Company will endeavor to respond to all legitimate requests within 30 days. In some cases, such as complex requests or multiple submissions, the response time may exceed 30 days. In such cases, the Company will keep you informed of the progress and status of your request.

## **7. Security Measures**

The Company has implemented appropriate security measures for personal data, including administrative, technical, and physical safeguards to control and restrict access to personal data. These measures are designed to ensure the confidentiality, integrity, and availability of personal data and to prevent unauthorized or unlawful loss, access, use, alteration, modification, or disclosure of personal data, in accordance with applicable laws.

The Company has established secure and appropriate access control measures for both personal data and the devices used to store and process it. These measures include limiting access based on user roles, defining permission levels for authorized personnel, and assigning clear responsibilities to users to prevent unauthorized access, disclosure, interception, copying, or theft of personal data or the devices used to process such data. The Company has also implemented audit trails and tracking systems for access, changes, deletion, or transfer of personal data in accordance with the methods and media used for collection, use, or disclosure of such data.

## **8. Contact Us**

If you wish to exercise your rights related to your personal data or have any questions regarding your personal data under this Privacy Notice, please contact the Company at:

PDPA Team

Phone: (+66) 2 727 0150-5

Fax: (+66) 2 727 0160-1

Email: [PDPAteam@mksjewelry.com](mailto:PDPAteam@mksjewelry.com)



## **MKS Jewelry International Co., Ltd.**

### **Privacy Notice for Business Partner/Supplier**

#### **1. Introduction**

1.1 This Privacy Notice for Business Partners explains how MKS Jewelry International Co., Ltd. (hereinafter referred to as the "Company" or "we") collects, uses, stores, discloses, and/or transfers personal data, including data of employees, contractors, personnel, authorized persons, directors, shareholders, and other contacts ("you" or "your") of our business partners (e.g., suppliers, vendors, service providers, and outsourcers) (each referred to as a "Business Partner"). This also includes the personal data of any third parties that you provide to us. This notice is intended to safeguard your personal data and privacy.

1.2 This Privacy Notice applies to both online and offline communication channels through which we collect your personal data—whether in person at our showroom, factory, or place of business, at events, by telephone through our call center, or online via email or social media platforms (such as our webpage, Facebook, or LINE), as well as any other business-related communication channels.

1.3 For the purposes of this Privacy Notice, "personal data" refers to any personal information or data that can identify you, as defined under applicable laws. This includes both general personal data and sensitive personal data.

1.4 The Company is committed to ensuring the privacy of your data is protected and that the processing of your personal data is carried out in compliance with applicable laws and regulations (as amended or newly enacted from time to time). This includes laws in countries where we currently operate or intend to do business. The Company will collect, use, store, disclose, and transfer your personal data abroad only in accordance with this Privacy Notice.

1.5 Please read the following information carefully to understand our perspective and practices regarding your personal data and how we will process it. Certain information about you may be required by law or essential for the business relationship we currently have or may have in the future. If you do not agree to provide such information, we may be unable to perform our duties or fulfill our obligations to you.

1.6 The Company reserves the right, at its sole discretion, to amend, modify, delete, or update this Privacy Notice from time to time. The Company will make reasonable efforts to notify you of any material changes in a suitable manner (e.g., by sending you the revised policy via email with the new effective date, or by posting a notice of the changes on our website).

#### **2. Personal Data We Collect from You**

We may collect or receive the following types of information, which may include your personal data either directly from you or indirectly from other sources such as government agencies or public sources. The following are examples of the personal data that may be collected:

2.1 Your Personal Data, which includes information you have provided through communications with us or information we collect from you. This may include, but is not limited to:

(a) Identifiable Information: Such as title, first name, last name, nickname, gender, age, date of birth, nationality, marital status, photograph, employment-related information (e.g., position, type of products/services, the company you work for or are employed by or partner with), a copy of your ID card, passport, house registration, work permit, or other similar government-issued identification documents, signature, CCTV footage, vehicle information (e.g., a copy of the vehicle registration, license plate number, brand, and color), financial information (e.g., account name and bank book number), and other identity documents.



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(b) Contact Information: Such as telephone number, fax number, mailing address, workplace, email address, LINE ID, and similar data.

(c) Sensitive Data: Such as religion as shown on your national ID card, race in identity verification documents, biometric data (e.g., fingerprint, facial recognition, or iris scan), and criminal records.

(d) Geolocation Data: Such as the location of vehicles and/or devices and/or communication tools and/or electronic devices (including longitude/latitude, city, and street location).

(e) Driving Behavior Data: Such as vehicle speed and braking behavior.

(f) Other Data collected, used, stored, disclosed, and/or transferred abroad that relates to our business relationship with you or our business partners. This includes data you provide in contracts, forms, surveys, or various documents.

2.2 Personal Data of Other Individuals, such as emergency contacts, references, agents/representatives, beneficiaries, guarantors, witnesses, or counterparties, including names, emails, addresses, and telephone/mobile numbers, as well as other related information you may provide to us in any form.

When you provide third-party personal data to us, you represent and warrant that you have the authority to do so and that you permit us to use such personal data in accordance with this Privacy Notice. You are also responsible for informing such persons about this Privacy Notice and/or obtaining their consent if necessary.

Although some data under Section 2 may not qualify as personal data on its own, if combined with other data or relevant personal information, it may be used to identify you. In such cases, it will be treated as personal data and subject to the same standard of protection. However, if we process anonymized or aggregated data that cannot be used to identify you, this Privacy Notice will not apply.

### **3. Processing of Personal Data and Legal Basis**

The Company and any third parties acting on our behalf may collect, use, store, disclose, and/or transfer your personal data abroad based on the following legal grounds and for the purposes described below:

#### **3.1 Consent or Explicit Consent**

We may collect, use, store, disclose, and/or transfer your sensitive personal data abroad for the following purposes, as required by law to obtain your explicit consent. This includes: Religion (as shown on your national ID card) – for identity verification purposes. Race (as shown on identification documents) – for identity verification purposes. Biometric data (e.g., fingerprints, facial recognition, iris scan) – for identity verification purposes. Criminal record – for security and protection of our interests or the interests of third parties. If your data is processed based on consent, you have the right to withdraw your consent at any time under the conditions stated in this Privacy Notice and applicable laws. Such withdrawal will not affect the lawfulness of data processing that occurred before the consent was withdrawn.

#### **3.2 Contractual Basis (Contract)**

If we are required by law or necessity to collect personal data in order to enter into or fulfill a contract with you, but you fail to provide the necessary data when requested, the Company may not be able to achieve



## **MKS Jewelry International Co., Ltd.**

the intended objectives. In cases where your consent is legally required for data collection, use, or disclosure, we will request your consent on a case-by-case basis. Examples include:

(a) Business Partner Selection – To assess the qualifications and suitability of you or your organization, to facilitate participation in bidding, request quotations, and enter into contracts.

(b) Business Purposes – To initiate or manage contractual relationships, communicate about products/services, execute transactions (e.g., deliveries, returns, quotations, invoices), and meet contractual obligations or requests.

(c) Relationship Management – To generate vendor codes, register in the business partner directory, provide support services, record interactions, issue access cards and parking permits, and invite partners to events.

(d) Registration and Identity Verification – To register, verify, and confirm your identity.

(e) Marketing Communications – To inform you of marketing communications, events, sales, promotions, offers, trade shows, procurement, support activities, special events, and direct marketing.

(f) Business Operations – To comply with internal record-keeping requirements, internal management, audits, reporting, data submissions, data processing, or other similar activities.

### **3.3 Legitimate Interest**

For purposes such as ensuring security, risk prevention, dispute resolution, record-keeping, managing conflicts, and preventing fraud or criminal activity.

### **3.2 Legal Obligation**

We rely on legal obligation as a basis for processing your personal data to comply with legal duties and obligations under applicable laws—both local and foreign—and to evaluate compliance with relevant laws, regulations, internal policies, procedures, or as required by regulatory or government authorities during investigations.

## **4. Disclosure of Your Personal Data to Third Parties**

4.1 We may share your personal data within our company network for the purposes described above. We will implement procedures to ensure that access to personal data is limited to employees and/or representatives of the Company on a strict “need-to-know” basis only.

4.2 We may also share your personal data outside of our company network with the following parties, for the purposes specified in this policy:

(a) Within the Group and Affiliated Companies: As the Company is part of a group of companies that collaborate and share certain business services and systems (e.g., website-related services), we may need to transfer your personal data to or allow access by other entities within the group for the purposes set out in this Privacy Notice. These entities may rely on the consent obtained by the Company.

(b) Business Partners: We may transfer your personal data to other business partners for the purposes of conducting business and providing services, provided that such business partners agree to handle your data in compliance with this Privacy Policy.



## **MKS Jewelry International Co., Ltd.**

(c) Authorized Distributors and Agents: At times, the Company may share personal data with officially authorized distributors selected by you or located near you to provide services on our behalf.

(d) Service Providers / Suppliers / Subcontractors: We may engage companies, agents, or contractors to perform services on our behalf or to support our business relationships with you. These may include, but are not limited to: (1) IT system providers and technology companies (2) Data analysis or research service providers (3) Statistical analysis companies (4) Survey companies (5) Marketing, advertising, creative, design, and communications agencies (6) Campaign, event, and promotional organizers (7) Outsourced administrative service providers (8) Data storage and cloud service providers (9) Other similar external providers that assist with our business operations

(e) External Advisors: Including lawyers, subject-matter experts, tax consultants, and auditors who assist with our business operations or help us enforce or exercise our legal rights.

(f) Third Parties as Required by Law: We may need to disclose or share your personal data in order to comply with applicable laws or regulations. This includes law enforcement authorities (e.g., Department of Land Transport, Revenue Department, Office of the Consumer Protection Board), courts, government authorities, or other third parties where we believe such disclosure is necessary to comply with legal obligations or to protect our rights, the rights of others, or individual safety, or to detect, prevent, or resolve issues related to fraud, security, or safety.

(g) Hospitals and Emergency Services: Your personal data may be disclosed in emergency situations to protect your vital interests.

(h) Third-Party Assignees / Successors: In the case of business reorganization, mergers, transfers (whether partial or full), sales, acquisitions, joint ventures, assignments, or other similar transactions involving our business, assets, or shares, such third-party assignees will be required to adhere to this Privacy Notice to protect your personal data.

(i) Public Sources: Such as websites, advertisements, and/or social media platforms.

4.3 To the extent permitted by law, the Company shall not be held liable for any use of your personal data by third parties. You are therefore advised to review the privacy notices of those third parties to understand how they may handle your data.

4.4 Except as stated in this Privacy Notice, we will not disclose, sell, rent, or lease your personal data to any third party unless we have obtained your permission or it is necessary to complete a transaction requested by you.

## **5. International Transfers of Personal Data**

5.1 The Company may transmit or transfer personal data collected from you to affiliated companies or group companies in order to carry out the purposes specified above. We may need to disclose your personal data to third parties located overseas for the purposes outlined in this Privacy Notice. Countries where we may transfer your personal data include, but are not limited to, the United States or Japan. Such disclosure or transfer of personal data may only be conducted with your consent, unless another legal basis applies (e.g., to fulfill contractual obligations between us and another party for your benefit), as permitted by applicable law which may exempt such transfers from requiring your consent.

5.2 In cases where the destination country does not have data protection standards equivalent to those specified by the Personal Data Protection Committee of Thailand, if we transfer your personal data to such a



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country, we will take necessary steps to ensure that your personal data remains protected at a level equivalent to our internal data protection measures and in compliance with applicable laws at the time of transfer.

### **6. Retention Period for Your Personal Data**

The Company will retain your personal data only for as long as reasonably necessary to fulfill the purposes outlined in this Privacy Notice. In the event of legal or disciplinary proceedings, we may retain your personal data until such proceedings are concluded, including any applicable appeal periods. After that, your personal data will either be deleted or archived in accordance with the applicable laws and regulations.

### **7. Data Security Measures**

The Company has implemented security measures to safeguard all personal data collected and received. We utilize technical, organizational, administrative, and physical safeguards to protect your personal data stored in our systems from loss, unauthorized access, use, alteration, damage, accidental deletion, unlawful processing, or access without authorization. Additionally, we will periodically review and update our security measures as necessary or in response to technological changes to ensure appropriate and effective protection. Once the Company receives your personal data, we strictly enforce internal security procedures and measures to prevent unauthorized access.

### **8. Your Rights as a Data Subject**

In certain cases, we may ask you to verify your identity before exercising your rights to ensure your privacy and data security. Subject to applicable law and exceptions thereunder, you may be entitled to the following rights:

#### **8.1 Right to Access Personal Data**

You may request access to your personal data or inquire about how your data was obtained (especially if you did not give consent). The Company will prepare or provide a copy of the relevant personal data via our communication channels. We may deny your request if legally required, under a court order, or if such access would harm the rights and freedoms of others.

#### **8.2 Right to Rectification**

You may request correction of your personal data to ensure it is accurate, up to date, complete, and not misleading. Supporting documents may be required. If the Company considers the request unjustified, we reserve the right to refuse and will record our reason.



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### **8.3 Right to Erasure, Destruction, or Anonymization**

You may request the deletion, destruction, or anonymization of your personal data under these conditions:

- The data is no longer necessary for the stated purposes.
- You withdraw your consent, and no legal basis remains for processing.
- You object to processing for public tasks or legitimate interests, and the Company cannot demonstrate overriding grounds.
- The data was unlawfully collected, used, or disclosed.

We may reject such requests under the following circumstances:

- Retention is required for freedom of expression.
- Retention is for historical, archival, or similar purposes.
- Retention is required for public interest tasks or governmental mandates.
- Retention is required by law or for health and occupational medicine, or public health reasons.
- The data is necessary for legal claims or defense, or for legal compliance.

### **8.4 Right to Withdraw Consent**

If you have given consent, you may withdraw it at any time. However, such withdrawal will not affect processing conducted before consent was withdrawn. The Company may reject the request if legal or contractual obligations prevent withdrawal.

### **8.5 Right to Data Portability**

You may request a copy or transfer of your personal data to another data controller in a machine-readable electronic format, under the following conditions:

- The data was collected based on your consent.
- The data was necessary for service provision or contractual obligations with the Company.

We may deny the request if:

- Processing is for public interest or legal obligations.
- The transfer would violate others' rights.
- Technical limitations prevent it.



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### **8.6 Right to Restrict Processing**

You may request to restrict processing of your personal data under the following conditions:

- While the Company verifies the data's accuracy.
- If the data is unlawfully processed but you prefer restriction over deletion.
- If the data is no longer needed but you require it for legal claims.
- If the Company is verifying the grounds for your objection.

### **8.7 Right to Object**

You may object to the collection, use, or disclosure of your personal data under these conditions:

- Processing is based on public task or legitimate interests. We may reject the objection if we can demonstrate overriding legal grounds or need to establish or defend legal claims.
- Processing is for scientific or historical research. We may deny the objection if necessary for public interest tasks.

If the objection is valid and not exempted, the Company will stop processing and clearly separate the data from other data sets upon your notification.

### **8.8 Right to be Informed**

You have the right to be informed when the Company collects your personal data directly or receives it from a third party, in accordance with our communication channels.

### **8.9 Right to Lodge a Complaint**

You may file a complaint if the data controller, data processor, or their employees or contractors violate or fail to comply with the Personal Data Protection Act B.E. 2562 (2019).

### **Rejection of Requests**

- The Company reserves the right to reject a request under the following circumstances:
- Legal grounds allow or require continued processing.
- Data has been anonymized and cannot identify the subject.
- The requester cannot prove their identity or authority to act on the subject's behalf.
- The request is unreasonable (e.g., you have no legal right or no data is held).
- The request is excessive or repetitive without reasonable cause.
- The Company may charge a fee in accordance with its established guidelines.





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### Verification and Processing Timeline

We may request additional information to verify your identity before granting access or other rights to ensure personal data is not disclosed to unauthorized individuals. The Company will attempt to respond to all legitimate requests within 30 days. In complex or high-volume cases, we may need more time and will keep you informed of the status.

### **9. Contact Us**

If you suspect or believe that there has been a breach of personal data, wish to make a complaint, or would like to exercise your rights as a data subject under this policy or the Personal Data Protection Act B.E. 2562 (2019), or if you have any questions or concerns, please contact us at:

PDPA Team

Phone: (+66) 2 727 0150-5

Fax: (+66) 2 727 0160-1

Email: [PDPAteam@mksjewelry.com](mailto:PDPAteam@mksjewelry.com)