

**PRIVACY POLICY**  
**LF LOGISTICS (THAILAND) LIMITED**

LF Logistics (Thailand) Limited (“**the Company**”, “**we**”, “**us**” or “**our**”) cares about your privacy and is fully committed to protect the privacy of your personal data.

This Privacy Policy covers how we deal with your personal data and gives you detailed information on how, what, when, and why we collect, use, disclose or process your personal data, what steps we take to ensure your personal data stays private and secure, how long we retain your personal data, how you can contact us, and your rights under the Personal Data Protection Act B.E. 2562 (the “**PDPA**”) including but not limited to its implementing rules and regulations and other applicable laws (as amended or replaced from time to time) protecting the privacy of your personal data.

Please take a moment to read our Privacy Policy to understand more about your rights to the personal data that you have given to us. This Privacy Policy is subject to change at any time while our relationship with you continues. So, you should come back and read this Privacy Policy from time to time. If there is any significant change to our Privacy Policy which may affect the rights to your personal data, we will inform you without delay by announcing on our website.

If you have questions or do not understand any part of this Privacy Policy or wish to exercise your rights relating to your collected personal data, please do not hesitate to contact us as described in the “Contact Us” section below.

**1. What personal data we collect from you**

Your personal data means any information that relates to you and can identify you, whether directly or indirectly, from that data alone or in a combination with other identifiers we possess or can reasonably access, except information about the deceased.

The type of personal data we collect from you may be different depending on transactions you engage in, services you select or your relationship with us. The collected personal data may include general and sensitive personal data as categorized in the table below:

General personal data	<ul style="list-style-type: none"><li>• Details about you, such as name, surname, gender, date of birth, occupation, marital status and nationality;</li><li>• Contact details, such as your name, home address, email address, phone number and social media accounts;</li><li>• Identification and authentication details, such as identification card number, passport number, driving license number, tax identification number, photo and CCTV footage;</li><li>• Financial details, such as your payments, credit card numbers and bank account details;</li><li>• Results of any credit check or background checks we have made on you;</li><li>• Employment information, such as job position, salary and work experience;</li><li>• Information identifying personally owned property e.g. vehicle plate number;</li></ul>
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	<ul style="list-style-type: none"> <li>• Information about how you use our websites, applications or other technologies, including IP addresses, cookies or other devices information;</li> <li>• Signatures and electronic signatures; and/or</li> <li>• Other information that you have given us.</li> </ul>
Sensitive personal data	<ul style="list-style-type: none"> <li>• Racial origin;</li> <li>• Religious beliefs; and/or</li> <li>• Biometric data e.g. fingerprint scans, facial recognition data, retina data.</li> </ul>

In some cases, we may enhance the information we hold about you with information we receive from third parties and with information which is publicly or commercially available and/or which is obtained by any other legal means. For example, we may collect publicly available information about you, including online postings, social media platforms, publication databases, journals, and societies.

If you do not or are unable or decline to provide certain personal data or consent us to collect, use, and disclose certain personal data which is necessary for us to make a relationship with you or provide our services to you, we may not be able to stay in contact with you, enter into a contract with you or perform our obligations resulting from a contract entered with you.

## **2. Why and how we collect, process and disclose your personal data**

We only collect, process or disclose your personal data by fair and lawful means to the extent necessary for the specific purposes. We have also set out some lawful reasons why we may process your personal data. These depend on what kind of personal data we are processing. We will collect, disclose and process your personal data for the following purposes:

### 1) Legal compliance

We will rely on the purpose of legal compliance for which the processing of your personal data is necessary for us to comply with a legal obligation to which we are subject as follows:

- a. to comply with the PDPA;
- b. to comply with the laws e.g. Civil and Commercial Code, tax laws and other regulations to which the Company is subject both in Thailand and other countries;
- c. to comply with legal or regulatory obligations and/or orders of authorised persons that apply to the Company e.g. orders by any court of competent jurisdiction, of governmental, supervisory or regulatory authorities or authorised officers; and/or
- d. to carry out prevention and investigatory activities and corrective actions, including those as requested by governmental officials, with respect to our business, services, and assessing compliance with the laws.

### 2) Vital interest

We will rely on the purpose of vital interests where the processing of your personal data is necessary to prevent or avoid danger to a person's life, body or health.

### 3) Contracts

We will rely on the purpose of contracts for which the processing of your personal data is necessary for us to perform under a contract to which you are a party or take steps at your request before entering into a contract including the following reasons:

- a. to establish, engage, manage, review, approve and conclude your business relationships, contracts or transactions with the Company;
- b. to create and keep the account record in connection with the contracts or transactions made between us;
- c. to exercise any rights that we may have in connection with products/services provided to you or us;
- d. to process and manage product picking and delivery; and/or

4) Legitimate interests

We may rely on the purpose of legitimate interests pursued by us or by a third party which require us to use and process your general personal data, except where the interests are overridden by your interests or fundamental rights and freedoms. Considering your interests, rights and freedoms, legitimate interests which allow us to process your personal data include:

- a. to communicate business transactions with you regarding any requests, inquiries and/or engagement with us;
- b. to collect and process personal data of directors, authorised persons, representatives or contact persons of corporate customers and/or suppliers which involves only the general personal data and not including the sensitive personal data;
- c. to send letters and messages to you via electronic mails, instant messaging application (e.g. LINE application) or other communication channels in order to build, manage and maintain our relationships;
- d. to protect our rights, property, safety or operations or those of any of our affiliates, you or others in order to allow us to prevent crime, pursue available remedies or limit damages that we may sustain;
- e. to conduct an internal audit, compliance audit, security audit, risk management, governance and internal control process;
- f. to establish, exercise or defend our legal rights or for the purposes of legal proceedings involving your general personal data; and/or

5) Legal claims

We will rely on the purpose of legal claims where the processing of your sensitive personal data is necessary to establish, exercise or defend legal claims, to comply with actual or prospective legal proceedings, and/or to obtain legal advice.

6) Consent

Apart from the above lawful bases, we may process your personal data with your consent. We will only ask for your consent if there is no other lawful basis to collect and process your personal data, especially, in the case where our processing activities have potential impact on your sensitive personal data. We may request your consent to process your personal data for the following purposes:

- a. to offer services to you through direct communication operated by the Company itself or by any person designated by the Company;
- b. to manage and process public relations or other strategic communications to build relationships with the public;
- c. to share your personal data with our affiliates for the report submission and data centralisation; and/or

If we need to ask for your consent, we will make it clear what we are asking for and ask you to confirm your choice of giving or not giving us your consent. If we cannot provide

a service without your consent to collect or process your personal data, we will make this clear when we ask for your consent.

Note that when the data subject is classified as a minor, quasi-incompetent or incompetent, consent will be requested from their legal representatives, guardians or curators.

### **3. Informing you of your personal data collection**

We will always notify you, before or at the time of collecting your personal data, about our purpose of processing except in some circumstances where such notification is not necessary, such as when:

- 1) you are aware of such new purposes or details of our processing;
- 2) we believe that notice of such new purposes or the details of our processing is impossible or will obstruct the use or disclosure of your personal data, where we have taken suitable measures to protect your rights, freedoms and interests;
- 3) it is urgent to use or disclose your personal data as required by law and we have implemented suitable measures to protect your interests; or
- 4) we are aware of or acquire your personal data from our duty, occupation or profession, and we have maintained such new purposes with confidentiality as required by law.

### **4. Who we share your personal data with**

We may disclose your personal data to the following parties, where reasonably necessary for various purposes as set out above:

- 1) to our affiliates;
- 2) to your colleagues within the organisation that you represent;
- 3) to service providers who host our web services or other information technology systems or otherwise hold or process your information on our behalf, under conditions of confidentiality and security required by law;
- 4) to external contractors, advisors, including lawyers, technicians and auditors who assist/help in running our business, and defending or bringing any legal claims;
- 5) to business partners, service providers, suppliers, subcontractors, including entities and individuals who are or will be, engaged by the Company, or performing services on behalf of the Company (e.g. logistics, courier and warehouse services providers, marketing and advertising services providers);
- 6) to a person who takes over our business and assets, or relevant parts of them in the event of any reorganization, merger, business transfer, whether in whole or in part, sale, purchase, joint venture, assignment, transfer or other disposition of all or any portion of the Company's business, assets or stock or similar transaction; and/or
- 7) to law enforcement agencies, competent regulatory, prosecuting and government authorities, litigation counterparties or other third parties, in order to comply with legal or regulatory obligations or otherwise to protect our rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise address safety issues in any country or territory; or where we are required by law to disclose.

### **5. International transfer of your personal data**

We may transfer your personal data to affiliated and group companies or third parties outside the Kingdom of Thailand for the purposes stated in this Privacy Policy. We will only transfer your collected personal data to a country that, in the view of the Thai Personal Data Protection Commission, has adequate data protections laws. Where it is necessary to transfer your

personal data to country in which such data security standards are deemed inadequate, we will provide appropriate safeguards to protect your interest or the transfer will take place if one of the exceptions defined by the PDPA is met. The exceptions are where:

- 1) the transfer is necessary for compliance with the law;
- 2) you have explicitly consented to the proposed transfer after having been informed of the possible risks of such transfer due to the absence of adequate security standards or safeguards;
- 3) the transfer is necessary for the performance of a contract with you or the implementation of pre-contractual measures taken at your request;
- 4) the transfer is necessary for the conclusion or performance of a contract in your interest between the Company and another natural or legal person;
- 5) the transfer is necessary to protect vital interests of you or other persons, where you are physically or legally incapable of giving consent; or
- 6) the transfer is necessary for important reasons of public interest.

## **6. How long we keep your personal data**

We shall retain your personal data for as long as it is necessary for the above-mentioned purposes or as required by the laws. the Company, its Affiliates and/or relevant third parties will anonymise, delete, destroy, remove or otherwise dispose of your personal data from our database permanently or when we consider the collection, use or disclosure of your personal data is no longer needed, for instance where:

- 1) it is no longer necessary for us to retain your personal data to fulfil the purposes for which we had collected it;
- 2) we believe that your personal data that we hold is inaccurate; or
- 3) you have informed us that you no longer consent to our processing of your personal data.

Sometimes, however:

- 1) there are legal or regulatory requirements which may require us to retain your personal information for a specified period, and in such cases, we will retain your personal information for such specified period; or
- 2) we may need to retain your personal information for certain longer periods in relation to legal disputes, and in such cases, we will retain it for such longer periods to the extent required.

## **7. Your rights**

You have rights to your personal data, and according to the PDPA these rights include:

- 1) Right to access and obtain copy

You have a right to access and obtain a copy of your personal data which falls within the responsibility of the Company, unless the Company is entitled to reject your request under the laws or court orders, or if such request will adversely affect the rights and freedoms of other individuals.

- 2) Right to rectification

You have the right to rectify your inaccurate personal data and to update your incomplete personal data to make it accurate, up-to-date, complete and not misleading. If we reject your request, we will record the rejection with reasons.

- 3) Right to erasure

You have the right to request us to delete, destroy or anonymise your personal data unless there are certain circumstances where the Company has legal grounds to reject your request.

4) Right to restrict

You have the right to request us to restrict the use of your personal data under certain circumstances, e.g. when the Company is carrying out an examination process in accordance with your request to rectify your personal data or to object to the collection, use or disclosure of your personal data, or you request to restrict the use of personal data instead of the deletion or destruction of personal data that is no longer needed.

5) Right to object

You have the right to object to the collection, use or disclosure of your personal data in case the Company proceeds with legitimate interests basis or for the purpose of direct marketing, or scientific, historical or statistic research, unless the Company has legitimate grounds to reject your request. For instance, the Company has compelling legitimate grounds to collect, use or disclose your personal data, or the collection, use or disclosure of your personal data is carried out for the establishment, compliance, or exercise legal claims, or for the reason of our public interests.

6) Right to data portability

You have the right to receive your personal data in case the Company can arrange such personal data to be in the format which is readable or commonly used by way of automatic tools or equipment and can be used or disclosed by automated means. Also, you have the right to request us to send or transfer your personal data to a third party, or to receive your personal data which the Company sent or transferred to the third party, unless it is impossible to do so due to technical circumstances, or because the Company exercises its legitimate right to reject your request.

7) Right to withdraw consent

You have the right to withdraw your consent that has been given to us at any time pursuant to the methods and means prescribed by us, unless the nature of consent does not allow such withdrawal.

Note that when the data subject is classified as a minor, quasi-incompetent or incompetent, the withdrawal of consent requires consent from the holder of parental responsibility over the child, the custodian who has the power to act on behalf of the incompetent person, or the curator who has the power to act on behalf of the quasi-incompetent person, unless the laws specify that consent can be withdrawal by a minor, quasi-incompetent or incompetent themselves.

8) Right to lodge a complaint

You have the right to make a complaint with the Personal Data Protection Committee or their office if the Company does not comply with the PDPA.

In order to exercise your rights stated above, you may refer to our contact details under “Contact Us” stated hereinbelow. If you make a request, we will ask you to confirm your identity (if necessary), and to provide information that helps us to understand your request better. We expect to respond to your request within 7 days of the receipt of your request.

We have full rights and sole discretion to either fulfil or decline your request or charge a reasonable fee to fulfil your request in the case where you have made more than 5 consecutive requests within 5 working days, or in the event that the requests are obviously excessive or unfounded. We are entitled to refuse your request on statutory grounds, and we will notify you of the refusal and our grounds.

## **8. Ensure security**

To keep your personal data safe and secure, we use a range of measures, which include encryption and other forms of security, and store your personal data in secure operating environments, databases, and tools, which are only accessible to the Company's authorized employees, affiliates and third parties who work on our behalf. We undertake to observe generally accepted industry standards and practices in the storage of your personal data or as required by the laws. We also will take appropriate and reasonable technical and organizational measures to ensure of the required data security and to protect your personal data against unauthorized loss, access, use, modification, amendment, disclosure, access, deletion or other processing. We shall require our employees, affiliates and third parties who process your personal data to similarly comply with appropriate privacy standards including obligations to protect your personal data against leakage and to apply appropriate security measures for the processing of information. We will treat information that is not deemed personal data, but when combined with other information or related personal data, could be used to identify you, with the same standards as the personal data.

We will also review such storage and security measures when it is necessary, or when the technology has changed, to efficiently maintain the appropriate security and safety of your personal data. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorized access.

We will maintain and update our security procedures and measures to ensure a level of security for the personal data appropriate to the respective risk and the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing, including to prevent loss and unauthorised collection, access, use, modification, correction or disclosure of personal data. Our security measures apply to all types of data processing regardless of whether the personal data is processed electronically or in paper form.

We certify that all personal data collected will be safely and securely stored under strict security standards. If you have reason to believe that your personal data has been breached or if you have any questions regarding this Privacy Policy, please contact us. See the 'Contact Us' section for contact details.

## **9. Cookies**

We may use "cookies" to improve our internet service. Cookies are small data files that are automatically stored on the web browser in your computer which can be retrieved by our website. Cookies enable our website to remember you and your preferences when you visit the website and enable us to tailor the website to your needs.

The information collected by cookies is anonymous personalised setting information that contains no name or address information, or any information that will enable anyone to contact you via telephone, e-mail or any other means. However, you can disable cookies by changing your web browser settings. Please note that this may affect how you use our website or online services. It may make it difficult for you to transact with us through our website and we may require time to request additional information.

## **10. Changes to this Privacy Policy**

This Privacy Policy may be revised from time to time to conform to practice amendment regarding personal data which relates to our services or to conform to regulations of relevant laws. In the event that there is amendment hereof, all previous versions will become invalid as of such time and we shall inform customers by announcing in our website. Please check back frequently to see any changes.

## **11. Contact us**

If you have any comments, suggestions, questions, complaints or want to exercise your rights regarding your personal data, please send a written request, including your name and contact information (e.g. telephone number, email address, mailing address) to us at:

Data Privacy Officer: Thailand PDPA Committee

Address: 505 Moo 2, Bangpa-In Industrial Estate, Udom Sorayudh Road, T.Klongjig, A.Bangpa-in, Ayudhaya 13610 (Marked "PDPA confidential").

Email: LFLTHLPDPA@LFLOGISTICS.COM

## **12. Effective date**

This Privacy Policy is effective as from May 27, 2021 onwards.

Please note that due to the postponement of the PDPA enforcement under the Royal Decree on Entities and Businesses Not Subject to Enforcement of the PDPA B.E. 2563, you may exercise your rights regarding your personal data on 1 June 2021 onwards.