

## **PERSONAL DATA PROTECTION POLICY FOR UNITHAI'S CUSTOMERS AND VENDORS**

### **Introduction**

Unithai Group (“the Company”, “we”, or “us”) as the contractual party under the business agreement with you have to collect, use and disclose your personal data that you agreed to provide when you agreed to sign the business agreement with us. Your personal data is important to us as the business partner to keep and to use as the customer and vendor database in order to comply with the related laws and the compliance of the business agreement with you.

To set the general guideline for the protection of your personal data protection under the Personal Data Protection law, we announce this policy that you are informed how your personal data are collected, used and disclosed for the purposes of the compliance of the business agreement and the required of related laws.

### **Scope of Intent**

1. We value your right to your privacy and is committed to comply with the Personal Data Protection Act B.E.2562 (“**PDPA**”). Therefore, we provide you this Personal Data Protection Policy (the “**Policy**”), which sets out how United Thai deals with customers and vendors personal data, including personnel files and data subject access requests; and customers and vendors' obligations in relation to personal data.
2. Unithai Group recognizes that customers and vendors have rights in relation to their own personal data processed by Unithai Group.

### **Scope of Policy**

3. The Policy applies to all individual customers and vendors of Unithai Group, its subsidiaries and its affiliates.

### **Exclusion of Policy**

4. The Policy does not apply to the following types of data:
  - a. Personal Data about a deceased individual. It means an exception for Personal Data about a deceased individual who has been dead for 10 years or less, in which case the provisions relating to disclosure of Personal Data will apply;

- b. Business Contact Information: for example, the individual's name, position name/ title, business phone number, business address, business mail address or similar information about that individual not provided solely for his personal purposes; and
- c. Information on non-individuals: for example, Companies, businesses, and entities.

### **Purpose of Policy**

5. While Unithai Group is committed to protecting the privacy and security of your Personal Data, we are also committed to exercising the use of such data to the best of interests of our business with our business partners. The purpose of the Policy is to:
  - a. Provide customers and vendors with a framework that outlines appropriate use of Personal Data in accordance with the PDPA; and
  - b. For your reference and understanding of our collection, use and disclosure of your personal data, including but not limited to your rights to such data in accordance with the PDPA.

### **Definitions**

6. Data protection is about the privacy of the individuals, and is governed by the PDPA which defines, among others, terms as follows:
  - **“Personal data”** means any information relating to a Person, which enables the identification of such Person, whether directly or indirectly, but not including the information of the deceased Person in particular;
  - **“Data controller”** means a Person or a juristic person having the power and duties to make a decisions regarding the collection, use, or disclosure of the Personal Data;
  - **“Data Processor”** means a Person or a juristic person who operates in relation to the collection, use, or disclosure of the Personal Data pursuant to the orders given by or on behalf of a Data Controller, whereby such Person or juristic person in not the Data controller;
  - **“Person”** means a natural person;
  - **“Committee”** means the Personal Data Protection Committee;
  - **"Data subject"** is the identified or identifiable person to whom the personal data relates;
  - **"Special categories of personal data"** means personal data which reveals a data subject' racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data.

### **Data Protection Principles**

7. The collected Personal Data will be used with the following principles:

- a. Unithai Group will use your Personal Data in accordance with this policy and any applicable law;
- b. Unithai Group tells customers and vendors the reason for collecting, using and disclosing their personal data, how it uses such data and the legal basis for processing in the Policy. We will not process personal data of individuals for other incompatible reasons;
- c. Unithai Group will only use your Personal Data for legitimate purposes and only for as long as it is necessary to achieve those purposes, which will be provided to you in requesting your consent, or for as long as we are otherwise required by applicable law to retain it;
- d. We will respect the privacy rights that you have under applicable law, including your right to access the personal information that we hold about you, correct it and keep it up to date; and
- e. We will implement appropriate security measures to keep your personal information safe and secure.

### **Collection and Use of Personal Data**

8. We collect, store, and use the following categories of personal data about you:
  - a. Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
  - b. Date of birth;
  - c. Gender;
  - d. Bank account details;
  - e. CCTV footage and other information obtained through electronics;
  - f. Photographs and videos;
  - g. ID card or passport numbers;
  - h. Occupation and company address and
  - i. Any electronic data that can identify the data subject.
9. Unithai Group will not collect your Personal Data unless we obtain explicit consent. Your Personal Data will be collected as it is necessary under the legitimate objective and within the scope of consent you provide to us.
10. Unithai Group, including our employees, are entitled to collect your personal data directly from you by keeping hard copies and soft copies of the documents. In addition to the direct collection from you, we may collect your personal data from third-parties, provided that we obtain your consent within 30 days from the date of such collection.
11. Unithai Group may collect your personal data via any engagement letter or business contract between you and us.

12. Unithai Group will use your Personal Data to enable us to perform our obligation as stated in the agreement; to enable us to comply with legal compliance; or where it is necessary to do so according to the government order; or public interest or our legitimate interest including but not limited to the following purposes:

- a. Accounting and auditing;
- b. Administration;
- c. Business analysis and planning;
- d. Business contact;
- e. Finance;
- f. Statistics and record;
- g. Filing as required by the law; and
- h. Marketing and advertisement.

13. Please note that we will, if necessary, process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### **Disclosure**

14. Unithai Group may disclose your personal data for the purposes stated above to third-parties listed bellowed in or outside of Thailand where required by law or where necessary. Please note that recipients in some countries have different applicable laws or measures regarding the protection of personal data.

- a. Related companies or affiliates and their employees;
- b. Service providers;
- c. Regulators and government authorities; and

15. Any personal data held directly by the Company is routinely transferred among the Company's affiliates located outside of Thailand.

#### **Retention of Personal Data**

16. Accordingly applicable law, we will retain your personal data until you request to delete it.

#### **Protection of Personal Data**

17. Unithai Group will provide appropriate security measures for preventing the unauthorized or unlawful loss, access to, use, alteration, correction or disclosure of Personal Data. In case that we have to provide your Personal Data to individuals or other juristic persons, we have measures to prevent such persons from using or disclosing such Personal Data unlawfully or without authorization.

18. Unithai Group has put in place security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, or altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third-parties who have a business need to know. They will only process your personal data on our instructions.
19. We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulators of a suspected breach where we are legally required to do so. Details on how we protect your personal data are listed below.
  - a. Provide appropriate security measures for preventing unauthorized or unlawful loss, access to, use, alteration, correction, or disclosure of Personal Data;
  - b. In the circumstance where the Personal Data is to be provided to other Persons or legal persons, apart from the Data Controller, the Data Controller, we shall take action to prevent such persons from using or disclosing such Personal Data unlawfully or without authorization;
  - c. Put in place an examination system for erasure or destruction of Personal Data when the retention period ends, or when the Personal Data is irrelevant or beyond the purpose necessary for which it has been collected, or when the data subject has requested to do so, or when the data subject withdraws consent, except where the retention of such Personal Data is for the purpose of freedom of expression; and
  - d. Notify the Office of any Personal Data breach without delay and, where feasible, within 72 hours after having become aware of it, unless such Personal Data breach is unlikely to result in a risk to the rights and freedoms of the Persons.

### **Rights of the Data Subject**

20. The Data Subject is entitled to exercise the right to access personal data related to yourself in our responsibility and request to obtain the copy. You also have the right to request information on the source of your personal data.
21. The Data Subject is entitled to exercise the right to object to collection, use, or disclosure of your personal data at any time.
22. The Data Subject is entitled to exercise the right to request for deletion, destruction, anonymization, restriction, correction, revision, or update your personal data.
23. The Data Subject is entitled to exercise the right to withdraw your consent at any time by contacting us.

24. If you have any questions or feedback relating to your Personal Data, or would like to withdraw your consent to any use of your Personal Data as set out in this Policy or otherwise; or would like to make access, obtain a copy, object, request for erasure or anonymization, restriction, corrections to your Personal Data records or exercise any rights under the PDPA, please contact us as follows:

**Email:** [privacy@unithai.com](mailto:privacy@unithai.com)

**Write in to:** Data Protection Office  
United Thai Shipping Corporation Limited and affiliated companies  
25 Alma Link Building, 11th Floor, Soi Chitlom,  
Ploenchit Road, Lumpini, Pathumwan, Bangkok 10330

We will generally be able to respond to such queries and/or requests within 30 days of receipt of your request.

25. However, we may require to retain some of your personal data after you make a request for deletion or destruction, for a statutory limitation period prescribed by applicable law or by contractual obligation.

## **List of Appendices**

Appendix 1 – Consent Statement for Customers and Vendors

### **Questions**

**If you have questions or concerns regarding this Policy, please do not hesitate to contact our privacy team via [privacy@unithai.com](mailto:privacy@unithai.com)**