

ALLIED METALS (THAILAND) CO., LTD.

Re: Privacy Policy

1. About Us

This Privacy Policy is developed by Allied Metals (Thailand) Co., Ltd. and its affiliates (“the Company”).

The Company respects personal rights and gives importance to protection of personal data of its customers. Therefore, the Company has developed this Personal Policy to inform you of how the Company collects, uses and discloses your personal, data, and for what purposes. You will also be informed of the procedures used to manage your personal data as well as your legal rights as a data subject under the Personal Data Protection Act, B.E. 2562 (2019).

This Privacy Policy covers the provision of services of the Company, either through websites, applications, social media, and other channels, to customers and visitors of the Company, **but does not apply to the Company’s employees, and job applicants.** You consent that your use of the Company’s services through various channels, or your provision of information to the Company means that you accept the procedures adopted by the Company as specified in this Privacy Policy. It is the Company’s policy to develop and improve its services to be modern, effective, and in conformity with the principles of good governance and laws. As such, the Company may modify this Privacy Policy from time to time to ensure that it is suitable for organizational management and business operations. Thus, you are asked to keep checking this Privacy Policy to be aware of the current personal data protection policy of the Company.

For your convenience, you can click and read each topic of this Privacy Policy as follows:

Privacy Policy

Section 1. Data collected by the Company

Section 2. Sources from which the Company collects your personal data

Section 3. Use of the data collected and lawful basis for processing of personal data

Section 4. Disclosure of data to third parties

Section 5. Data security measures

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Section 1. Data collected by the Company

Personal data means any information relating to a person, which enables the identification of such person, whether directly or indirectly, consisting of both general and sensitive information, but not including the information of the deceased persons and anonymous data. The Company will collect, use or disclose your personal information obtained from you or other reliable sources, such as the Company's communication channels, government agencies, business partners and affiliates. The personal data shall include:

Identity data, which means any information that can identify you, either directly or indirectly, such as first name and last name, date of birth, gender, national identification number, driver's license number, passport number, marital status, and nationality.

Contact data, such as address, email, telephone number, line ID, Facebook, IG, LinkedIn (corporate and individual).

Sensitive data, which means personal data about racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual behavior, criminal record, health, disabilities, labor union membership, genetic or biometric data, or any other information having similar impacts on the data subject as determined by the Personal Data Protection Committee, as well as any other information of similar manner. The Company will not process all types of sensitive data.

Financial, corporate, individual and transaction data, such as account number, credit card number, debit card number, monthly salary, payment, company affidavit, and certificate of VAT registration.

Sales and service data, including information revealing interests, preferences, budget, reasons for buying goods, models and prices of the goods chosen, date of purchase, and progress of a project.

Marketing and communication data:

- Technical and usage data of the website: www.alliedmetals.com, such as log-in data for members and general users, information on sale and purchase of goods, benefits, period of usage, place of usage, pages visited, interests, search for goods, downloading, and IP address;
- Address: website traffic, cookies, type of devices, settings, platforms and other technologies used to access the Company's website;
- Data on EDM (Electronic Direct Mail) of the Company;
- Social network data: Facebook, IG, Line, LinkedIn;
- Data from am_online@alliedmetals.com, and emails under hosting@alliedmetals.com;
- Data from telephone numbers of Bangkok Office, Phuket Office, and Marketing Division;

- Data from facsimile; and
- Data from survey forms.

If there is any change to its communication channels, the Company will ask users to check and update the agreement to choose the channels that users can communicate with and receive information from the Company again.

After-sales services information, such as name of user/person requesting a repair and password, SMS text or email indicating a desire to receive after-sales service, maintenance, product data, project data, interests, preferences, budget, reasons for purchase of goods, information from telephone numbers making contact via Bangkok Office, Phuket Office, and After-Sales Service Department.

Human resource information, such as personal information, employment record, and necessary reference documents.

Supplier/Outsource/Service Provider/Sub-Contractor: the Company will collect data on execution of contract, purchase and requisition, inspection of product or service quality, or efficiency assessment of the service providers.

Section 2. Sources from which the Company collects your personal data

- Directly from you via:
 - EDM: Electronic Direct Mail
 - Social Media
 - Facebook: @alliedmetalsthailand
 - IG: alliedmetals_official
 - Line: @amtofficial
 - LinkedIn ID: Allied Metals (Thailand) Co., Ltd.
 - Email address: am_online@alliedmetals.com; Email under hosting@ alliedmetals.com
 - Contact Centers:
 - (Bangkok Office) +66 2318 0965-8
 - (Phuket Office) +66 7622 4039
 - (Marketing Department) +66 83 540 9387
 - (After-Sales Service Department) +66 86 988 8550

- Fax: +66 2318 0969
- Online and office survey forms
- Website: www.alliedmetals.com

- **Tracking Technology**

Data on use of the website on computer will be collected in the form of cookies or other similar systems when you use the website and social media of Company.

*Collection and transfer of data depend on settings of the users' accounts used to access the social media. Data collection will occur when users start logging into the social media or using www.alliedmetals.com.

*Additional information on the Company's cookies can be found in the Cookies Policy.

- **Affiliates**
- **Third Parties**, such as:
 - Government agencies
 - Financial institutions and online payment channels, including 2C2P
 - Representatives, agents, and other intermediaries
 - Business partners
 - Data service providers

This is to benefit the updating of users' personal data and to improve the quality and efficiency of the Company's products and services.

Section 3. Use of the data collected and lawful basis for processing of personal data

Collection, use or disclosure of personal data by the Company will be performed in accordance with lawful basis. The Company has different lawful bases to process your personal data, depending on purpose of the processing. The lawful bases are set out as follows:

3.1 Consent

The Company will process your personal data based on a specific purpose notified to you and explicit consent granted by you.

3.2 Contract

The Company processes personal data under the contract basis when the processing of such personal data is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract, such as provision of services to you, compliance with internal procedures of the Company, or achievement of objectives of the contract.

3.3 Legal Obligation

The Company processes the personal data in order to comply with the controller's legal obligations, such as prevention and detection of irregular transactions that may lead to illegal activities and reporting of personal data to government agencies as required by laws.

3.4 Public Interest

In some cases, the Company may be required to process personal data in the public interest or in the exercise of duties assigned by government agencies.

3.5 Legitimate Interest

The Company processes personal data for the legitimate interests, such as internal management of the Company and disclosure of data among entities in the same business group to upgrade the Company's work standards, provided that such disclosure is in compliance with the Company's Privacy Policy and Privacy Notice. Processing of personal data may also be carried out in prevention of, response to and reduction of risk of illegal actions, including taking of pictures in the project area or any other areas of the Company, security of persons residing in such areas, relationship maintenance with customers, such as management of complaints and offer of benefits without commercial purpose.

Objectives of Collection and Use

The Company collects, uses and discloses your personal data for:

- Management of purchase and sale: personal data as well as information on budget, goods selected, models and prices of the goods purchased, date of purchase and project progress will be used for delivery of goods after sale and implementation of a project or contract made with a party that the Company employs or uses services from.

*In case of usage of external services (supplier/outsource/service provider/sub-contractor), the Company will use or disclose the data for the purposes of execution of sale and purchase agreements or service agreements, inspection of quality of products or services after installation, or assessment of performance of service providers.

- To facilitate payment via different channels, personal data and financial data will be used for the transfer of funds used to sell and purchase goods between the Company and its trade partners.

- Marketing communication: members or users can receive promotional offers, information on the goods or the Company (corporate communications), or communication between employees to request data, answer questions, express opinions, lodge complaints, and participate in activities, events, seminars and workshops.

Personal and marketing data is used to get back to the data subject or fulfil the data subject's requests.

- After-sales services: name of user/person requesting a repair and password, personal data, product data, project data, opinions expressed, or detail of the request for repair given by you will be used to get back to the user, commence the repair, provide services, and improve the Company's services.

- To provide the services of www.alliedmetals.com: details of systems required to activate or use the website, display of results on the website, downloading, and Internet Protocol (IP) address collected by cookies or similar systems will be used to improve the operating system and display of results on the website in order to improve the efficiency and performance.

- Job application

- Receipt and delivery of documents and goods through messengers

*Information on communication channels and uses will be collected by website service providers and Google Analytics, Line, Facebook, IG and LinkedIn to analyze and determine the channels that are effective and suitable for communication.

Section 4. Disclosure of data to third parties

To effectively manage the works between business partners and the Company through external services (supplier/outsource/service provider/sub-contractor), the Company may have to disclose personal data to the third parties, both in and outside the country. The personal data will be used to:

- Implement a project, summarize the sale, purchase or services, monitor the project, take steps to enter into a contract to procure goods or services, and examine the quality of goods or services of third parties, or evaluate the efficiency of service providers in implementing the project;
- To improve steps to be taken or services to be provided, or to facilitate the sale and/or purchase;
- To make payment for goods and services via financial institutions;
- To improve communication channels to offer information on products or services, to give notice on updates and benefits as well as to serve as channels to send invitations to activities and provide marketing data and/or promotional programs through a company employed to carry out marketing activities or serve as a comprehensive marketing consultant;

- To effectively communicate with user, the personal data may be sent to “system/network service provider and/or SMS/MMS service provider” with relevant information, including first name and last name, contact data, telephone number, privileges of the user, promotions, answers to questions, complaints or requests for additional services via telephone;

- To ensure provision of complete services on www.alliedmetals.com, a third party means a person who is employed to perform works related to technology and information in order to support/manage online systems, such as an IT company, programmer, electronic mail (email) service provider, social network administrator, or agency with expertise in media and technology. Such third party is required to sign a non-disclosure agreement, refrain from disclosing or transferring information to another person, and put in place measures to collect and store personal data during and after use.

- To maintain security and comply with laws, rules, regulations and requirements of authorities and court orders, the Company may need to transfer data of a person or member with suspicious background or criminal records and there may be requests made by competent officials to inspect any act that causes any disorder and danger both during and after use of services. The Company reserves the right to cancel or prohibit the use of services if any user or member has or is suspicious to have criminal records other than those stated in the first paragraph. The Company has no policy to sell your personal data to any third party. Your data will be kept confidential. We will not disclose your data to any person or organization, unless it is necessary to do so to achieve an objective that the Company has notified you per details above or your prior consent has been granted.

Section 5. Data security measures

The Company has strict measures to keep your personal data safe. We respect your privacy and will comply with provisions of applicable laws as follows:

- Your personal data is classified as confidential information;
- There are organizational and technical measures to manage the data and prevent unauthorized access, use or modification, such as information security system and policy to keep customers’ information confidential;

- Personnel, employees and external parties (suppliers/ outsource/ service providers) are obliged to keep customers’ personal data confidential in accordance with the non-disclosure agreement executed with the Company;

- **A process is developed to manage data breach and notify you if your personal data is violated** by alarming DC (GDPR representative in case of users covered by EU laws) within relevant organizations to lead to steps determined by applicable laws.

- If data is sent to a wrong recipient or email address, there will be Confidentiality Notice enclosed at the end of every email sent from the Company; and
- Distribution, reproduction, copying, collection or downloading of an attachment containing personal data by a person who is not an intended recipient named in the email and notified in the process of service usage in relation to relation between last name and email shall be subject to punishment in accordance with related clauses of the Computer Act, B.E. 2560 (2017) or any (applicable) foreign laws governing digital media, computer, technology and information.

Section 6. Disclaimer Notice

You can choose not to receive marketing data via communication channels or by checking details in Opting Out/ Unsubscribe/ Unfollow section.

Moreover, you may refuse to receive any information from the Company by sending an email to the following email address: am_online@alliedmetals.com. In the event that you choose to refuse to receive any information, such cancellation/refusal shall not affect the products or services to be delivered to you or other transactions that you have with the Company.

Communication channels to provide, receive or modify the information on goods, sale and purchase, and marketing privileges to be offered by the Company are as follows:

Telephone:

(Bangkok Office) +66 2318 0965-8

(Phuket Office) +66 7622 4039

(Marketing Department) +66 83 540 9387

(After-Sales Service Department) +66 86 988 8550

Fax: +66 2318 0969

Facebook ID: @alliedmetalsthailand

Instagram ID: alliedmetals_official

Line ID: @amtofficial

LinkedIn ID: Allied Metals (Thailand) Co., Ltd.

Email: am_online@alliedmetals.com

To manage the receipt and transmission of the abovementioned information, the Company reserves the right to modify and improve any contents, requirements and conditions contained in the communication channels identified above without having to give a prior notice or being liable for any damages caused by the above acts, either direct or indirect damages, special damages or incidental damages, or failure to provide services, omission of any acts, or delay in carrying out any acts, unless it is the Company's fault.

There are some limitations in the security of data received and transmitted via the internet although the Company has strict data security measures. Thus, the Company cannot guarantee the safety of data disclosed by you via online channels. The Company's website, www.alliedmetals.com, may contain links to websites of third parties that are not managed by the Company, but are business and service partners of the Company.

When you click a link from the Company's website and are on a third party website, it shall be deemed that your visit to the Company's website is terminated and this Privacy Notice comes to an end. The third party website that you visit may have unauthorized access to your personal data. In the case where such third party website collects, uses or discloses your personal data, the Company will not be responsible for accuracy and completeness of the data and services provided by the third party website. For the purpose of your privacy, we suggest that you read the Privacy Notice on every website you visit.

We cannot guarantee that our website, is free from computer viruses and other tools that may cause any damage. The Company will not be responsible for any loss or damage, either direct or indirect, or the damage caused by inability to use the services.

Section 7. Data retention period

The Company will retain your personal data for no longer than necessary in light of the purposes for which the data was collected as well as for examination of the organization. In the case where you have already terminated your business relationship with the Company, your personal data will be stored in accordance with the Company's Privacy Policy, which is for a minimum period of 10 years for inspection of the provision of goods or services to you and for legal purposes, security, and compliance with rules and regulations of the government agencies. Upon expiration of the retention period, the Company will destroy such personal data. If the data subject has a history of committing any act causing disorder and danger, such history will be covered in the content of personal data and will be disclosed or sent to relevant authorities in the case where there are investigation, resolution or punishment under the laws.

Section 8. Data subject rights

You have legal rights in accordance with the personal data protection act that you should know. You may submit a request to exercise such rights through the channels provided under Section 9, "Contact Us". The Company will fulfill your request as soon as possible, but not later than 30 days or more, depending on quantity and complexity of your request. As a data subject, you may have the following rights:

Right to Withdraw Consent

You may communicate the withdrawal of your consent to collection, use or disclosure of your personal data at any time and the Company will immediately terminate the processing of your personal data. In this regard, the Company may not collect, use or disclose such personal data any further under any other lawful basis. Moreover, the Company will delete your personal data.

Right to Access

You are entitled to request access to and obtain copy of your personal data under responsibility of the Company and to request the disclosure of the acquisition of personal data obtained without your consent. Your request will be fulfilled within 30 days from the date of receipt by the Company.

Right to Rectification

You may ask the Company to rectify your personal data to be accurate, updated, complete, and not misleading.

Right to Data Portability

You have the right to request data concerning your own and to ask the Company to send or transfer the data to another data controller or to receive the data that the Company sent or transferred directly to the other data controller.

Right to Data Erasure

You may ask the Company to erase or destroy your personal data or make it unidentifiable in the following cases:

Your personal data are no longer necessary in relation to the purposes for which it was collected or processed.

As the data subject, you have withdrawn your consent to processing of personal data and the Company does not have the authority by other legal ground to process such personal data.

You have objected to the processing of personal data.

It is an illegal processing of personal data.

The data subject objected to processing of personal data (other than that related to the objection to processing for the purpose of direct marketing) and the Company has no overriding legitimate grounds to refuse such objection.

Right to Restriction of Processing

You have the right to forbid the processing of personal data in the following cases:

It is no longer necessary to process the personal data, but it is still necessary to collect personal data for the purpose of exercising the right to lodge complaints under the law.

The processing is illegal, but the data subject would like to prohibit the processing rather than erasure or destruction of personal data.

When it is during the process to verify accuracy of personal data as requested by you.

When it is during the process to investigate the legitimate cause that is more significant.

Right to Object

You have the right to object the collection, use or disclosure of personal data in the following cases:

The collection, use or disclosure of personal data is performed for the purpose of direct marketing.

The Company processes your personal data for the purposes of scientific, historic or statistic research, unless it is necessary for the performance of task carried out for reasons of public interest by the Company.

The Company collects your personal data to carry out a mission for the public task of the Company or necessary reason for legitimate benefits, unless the Company demonstrates a legitimate cause that is more significant or it is necessary for the establishment, compliance, exercise or defense of legal claims.

Right to Lodge a Complaint

You have the right to lodge your complaint to relevant government agencies if the Company or its employee or contractor violates or fails to comply with provisions of the personal data protection act.

Section 9. Contact Us

If you need to contact us in order to exercise the data subject rights, access or modify personal data, revise the acceptance of communication channels, or if you have any questions or complaints, you can reach us at **dc-pdpa@alliedmetals.com**.

Section 10. Change to the Privacy Policy

We may amend this Privacy Policy and will notify you via the Company's communication channels so that you are aware of our current Privacy Policy and revise your acceptance of this Privacy Policy again.

This Privacy Policy is published on 25 May 2022.

Last update: 30 June 2022
