

**Privacy Policy**  
**of**  
**SUEHIRO EPM CORPORATION Bangkok Office**  
**(for Customer and Supplier)**

**1. Introduction**

This personal data protection policy (hereinafter referred to as the "**Privacy Policy**") contains the policies, procedures, and practices to be followed by SUEHIRO EPM CORPORATION Bangkok Office (hereinafter referred to as the "**Office**") in connection with the collection, use, and disclosure of personal data (hereinafter referred to as "**Personal Data**") of SUEHIRO EPM CORPORATION (hereinafter referred to as "**Headquarter**") and the Office's customer and/or individual having involvement with a juristic person which is a customer (hereinafter referred to as the "**Customer**") and, the Headquarter and the Office's supplier and/or individual having involvement with a juristic person which is a supplier (hereinafter referred to as the "**Supplier**").

The Headquarter and the Office believes the Customer and Supplier's privacy is important. Therefore, to fulfill the Headquarter and the Office's commitment to respect and protect the Customer and Supplier's privacy in relation to the purchase and service, the Office has placed importance on personal data protection and shall comply with the Personal Data Protection Act B.E.2562 (2019) of Thailand (hereinafter referred to as the "**PDPA**"), and other relevant laws and regulations (collectively referred to as the "**Applicable Laws**"). The Office hereby formulated this Privacy Policy to inform the Customer and/or the Supplier, as a data subject (collectively referred to as "**you**" or "**your**"), of the details of the collection, use, disclosure and processing of the Personal Data and other relevant data.

Under this Privacy Policy, the Office shall comply with the following general principles:

- 1) The Office shall inform you that your Personal Data will be collected, and the purposes of collection, use, and/or disclosure of your Personal Data, including the lawful basis for such collection, use, and/or disclosure. In the case where it is regulated by law that the collection shall be done under your consent, the Office shall take appropriate action to obtain explicit consent from you prior to the collection of such Personal Data.
- 2) The Office shall only collect the Personal Data that is necessary to carry out the specified purposes.
- 3) The Office shall use and/or disclose your Personal Data only for the purposes for which it has been collected, except the use and/or disclosure under your consent or as required by Applicable Laws.
- 4) The Office shall retain your Personal Data only for the period as necessary to fulfill the specified purposes. Once your relationship with the Headquarter and/or the Office ends or the purposes were completely accomplished, the Office may further retain your Personal Data for a period as necessary for the Headquarter and/or the Office's business operation or for a period as required or permitted by Applicable Laws or other relevant laws and regulations. However, the retention period shall not exceed 3 years after the end of relationship or completion of the specified purposes.

- 5) The Office shall ensure that your Personal Data is accurate, complete, and up-to-date.
- 6) The Office shall implement appropriate technical and organizational measures to secure your Personal Data.
- 7) You, as a Data Subject, are entitled to, at any time, exercise your rights as appropriate in accordance with the rights of Data Subject under the Applicable Laws.

## **2. Personal Data Processing Method**

Principally, your Personal Data will be collected, used, and disclosed for purposes pertaining to the activities of the Office, including procurement and locating suppliers of goods or services for the Headquarter, quality and quantity inspection and control by the Headquarter of products to be manufactured on commission or purchased and delivered in Thailand, guidance on products sold by the Headquarter to distributors or consumers, and communication and dissemination of information on new products or services offered by the Headquarter. The Personal Data will only be used for the stated purposes. The collection, use, or disclosure of the Personal Data shall not be conducted in a manner that is different from the purpose previously notified to you who is a Data Subject.

However, the Office may collect, use, or disclose your Personal Data for a purpose other than the originally stated purpose where the new purpose is required by the laws or where the Office has obtained your consent in writing prior to the collection, use, or disclosure for each new purpose.

### **(1) Purposes, Lawful Basis and Personal Data shall be collected**

The type and amount of Personal Data collected by the Office will be in accordance with the necessity to accomplish reasonable business purposes only. The Office will process your Personal Data only for the following purposes. Failure to provide Personal Data may result in the inability or insufficiency of the responses described in the respective purposes.

A. Purposes under the Lawful Basis other than Consent basis

<b>Purposes</b>	<b>Lawful Basis</b>	<b>Personal Data shall be collected</b>
For procurement and locating suppliers of goods or services for the Headquarter which the Personal Data is required for conclusion of the contract.	Contract basis <i>(the contract Customer or Supplier will make/have made with the Headquarter)</i>	Name, date of birth, gender, address, working place (department), telephone number, email address, and so on.
For quality and quantity inspection and control by the Headquarter of products to be manufactured on commission or purchased and delivered in Thailand.	Contract basis <i>(the contract Customer or Supplier have made with the Headquarter)</i>	Name, date of birth, gender, address, working place (department), telephone number, email address, and so on.
For guidance on products sold by the Headquarter to distributors or consumers.	Contract basis <i>(the contract Customer or Supplier have made with the Headquarter)</i>	Name, date of birth, gender, address, working place (department), telephone number, email address, and so on.
For communication and dissemination of information on new products or services offered by the Headquarter upon your inquiry.	Legitimate interests basis	Name, date of birth, gender, address, working place (department), telephone number, email address, and so on.
For managing the security of the Office.	Legitimate interests basis	CCTV recording of the appearance, demeanor and sound of the Customer and Supplier.
For coordination with the government offices pursuant to the laws and regulation, including but not limited to, the Revenue Department, Ministry of Commerce and so on.	Legal obligation basis	Name, date of birth, gender, ID card no., Tax ID no., passport no., nationality, address, working place (department), telephone number, email address, and so on.

## B. Purposes under Consent basis

<b>Purposes</b>	<b>Lawful Basis</b>	<b>Personal Data shall be collected</b>
For provision of information regarding new products and/or services of the Office, or any marketing promotions or offers may be interesting for you.	Consent basis	Name, address, working place (department), telephone number, email address, and so on.

In principle, the Office shall not collect Sensitive Personal Data, such as data relating to political opinion or religious belief, data relating to medical treatment and health conditions, or data relating to committing an offence or being alleged to commit an offence, and so on. However, in case it is necessary for the Office to collect the said Sensitive Personal Data, the Office shall notify you and proceed as appropriate to obtain explicit consent from you prior to the said collection.

In addition, the Office shall not collect the Personal Data from any other sources, apart from you directly, except where the Office has notified you of the collection of such Personal Data from other sources without delay but shall not exceed thirty (30) days from the date of such collection and has obtained the written consent from you.

### (2) Use and Disclosure of Personal Data

In principle, the collected Personal Data shall only be used for the stated purposes. However, in case it is necessary to the Office to use or disclose the collected Personal Data for a purpose other than the originally stated purpose, the Office shall ensure that the said use and/or disclosure shall be informed to you without delay and shall be conducted in accordance with the requirement or permission of the Applicable Laws or, for the case where your consent is required, you will be informed and requested for explicit consent for such new purpose.

The Office shall control the storage of all Personal Data to be secure and not disclose any Personal Data to the third party, except where any of the following conditions are applied.

- (a) The disclosure has been proceeded under your explicit consent;
- (b) The disclosure is for accomplishing the purpose for which the said Personal Data was originally collected.
- (c) The Office is permitted or required to do so by applicable laws.
- (d) There is an emergency to protect your safety.

Furthermore, the Office may disclose your Personal Data to the subsidiary company or any organization, which is responsible for performing the purposes specified in this Privacy Policy. In this regard, the Office shall require the said person, company or organization to take appropriate measures to maintain the security of the Personal Data, which may receive from the Office for their performance, in consistence with the Office's Privacy Policy and shall require the said person, company or organization not to use the Personal Data received from the Office for any other purposes.

### **3. Transfer of Personal Data**

Your Personal Data may be transferred to the affiliate companies located outside of Thailand, (hereinafter referred to as “Affiliates”) as described below.

SUEHIRO EPM CORPORATION (Headquarter)

In case the destination country has insufficient standards for protecting the personal data in accordance with the personal data protection standards stipulated in the personal data protection law of Thailand, the Office shall ensure that the transfer of your Personal Data proceeds in accordance with the appropriate security standards, and shall ensure that all Affiliates are required to follow the relevant privacy policy relating with the provisions set forth in this Privacy Policy.

### **4. Retention Method and Period**

The Personal Data collected by the Office shall be stored on lockable storage shelves or shared folder and managed in safe and retained by the Office under the appropriate technical and organizational measures.

In this regard, your Personal Data shall be retained by the Office for the period as necessary to fulfill the specified purposes. Once your relationship with the Office ends or the purposes were completely accomplished, the Office may further retain your Personal Data for a period as necessary for the Office’s business operation or for a period as required or permitted by Applicable Laws or other relevant laws and regulations. However, the retention period shall not exceed three (3) years after the end of relationship or completion of the specified purposes. After the said period is finished, the Office shall take appropriate steps to delete or destroy your Personal Data or make it anonymous.

### **5. Rights of the Data Subject**

As a Data Subject, you are entitled to, at any time, exercise any of the right specified below, as stipulated in the Applicable Laws.

- (a) Rights to access your own Personal Data;
- (b) Rights to obtain a copy of your own Personal Data;
- (c) Rights to request to delete or suspend the use of your own Personal Data after the contract or agreement is terminated or expired, except for the Personal Data which is necessary to be retained by the Office for the period stipulated by any relevant law;
- (d) Rights to rectify your own Personal Data to be correct, complete, and up-to-date;
- (e) Rights to object the collection, use or disclosure of your Personal Data at any time. However, the Office shall continue to collect, use, and/or disclose your Personal Data if the collection, use or disclosure, which you lodge the objection, is undertaken under legitimate ground or other grounds permitted by PDPA.

- (f) Rights to lodge a complaint in case you are of the opinion that the said collection, use or disclosure is not in accordance with this Privacy Policy or the Applicable Laws;
- (g) Rights to withdraw your consent which was given to the Office;
- (h) Rights to be informed when your Personal Data is at risk as stipulated by the Applicable Laws.

## **6. Data Controller and Contact Information**

This detail of Data Controller is as follows:

SUEHIRO EPM CORPORATION Bangkok Office

Address : 2 Jasmine Bldg., 12th Fl., Soi Prasarnmitr(Sukhumvit23), Sukhumvit Rd.,  
North Klongtoey, Wattana, Bangkok 10110 THAILAND

TEL : 02-612-7310

In case you have any inquiries or complaints in connection with this Privacy Policy, you can contact the Office at the details specified below.

Department: SUEHIRO EPM CORPORATION  
General Affairs and Accounting Department

E-mail : [info@suehiroepm.co.jp](mailto:info@suehiroepm.co.jp)

TEL : +81-59-353-7551

In this regard, please be informed that, to submit any inquiries or complaints as specified above, your Personal Data, such as, name and surname, working place, company and/or organization name, address, email address, telephone number, and so on, shall be required for verification of your identity.

## **7. Modification and Revision**

The Office may modify, revise, or amend this Privacy Policy at any time and in any manner in order to comply with the Applicable Laws or instructions or guidelines of the competent authority, or security standards for personal data protection. In this regard, the Office shall notify you such modification, revision, or amendment through this Website.

This Privacy Policy was last updated in March 2024.