

## Privacy Notice

**Latest update:** June 18, 2021

Dear Vendor and business partner

Laemcharoen Seafood Company Limited ("**We**") values your personal data and the personal data of individuals associated with you or your business ("**Personal Data**") under the Personal Data Protection Act B.E. 2019 ("**PDPA**"). Therefore, we provide this Privacy Notice to describe the collection, use, and/or disclosure (collectively, "**Processing**") of Personal Data with the following details:

- Personal data we collect, including information that you provide to us about yourself, people associated with you, or your business ("**You**")
- How we use your personal data
- Disclosure of your personal data
- The choices we offer you, including how to access your personal data and how to keep your personal data up to date
- Data subject right

### 1. Collection of personal data

We will collect your personal data only if we have necessary and reasonable reasons to process it. Depending on the circumstances, the personal data we collect may be collected in a variety of categories and types of personal data.

We may collect your personal data from a variety of sources, such as:

- Information obtained directly from you as part of becoming a vendor or business partner with us.
- Information provided by third parties as part of becoming a vendor or business partner with us, such as credit information, trade data, information from our customers or your customers, information from law enforcement, etc.
- Conversations between you and us, including recordings of telephone conversations, letters, emails, message record or any other method.
- When you use our website, applications, or online channels.
- When you make your personal data explicitly public, you will be asked to provide your personal data to the public. In such cases, we will only collect personal data that you have chosen to make public.

We may also, together with third parties, collect your personal data relating to online activities when you visit our online resources.

Types of your personal data collected are the following:

- **Personal information:** First name, surname, nickname, gender, date of birth, age, blood group, personal identification number, other identification number issued by the government authorities to be used as an identity verification document, important documents of legal entities issued by the government (in case that the business partner is a juristic person), taxpayer identification number, photograph as appears in the identification card, signatures, face and voice recognition, information and pictures and images or records from CCTV
- **Financial information:** Bank account information, billing address, credit card number, cardholder's name, and credit card details
- **Contact information:** Address, telephone number, e-mail address and social media details
- **Electronic data:** IP addresses, cookies, activity logs, identification information
- **Sensitive personal data:**
  - Religion

We may also collect some sensitive personal data about you for our partnering. However, we will not collect, use and/or disclose this type of data without your consent unless the law allows us to do so.

If you provide us with any person's personal data, you agree and certify that you have informed them that we may process their personal data and they have also been notified of our Privacy Notice. And as required by the Personal Data Protection law, you have obtained the consent of such person in accordance with the format and content we define for which we process their personal data.

## 2. How we use your personal data

We will only use your personal data if we have the necessary and reasonable reasons for processing it. We will use at least one of the following legal bases to process your personal data:

- **Contractual basis** - When we are required to process your personal data in order to comply with your contract or before we enter into a contract with you.
- **Legal obligation basis** - When we are required to process your personal data in order to comply with the law or its legal obligations.
- **Legitimate interest basis** - When it is in our legitimate interest to process your personal data as permitted by law, unless we see that our legitimate interests are less important than your interests and fundamental rights and freedoms.

- **Consent basis** - When you give us your consent to process your personal data for a particular purpose.

However, we will not process sensitive personal data without your consent, unless permitted by law.

We may process your personal data under applicable laws and legal basis for the following purposes:

| Purpose of Processing Personal Data   | Legal Basis   |
|---|---|
| Sourcing goods and/or services  |   |
| <ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To register and keep your data in database.</li> <li>• To consider purchasing goods and/or services with you.</li> <li>• For the making of your order and/or service and to collect it as proof of order.</li> <li>• To receive goods and/or services from you.</li> <li>• To communicate with you about products and/or services.</li> <li>• To perform agreements and contracts between you and us.</li> <li>• To manage payments, manage expenses, and collect evidence of payment.</li> <li>• To check the health information of the service provider in a specific position.</li> <li>• To comply with your requests based on your rights to your personal data in our possession.</li> <li>• For consideration of letter of guarantee and collateral.</li> </ul> | <ul style="list-style-type: none"> <li>• Contractual basis</li> <li>• Consent basis</li> <li>• Legal obligation basis</li> <li>• Legitimate interest basis</li> </ul> |
| Business relations  |   |
| <ul style="list-style-type: none"> <li>• To manage our relationship with you or your business.</li> <li>• To store and keep your contact information up to date.</li> </ul>   | <ul style="list-style-type: none"> <li>• Legitimate interest basis</li> </ul>   |
| business operations and business development  |   |
| <ul style="list-style-type: none"> <li>• To plan the development of existing products and services.</li> <li>• To evaluate your suitability to be a vendor or business partner with us.</li> </ul>  | <ul style="list-style-type: none"> <li>• Legitimate interest basis</li> </ul>   |

| Purpose of Processing Personal Data  | Legal Basis   |
|--|---|
| Security and risk management   |   |
| <ul style="list-style-type: none"> <li>• To prevent crimes, manage our safety and hygiene, such as installing a closed-circuit television (CCTV) inside and around our restaurants and/or areas where your animations or voice recordings may be stored.</li> <li>• To prevent accidents that may occur in our workplaces.</li> <li>• To prepare audit reports, summaries of amendments, and internal prevention guidelines.</li> <li>• To deal with legal disputes.</li> <li>• To comply with applicable laws and regulations.</li> </ul> | <ul style="list-style-type: none"> <li>• Legal obligation basis</li> <li>• Legitimate interest basis</li> </ul> |

We will not process your personal data for purposes other than those set in this Privacy Notice. If we will further process your personal data which is not specified in this Privacy Notice, we will notify you and ask for your consent before such processing unless permitted by law to do so without your consent. You have the right to consent or refuse to process your Personal Data.

**Refusal to give Personal Data to us**

In the event that we are required to process your personal data under the laws permitted by law or contract terms between you and us, and you do not provide personal data to us. We may not be able to meet our obligations or to you and may not continue to do anything related to you.

**3. Disclosure of your personal data**

We will only disclose your personal data if we have the necessary and reasonable reasons for processing it. This can include the following cases:

- It is necessary to comply with the terms of the contract.
- It is legally obliged to do so (e.g. withholding tax, etc.).
- It is necessary to report according to the law, prosecute, exercise legal rights, or protect legal rights.
- For the benefit of our legitimate business or for our legitimate interests (e.g. for risk management, in-house reporting, to analyze information, to verify identity, so that other companies can provide the services you have requested, to assess your suitability to be a partner or business partner with us, etc.)
- Obtain your consent to disclose your personal data to third parties and you have given your consent to do so.

We may be required to disclose your personal data to any of the following third parties:

- Our affiliates.
- Subcontractors, any broker, or service provider that works for us or provides services to us, including subcontractors, brokers, service providers, supervisors, and workers.
- The person assigned to manage any of your interests, including your intermediaries, contact persons, and representatives, such as delegates, lawyers, etc.
- Any person you pay and/or receive payments, including financial institutions and payment service providers.
- Any person or company which involves the restructuring of company, merger or acquisition that has occurred or may have occurred. This includes the assignment of any rights or obligations that we have under the contract between us and you.
- Law enforcement agencies, government, courts, dispute resolution agencies, auditors, and any person appointed or requested to monitor our operational activities.
- Any other person who is involved in any dispute that arises.
- Anti-corruption agencies that use personal data to verify your identity and investigate and prevent fraud, including financial crimes.
- Any person we have been instructed from you to disclose your personal data to.

#### **Disclosure of personal data abroad**

We may need to disclose your personal data to foreign countries in order to fulfill contracts made between you and us to comply with legal requirements, to protect the public interest and/or for our legitimate interests. The laws of some countries may require that certain types of personal data be disclosed to individuals as required by such law (e.g. disclosed to tax authorities, etc.). In this case, we will only disclose personal data to individuals who have the right to see or access such personal data and will establish appropriate levels of personal data protection measures.

#### **4. Retention of personal data**

We will retain your personal data for as long as necessary to meet the purposes set out in this Privacy Notice unless requested or permitted by law. When we do not need to process your personal data, we will process the deletion of your personal data or make your personal data anonymized, or if it is not possible (e.g. your personal data is stored in a permanent backup database), we will keep your personal data secure and exclude your personal data from further processing until we can proceed with the deletion of your personal data.

## **Accuracy of your personal data**

We ask for your cooperation in keeping your personal data in our possession up to date, complete, and accurate. You can notify us when your personal data changes through the contact channels in Article 8 below.

We may ask you to update your personal data from time to time so that it is up-to-date, accurate, and complete.

## **5. Data subject right**

You have the following rights to process your Personal Data:

- **Right to withdraw consent:** You have the right to withdraw consent that you have given to us at any time according to the procedures and methods that we define unless as a condition, consent cannot be withdrawn.
- **Right to access:** You have the right to access, obtain a copy of your personal data or ask to disclose the acquisition of your personal data, unless we have the right to refuse your request in accordance with law or court order, or if your request may have potentially damaged the rights and freedoms of another person.
- **Right to correct:** You have the right to correct or change of your personal data, in the event that the information is inaccurate or incomplete and keeps your information up to date, completely and not misleading.
- **Right to erasure:** You have the right to request erasure, destruction or make personal data non-personally identifiable information, unless we comply with applicable laws for the retention of such data.
- **Right to object:** You have the right to object to the processing of your personal data unless we have reasons to lawfully refuse your request.
- **Right to restrict processing:** You have the right to request that the processing of your personal data be suspended temporarily or permanently.
- **Right to transfer:** You have the right to obtain your personal data electronically or request that such personal data be sent or transferred to a third party, unless we cannot, by technical condition, or have reasons for lawfully denying your request.
- **Right to lodge a complaint:** You have the right to complain to the relevant government agency in case you believe that our actions do not comply with PDPA provided.

You may exercise your rights at any time by contacting us via the contact channels set out in this Privacy Notice, free of charge. However, we may charge reasonable fees if your request is unfounded, redundant, or overreacting, and we may refuse to process your requests in those circumstances.

## **Dealing with complaints**

You can contact us with a complaint about how we process your personal data on the contact channels set out in this Privacy Notice.

## **6. Security of your personal data**

We take the security of your personal data very seriously, so we will always review and implement up-to-date physical and technical security measures when processing your personal data. We have established internal control policies and measures to ensure that your personal data is not lost, inadvertently destroyed, misused, exposed and accessed by individuals who are not our employees. Our employees are trained to handle personal data safely under our policies.

## **7. Amendments to the Privacy Notice**

This Privacy Notice is effective from the date specified at the top of the document. Changes may be made from time to time. However, the latest changes can be found on the dates listed above in this Privacy Notice. You should periodically review this Privacy Notice to be aware of any changes that may occur.

## **8. Contact Us**

If you have any questions about the protection of your personal data or request to exercise any of your rights, you can contact us at:

- **Contact at** : MK Restaurant Group Public Company Limited  
1200 Debaratna Road, Bangna-Tai, Bangna, Bangkok 10260
- **E-mail to** : [dpo@mkrestaurantgroup.com](mailto:dpo@mkrestaurantgroup.com) or
- **Telephone Number** : 02-836-1088 or 02-066-1000