

Privacy Policy

Moshi Moshi Retail Corporation Public Company Limited

Data Protection Policy

Moshi Moshi Retail Corporation Public Company Limited

Moshi Moshi Retail Corporation Public Company Limited (“the Company”) has collected, used, disclosed personal information of customers, partners, employees, applicants, personnel, and any other related person. The Company respects and recognizes the importance of the Personal Data Protection Act, B.E. 2562 (2019), so it has established this Privacy Policy to require that the processing of personal information has rules, regulations, management and appropriate measures. It shall be deemed that it is the Company's policy applying to all employees to ensure that the personal information obtained by the Company will be used in accordance with the regulations and the personal data protection law with the following details:

1. Definitions

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| “Company” | refers to Moshi Moshi Retail Corporation Public Company Limited |
| “Personal information” | refers to information about a person, which enables it to identify a person directly or indirectly, but does not include the information of the deceased in particular. |
| “Sensitive personal information” | refers to personal information about race, ethnicity, political opinion, belief in cult, religion or philosophy, sexual behavior, criminal history, health information, disability, labor union information, genetic information, biological information, or any other information that affects the information owner in the same way as the Data Protection Committee announced. |
| “Personal Data Controller” | refers to a person or juristic person who has the authority to decide on the collection, use, or disclosure of personal information. |
| “Personal Data Processor” | refers to a person or juristic person who carries out the collection, use, or disclosure of personal data according to the order or on behalf of the personal data controller. |
| “Personal Data Subject” | refers to a natural person to whom the personal data is identified. |
| “Data Processing” | refers to any action relating to the collection, use, and disclosure of personal information. |
| “Board of Directors” | refers to the Board of Directors of Moshi Moshi Retail Corporation Public Company Limited. |
| “Executive” | refers to the management of Moshi Moshi Retail Corporation Public Company Limited. |
| “Employee” | refers to an employee at the subordinate level of the Company's management of Moshi Moshi Retail Corporation Public Company Limited |

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| “Privacy Notice” | refers to an announcement on the website to inform the website user of the purpose, collecting method, process, and store the personal data of the website. |
| “Cookie” | refers to a unique file created by the website and stored on the user's computer or communication device. It stores personal information, usage, and settings of the user to improve the user's website experience. |

2. Principles and Practices on Personal Information Protection

Personal Data Protection

The Company as a controller of personal information in accordance with the Personal Data Protection Act, pursuant to the principles of personal data protection as specified below in order to ensure the correct use of personal information. The Company shall manage itself to achieve the following actions:

(1) Collection, use, or disclosure of personal information:

The Company shall prescribe an explicit and simple method or form for requesting consent with the personal data subject by doing it in a form of either a letter or an electronic system.

(2) Notification of the purpose of the collection, use, or disclosure of personal information:

The Company shall clearly specify a method or form for informing the purpose and necessary information to the personal data subject before collecting or while collecting the personal information. It is defined in either a letter or an electronic system.

(The Company shall consider the collection of personal data as necessary for the purpose, which is notified to the personal data subject.)

(3) Personal Data Protection

The Company shall provide security measures of personal information for collecting, using, or disclosing, including sending or transferring personal data to other persons, and review the measures in accordance with the changes and prevent unauthorized use or disclosure of the information.

(4) Personal Data Management

(a) The Company shall require that the rights and restrictions of access to personal information, amendments, alterations, deletion, or destruction of information must be made under the request of the data subject. In the event that it is deemed appropriate to amend it, the Company shall notify the personal data subject every time.

(b) The Company shall require a follow-up and investigation of deletion or destruction of personal information when the retention period is overdue, or if the information is irrelevant or beyond the purpose specified or the data subject requests or withdrawals of consent.

- (c) The Company shall determine to have recording of personal information so that the personal data subject can access or verify it.
- (d) The Company shall set up the process of informing the event of a breach of personal information to the personal data protection officer and the personal data subject immediately upon detection.

In the event that the Company may acquire the personal information of other personal data controllers who are legally bound by the law in the form of a contract, the Company shall act as the personal data processor in accordance with the Personal Data Protection Act and shall comply with the principles of personal data protection as specified below to ensure the correct use of personal information. The Company shall manage itself to achieve the following actions:

(1) Collection, use, or disclosure of personal information:

The Company shall operate under the method or form specified by the Personal Data Controller only.

(2) Notification of the purpose of the collection, use, or disclosure of personal information:

The Company shall operate under the method or form specified by the Personal Data Controller only.

(3) Personal Data Protection

The Company shall provide security measures of personal information for collecting, using, or disclosing, including sending or transferring personal data to other persons, and review the measures in accordance with the changes and prevent unauthorized use or disclosure of the information.

(4) Personal Data Management

- (a) The Company shall require that the rights and restrictions of access to personal data, amendments, alterations, deletions, or destruction of information must be done only under the method or form prescribed by the Personal Data Controller, or in the event that it is deemed appropriate to be amended or altered, the Company shall notify the Personal Data Controller every time.
- (b) The Company shall require a follow-up and investigation of deletion or destruction of personal information under the method or form specified by the Personal Date Controller only.
- (c) The Company shall require a record of personal information so that the personal data subject, personal data controller, and the Office of the Personal Data Protection Committee can access or verify it.
- (d) The Company shall require the process of informing the event of a breach of personal information to the personal data controller immediately upon detection.

3. Purpose and Collection of Personal Information

3.1. The Company as a personal data controller under the Personal Data Protection Act shall carry out collection or use personal information with legitimate and fair purposes and shall inform the data subject of such purposes for the benefit of business operations, as well as complying with any laws that the Company or persons shall comply with.

3.2. The company as a personal data controller under the Personal Data Protection Act will only collect or use personal data only to the extent necessary to operate under the purposes of the personal data processing. In the event that the Company takes any actions other than the designated purposes, the Company will inform the data owner and obtain consent if necessary.

3.3. In the event that the Company collects and uses personal information, the Company will seek the consent of the data subject first, unless there is an exception under the personal data protection law that can be done without requesting such consent.

3.4. The Company shall not store personal information about race, ethnicity, political opinion, belief in cult, religion or philosophy, sexual behavior, criminal history, health information, disability, labor union information, genetic information, biological information, or any other information that affects the data subject in the same way, unless there is an exception under the personal data protection law that can be done without requesting such consent. The Company will collect and use such personal information with caution under appropriate security measures.

4. Disclosure of Personal Information

4.1. The Company may disclose personal information to individuals, state agencies, government agencies, regulatory agencies, organizations, external entities, which have contracts with the Company or under the rules permitted by law for the Company to disclose.

4.2. The Company may disclose personal data to its affiliated companies for the benefit of the Company's operations and for the benefit of its data subjects under appropriate security measures.

5. Personal Data Processing by Third Parties

The company may need to send or transfer personal data to a person or third parties for processing. The Company shall oversee the delivery or transfer of personal information in accordance with the law and shall take measures to protect personal information that is deemed necessary and appropriate in accordance with confidentiality standards, such as data fragmentation before sending personal information. Necessary delivery of data includes having a confidentiality agreement or a data processing agreement with the recipient of such data.

6. Sending or Transfer of Personal Information to Foreign Countries

The Company may need to send or transfer personal information to companies in the Company's network located abroad or to other data recipients as part of the Company's normal business operations, such as sending or transferring personal information to be stored on the server or cloud in different countries. The company will be aware and consider that the destination country has been certified to have adequate personal data protection standards.

In case the destination country has insufficient standards, the Company will oversee the transmission or transfer of personal information in accordance with the law and will take measures to protect the personal information that is deemed necessary and appropriate in conformity to the confidentiality standards, unless it meets exceptions to the personal data protection law in cases where the destination country has insufficient standards. International transfers of personal data are also possible if there are exceptions to the law for complying with the law, obtaining consent from the data subject, being necessary to perform the contract, preventing life danger, or being necessary for the public interests.

7. Personal Data Storage Period

The Company will retain personal data for the period necessary to conduct business for the purposes or throughout the period necessary to achieve the purposes, which may be required to retain it later if required or authorized by law. Take for example, being stored in accordance with the law on the prevention and suppression of money laundering, stored for the purpose of proving and investigating the case of a dispute within the legal age defined by law for a period of no exceeding 10 years.

The Company will delete or destroy personal information or make it non-personally identifiable at the expiration or end of such period.

8. Security

8.1. The Company shall provide appropriate security measures for personal information, including technical measures, such as password setting, secure sockets layer/SSL, and network equipment security system; and organizational measures, namely information security policy formulation, confidentiality, access rights, assessment and risk management, and rules and regulations establishment. Such measures are strictly enforced and regularly reviewed for improvements or when technology changes to ensure security efficiency and prevent the breach of personal data, loss, access, destruction, use, alteration, correct, application, or wrongful disclosure of personal data.

8.2. All employees and personnel of the Company are obliged to comply with the personal information protection law, taking into account the security of personal information and not using the information obtained from the operation for other purposes or causing damage to the Company.

9. Breach of Personal Information

In the event of a personal data breach, the Company will notify the Office of the Personal Data Protection Committee within 72 hours from the date the Company becomes aware of the breach; or if the breach of personal data is at high risk of affecting the rights and freedoms of the data subject, the Company will report the breach with the remedies of such breach to the data subject without delay.

10. Rights of Personal Data Subjects

The rights of the data owner are legal rights. The data subject can request the exercise of rights under the terms of the law, and the Company will proceed to the data subject's request without delay. In this regard, if the Company has to reject the request, the Company will notify the data subject of the reasons for the refusal.

10.1 With respect to the right to withdraw consent, if the data subject has given consent to the Company to collect, use, or disclose personal information (whether it is the consent provided by the data subject before the date of enforcement of the personal data protection law or afterwards), the data subject has the right to withdraw consent at any time as long as the personal data is stored by the Company. Unless such rights are restricted by law or there are contracts providing you with benefits, the Company will inform you of the consequences that may arise from the withdrawal of such consent.

10.2 Regarding the right to access personal information, the data subject has the right to request access or obtain a copy of his or her personal information that is under the Company's responsibility, including asking the Company to disclose the acquisition of such personal data that the data subject has not provided consent. The Company has the right to reject the request if it is in accordance with the law or court order, or the access or request of the copy affects the rights of other persons.

10.3 For the right to transfer personal information, the data subject has the right to obtain personal information in the event that the Company has prepared personal information in a form that can be read or used with tools or devices that works automatically and can be used or disclosed by automated means. The data object is also entitled to request the Company for sending or transferring personal information in such form to other personal data controllers when it can be done by automatic means and to obtain personal information that the Company sends or transfers in such form directly to other personal information controllers, unless it is not possible to do so for technical reasons.

The above personal data must be personal data that the data subject has given the Company consent to collect, use, or disclose, or be personal data that the Company needs to collect, use, or disclose to be able to execute the contract according to the purposes, or be other personal data as required by law.

10.4 Regarding the right to object to the collection, use, disclosure of personal data, the data subject has the right to object to the collection, use, or disclosure of personal data at any time if it is personal data collected with the exception of consent or for direct marketing purposes or for the purposes of scientific research or statistics. The Company can refuse the request if it is necessary for carrying out missions for the Company's public interest,

or if the Company demonstrates a more significant legitimate reason or to constitute a claim for compliance with the law.

10.5 In regard to the right to delete or destroy information, the data subject has the right to request the deletion or destruction of personal information or make personal information unidentifiable if the data subject believes that the personal information has been collected, used, or disclosed unlawfully according to relevant laws, or deems that the Company does not need to retain it for the purposes in relation to this policy, or when the data subject has exercised the right to withdraw the consent or to object as stated above.

10.6 For the right to suspend the use of the data, the data subject is entitled to temporarily suspend the use of the personal data in the event that the Company is under investigation according to the request for exercise of the right to correct the personal data or to object, or in any other case in which the Company does not need to delete or destroy the personal data following the applicable law.

10.7 With respect to the right to correct the information, the data subject can request to correct the personal information to be up to date, complete, and not cause misunderstanding.

11. Penalty

If the person who is responsible for performing any matters according to his or her duties neglects or refrains from commanding or does not perform or command or performs one of their duties in violation of personal information policies and practices that cause legal wrongdoing or damage, that person shall be subject to disciplinary penalties according to the Company's regulations. The Company shall not compromise on any offense committed by the responsible person and such person shall bear legal penalties for the offense committed and be punished according to the law. If such offense causes damage to the Company or any other person, the Company may consider further legal proceedings.

12. Policy Review

The Company will review this policy at least once a year or if the law has been amended.

This Personal Data Protection Policy shall be effective from July 6, 2022, onwards.

(Dr. Warapatr Todhanakasem)

Chairman of the Board of Directors

Moshi Moshi Retail Corporation Public Company Limited