

## Privacy Policy for Business Partners, Contracting Parties and Related Persons

C.U. Dent Innovation Co., Ltd. (the "Company") values and respects your privacy rights and is committed to ensuring the security of your personal data. The Company acknowledges its responsibilities under the Personal Data Protection Act B.E. 2562 (2019). Therefore, this Privacy Policy has been established to apply to the personal data of business partners, vendors, contractors, and other relevant parties. This policy aims to inform you about the following:

- How the Company collects personal data
- What types of data are collected
- The purpose of data processing
- How personal data is disclosed
- Measures to safeguard personal data
- Your legal rights as a data subject

### 1. Scope of the Policy

This policy applies to the personal data of **business partners, vendors, contractors, and other related parties** associated with the Company.

### 2. Definition of Personal Data

2.1 **Personal Data** refers to any information related to an individual that can directly or indirectly identify that person, excluding information about deceased individuals.

2.2 **Sensitive Personal Data** includes information about race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disabilities,

trade union membership, genetic data, biometric data, or any other information that significantly impacts the data subject, as defined by the Personal Data Protection Committee.

### 3. Personal Data Collected

The Company may collect various types of personal data depending on the purpose of use, including:

- **Identity Verification Data** – name, surname, national ID number, photograph, and other identification documents.
- **Contact Information** – business card details, full name, job position, phone number, email, work address, and social media accounts.
- **Operational and Contractual Data** – work history, employment information, safety and occupational health details, banking details (e.g., account number, payment information).
- **Activity Participation Records** – history of participation in previous Company events.
- **CCTV Footage** – images recorded by **CCTV cameras** within Company premises (note: no audio is recorded, and warning signs are provided in CCTV-monitored areas).
- **Sensitive Personal Data** – health information, biometric data, religious beliefs, race, nationality (collected only with explicit consent or as required by law).

### 4. Purpose of Collecting, Using, and Disclosing Personal Data

The Company collects, uses, and discloses personal data under the following legal bases:

1. **Contractual Necessity** – To fulfill contractual obligations, including vendor due diligence, contract management, payment processing, and contract performance evaluations.

2. **Legal Compliance** – To comply with legal obligations, such as tax laws and commercial regulations.
3. **Legitimate Interests** – To manage business operations, develop products/services, conduct research, prevent fraud/crime, and ensure IT system security.
4. **Legal Claims** – To establish, exercise, or defend legal claims.
5. **Consent-Based Processing** – For activities requiring explicit consent, such as marketing research and promotional communications.

## 5. Disclosure of Personal Data to Third Parties

The Company may disclose personal data under legal requirements, including compliance with court orders, regulatory requirements, or legal obligations. Data may also be shared with relevant authorities to ensure compliance with legal and security regulations.

## 6. Transfer of Personal Data Abroad

Personal data may be transferred to third parties or servers located in foreign countries that may not provide the same level of data protection. The Company will implement necessary safeguards to ensure secure data transfer and appropriate protection in the receiving country.

## 7. Retention Period of Personal Data

The Company retains personal data only for as long as necessary to fulfill its intended purposes, including:

- **Contractual Obligations** – Data is retained for the duration of contractual obligations.
- **Legal Compliance** – Data is stored as required by applicable laws and statutes of limitations.

- **Data Deletion** – Once retention is no longer necessary, the Company will delete or anonymize personal data.

## 8. Security Measures

The Company implements **technical and organizational measures** to safeguard personal data against unauthorized access, loss, destruction, or misuse. Access to personal data is restricted to authorized personnel, and third-party processors are required to comply with data protection standards.

## 9. Rights of Data Subjects

You have the right to:

1. **Access and request a copy** of your personal data.
2. **Withdraw consent** for data collection, use, or disclosure (unless legally restricted).
3. **Request correction** of inaccurate or outdated personal data.
4. **Request data portability** in an accessible electronic format.
5. **Object to data processing** under specific circumstances.
6. **Request restriction** of personal data processing.
7. **Request deletion** of personal data unless legally required for retention.
8. **File a complaint** if your data rights have been violated.

## 10. Contact Information

For inquiries or to exercise your data rights, please contact:

**C.U. Dent Innovation Co., Ltd.**

**Address:** 34 Henri Dunant Road, Wang Mai, Pathumwan, Bangkok 10330

**Phone:** 02-218-8863, 083-979-7644