



Notification of Energy Complex Company Limited

PS/0013/65

Privacy Notice - Customers

Energy Complex Co., Ltd. (“**Company**”) is aware of the significance and duties under the Personal Data Protection Act 2019 (B.E. 2562). The company prioritizes the privacy of current and potential customers and the ordinary person who is operating on behalf of the legal entity who is the data subject (from now on referred to as “**Customer**”) and is determined to protect your data to ensure that they are protected under the personal data protection law and other relevant laws. Therefore, the company announces this privacy notice to inform the details concerning the data collection, use, and disclosure (**collectively called “processing”**) and the legitimate rights of the data subject as the following details.

No 1. Types of persons to collect personal data

This privacy notice pertains to the personal data of customers and any individuals acting on behalf of a legal entity that is the data subject. This includes directors, executives, employees, suppliers, and other individuals associated with the company personnel.

“**Customer**” refers to a specific person who is the target of the company’s marketing efforts to sell its products or services. This person participates in the company’s campaigns or marketing activities, a person who is interested in the company’s products and services via any channels, and/or a service user via online media and electronic media, including the authorized person who is performing on behalf of the customer, such as a person with parental power, the incompetent person’s curator, quasi-incompetent person’s custodian.

No. 2 Personal data refers to:

2.1 “ Personal data” refers to data concerning an individual that can identify the person directly or indirectly, but not including the data of a deceased person in particular, such as name, surname, nickname, date of birth, address, phone number, ID card number, disabled person ID card number, passport number, social security number, driving license number, tax number, bank account, credit card number, e-mail, car registration number, motorbike registration number, land title deed, IP Address, Cookie ID, and Log File.

However, the following data is not considered personal data: business information contact that does not identify the person, such as the company name, company address, legal entity number, work phone number, work e-mail, workgroup e-mail such as info@company.co.th, anonymous data or

pseudonymous data that become anonymous by the technical technique, and data of a deceased person.

2.2 “Sensitive data” refers to personal data concerning race, ethnicity, political opinions, beliefs, religions or philosophies, sexual orientation, criminal records, health information, disability, labor union information, genetic information, biometric information, or other data that have a similar effect on the data subject as determined by the Personal Data Protection Committee, which the company must operate the data carefully. The company shall collect, use, and/or disclose the sensitive data when receiving your explicit consent only or if necessary for the proceeding allowed by law.

Hereinafter in this privacy notice, if there is no specification of “personal data” and “sensitive data” concerning the service user, they are collectively referred to as “**personal data.**”

If the company receives a copy of your ID card or identification document or exports data from your ID card or identification document via an electronic method for authentication purposes for legal relations and/or any transactions with the company, the receiving data may contain sensitive data. The company has no plans to store the mentioned data; therefore, please remove or conceal the data. If you fail, the company reserves the right to take necessary actions to protect your sensitive information.

No. 3 Collecting personal data

The company stores your personal data as necessary based on the objective of the data use and the company shall inform you afterward. Collected personal data by the company are categorized.

Type of Personal Data	Collecting Details
Personal data (basic)	For example, title, name, surname, nickname, gender, photo, date of birth, age, nationality, ID number, current address, permanent address, e-mail, phone number, and marriage status.
Sensitive data	For example, race, religion, criminal record, facial recognition that has your consent or is allowed by law.
Other data	(a) Contact data, such as address, phone number, e-mail, LINE ID, Facebook ID, Google ID, X (formally Twitter) ID, ID of other social media, and information of emergency contact person. (b) Financial data, such as bank account number. (c) Communication data, such as photos or voice recordings when contacting with the company. (d) Activity participation, such as photos or videos. (e) Study and training records, such as education, training courses.

Type of Personal Data	Collecting Details
	(f) Company data, such as workplace name, workplace address, phone number, e-mail, position, and superior's name. (g) Behavior data and preference, such as activity, food, drinks, and confectionary.

No. 4 Sources of personal data

The company collects personal data and sensitive data via the following process.

- 1) The company collects your data directly from you via the company's systems, name card exchange, e-mail, LINE ID, telephone, fax, letter, electronic registration, company information system, and the use of the company's website or applications.
- 2) The company collects your data from other sources, such as public websites, partner/vendor's company, outside service providers, or signatories of the subsidiary or companies in the PTT Group or other people.

When you agree and give consent to give personal data relating to outsiders, which includes but is not limited to a person involved with customers and service users of either business or other areas, such as family members, you guarantee and assure the accuracy of data and affirm that you have informed the person about this privacy notice.

No. 5 Objectives of personal data collection, use, and disclosure

The company collects, uses, or discloses your personal data with the objectives under the following data processing principles.

5.1 Contractual Basis To comply with the contract that you are the signatory of, such as an employment contract or other contracts, or to execute your request/application before signing a contract, as the case may be.

5.2 Legal Obligation To perform the obligation determined by the law, such as the civil and commercial code, labor protection law, social security law, compensation law, labor relation law, provident fund law, laws concerning state enterprise, taxation law, anti-money laundering law, computer law, and personal data protection law.

5.3 Legitimate Interest For legitimate interest under the expected and reasonable scope that does not violate your basic rights and liberty.

5.4 Consent The company must obtain your consent if processing your personal data is required by law or if there is no legitimate reason for processing.

Objectives for customers

The company collects, uses, or discloses your personal data under the following objectives.

Operational Objective	Details	Fundamental of Data Processing
1. To process your request before signing a contract or on a contractual basis	To sell your products and/or services or follow the contractual basis that you are the signatory. To manage your account and membership application data, send accounting and financial data, after-sales service, product return, and any execution so you receive your requested products and services.	<ul style="list-style-type: none"> ● Contractual Basis
2. To manage advertisement, public relations, and marketing activities	Create public relations and marketing campaigns. Analyze and develop products and contact the customers to give advice or present products. Handle advertisement media and public relations that you are or are partial advertisement media.	<ul style="list-style-type: none"> ● Consent
3. To administrate the operation and after-sales service	Monitor and analyze personal data and sensitive data.	<ul style="list-style-type: none"> ● Legitimate Interest ● Consent
	To develop the online service so you receive the quality service quickly and conveniently.	<ul style="list-style-type: none"> ● Legitimate Interest
	To access or transfer data in the membership, account, or personal password served by the company via more than one computer and/or electronic device, to monitor the use of account, membership, or password efficiently to prevent the unauthorized use or access by other persons or unlawful use, and to improve the company services to be more appropriate and efficient.	<ul style="list-style-type: none"> ● Contractual Basis ● Legitimate Interest
4. Information technology management	Set up the information system to store the data, process the data, and link the data with the customers and suppliers.	<ul style="list-style-type: none"> ● Contractual Basis ● Legitimate Interest ● Consent

Operational Objective	Details	Fundamental of Data Processing
	Set up and provide an information technology system service to process the customer's data from the use of the company's website, applications, and social media, such as Facebook, LinkedIn, Twitter, YouTube, and Line.	<ul style="list-style-type: none"> ● Contractual Basis ● Legitimate Interest ● Consent
5. To manage, develop, and execute any affairs to operate business efficiently	Products and/or services management (including websites and applications), inspection and prevention of fraud or crimes, relationship management with current or potential partners, and IT system use and maintenance.	<ul style="list-style-type: none"> ● Legal Obligation ● Legitimate Interest ● Consent
	Measuring the efficiency of marketing policy and the effectiveness of public relations via different channels.	<ul style="list-style-type: none"> ● Legitimate Interest ● Consent
6. Complaints, disputes, case management, and risk management	<p>1) Inspection and investigation of corrupt behavior, fraud, or any acts violating the laws or peace and public order.</p> <p>2) Any executions to inspect, investigate, inquire, prosecute, or process any actions to exercise the rights, tentative dispute or conflict resolution between the company and you relating to the business operation and/or legal relation with the company.</p>	<ul style="list-style-type: none"> ● Contract Basis ● Legal Obligation ● Legitimate Interest
7. To maintain the safety and security in the company's buildings and premises and the assigned buildings and areas for management	<p>1) In order to ensure the safety and security of the company's buildings and premises, it is necessary to assess the safety risks and issue appropriate passes for entry into the office, branch office, or visitor area, as well as car stickers. Additionally, visitors' pictures will be recorded via CCTV.</p> <p>2) To communicate as necessary or in emergency cases, such as to notify the incident happening to the employee and/or the probation worker.</p> <p>3) To use as a reference for treatment in case of illness or injury of yourself or other persons.</p>	<ul style="list-style-type: none"> ● Contractual Basis ● Legal Obligation ● Legitimate Interest

No. 6 Disclosure of personal data

6.1 Your personal data may be disclosed or sent to departments in the company that have the roles only under the objective. To execute the processes, management, and internal communication, these persons or the teams may be allowed to access your personal data as necessary and if related only. The right to access is determined by the roles and responsibilities of the support departments and teams, such as digital, accounting, and finance.

6.2 The company may disclose your personal data (as necessary) to outside personnel or organizations according to the objectives prescribed in this policy. The outside personnel or organizations may be located in Thailand or abroad.

1) Subsidiaries, joint ventures, and companies in the PTT Group

The company may share your personal data with companies in the PTT Group and joint venture for risk management, data exchange, and internal audit.

2) Outsiders who are service providers related to the company's operation

The company may disclose your personal data to such persons, whether they are the data controller or processor, such as the bank that provides the information technology service, Cloud and data storage service providers, application providers, hospitals, survey and analysis service providers, and translation service providers.

3) Relevant government authorities

The company may disclose your personal data to state and government authorities who have legal authority to protect the rights of the company, others, or you and to respond to government requests, such as the State Audit Office of the Kingdom of Thailand, Office of the National Anti-Corruption Commission, Department of Disease Control, Royal Thai Police, Court of Justice, Revenue Department, Department of Mineral Fuels, Department of Consular Affairs, embassy, Legal Execution Department, Department of Labor Protection and Welfare, Student Loan Fund, Social Security Office, Department of Skill Development, and Department of Labor Employment. The company shall send your personal data only if they comply with the law and the company sees fit.

4) Outside people or organizations

The company may disclose your personal data to outside people or organizations, such as a professional advisor (legal advisors, outside auditors) and outside organizations that the company would like to publicize or process activities according to the objective stated above.

No. 7 Marketing and Privilege

The company may use your data for purposes besides those informed to you via this privacy notice and under the legal requirements. The company may use name, surname, and contact details, such as e-mail, phone number, which includes a mobile phone number, and postcode, for marketing purposes, such as

7.1 Send the privilege about products and services and propose cross-selling and/or upselling.

7.2 Loyalty program or privilege program.

7.3 Promotions and marketing communication, contest, raffle, lucky draw, events, and competitions.

7.4 Donation for charity and/or non-profit activities.

According to the above execution, the company may disclose your personal data to personnel and/or business partners to process any execution to achieve the above objectives.

Please inform the company anytime if you wish to refrain from receiving marketing information and privileges. You can cancel to receive the marketing e-mail by clicking the unsubscribe shown at the bottom of each e-mail. The company shall process your request as soon as possible.

No. 8 Request of consent and potential impact of Consent Withdrawal

8.1 If the company collects, uses, or discloses the data based on your consent, you can withdraw your consent at any time. Your consent withdrawal shall not affect the collection, use, or disclosure of data to which you have already consented.

8.2 If you are a minor, incompetent person, or quasi-incompetent person according to the Civil and Commercial Code, please inform the details of a person who has the parental power of the minor, incompetent person's curator, and quasi-incompetent's custodian to the company to request for their consent.

By informing the company, you may withdraw your consent to collect, use, and disclose all or part of your personal data as stated in this privacy notice.

Suppose you withdraw your consent to allow the company to collect, use, or disclose your data due to other reasons or purposes apart from marketing purposes. In that case, the company may not be able to process the steps, serve, and/or manage products and services, or relationship, and/or your account with the company, which you may lose the benefits from using the company services at the same level as when giving your consent to the company.

No. 9 Sending or transmitting personal data abroad

9.1 The company may transmit your personal data abroad when necessary on a contractual basis. This can occur if you are a signatory between the company and an individual or legal entity in the interest of you. The company may also transfer the personal data to process requests before employment or to prevent or suspend harm to the life, body, or health of you or others. This is done to comply with the law or execute the mission for the public interest.

9.2 The company may collect your data on the computer, server, or Cloud served by another person and use the other's program or platform in software and platform package service to process your personal data. The company shall not allow the unconcerned person to access personal data and determine them to have the appropriate preventive measures to protect personal data.

9.3 If personal data needs to be sent or transmitted abroad, the company will comply with the personal data protection law and take the necessary measures to protect your personal data. You can also exercise your rights regarding personal data as prescribed by law. Additionally, the company will require the data recipient to implement appropriate preventive measures, process the data only if necessary, and prevent any unauthorized use or disclosure of personal data.

No. 10 Retention and retention period

10.1 The company shall retain your personal data as long as necessary, considering the necessary objectives of collection, use, and processing, including compliance with the enforced laws.

10.2 The company shall continue collecting, using, and disclosing your personal data. However, you conclude relations with the company, as necessary, based on the law and regulation for the legitimate interest, or shall store the data in a form that cannot directly or indirectly identify the person, such as creating "anonymous data" or "pseudonymous data" with technical methods.

10.3 The company may retain your personal data as long as necessary for achieving the data processing purpose stated in this privacy notice. The company shall store your data for a maximum of ten years from the day you conclude the relationship with the company or the day you last contacted the company. The company may store your data longer if allowed by law.

10.4 To comply with legal requirements, the company will keep your data in an appropriate format for the required time. However, the company will only retain your data beyond this period if doing so serves a legitimate interest less significant than your basic right to privacy.

10.5 The company shall process the investigation to erase or destroy personal data, anonymize the data so it cannot identify the data subject permanently, or execute other methods to limit all personal data after the retention period or when there is no necessity for storing such data, or when the company has to follow your order to erase your data.

No. 11 Personal data protection by company

The company shall store your personal data based on the technical and organizational measures to maintain data processing safety appropriately and prevent violations. The company sets the policy, regulations, and criteria for personal data protection and preventive measures to prevent the data receiver from using or disclosing the data for other purposes, without authority, or wrongfully. Further, the company revises the policy, regulations, and criteria as necessary and appropriate. The executives, employees, contractors, suppliers, advisors, and data receivers must maintain confidentiality according to the measures determined by the company.

No. 12 Rights of the Data Subject

You have the right to execute the following processes.

(1) Right to withdraw consent

If you have given consent to the company to collect, use, and/or disclose your data (either before or after the effectiveness of personal data protection law), you have the right to withdraw your consent at any time while the company possessing your data unless there is the limitation by law or the beneficial contract for you.

Your consent withdrawal may affect your use of products and/or services. For example, you may not be eligible for benefits, promotions, or new proposals, receive better products or services that fulfill your needs, or get useful information. Therefore, you must study and query the impact before withdrawing your consent.

(2) Right to access

You have the right to access your personal data and request the company to make a copy of the data or disclose the acquisition of the data possessed by the company. The company may reject your request if the access or receiving of a copy affects the rights and liberty of others or if the company must comply with the law or court order that does not allow data disclosure.

(3) Right to data portability

You have the right to access your personal data in a readable format through automated tools, and the company must use these tools to disclose personal data. Additionally, you can request the company to provide your data in a transferable format to another data controller if it can be processed automatically. You also have the right to receive such data that the company sent or transferred to the data controller directly unless it cannot be processed due to technical difficulties.

Your personal data must be data you have given the company consent to collect, use, and/or disclose or the data that are necessary for the company to collect, use, and/or disclose to facilitate you to use the company's products and/or services as per your objective, that you are the signatory with the company, or to process your request before using the company products and/or services, or other personal data prescribed by the authorized person.

(4) Right to object data processing

You have the right to object to the collection, use, and/or disclosure of your personal data at any time if the collection, use, and/or disclosure of your data aims for the necessary processes under the legal interest of the company, individual, or legal entity under your expected and reasonable scope, or for processing the mission for the public interest. The company will continue collecting, using, and/or disclosing your data as long as it can give a more vital legal reason than your basic right, or it is for confirming the legitimate rights, compliance with laws, or litigation, as the case may be

Additionally, you have the right to object to the collection, use, and/or disclosure of your personal for marketing and scientific, historical, or statistical research purposes.

(5) Right to erasure

You have the right to request for the deletion or destruction of your personal data or anonymize them if you believe your data are collected, used, and/or disclosed wrongfully or if the company does not need them for the relevant purposes prescribed in this privacy notice, or you use the right to withdraw your consent or object as stated above unless the company must be compliant with the law or exercise the legal right to retain such data.

(6) Right to restriction

You have the right to request the temporary suspension of data used in case the company is investigating the request to amend the data, your objection, or other cases that the company has no necessity and must delete or destroy your data, but you request the suspension instead.

(7) Right to rectification

You have the right to request the company to amend and update your data accurately and completely to avoid ambiguity.

(8) Right to lodge a complaint

You have the right to complain to the person in authority if you believe that the data collection, use, and/or disclosure violates or is not compliant with the relevant law.

You can request to use your legal right by filling out the Data Subject Request Form on www.energycomplex.co.th or email pdpa@energycomplex.co.th. to request the form.

The exercise of your rights above may be limited under the relevant laws. In some cases, the company may reject or cannot process your request due to necessary reasons, such as to comply with the law or the court order for the public interest, or the right may violate the rights and liberty of others. If the company rejects the request, the company shall inform the reason.

No. 13 Personal data security measures

The company prioritizes the significance of your data security, such as encryption and data access limitation, to ensure that the company personnel and outside service providers operating on the company's behalf follow the personal data protection standard, which includes the duty to

prevent data leaking. In addition, the company shall implement the appropriate security measures for data processing.

The company reviews and revises the personal data security steps and measures constantly to maintain the appropriate data security level to the risk and to continue the confidentiality, completion, availability, and liquidity of the data processing process, as well as to prevent the loss and unauthorized data access, use, modification, amendment, or disclosure. The company shall implement security measures to process all electronic or document data.

No. 14 Connecting with the outsider's website

Using the company's applications or website, it may connect with social media, platforms, and other websites operated by outsiders. The company is trying to connect with the website that the standards of personal data protection are in place only. However, the company cannot be responsible for content or personal data protection standards on that website unless stated otherwise. Such persons collect any data given to the outsider's website and are under the personal data protection notice/policy of such persons (if any). Please study and follow the personal data protection notice/policy that appeared on that website separately.

No. 15 Update of privacy notice of customers

The company shall review and announce the privacy notice every three years unless there is a change in law or proceeding with significance. The company shall announce the essence update before the effective date and publish the updated version via the appropriate channel. The company may ask for your consent if required by law. The company recommends checking the update of this privacy notice periodically.

No. 16 Contact channels

If you believe that processing your personal data is not compliant with the Personal Data Protection Act 2019 (B.E. 2562), you have the right to complain to the personal data protection officer.

Energy Complex Company Limited

Location: Energy Complex Company Limited 555/1 Vibhavadi Rangsit Road, Chatuchak Sub-district, Chatuchak District, Bangkok 10900
Tel: 0-2140-1234
E-mail: callcenter@energycomplex.co.th

Data Protection Officer

Location: Energy Complex Company Limited 555/1 Vibhavadi Rangsit Road, Chatuchak Sub-district, Chatuchak District, Bangkok 10900
Tel: 0-2140-1148
E-mail: pdpa@energycomplex.co.th

No. 17 Applicable laws

The privacy notice is under enforcement and interpretation according to Thai laws, and the Thai court has authority for any potential dispute consideration.

Announced on 19 May 2022.

Sirasak Chandrema

President