

Privacy Notice
Of
Lotte- Rent- A Car (Thailand) Co., Ltd.

As **Lotte- Rent- A Car (Thailand) Co., Ltd. (“Company”)** is aware of the importance of your personal data provided to the Company with your trust; therefore, the Company, hereby, made available this Privacy Notice in order to acknowledge the Company’s customers, partners, clients, interested person or other persons related to the Company of the Company’s announcement concerning to the collection, use, disclose and processing of the personal data and the types of data and objectives related thereto, including the details concerning the period of such personal data collection and disclosure along with your rights concerning your personal data and also the method to contact the Company of which, all of the aforementioned, are in compliance with the Personal Data Protection Act 2019 (“ PDPA”) and other related law and regulations.

Nevertheless, the Company will collect, us or disclose your personal data solely in case of necessary of which including the collection, use, disclose or processing of the personal data in compliance with the legal obligation or related to your obligation under the contract entered into with the Company within the legitimate benefit of the Company, related to your request of your data processing or your consent and/or under other law for the purpose of the collection, use and disclosure of the Company as follows; .

1. Personal Data Collection

1.1. Types of the Personal Data Collected by the Company

The Company is collecting the personal data from various sources of which consist of the type of information as per below;

1.1.1. Personal Data are the information directly or indirectly enables the identification of related person of which the customers, partners, clients or other interested person provided to the Company i.e.

- (a) General identity data e.g. name/ surname, ID Card no., Passport no., gender, date of birth, age, photo, etc.
- (b) Personal contact information e.g. name, surname, telephone no., address, email, etc.
- (c) Identification information e.g. username, password, employee no., customer no., ID Card no., Passport no.
- (d) Your financial information or financial transaction information conducted with the Company e.g. bank account no., etc.
- (e) Other information specified in any form provided to you for fill in including other documents related to the form.

1.1.2 Sensitive Data are the data of which designated by PDPA to be the Sensitive Data e.g. race, religious, sexual behavior, political opinion, bodily disability, genetic data, bio data, health data, etc. The collection of sensitive data will be allowed only for the purposes specified by the law and must obtain your prior consent; therefore, the collection of the sensitive data by the Company will be solely in the necessary case and the Company will be

explicitly informing you concerning the necessity of collection including may request for your consent for the collection in some case.

1.1.3 Technical Data and Usage are;

- (a) Data concerning the website visitor who are willing to provide his/her addresses or other information e.g. contact information and or the information related to the sign in registration. The website visitors may be asked for the opinion concerning the Company's website and may, from time to time, obtain message from the Company.
- (b) Log are the information concerning the IP address, time of website using, connected device, connected mobile phone network, connected data, location data, browser data, website login and logout data, referring website, website using history, login log, transaction log.
- (c) Record of the photo and voice via CCTV which will be conducted when you enter into the Company's office premises, the Company will record your photo and voice and the details of contact via CCTV. However, the Company will arrange signage to inform you in the Company's premises of which using CCTV.
- (d) Data of which derive from the analysis and collection of the statistic of service or system usage e.g. customer behavior, access time, search history and other record of website function usage and other data of which Company collect via cookies

The personal data collected by the Company will variable depending upon relationship between you and Company, your method, digital technology and the services between you and your Company.

1.2 Source of Personal Data

The Company may obtain the personal data from the following sources.

1.2.1 Collect directly from data subject e.g. the Collection of the personal data from the signing of the contract or job application, answering of the questionnaire regardless whether in paper or online, or when the data subject communicates with the Company via designated channel.

1.2.2 Collect from the data subject from the access of the Company's website, software or application e.g. the tracking of website or services using behavior via Cookies or from software of the data subject's devices, etc.

1.2.3 Collect from other source of which is not the data subject which the company shall, without any delay, inform to the data subject within 30 days after obtain the information from other source in order to obtain consent from the data subject.

The Company will collect the personal as much as necessary and legitimate objective of which inform to the data subject before or during collect the information. The Company will explicitly request for the consent before or during collect the personal data except for the case that the collection of personal data is allowed by law without consent as follows;

(a) To achieve the purpose concerning the historical documents or achieves for public interest or related to the research or statistic of which arrange sufficient measure to protect the rights and freedom of the data subject.

(b) To prevent or stop any harmful for life, body or heath of any person.

(c) It is necessary to perform obligation of the contract of which enter into with the data subject or to proceed with any request of the data subject before enter into such contract.

(d) It is necessary to proceed with any obligation for public interest of the data controller or perform any obligation of which assign to the data controller by the government.

(e) It is necessary for the legitimate interest of the data controller or other juristic person which is not the data controller except for the case that such controller interest is less important than the basic rights of the personal data of the data subject

(f) To comply with data protection law

In case that the data subject must provide his/her personal information in order to comply with the law or contract or the personal data is necessary to be provided in order to enter into the contract or for any other reasons and the data subject reject to do so, it may cause the restraint or cease of any transaction or other activities related to data subject until the Company obtain personal data since the Company cannot process with the data or the law prohibit the Company to further undertake such transaction or activity.

2. The purpose of the collection, use, process and disclose your personal information

The Company will collect the personal data for proceeding with the legitimate purpose of Company's operation and for improving of Company's business operation to be more efficiency. Whereas, the Company will collect solely the necessary personal information for the following proceeding

2.1 To enforce any arrangement, agreement or for the debt enforcement or in order to comply with the law related to any commercial or criminal dispute incurred to the Company.

2.2 To take any action necessary for the legitimate benefit of the Company or other juristic person.

2.3 To improve or modify the system and services, to increase operation efficiency in order to increase the services standard and/or any other activities concerning Company's business operation.

2.4 to take any action necessary for the Company to perform their obligation of which the Company has with the regulatory authorities or tax authorities to enforce or to perform any duty in order to establish orderliness, compliance with the applicable existing or future amendment law, rules or regulation

2.5 To contact with data subject via various channel in order to query, inform, inspect verify the information concerning the data subject.

2.6 To record slide and/or motion and/or voice regarding the meeting, training, seminar, recreation, leisure and/or other marketing activities.

2.7 For benefit of study, research or statistic arrangement.

2.8 For improving of the services, marketing arrangement, advertisement and public communication.

Any change to the purpose of the personal data collection will be immediately informed to the data subject.

3. Disclosure of the personal data

For the smoothness of the Company's operation or to perform any obligation having with the customers, partners, clients including other Company's interested or related person. The Company may disclose the personal information to any third party, representative, government officer or authority, in this case, the Company will impose to such third party the confidential obligation, provide security to the personal data and prohibit the use of the personal data other than the purpose specified by the Company. The third party of which the Company will disclose the personal data will be as follows;

3.1 Any third party who is a party in any contract with the Company in country or abroad e.g. Outsource/Service Provider Cloud Computing Service Provider, Registrar, etc.

3.2 Outsource/Service Providers, any contractor under hire of work contract with the Company or Company's agent conducting any activities on behalf of the Company.

3.3 Disclose to the government office or regulatory authorities in order to comply with the law or competent authority order e.g. Revenue Department, Execution Department, Royal Thai Police or other person of which the designated by the applicable law or disclose in compliance with request of any foreign entity or organization of which acceptable by the relevant Thai government regulatory in order to comply with the law.

3.4 In order to comply with the law, court orders, summons or other legal processes

3.5 Specialist consultants, consultants, and/or external auditors, debt collectors, attorneys in order to enforce the Company's legitimate rights or raise claims in accordance with contract or law.

3.6 Any third party in accordance with your consent or in order to proceed with transaction in accordance with your request.

Except for the abovementioned, the Company will not disclose your personal data without your consent unless the Company believe, in good faith, that it is a necessary or allowed under any related law.

4. Data Subject Rights

Under the law, you are entitled to your personal data as per PDPA as follows;

4.1 Right to Withdraw Consent is the right, of which can be exercised anytime, to withdraw of Consent given to the Company to collect, use or disclose of the personal information. If the Company is no longer has legitimate rights to collect use or disclose of the personal information, the Company will delete the personal data information.

4.2 Right to Access is your rights to access your personal data in order to acknowledge and obtain copy of your personal data of which under control of the Company or request to the Company to disclose the method of obtaining of your personal data without your consent.

4.3 Right of Rectification is the right to request to the Company to rectify your personal information to be correct, update, complete and not caused any misunderstanding.

4.4 Right of Data Portability is your rights to obtain your personal data from the Company, if the Company made such data in the readable or generally usable via automatic device or tool and can be used or disclosed via automatically method including (a) ask the Company to send or transfer personal information in such from to other data controller, if applicable by automatic method. (b) request for the personal information to send or transfer the personal data in such form to other data controller except cannot be done under technical restriction.

4.5 Right to Erasure or Right to be Forgotten is your rights to request to the Company to delete or destroy or make such personal information in the manner that cannot verify your identity unless the Company has legitimate rights to reject your request.

4.6 Right to request for cessation of use is your rights to request the Company to cease to use your personal information in some case e.g. the Company is during the process of your request for your personal information rectification or objection of the collection, use or disclose your personal information, your request to the cessation of use of your necessary personal information instead of deletion or destroy since such information is necessary for you to retain in order to establish your right of claim according to the law, to comply with the right of claim in accordance with the law or to raise against any claim in accordance with the law.

4.7 Right to Object is your rights to object any collection use or disclose your personal information in the following cases;

In case of the collection for the purpose of scientific research history or statistic except for the necessary case for the Company's public interest activities.

In case of the collection for the necessary case for the Company's public interest activities or any necessary case for the legitimate benefit of the Company except the Company can express any more important legitimate rights to establish your right of claim according to the law, to comply with the right of claim in accordance with the law or to raise against any claim in accordance with the law.

4.8 Right to Lodge a Complaint is your rights to raise the claim to the relevant competent authority in case that the Company's employee or the person under the hire of work contract violate or not comply with PDPA

The claim raised under the abovementioned paragraph must be in writing and the Company will, at its best endeavor, proceed with your request in reasonable period and within the period designated by law; whereas, the Company will comply with the law concerning your rights as a data subject.

5. Personal Data Transfer to Abroad

If it is necessary to the Company to transfer your personal data to abroad, the Company, at its best endeavor, will transfer your personal data to trustable business alliance, service provider or the data receiver in most secured methods to provide security to your personal information including the following case.

5.1 To be in compliance with the law;

5.2 Have already inform you concerning the insufficient data security protection from the designation country and obtain consent from you to transfer your personal data;

5.3 To perform the obligation under the contract entered into between you and the Company or to proceed with your request before enter into the Contract;

5.4 To perform the obligation under the contract between Company and other person or juristic person for your interest;

5.5 To prevent or stop anything that may harmful to your or others' physical body or health where you are unable to provide your consent at that time;

5.6 To conduct any activity for public interest.

6. Personal Data Collection via Company's website

The Company will collect your personal data when you access of the Company's website for the purpose designated in this notice or in accordance with Company's policy e.g. the Company will use the data which are collected by Cookies or other similar technology for the statistical analysis, other activities in the Company's website or other Company's operation in order to support the improvement of the capacity and quality of the service provided by the Company's website. You can check the data collection via the Company's website from Cookies Policy on the Company's website.

7. Personal Data Security Policy

The Company set the policy, code of conduct and standard for security of personal data of customers, partner, clients and interested person including organizational measure, technical measure to prevent any access to your personal data without consent or personal data violation e.g. information system for the intensive security for your personal data, etc. and the Company improve policy, code of conduct and minimum standard from time to time in accordance with the law. Moreover, staff, employee, representative and service provider of the Company will be obligated to protect your personal data.

If it is necessary for the Company to send or transfer your personal data which has the data protection management standard lower than in Thailand, the Company will take all necessary measure as it deems appropriate at least the same standard as the standard provided in such country e.g. specify the confidential obligation for the parties of the contract etc.

8. Period of Personal Data Collection

The Company will keep your personal information so long as it is necessary to complete the purpose of which specified in this privacy note or in accordance with PDPA of which may be variable in each person of which you can check the detail of each company's

activity and service. If any data subject is no longer Company's customer, partner, client and or other interested person or related person of the Company or already end of the relationship with the Company, the Company will keep the personal data of such person in necessary period or in the period designated or permitted by law or in accordance with Company's policy or code of conduct dealing with the storage and destruction.

Nevertheless, the Company may keep your personal data longer than the designated period, if the Company is informed or, in Good Faith, believes that there is any action of which breach the agreement, violate law or any arisen of the dispute or lawsuit and it is necessary to be investigated including collecting of evidence in order to proceed with legal action, in this case, the company will keep your personal information only in the period necessary to complete the related proceeding or in the period designated by relevant law.

9. Variation of the Privacy Note

This Privacy note may be review change or revise to be updated. Therefore, if there any change in this Privacy Note, the updated Policy will be posted by the Company in the Company's website.

10. Contact Information

Company and Data Controller Contact

Name : Lotte- Rent- A Car (Thailand) Co., Ltd.
Head Office : 689 Bhiraj Tower Room No. 3211-3212, Floor 32, Sukhumvit
Road, North Klongton Sub-district, Wattana District, Bangkok
Contact (Telephone):
(Fax):
Email :
Company Website : <https://www.lotterentacar.co.th/>

Regulatory Authority Contact

Name : Office of the Personal Data Protection
Committee
Contact : 02-142-1033 or pdpc@mdes.go.th