

DHL ECOMMERCE SOLUTIONS (THAILAND) CO., LTD.

DATA PRIVACY POLICY

1. Introduction

DHL eCommerce Solutions (Thailand) Co., Ltd. is part of Deutsche Post DHL Group. Deutsche Post DHL Group provides an integrated local and international logistics business and a solid mail business around the world including in Thailand.

The use of modern information and communication technologies and the global networking of information flows are fundamental to the business processes of Deutsche Post DHL Group. The protection of the Personal Data of customers, employees, shareholders and business partners is an essential global concern of all company within Deutsche Post DHL Group.

The aim of this Data Privacy Policy is to establish a standardized, adequate and global data protection and data security standard for us in processing Personal Data and/or Sensitive Personal Data in compliance with the global standard of Deutsche Post DHL Group as a whole. In particular, the aim is to guarantee adherence to local legal requirements under the Personal Data Protection Act B.E. 2562 (A.D. 2019) (“**PDPA**”) as well as to ensure adequate protection for Data Subjects. DHL eCommerce Solutions (Thailand) Co., Ltd. will be responsible for implementing this Data Privacy Policy by handling Personal Data in a reliable and secure manner in order to contribute to the commercial success of Deutsche Post DHL Group.

2. Scope of Application

This Data Privacy Policy applies to the processing of Personal Data and/or Sensitive Personal Data of identifiable individuals/natural persons, including but not limited to, the Personal Data and/or Sensitive Personal Data of our current, past and prospective employees, customers, visitors, users of websites, vendors, suppliers, shareholders and business partners by us. Processing in this case means any operation or set of operations which is performed on Personal Data and/or Sensitive Personal Data, whether or not by automated means, such as collection, recording, organization, structure, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

This Data Privacy Policy applies to all systems, people and processes that constitute the organisation’s information systems, including board members, directors, employees, vendors, suppliers, service providers and other third parties who have access to our systems. We will collect, use, disclose and process the Personal Data and/or Sensitive Personal Data as outlined in this Data Privacy Policy.

3. Definitions

The terms used in this Data Privacy Notice will have the meanings as prescribed below, unless the context requires otherwise.

“Personal Data” means any data related to a living individual, which enables either direct or indirect identification of such individual.

“PDPA” means the Personal Data Protection Act B.E. 2562 (A.D. 2019) and all of its implementation rules and regulations.

“Data Subject” means a living individual who owns the Personal Data.

“Data Controller” means a person or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the Personal Data.

“Data Processor” means a person or a juristic person who operates in relation to the collection, use, or disclosure of the Personal Data pursuant to the orders given by or on behalf of a Data Controller, whereby such person or juristic person is not the Data Controller.

“Sensitive Personal Data” means any Personal Data related to ethnicity, political opinions, philosophical beliefs, religion, sexual behaviour, criminal history, health information, disability, labour union information, genetic data, biological data, or any other information which impacts a Data Subject.

“Cookies” means text files in the computer of the Data Subject that is used for collecting the details of the Data Subject’s internet usage or activities in the website.

“Data Protection Officer” or **“DPO”** means a Data Protection Officer appointed by any of the company in DHL eCommerce Solutions (Thailand) Co., Ltd. or the Data Processor where required by the PDPA.

“Personal Data Protection Committee” or **“PDPC”** means the Personal Data Protection Committee established under the PDPA.

“Office of the Personal Data Protection Committee” or **“OPDPC”** means the authority established under the PDPA to govern the implementation of the PDPA.

4. Personal Data to Be Processed

DHL eCommerce Solutions (Thailand) Co., Ltd. will collect, use and disclose at least the following Personal Data and/or Sensitive Personal Data of the following Data Subjects:-

- (1) **walk-in customers** – their names, email addresses, contact numbers, Thai National ID Card / passport numbers, date of birth, nationalities, religion, CCTV footages, information of the sender and the recipient, details of the service provided to them;
- (2) **customers / visitors of its websites and mobile app-based services** – their names, email addresses, contact numbers, Thai national ID card / passport numbers, date of birth, nationalities, religion, IP addresses, logged-in usernames and passwords, logged-on and logged-out history, transaction records, voice recordings, bank account or credit card information, their devices and their interaction with such services including collection of Cookies and Cookies ID, details of the service provided to them, their request and complaint records, information of the sender and the recipient;
- (3) **job applicants** – their names, addresses, email addresses, telephone numbers, date of birth, nationalities, religion, Thai national ID card / passport numbers, including names, contact details and other personal data of their parents, spouse, children and/or reference persons (if any), educational levels, diplomas, transcripts, certificates, licenses, educational and employment background, recognitions, publications and awards, skills, language proficiency, aptitude test results, interview process test results, previous and expected remuneration, photos, other Personal Data and/or Sensitive Personal Data contained in the job application supporting documents or provided during the interview sessions, medical history, including information about past injury, operation, illness, disability, and congenital diseases, criminal history and behaviour, whether they apply to work with DHL eCommerce Solutions (Thailand) Co., Ltd. directly or through recruiting company;
- (4) **current and past employees** – their names, nicknames, date of birth, nationalities, religion, blood type, fingerprints addresses, contact number, e-mail address, employee code, Thai national ID card / passport number, photos, bank account number, including names, contact details and other personal data of their parents, spouse, children and/or reference persons (if any), diplomas, transcripts, certificates, permits, licenses, educational and employment background, recognitions, publications and awards, skills, language proficiency, aptitude test results, interview process test results, and other Personal Data and/or Sensitive Personal Data contained in job application documents or provided as part of their job application or during the interview process, information on their property ownership documents, their past and current level of remuneration and benefit entitlements, contributions to the social security fund, workmen compensation fund and provident fund (where applicable), withholding tax information, information about their entitlement to work in Thailand, working hours and working overtime records, working performances, job grade, audit log records, leave records, information about their use of DHL eCommerce Solutions (Thailand) Co., Ltd.'s resources, photos and video, records of training and development activities, disciplinary action or warnings, employment termination records, claims and disputes, information on medical history, including information about past injury, operation,

illness, disability, and congenital diseases, medical certificates, medical checkup records, criminal history and behavior;

- (5) **business partners, service providers, vendors, suppliers, or contractors who provided services to DHL eCommerce Solutions (Thailand) Co., Ltd.** – their names, email addresses, contact numbers, Thai national ID card / passport Number, bank account information, information on their professional licenses or permits, details of services provided by them, information of the sender and the recipient, payment and withholding tax information; and
- (6) other Personal Data and/or Sensitive Personal Data of the Data Subject to be notified via online or offline platform to the Data Subject before or at the time of collecting their Personal Data and/or Sensitive Personal Data.

5. Source of Personal Data

- 5.1 DHL eCommerce Solutions (Thailand) Co., Ltd. may receive the Personal Data and/or Sensitive Personal Data directly from the Data Subjects in person and/or through their subscriptions / uses of DHL eCommerce Solutions (Thailand) Co., Ltd.'s website and/or applications, the browser's Cookies, their willingness or permission to give their Personal Data and/or Sensitive Personal Data to DHL eCommerce Solutions (Thailand) Co., Ltd. via emails or telephone calls or their participation in the survey or special activities or program made by DHL eCommerce Solutions (Thailand) Co., Ltd..
- 5.2 DHL eCommerce Solutions (Thailand) Co., Ltd. may obtain certain Personal Data and/or Sensitive Personal Data indirectly from third party sources, such as, recruitment agencies, background check providers or vetting team, our employees or other customers / users of the DHL eCommerce Solutions (Thailand) Co., Ltd. services, or combine the Personal Data and/or Sensitive Personal Data with data obtained from third party sources and/or their services to help providing and improving the services of DHL eCommerce Solutions (Thailand) Co., Ltd. and for marketing and advertising.

6. Purposes for Processing Personal Data

The purposes for DHL eCommerce Solutions (Thailand) Co., Ltd. to process the Personal Data and/or Sensitive Personal Data are as follows:-

- (1) providing their services to their customers / users of their websites and online applications and maintaining the quality control of their services;
- (2) assessing the number of the visitor on the website and user of the applications, checking the popularity of the elements of the website in order to track the transaction on website, conducting researches and development in order to improve their services including courier, warehousing, transportation, logistics and other value added services to meet

with customers expectation, maximize customers' experiences, and to increase the number of their potential customers;

- (3) marketing and advertising their services and promotions to both existing and potential customers and providing interest-based advertising to them;
- (4) providing and maintaining security to their network and system;
- (5) complying with the PDPA and other applicable laws and regulations, regulatory requirements, their internal policies, including the requests made by the government authorities;
- (6) complying with contract requirements between DHL eCommerce Solutions (Thailand) Co., Ltd. company with its customers, visitors, users, employees, business partners, vendors, suppliers, contractors, service providers or third parties;
- (7) protecting their legitimate interests which are not overridden by the fundamental rights of the Data Subjects in relation to their Personal Data and/or Sensitive Personal Data; and
- (8) other purposes to be informed to the Data Subjects before or at the time of processing their Personal Data.

7. Notice to Data Subject

- 7.1 DHL eCommerce Solutions (Thailand) Co., Ltd. will give a notice with the full information particulars required under the PDPA to the Data Subjects before or at the time when DHL eCommerce Solutions (Thailand) Co., Ltd. collects their Personal Data and/or the Sensitive Personal Data.

The information particulars, which are required to be given to the Data Subjects under the PDPA, are as listed below:-

- (1) the purpose(s) of collection, use or disclosure of the Personal Data and/or Sensitive Personal Data;
- (2) the situations where the Data Subject is required to provide his/her Personal Data and/or Sensitive Personal Data for legal or contractual compliance and the consequences if the Data Subject does not provide such Personal Data and/or Sensitive Personal Data;
- (3) the Personal Data to be collected and the retention period;
- (4) the person or the authority to whom the Personal Data may be disclosed;

- (5) the names and the contact details of the Data Controller and the DPO; and
- (6) the rights of the Data Subject under the PDPA as shown in Clause 12 of this Data Privacy Policy.
- 7.2 If the Personal Data and/or Sensitive Personal Data are collected from a third party, such as a recruitment agency, supplier, police, etc., DHL eCommerce Solutions (Thailand) Co., Ltd. will give a notice on the purposes of the Personal Data and/or Sensitive Personal Data collection to the Data Subject within 30 days from the date on which DHL eCommerce Solutions (Thailand) Co., Ltd. collects the Personal Data and/or Sensitive Personal Data from the third party and to obtain a consent from the Data Subject, except where there is a legal basis for DHL eCommerce Solutions (Thailand) Co., Ltd. to process the Personal Data and/or Sensitive Personal Data without obtaining a consent from the Data Subject.
- 7.3 The data privacy notices are prepared and made accessible to the Data Subject online and offline, i.e. the Privacy Notice, Nov. 2019 of Deutsche Post DHL Group, Employee Privacy Notice, Job Applicant Privacy Notice, Vendor and Supplier Privacy Notice and CCTV Privacy Notice of DHL eCommerce Solutions (Thailand) Co., Ltd..

8. Consent of Data Subject

- 8.1 In general, any collection, use, or disclosure of the Personal Data and/or Sensitive Personal Data by DHL eCommerce Solutions (Thailand) Co., Ltd. is subject to an explicit consent given in writing or via an electronic means from the Data Subject before or at the time of the processing such Personal Data and/or Sensitive Personal Data.
- 8.2 The consent request will be clearly separated from other contractual statements with clear and understandable wordings with no intention to mislead the Data Subject of the purposes for processing such Personal Data and/or Sensitive Personal Data as shown in the Data Subject Consent Request and the Criminal Record Consent Form. The consent will not be a condition for the Data Subject to enter into an agreement with DHL eCommerce Solutions (Thailand) Co., Ltd. and it will be revocable anytime by the Data Subject.
- 8.3 DHL eCommerce Solutions (Thailand) Co., Ltd. can process the Personal Data without consent of the Data Subject if its processing is for the following purposes (Section 24 of the PDPA):-
 - (1) achievement of the preparation of the historical documents or the archives for public interest, or for the purpose relating to research or statistics in accordance with the suitable measures to safeguard the Data Subject's rights and freedom as prescribed by the PDPC;

- (2) prevention of the vital interest, i.e. harm to life, body or health of the Data Subject or other persons;
- (3) compliance with the contractual obligations to which the Data Subject is a party;
- (4) performance of a task carried out by DHL eCommerce Solutions (Thailand) Co., Ltd. in the public interest or as part of an official duty;
- (5) legitimate interests of DHL eCommerce Solutions (Thailand) Co., Ltd. which are not affecting the rights and freedoms of the Data Subject in a significant way; and
- (6) legal compliance.

In these exceptional cases, DHL eCommerce Solutions (Thailand) Co., Ltd. is only required to send the notice to the Data Subject under Clause 7 of this Data Privacy Policy.

- 8.4 DHL eCommerce Solutions (Thailand) Co., Ltd. can process Sensitive Personal Data without consent of the Data Subject if the Sensitive Personal Data was already disclosed to the public with the explicit consent from the Data Subject or if the processing of Sensitive Personal Data is for at least the following purposes (Section 26 of the PDPA):-

- (1) prevention of harm to life, body or health of the Data Subject or other persons;
- (2) setting up of a legal claim;
- (3) compliance with certain law in relation to labour protection, social welfare, healthcare services, etc. and subject to the legal requirements under the PDPA.

The exception of an explicit consent on the ground of compliance with contractual obligations does not apply to Sensitive Personal Data.

- 8.5 If DHL eCommerce Solutions (Thailand) Co., Ltd. receives from a third party who collected the Personal Data and/or Sensitive Personal Data for a purpose already notified to the Data Subject (the original purpose) and if DHL eCommerce Solutions (Thailand) Co., Ltd. processes such Personal Data and/or Sensitive Personal Data for a new purpose, DHL eCommerce Solutions (Thailand) Co., Ltd. will notify the new purpose to the Data Subject within 30 days of the date on which it receives the Personal Data and/or Sensitive Personal Data from the third party, or immediately when DHL eCommerce Solutions (Thailand) Co., Ltd. first contacts the Data Subject, or before the Personal Data and/or Sensitive Personal Data is first disclosed to other persons, except for the cases where the Data Subject has already known of the new purpose, or where the Personal Data and/or Sensitive Personal Data processing is urgently required under the law and DHL eCommerce Solutions (Thailand) Co., Ltd. has already provided an appropriate measure to protect the benefits (rights, liberty and interests) of the Data

Subject, or other specific purposes specified under Section 25 of the PDPA. A consent will also be obtained from the Data Subject if the new purpose is subject to a consent from the Data Subject.

- 8.6 If the original purpose of the Personal Data and/or Sensitive Personal Data processing is subject to a consent from the Data Subject under Sections 24 and 26 of the PDPA and if DHL eCommerce Solutions (Thailand) Co., Ltd. processes the Personal Data and/or Sensitive Personal Data under the original purpose, DHL eCommerce Solutions (Thailand) Co., Ltd. will notify and obtain a consent from the Data Subject within 30 days of the date on which it receives the Personal Data and/or Sensitive Personal Data from the third party and obtains the consent from the Data Subject under Section 25 of the PDPA.
- 8.7 The Data Subject can withdraw their consent at any time with future effect and without affecting the lawfulness of processing of the Personal Data and/or Sensitive Personal Data based on the consent provided before its withdrawal. The withdrawal of consent can be made by completing the Consent Withdrawal Form and submitting it to the DHL eCommerce Solutions (Thailand) Co., Ltd.. The Data Subject will be informed of the consequences of the consent's withdrawal in relation to the provision of services from DHL eCommerce Solutions (Thailand) Co., Ltd. to them.

9. Data Collection Necessity

- 9.1 The collection of the Personal Data and/or Sensitive Personal Data will be made only to the extent necessary for its lawful purposes. DHL eCommerce Solutions (Thailand) Co., Ltd. will not collect types and items of the Personal Data and/or Sensitive Personal Data more than those necessary for the purpose already notified to the Data Subject, or the purpose for which a consent is already given by the Data Subject where a consent from the Data Subject is required.
- 9.2 DHL eCommerce Solutions (Thailand) Co., Ltd. will regularly review the types of the Personal Data and/or Sensitive Personal Data collected by its departments to ensure that they collect only the types and items of the necessary Personal Data and/or Sensitive Personal Data in compliance with the PDPA. DHL eCommerce Solutions (Thailand) Co., Ltd. will delete from its data records and systems the Personal Data and/or Sensitive Personal Data collected beyond the purpose notified to, or outside the consent of, the Data Subject.

10. Disclosure of Personal Data

The individuals and organizations to whom DHL eCommerce Solutions (Thailand) Co., Ltd. may disclose the Personal Data and/or Sensitive Personal Data include:-

- (1) the Customs Department;

- (2) the Revenue Offices, the Revenue Department;
- (3) the Royal Thai Police;
- (4) the Social Security Offices, the Labour Department;
- (5) the Department of Labour Protection and Welfare;
- (6) the Department of Land Transport;
- (7) the competent courts of jurisdiction;
- (8) public and/or private hospitals;
- (9) commercial banks and financial institutions;
- (10) insurance company;
- (11) law firms;
- (12) auditors;
- (13) all service providers, vendors, suppliers, and contractors of DHL eCommerce Solutions (Thailand) Co., Ltd. e.g. telecommunication company, IT development company, subcontracted transportation company, warehouse operators, social network providers, etc.; and
- (14) other company within the DHL eCommerce Solutions (Thailand) Co., Ltd. and Deutsche Post DHL Group company.

11. Retention and Deletion of Personal Data

- 11.1 DHL eCommerce Solutions (Thailand) Co., Ltd. will retain the Personal Data and/or the Sensitive Personal Data only for a period necessary for the purpose of its collection, use and disclosure, which includes the followings:-

Record Category	Descriptions	Retention Period	Allowable Storage Media
Finance and Accounting	Invoices, purchase orders, receipts, bank account information, other historical financial records, etc.	10 years	Electronic / Paper
IT - System Transaction Logs	Database journals and other logs used for database recovery and security, etc.	We will keep your data for as long as necessary to fulfill our purposes, to execute our contracts and to comply with any legal obligation.	Electronic
IT/Security - Audit Logs	IP address, Cookies ID, GPS location, user/visitor logs, security logs e.g. records of	We will keep your data for as long as necessary to fulfill our purposes, to	Electronic

Record Category	Descriptions	Retention Period	Allowable Storage Media
	logon-logoff, permission changes, etc.	execute our contracts and to comply with any legal obligation.	
Security - CCTV	CCTV footage of walk-in customers, visitors, employees, vendors and suppliers, etc.	Not more than 30 days	Electronic
Operation	Records of services provided, records associated with the completion of operational procedures, etc.	Not more than 1 year	Electronic / Paper
Customers	Personal Data, including customer names, addresses, ID card numbers, order history, credit card and bank details, etc.	10 years after last purchase	Electronic / Paper
Suppliers / Vendors	Personal Data, including their names, addresses, professional license numbers, ID card numbers, bank account details, etc.	10 years after end of supply	Electronic / Paper
Human Resources	Names, addresses, ID Card numbers, photos, videos, bank details, criminal records, medical records, religion, blood type, fingerprint, and other employment records of the employee and job applicants, etc.	10 years after end of employment	Electronic / Paper
Customer Services	Voice recordings	3 months	Electronic / Paper

- 11.2 The retention period for retaining each type of Personal Data and/or the Sensitive Personal Data will be notified to the Data Subject before or upon collection of the Personal Data and/or the Sensitive Personal Data.

- 11.3 The staffs of DHL eCommerce Solutions (Thailand) Co., Ltd. in charge of the Personal Data and/or the Sensitive Personal Data are being trained and fully aware of the retention periods applicable to each type of the Personal Data and/or the Sensitive Personal Data. They will make sure that the Personal Data and/or the Sensitive Personal Data are retained only within each retention period.
- 11.4 The retention and storage of records will be subject to a regular review process carried out under the guidance of management to ensure that this Data Privacy Policy on records retention and protection remains valid, and legal, regulatory and contractual requirements are being fulfilled. The results of these reviews will also be recorded.
- 11.5 Where DHL eCommerce Solutions (Thailand) Co., Ltd. no longer need to process the Personal Data and/or Sensitive Personal Data for the purposes set out in this Data Privacy Policy or as notified to the Data Subject in the Privacy Notice, Nov. 2019 of Deutsche Post DHL Group, Employee Privacy Notice, Job Applicant Privacy Notice, Vendor and Supplier Privacy Notice and CCTV Privacy Notice of DHL eCommerce Solutions (Thailand) Co., Ltd. DHL eCommerce Solutions (Thailand) Co., Ltd. will delete such Personal Data and/or Sensitive Personal Data from its systems. The destruction procedure and the details of disposal will also be recorded.
- 11.6 Where permissible, DHL eCommerce Solutions (Thailand) Co., Ltd. will also delete the Personal Data and/or Sensitive Personal Data upon the Data Subject's request. Information on how to exercise the Data Subject's right to a deletion request are mentioned under Clause 12 of this Data Privacy Policy.
- 11.7 The retention and deletion of the Personal Data and/or Sensitive Personal Data will be in accordance with the Data Retention and Deletion Policy of DHL eCommerce Solutions (Thailand) Co., Ltd..

12. Rights of Data Subjects

- 12.1 DHL eCommerce Solutions (Thailand) Co., Ltd. will inform the Data Subjects, before or upon collection of the Personal Data and/or Sensitive Personal Data, of their following rights:-
- (1) right to withdraw their consent at any time;
 - (2) right to access, obtain copies or request for disclosure of the possession of the Personal Data and/or Sensitive Personal Data collected without their consent;
 - (3) right to transfer the Personal Data and/or Sensitive Personal Data to other Data Controllers (Data Portability);

- (4) right to object the collection, use and disclosure of their Personal Data and/or Sensitive Personal Data;
- (5) right to delete or anonymize their Personal Data and/or Sensitive Personal Data;
- (6) right to cease or suspend the use or disclosure of their Personal Data and/or Sensitive Personal Data;
- (7) right to update or rectify their Personal Data and/or Sensitive Personal Data;
- (8) right to ask DHL eCommerce Solutions (Thailand) Co., Ltd. to record the rejection of their requests; and
- (9) right to file a complaint against DHL eCommerce Solutions (Thailand) Co., Ltd. or its Data Processor with the OPDPC on their violation of the PDPA.

12.2 A Data Subject Rights Notice will be prepared and sent to each Data Subject to notify their said rights before or at the time of processing their Personal Data and/or Sensitive Personal Data.

12.3 The Data Subject can exercise their rights at no cost by contacting the DPO at the contact details under Clause 17 of this Data Privacy Policy.

12.4 Each of these rights are supported by appropriate procedures in accordance with the Data Subject Request Procedure of DHL eCommerce Solutions (Thailand) Co., Ltd. that allows the required actions to be taken within the following timelines:-

Data Subject Requests	Timelines
The right to withdraw their consent	Within 30 days upon receiving the request
The right of access	Within 30 days upon receiving the request
The right to data portability	Within 30 days upon receiving the request
The right to object	Within 30 days upon receiving the request
The right to deletion	Within 30 days upon receiving the request
The right to restriction	Within 30 days upon receiving the request
The right to rectification	Within 30 days upon receiving the request
The right to record the rejection	Within 30 days upon receiving the request

13. Cross-Border Transfer of Personal Data

13.1 DHL eCommerce Solutions (Thailand) Co., Ltd. may transfer some of the Personal Data and/or Sensitive Personal Data abroad, e.g. to Information Technology Service

Centre (ITSC) of Deutsche Post DHL Group in Malaysia, Czech Republic and the United States of America for safe-keeping, or to other Deutsche Post DHL Group company for joint business operations.

Such cross-border transfer will be subject to legally binding agreements referred to as Binding Corporate Rules (BCR), which provide enforceable rights for data subjects and it shall be in accordance with the Data Privacy Policy, V2.0, October 2019 of the Deutsche Post DHL Group, its Supplement and Guideline on Cross-Border Transfers of Personal Data prepared for the DHL eCommerce Solutions (Thailand) Co., Ltd. (“**Documents**”), which cover cross-border transfer of the Personal Data and/or Sensitive Personal Data within the Deutsche Post DHL Group company. They provided measures to safeguard and remedy the Data Subject’s rights for cross-border transfer as required under the PDPA. The Documents should be submitted to the PDPC for approval once the PDPC is established and the relevant rules and regulations have been issued. Such Documents should also be submitted to the PDPC for approval when there has been an update to each of them.

- 13.2 If DHL eCommerce Solutions (Thailand) Co., Ltd. or its Data Processor transfers the Personal Data and/or Sensitive Personal Data to a third party abroad apart from the Deutsche Post DHL Group company, DHL eCommerce Solutions (Thailand) Co., Ltd. will ensure that the import country (the country in which the receiving party is located) has adequate Personal Data protection standards required by the rules to be prescribed by the PDPC, except only in cases where the Personal Data transfer is made on the grounds of the legal compliance or the contractual obligations, or a consent is given by the Data Subject knowingly of the inadequacy of the Personal Data protection standards in the import country, or the other grounds specified under the PDPA.

For the avoidance of doubt, where an adequacy of the Personal Data protection standards does not exist for an import country, an appropriate safeguard such as standard contractual clauses will be used, or a relevant exception identified as permitted under the PDPA.

Such cross-border transfer will be in accordance with the Guideline on Cross-Border Data Transfer of DHL eCommerce Solutions (Thailand) Co., Ltd. and its Supplement (if any) prepared for the DHL eCommerce Solutions (Thailand) Co., Ltd. to safeguard and remedy the Data Subject’s rights as required under the PDPA.

14. Data Inventory

DHL eCommerce Solutions (Thailand) Co., Ltd. has its own Inventory of Data Processing Activities that meets the requirements under Section 39 of the PDPA. This data inventory is prepared in an electronic form covering the Personal Data and/or Sensitive Personal Data collected, used and disclosed ready for inspection by the Data Subject and the PDPC. The purposes of the Personal Data and/or Sensitive Personal

Data collection, the retention periods, and the records of the rejections of the requests of the Data Subjects, the information of DHL eCommerce Solutions (Thailand) Co., Ltd. the rights and the means for data access, the disclosure of the Personal Data and/or Sensitive Personal Data to a third party, and the security policy/measures are included in this data inventory.

15. Security of Personal Data and Data Breach

- 15.1 DHL eCommerce Solutions (Thailand) Co., Ltd. has implemented the 2019 Information Security Control Standards, V1.31b of the Deutsche Post DHL Group and its Supplement prepared for DHL eCommerce Solutions (Thailand) Co., Ltd. the Information Security policy and the Information Security process standard of the Deutsche Post DHL Group to protect the security of the Personal Data and/or Sensitive Personal Data which it processes, and to prevent from the use or disclosure of the Personal Data and/or Sensitive Personal Data without authorization, or for any unlawful purpose by a third party.
- 15.2 In case of data breach, DHL eCommerce Solutions (Thailand) Co., Ltd. and its Data Processor will (1) notify the OPDPC of a data breach within 72 hours after it is aware of such data breach and (2) notify the breach and the remedial measures to the Data Subject if it is likely that the breach will result in a risk to the rights and freedoms of individuals. The notification will be made in the Data Breach Notice form and appropriated procedures in response to the data breach will be in accordance with the Data Breach Response Procedure of DHL eCommerce Solutions (Thailand) Co., Ltd. which sets out the overall process of handling information security incidents.
- 15.3 DHL eCommerce Solutions (Thailand) Co., Ltd. will record the data breach in its Data Breach Register.

16. Data Processing by and Sharing Data with Third Parties

- 16.1 Any of the third parties (e.g. each of DHL eCommerce Solutions (Thailand) Co., Ltd. company, Deutsche Post DHL Group, vendors, suppliers, service providers, etc.) that receives the Personal Data and/or Sensitive Personal Data from a company in the DHL eCommerce Solutions (Thailand) Co., Ltd. or collects the Personal Data and/or Sensitive Personal Data for a company in the DHL eCommerce Solutions (Thailand) Co., Ltd. either in or outside Thailand in relation to the provision of services or for monitoring behaviors of the Data Subjects for a company in the DHL eCommerce Solutions (Thailand) Co., Ltd. is the Data Processor of such company in the DHL eCommerce Solutions (Thailand) Co., Ltd..
- 16.2 DHL eCommerce Solutions (Thailand) Co., Ltd. will enter into the Data Processing Agreement with each of its Data Processors and the Data Sharing Agreement with each of the third parties who receives the Personal Data and/or Sensitive Personal Data from

DHL eCommerce Solutions (Thailand) Co., Ltd.. DHL eCommerce Solutions (Thailand) Co., Ltd. will ensure that all relationship it enters into that involve the processing of Personal Data and/or Sensitive Personal Data under the Data Processing Agreement and the Data Sharing Agreement includes the specific information and terms required by the PDPA.

17. Data Protection Officer (DPO) and Representative

- 17.1 As the business operation of ADHL eCommerce Solutions (Thailand) Co., Ltd. may involve with a large quantity of Personal Data and/or Sensitive Personal Data, and it may be necessary for DHL eCommerce Solutions (Thailand) Co., Ltd. to review the Personal Data and/or Sensitive Personal Data or its system on a regular basis for the purposes of its business operation and Personal Data processing, each of the DHL eCommerce Solutions (Thailand) Co., Ltd. company appointed its own DPO. The name and contact detail DPO is as follows.

DHL eCommerce Solutions (Thailand) Co., Ltd.

Attn: Data Protection Officer

No. 93/1 GPF Withayu Building, Room No.202 and 1004, 2nd Floor and 10th Floor,
Wireless Road, Lumpini Sub-District, Pathumwan District, Bangkok

Tel. No.: 098-282-3881

E-mail: DHLECS.TH.DPO@DHL.COM

- 17.2 The responsibility of DPO is to provide advice to DHL eCommerce Solutions (Thailand) Co., Ltd. monitor and assess the PDPA compliance, coordinate and cooperate with the OPDPC and keep the Personal Data and/or Sensitive Personal Data confidential.
- 17.3 The Data Processors of DHL eCommerce Solutions (Thailand) Co., Ltd. outside Thailand will appoint a DPO and a representative without liability limit in Thailand, which may be the same DPO as those of DHL eCommerce Solutions (Thailand) Co., Ltd.. DHL eCommerce Solutions (Thailand) Co., Ltd. will also make sure that the DPO fully perform his duties and responsibilities under the PDPA at all times.

18. Cookies

- 18.1 DHL eCommerce Solutions (Thailand) Co., Ltd. may collect the information of visiting their websites from its users or visitors through Cookies or other similar technology in order to improve the efficiency for the users or visitors in accessing their online services in the following cases:-
- (1) for the users or visitors to be able to continuously log into their online accounts on the websites of DHL eCommerce Solutions (Thailand) Co., Ltd. company in the same settings;

- (2) for observing the visitors' behavior in order to improve the website and the services provided by DHL eCommerce Solutions (Thailand) Co., Ltd. to be more user-friendly; and
- (3) for providing appropriate interest-based advertising to the users or visitors.

18.2 The users or visitors will be asked to consent to the use of Cookies.

18.3 DHL eCommerce Solutions (Thailand) Co., Ltd. uses the following Cookies on their websites:-

- (1) functionality Cookies for recording information about the choice that the visitors choose in the platform, such as, language, personal settings, credit card details, etc.; and
- (2) advertising Cookies for recording the visitors' behavior or history of the sites they visited in order to present the services or other advertisements that matches with the visitors' preference.

19. The Data Privacy Policy of Other Websites

This Data Privacy Policy only applies to the processing of Personal Data and/or Sensitive Personal Data for the provision of services by DHL eCommerce Solutions (Thailand) Co., Ltd. company and/or only. For using the websites of DHL eCommerce Solutions (Thailand) Co., Ltd. if the users or visitors click the link to other websites, regardless of accessing them through DHL eCommerce Solutions (Thailand) Co., Ltd.'s websites, the visitors are no longer subject to this Data Privacy Policy. The visitors are required to follow the data privacy policy of such other websites which are separated from this Data Privacy Policy.

20. Change of Personal Data Privacy Policy

DHL eCommerce Solutions (Thailand) Co., Ltd. will review this Data Privacy Policy on a regular basis as part of the management process concerned with data protection to make sure that it remains in accordance with the PDPA and any business changes. If there is any change in this Data Privacy Policy, the DHL eCommerce Solutions (Thailand) Co., Ltd. will inform their Data Subjects by updating it on their websites.

DHL eCommerce Solutions (Thailand) Co., Ltd.