

## Customer Privacy Policy

Puumsoft Company Limited (“Puumsoft”, “we” or “us”) would like Customer (“you”) do understand this Privacy Policy. This Privacy Policy describes how we handle your Personal Data and Sensitive Data, including collection, storage, use, disclosure and your rights relating to your Personal Data and Sensitive Data.

### 1. What is Personal Data?

**Personal Data** is any other data which identify yourself (no matter it can be identified by itself, or together with other information).

**Sensitive Data** is Personal Data relating to racial or ethnic origin, religious or philosophical beliefs, Political Opinion, data concerning a natural person’s sex life, criminal record, data concerning health, disabilities, biometric data etc.

**Customer** is the person who is coordinating the project or contract.

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## 2. Personal or Sensitive Data Processing

2.1 We entitle to collect, use and disclose your Personal Data and Sensitive data (“Processing”) for the purposes of project coordination or contract implementation with the following data:

- Name-surname
- Date of birth
- Nick name (if any)
- Title (if any)
- Phone number
- E-mail
- Address
- Copy of National Identification

Below are details of our processing activities:

Processing Area	Activities	Basis for Processing
<b>Coordination</b>	For use in coordinating sales activities.	Contract/Before contract
	For use in presenting price quotation.	Contract/Before contract
<b>Contract Signing</b>	For use in signing the contract and appendices.	Contract/Before contract
	For use in payment collection.	Contract/Before contract
	For use in reference to our services and products.	Contract/Before contract
<b>Contract Execution</b>	For use in coordinating the execution of the contract.	Contract/Before contract

Processing Area	Activities	Basis for Processing
Follow-up of Services	For use in conducting satisfaction surveys.	Contract/Before contract

2.2 We will strictly and properly implement the Personal Data security measure and be compliant with Privacy Policy in order to protect your Personal Data or Sensitive Data from any loss, destroying, modifying, accessing or disclosing without permission or legality in accordance with Data Security Policy and Procedure and IT Security Guideline and Policy.

2.3 If there is any change and/or adding of the purpose of processing e.g. processing based on contract or lawful basis etc., we will inform you of new purpose via Puumsoft website, poster announcement or e-mail. We will record such changes for evidence. In addition, we may request your consent before processing any activities of new purposes (if consent required by law).

### 3. We process your Personal Data restrictively

3.1 We will restrictively process your Personal Data or Sensitive Data by using legitimate and fair method and within the scope of the specified objective.

3.2 Other than the specified objective, we will obtain your consent prior to processing Personal Data; unless

- (1) It is required by laws;
- (2) It is beneficial to you, given that it is impossible to obtain your consent at that time;
- (3) It is beneficial to your or someone else's life, health or security;
- (4) It is for a purpose of investigation of an officer or judicial process of court;
- (5) It is beneficial to research or statistics preparation.

3.3 In case of necessity, we may collect your Sensitive Data, obtained from outside sources only as necessary and will notify the data owner within 30 days or will seek permission from the customer (in the case the law requires it), all for the purposes above and to bring customer's data up-to-date, improve quality and efficiency for us.

#### 4. Transfer to Third Country

We may transfer customer personal data to a foreign country to support our operations. The customer grants permission to us to transfer customer personal data to a foreign country to persons or companies in another country, or into another country's jurisdiction, even if personal data protection laws in such a country may be at the same or less than the level of protection in Thailand. In any case, we will follow suitable steps in protecting the customer's personal data at the same protection level as in Thailand.

#### 5. Your participation as Personal Data owner

We have rights to check the existence of personal data, type of data and the purpose of the use of the data. In addition, the customer has a right to:

5.1 Request a copy of the personal data in electronic form that can be transferred outside of the company or the customer can request direct transfer of the data from us.

5.2 Request us to modify, update or correct the personal data to avoid any misunderstanding.

5.3 Dispute or prohibit the use or revealing of customer personal data for purposes of marketing or other purposes.

5.4 Request the deletion of customer personal data when there is no useful purpose for the data, including limiting the use of the data in the case the data cannot be deleted.

5.5 Reveal the source of where the personal or sensitive data was obtained in the case the customer did not grant permission to obtain or store such personal data.

5.6 Cancel any permission granted to obtain or use the personal data.

5.7 Request the transfer of the personal data to other data protection officers.

5.8 Lodge a complaint with the relevant organizations in the case the customer suspects there has been a breach of personal data.

However, the customer's rights must be in compliance of the Personal Data Protection Act as well as the Privacy Policy and other relevant data regulation.

**Remark:**

If we process your Personal Data and/or Sensitive Data based on Contract, legitimate interest or legal obligation basis, we reserve our right to refuse your right in (5.4).

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Please note that if the customer chooses to exercise your right in (5.4), we may not be able to perform the obligations under the contract which might result in contract termination and/or the inability to provide the benefits under the contract to you.

If the customer refuses to provide crucial data that we may not be able to perform the obligations under the contract which might result in contract termination and/or the inability to provide the benefits under the contract to you.

## 6. Data Retention Period

We reserve our rights to process and disclose your Personal Data and your Sensitive Data and any relevant authorities as required by laws. In the event there is no agreement on data retention, the data will be retained for 10 years from the date the data was received.

## 7. Limitation of liability

Although we employ the strictest measures and best technology to protect personal data security, we will not be able to guarantee zero incidents of personal data security breach. Therefore, we reserve the right to not be held responsible for any loss or damages to personal data in all cases.

## 8. Notification of personal data security breaches

Employees may notify any breaches of personal data to our Data Protection Officer (DPO) as specified in section 9 of this policy for the benefit of the employee. We request that the employee notify us of such breaches as soon as possible after the employee discovers the breach.

## 9. Changes to this Privacy Notice

You may ask questions regarding this Privacy Policy or the methods in obtaining, storing, revealing or making use of personal data and how to exercise their right under the law with the Data Protection Officer at:

- Email: [dpo@puumsoft.co.th](mailto:dpo@puumsoft.co.th)
- Website: <https://www.puumsoft.co.th>
- Telephone: 02 260 0100-2
- Address: 54 BB Building 14<sup>th</sup> Floor Room 1402, Sukhumvit 21 Road, Klongtoeyneau,

Wattana, Bangkok 10110.

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## 10. Changes to the Personal Data Protection Policy

We may make improvements or modifications to this Personal Data Protection Policy from time to time to comply with your company's policy, operations, or suggestions and or recommendations from us. We will announce the changes officially before actually making any changes. We may notify you directly through our communication channels such as bulletin boards or e-mail.

This policy is effective from 1 February 2023.

Arporna Paul Sribhibhadh  
Managing Director

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