

Personal Data Protection Policy for Customers

Personal Data Protection Policy for Customers (hereinafter referred to as the “Policy”) is prepared to clarify details regarding the collection, use, or disclosure of personal data of customers, prospective customers, interested persons in projects, event participants, event attendees, residents in projects, or any individuals (hereinafter referred to as “you”), which Ornsirin Holding Public Company Limited and its subsidiaries (collectively referred to as the “Ornsirin Group”) have received or are under the control of the Ornsirin Group, in accordance with the Personal Data Protection Act B.E. 2562 (2019) and/or related subordinate laws on personal data protection (collectively referred to as the “personal data protection laws”).

The Ornsirin Group aims to ensure your confidence in the collection, use, disclosure, and/or transfer of your personal data to overseas. Therefore, this Policy has been prepared for the following purposes:

(1) to ensure that the operations of the Ornsirin Group relating to your personal data comply with the personal data protection laws;

(2) to inform data subjects of how the Ornsirin Group collects, uses, discloses, and/or transfers personal data overseas, including other details as required by personal data protection laws.

1. Definitions

The following terms shall have the meanings set forth below:

Personal Data means any information relating to a person which enables the identification of such person, whether directly or indirectly.

Sensitive Personal Data means personal data as specifically defined under personal data protection laws, including race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any other data as prescribed by the Personal Data Protection Committee.

2. Collection of Personal Data

2.1 Personal Data Collected Directly

The Ornsirin Group collects your personal data directly through various channels, including online channels such as email, your personal social media accounts (e.g., Facebook, Instagram, YouTube, LINE, or WeChat), the Ornsirin Group’s websites and applications, as well as other direct channels such as telephone, postal mail, at project sites, events, or exhibitions.

2.2 Personal Data Collected from Other Sources

The Ornsirin Group may collect your personal data from sources other than directly from you, such as affiliated companies within the Ornsirin Group, business partners of the Ornsirin Group, service providers, information systems that you use, references, public sources, or government agencies. The personal data collected will depend on your relationship with the Ornsirin Group or your use of its products or services.

2.3 Types of Personal Data Collected

- General personal data such as title, name, surname, gender, nationality, date of birth, photographs, signature, marital status, lifestyle information, and/or any other information you choose to provide which may be considered personal data.

- Contact information such as registered address, current address, type of residence, mobile phone number, email, social media accounts (e.g., Facebook, Instagram, YouTube, LINE, or WeChat), records of correspondence and communication, and preferred communication channels.

- Official identification data such as national ID card, passport, house registration, name change documents, marriage certificate, government officer/state enterprise ID, foreigner identification documents, work permit, vehicle registration, and driver's license.

- Employment information such as occupation, position, workplace, affiliated company, and directorship in companies/legal entities.

- Information relating to interests and purchases such as interest in real estate (e.g., preferred house/unit type, reasons for purchasing real estate, appointment date and time for project visits), use of benefits, real estate transaction data, details of real estate purchased (e.g., location), reasons for unsuccessful sales (e.g., loan rejection, inability to transfer ownership), resale information, inspection data, insurance/warranty information, and after-sales service data.

- Financial information such as financial status, salary, income, bank accounts, payment information and methods (e.g., loan, cash), foreign remittance certification documents, loan application supporting information submitted to banks (e.g., eligibility, bank forms), default information, credit information, bankruptcy, and receivership status.

- Technical data such as device-related information, data automatically collected through website visits, identifiable cookies, IT data relating to devices and browsers used to access websites, and IP address.

- Other information such as CCTV data, complaint details, marketing data, contractual documents, status as a contracting party or litigant, and survey data.

- Sensitive personal data such as sensitive information appearing on identification documents (e.g., religion).

In the event that the Ornsirin Group collects, uses, discloses, and/or transfers your sensitive personal data, it will do so only with your explicit consent or where permitted by law.

If you do not provide personal data to the Ornsirin Group, we may be unable to offer or provide products or services, or perform other actions as requested or under contract, which may result in inconvenience or inability to fulfill contractual obligations.

2.4 Personal Data of Third Parties

Where you provide personal data of third parties to the Ornsirin Group, you are responsible for informing such third parties (e.g., directors, authorized persons, authorized signatories of your affiliated company, event participants, family members, close persons, references, emergency contacts, or caregivers of persons with disabilities) of the details in this Policy regarding the collection, use, disclosure, and/or transfer of personal data overseas, and for obtaining consent or having other legal bases to enable the Ornsirin Group to process such personal data in accordance with applicable laws.

2.5 Personal Data of Minors, Quasi-Incompetent, and Incompetent Persons

The Ornsirin Group does not intend to collect personal data of minors, quasi-incompetent persons, or incompetent persons, unless consent has been obtained from a person exercising parental authority (where consent is required and the minor cannot provide consent by themselves under the law), a guardian, or a curator, as the case may be.

If the Ornsirin Group becomes aware that such personal data has been collected without the required consent unintentionally, the Ornsirin Group will delete such data as soon as practicable, unless there is a lawful basis permitting the collection, use, disclosure, and/or transfer of such personal data in accordance with applicable laws.

3. Purposes for Collection, Use, and/or Disclosure of Personal Data and Relevant Legal Bases

In general, the Ornsirin Group will collect, use, or disclose your personal data only as necessary or as required by law. The Ornsirin Group relies on the following legal bases: (1) consent; (2) necessity for the performance of a contract between you and the Ornsirin Group; (3) necessity to prevent or suppress danger to life, body, or health of a person; (4) necessity for compliance with legal obligations of the Ornsirin Group; (5) legitimate interests of the Ornsirin Group; (6) public interest for the performance of tasks carried out in the public interest or the exercise of official authority; and (7) necessity for the establishment, exercise, or defense of legal claims, and/or other legal bases as permitted under applicable laws, for the collection, use, disclosure, and/or transfer of your personal data overseas.

4. Purposes for Collection, Use, and/or Disclosure of Personal Data Based on Legal Grounds Other than Consent

The Ornsirin Group will collect, use, and/or disclose your personal data for the following purposes:

- For real estate transactions and/or provision of services of the Ornsirin Group, such as offering for sale, identity verification, entering into transactions or contracts, transfer of ownership, after-sales services (e.g., repair requests), debt collection, coordination with business partners to provide products or services to customers (e.g., coordination with banks for loan applications), and facilitating after-sales services (e.g., repair assessment).
- For communication purposes, such as scheduling project visits, coordination, providing information, marketing, public relations, and advertising through various communication channels, offering special privileges and benefits for customers, delivering gifts and prizes, organizing events, press conferences, and exhibitions.
- For customer relationship management, such as updating customer information, maintaining financial records, assessing customer satisfaction, handling complaints, and resolving complaints.
- For project management, such as organizing meetings to establish juristic persons, managing juristic persons prior to project transfer, and project administration (e.g., collection of common fees, access control systems, issuing parking cards).
- For internal management and data analytics of the Ornsirin Group, such as performance analysis, preparation of operational reports, sales evaluation, customer data analysis, data analysis for investment decisions in new businesses, investment and expansion of related businesses, disbursement of funds, internal audit, fraud-related reporting, strategic planning, preparation and presentation of risk management approaches, supervision, investigation, and collection of evidence, establishment, exercise, or defense of legal claims, or legal proceedings.
- For compliance with laws and internal policies of the Ornsirin Group, such as compliance with policies, announcements, or orders of the Ornsirin Group, compliance with legal obligations, conducting KYC with customers, cooperation with government authorities or other competent authorities, and submission of reports as required by law.

- For prevention or suppression of danger, such as preventing or suppressing danger to life, body, or health of a person.
- For management of the Ornsirin Group's information systems, such as system administration and troubleshooting, development of accounting and transaction/payment systems, system security, and maintenance of customer database systems.

5. Purposes Requiring Consent

The Ornsirin Group relies on consent for the collection, use, and/or disclosure of personal data for the following purposes:

- Religious information as stated on national identification cards, which the Ornsirin Group collects from copies of such identification cards, without any specific intention to use such data.
- Biometric data such as fingerprint scans and facial recognition data for identity verification and authentication.
- Certain types of marketing communications where the Ornsirin Group cannot rely on other legal bases, such as providing information, privileges, and promotional communications regarding products and services of the Ornsirin Group and/or its business partners.

6. Disclosure of Personal Data

The Ornsirin Group may disclose your personal data to the following recipients for the purposes specified above:

- Companies within the Ornsirin Group, such as Ornsirin Holding Public Company Limited and its subsidiaries.
- Business partners of the Ornsirin Group, such as banks, financial institutions, insurance companies, brokers, loan service providers, asset valuation companies, and juristic person management companies.
- External service providers, such as legal advisors, accounting advisors, financial advisors, project consultants, environmental consultants, property inspection service providers, registration service providers, repair service providers, construction contractors, event organizers, advertising agencies, social media management service providers, data analytics providers, marketing analytics providers, access control system providers, survey service providers, billing/payment system providers, security service providers, IT system providers, and cloud service providers.
- Government agencies, such as the Revenue Department, Department of Lands, Department of Highways, Department of Public Works and Town & Country Planning, Social Security Office, Anti-Money Laundering Office, Royal Thai Police, or other government authorities upon request.

7. Cross-Border Transfer of Personal Data

The Ornsirin Group may transfer your personal data to recipients located in foreign countries for the purposes specified above, such as (1) business partners of the Ornsirin Group, to enable overseas partners to provide services to you or for communication with brokers or agents abroad; and (2) external service providers who provide information technology systems to the Ornsirin Group, where it is necessary to transfer data overseas for cloud storage with servers located abroad, including for the use of international payment systems.

As the destination countries may or may not have personal data protection standards equivalent to those prescribed in Thailand, the Ornsirin Group will implement appropriate procedures and measures to ensure that such transfers are conducted securely and that recipients provide adequate personal data protection standards or fall within other exceptions as permitted under personal data protection laws.

7.1 Retention Period of Personal Data

The Ornsirin Group will retain your personal data for an appropriate period as necessary to fulfill the purposes for which the personal data was collected, in accordance with this Policy and applicable laws. However, the Ornsirin Group may retain your personal data for a longer period as required to comply with applicable laws and regulations, as well as internal policies or operational requirements of the Ornsirin Group.

7.2 Personal Data Security Measures

7.2.1 The Ornsirin Group will implement personal data security measures covering administrative, technical, and physical safeguards to prevent loss, destruction, alteration, modification, use, disclosure, or unauthorized or unlawful access to personal data, in accordance with applicable laws. Such measures may include, but are not limited to, access control over personal data and devices used for storage and processing, taking into account usability and security; authorization and user access rights management for accessing, using, disclosing, and processing personal data; user access management; assignment of user roles and responsibilities to prevent unauthorized access, disclosure, awareness, copying, or theft of storage or processing devices; implementation of audit trail mechanisms to monitor access, modification, deletion, or transfer of personal data; alignment with appropriate methods and media used for the collection, use, or disclosure of personal data; and identity verification of individuals accessing or using personal data, in accordance with the Ornsirin Group's information security policies.

7.2.2 The Ornsirin Group will promptly notify data subjects, including providing remediation measures, in the event of a personal data breach or leakage to the public resulting from deficiencies in the Ornsirin Group's security measures. However, the Ornsirin Group shall not be responsible for any damage arising from the use or disclosure of personal data to third parties, including negligence or failure to log out from databases or social media systems of the Ornsirin Group by the data subject or any other person authorized by the data subject.

7.3 Changes to the Privacy Policy

The Ornsirin Group may change, update, or amend this Policy from time to time. The updated Policy will be available at www.ornsirin.com and shall supersede all previous versions. If you wish to be informed of any changes, the Ornsirin Group recommends that you review this Policy regularly through the aforementioned channel. However, the Ornsirin Group will notify you of any material changes and seek your consent again where necessary and as required by law.

7.4 Cookie Policy

The Ornsirin Group uses cookies to store or remember user information until the browser is closed or until the user deletes or refuses the use of cookies. However, if you choose to allow cookie tracking, you may find that your experience on the website becomes more convenient, as cookies help store information about websites you have previously visited or accessed. In addition, the website will use the collected cookie data for statistical analysis and/or other activities of the Ornsirin Group to improve its products and services.

7.5 Data Subject Rights

Under applicable personal data protection laws, you have the following rights as a data subject:

7.5.1 Right to withdraw consent: You have the right to withdraw your consent previously given to the Ornsirin Group for the collection, use, or disclosure of your personal data at any time. However, if you do not provide or withdraw your consent, the Ornsirin Group may be unable to offer or provide certain products or services, or perform certain actions as requested, which may result in inconvenience or inability to fulfill your requests.

7.5.2 Right of access and to obtain a copy: You may have the right to request access to and obtain a copy of your personal data under the responsibility of the Ornsirin Group, as well as to request disclosure of how your personal data was obtained. For security purposes, the Ornsirin Group may verify your identity before providing the requested data.

7.5.3 Right to rectification: You may have the right to request correction of your personal data where such data is incomplete, inaccurate, misleading, or not up to date.

7.5.4 Right to data portability: You may have the right to receive your personal data in electronic format and to request that the Ornsirin Group transmit or transfer such data to another data controller, subject to conditions prescribed by law.

7.5.5 Right to object: You may have the right to object to the collection, use, or disclosure of your personal data in certain cases, such as direct marketing.

7.5.6 Right to erasure: You may have the right to request that the Ornsirin Group delete or destroy your personal data, or anonymize such data, subject to conditions prescribed by law.

7.5.7 Right to restriction of processing: You may have the right to request that the Ornsirin Group restrict the use of your personal data in certain cases.

7.5.8 Right to lodge a complaint: You have the right to lodge a complaint with a competent authority if you believe that the collection, use, and/or disclosure of your personal data is unlawful or not in compliance with applicable personal data protection laws. However, the Ornsirin Group would appreciate the opportunity to be informed of your concerns or complaints in order to clarify and resolve the matter before you contact the relevant authority.

In cases where the exercise of data subject rights is restricted by law or other applicable exceptions, the Ornsirin Group may not be able to comply with your request. In such cases, the Ornsirin Group will inform you of the reasons for refusal.

7.6 Contact Channels

For inquiries regarding personal data, submission of suggestions, or requests to exercise data subject rights, please contact:

Ornsirin Group:

79 Moo 8, San Pu Loei Subdistrict, Doi Saket District, Chiang Mai

Tel: 053-295-709 or visit www.ornsirin.co.th

You may find further details regarding the personal data protection policy for customers and business partners on the Company's website. You may also contact the Data Protection Officer of the Ornsirin Group as follows:

Data Protection Officer: Ms. Nongnuch Kasorn Tel: 053-295709 ext. 102

Effective from 15 November 2024 onwards