

Lorenz & Partners

Legal, Tax and Business Consultants

Privacy Notice

Lorenz & Partners Co., Ltd., F.I.H. Co., Ltd., and our group of companies (“**COMPANY**”) recognise the importance of personal data protection and compliance with the Personal Data Protection Act B.E. 2562 (“**PDPA**”). For the personal data activities of the COMPANY as the data controller, the COMPANY issues this privacy notice (“**NOTICE**”) in order to describe how the COMPANY collects, uses, discloses, and processes the personal data of the data subject, to comply with the legal obligations and requirements as prescribed under the PDPA and the international data protection standards.

The COMPANY has to collect, use, disclose, and process the personal data of the data subject, in order to comply with the laws and/or to fulfil obligations under agreements. This NOTICE applies to the current and future personal data activities of the COMPANY, as well as to all activities, services, and products of the COMPANY.

I. Collected Data, Purpose of Collection, Use, and Disclosure

The personal data means any information relating to a person, which enables the identification of a such person, whether directly or indirectly, but not including the information of the deceased persons and juristic person in particular (“**PERSONAL DATA**”).

For specific details regarding the collected PERSONAL DATA, the collection, use, and disclosure, including the purpose and legal ground(s), for each data subject, please refer to the data processing details sheet (“**PROCESSING DETAIL SHEET**”), relevant to each type of data subject, which is sent to each data subject together with this NOTICE or available on the link below (as the case may be).

II. Sources of PERSONAL DATA collection

The COMPANY may collect your PERSONAL DATA through the following channels:

a. Data subject

In general, the COMPANY obtains your PERSONAL DATA through the information you directly provided to the COMPANY, including but not limited to email, form, phone call, application form, condition of engagement form, verbal and non-verbal communication.

b. Third party

In some cases, the COMPANY obtain your personal from other sources, including but not limited to government agencies, service providers, business partners, online services, recruitment agencies, or other sources that are rightfully and/or lawfully entitled to disclose your PERSONAL DATA to the COMPANY.

III. Ground of collection, use, and disclosure

The COMPANY collect, use, and disclosure your PERSONAL DATA on the following grounds:

a. Consent: The data subject has an absolute unrestricted right to withdraw consent at any

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time. If the data subject wishes to withdraw the consent once it is given, the data subject can contact the COMPANY using the contact information in item XI below.

- b. Non-consent:** The COMPANY may collect, use, and disclose your PERSONAL DATA without your consent, under the grounds provided under the PDPA (e.g. for performance of a contract, necessary for legitimate interests of the COMPANY, for compliance with laws, etc.).

IV. Disclosure of PERSONAL DATA

The COMPANY may disclose your PERSONAL DATA to third parties under your consent or under the grounds permitted by law. The person or entity that is the recipient of such PERSONAL DATA will collect, use and/or disclose your PERSONAL DATA to the extent that you have given your consent, as allowed by laws, or the scope related to this policy.

The COMPANY may disclose the PERSONAL DATA to individuals or entities depending on your relationship and transaction with the COMPANY.

V. Duration of retention

The COMPANY will retain the collected PERSONAL DATA as long as it is necessary for the purpose of the collection as mentioned in this NOTICE and/or for compliance with the laws or any legal obligations. (“**RETENTION PERIOD**”). We, generally, retain PERSONAL DATA for up to 10 years as per the general prescription period, specified in the Civil and Commercial Code Section 193/30.

Subject to laws, regulations, rights of the COMPANY, and any other legal obligations, after the RETENTION PERIOD, the COMPANY will permanently erase or destroy the collected PERSONAL DATA which has surpassed the RETENTION PERIOD in a way that cannot be recovered by any person at any time.

In case of a hard copy or on a paper document, such hard copy or document paper shall be returned to the data subject within 90 days after the expiry of the RETENTION PERIOD, unless the PARTIES agree to destroy such document.

VI. Rights of the data subject

The data subject has the rights under the PDPA as follows:

Consent withdrawal (Section 19 para 5)	The data subject has an absolute unrestricted right to withdraw consent at any time. If the data subject wishes to withdraw the consent once it is given, the data subject can contact the COMPANY using the contact information in item VIII below.
Right to access (Section 30)	The data subject has the right to request access to and obtain a copy of the PERSONAL DATA related to him or her which is under the possession of the COMPANY, or to request the disclosure of the acquisition of the PERSONAL DATA obtained without his or her consent.

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Right to data portability (Section 31)	The data subject has the right to receive a copy of the PERSONAL DATA concerning him or her from the COMPANY, to request the COMPANY to send or transfer the PERSONAL DATA in such formats to other persons, if it can be done by automatic means, or to request to directly obtain the PERSONAL DATA in such formats that the COMPANY sends or transfers to other COMPANY unless it is impossible to do so because of the technical circumstances.
Right to object (Section 32)	The data subject has the right to object to the collection, use, or disclosure of the PERSONAL DATA concerning him or her, at any time in the circumstances as prescribed by law, unless the COMPANY has the compelling legitimate ground or the PERSONAL DATA is used for compliance, exercising, or defending of legal claims.
Right to be forgotten (Section 33)	The data subject has the right to request the COMPANY to erase or destroy the PERSONAL DATA or anonymize the PERSONAL DATA to become the anonymous data which makes it impossible to identify the data subject, in case <ol style="list-style-type: none">(1) the PERSONAL DATA is no longer necessary in relation to the purposes for which it was collected, used, or disclosed;(2) the data subject withdraws consent and the COMPANY has no legal ground for such collection, use, or disclosure;(3) the data subject objects to the PERSONAL DATA activities as per Section 32 (1), and the COMPANY cannot reject to such request as per Section 32 (1) (a) or (b), or where the data subject exercise his or her right to object as per Section 32 (2);(4) the PERSONAL DATA have been unlawfully collected, used, or disclosed under the law.
Right to cease usage (Section 34)	The data subject has the right to request the COMPANY to restrict the use of the PERSONAL DATA where the following applies: <ol style="list-style-type: none">(1) when the COMPANY is pending for examination process in accordance with the Employee's request pursuant to Section 36;(2) when there is the PERSONAL DATA which shall be erased or destroyed pursuant to Section 33 (4), but the data subject requests the restriction of the use of such PERSONAL DATA instead;(3) when it is no longer necessary to retain the PERSONAL DATA for the purposes of such collection, but the data subject has the necessity to request the retention for the purposes of the establishment, compliance, or exercise of legal claims, or the defence of legal claims;(4) when the COMPANY is pending verification with regard to Section 32 (1), or pending examination with regard to Section 32 (3), in order to reject the objection request made by the data subject in accordance to Section 32 paragraph three.
Right to rectify (Section 36)	The data subject has the right to request the COMPANY to rectify his/her PERSONAL DATA to keep it accurate, up-to-date, complete and not misleading.

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Right to file a complaint (Section 73)	The data subject has the right to file a complaint in the event that the COMPANY, including the employees or the service providers of the COMPANY, violates or does not comply with the PDPA, or notifications issued in accordance with the PDPA.
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VII. Amendment of the NOTICE

The COMPANY may, from time to time, amend or revise this NOTICE, to be in compliance with the practice, requirements, and applicable law. Once the NOTICE is amended, the COMPANY will notify by the announcement via www.lorenz-partners.com. The NOTICE published on the website is the most updated version. The COMPANY recommend the data subject frequently visit the website to update the NOTICE.

VIII. Contact Information

If the data subject has questions in relation to this NOTICE or wants to exercise the rights under PDPA, please contact the COMPANY through any of the following channels:

Lorenz & Partners Co., Ltd.

Email: info@lorenz-partners.com

Phone: +66 228 718 82

Address: 179 Bangkok City Tower, 27th Floor, South Sathorn Road, Thungmahamek, Sathorn, Bangkok 10120, Thailand

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Annex 1 – Processing Detail Sheet (Clients)

Data Subject	Collected Data	Purpose	Legal ground	Consequence of not providing the PERSONAL DATA	Disclosure to Third Party (if any)
Clients	Name, address, email, phone number, passport/ID card, tax ID	To have contact information to properly provide services, to issue agreement, invoices, and related documents (e.g. tax documents)	Legitimate interest Performance of contract	May not be able to provide services to the client, invoices and agreement cannot be issued	Revenue Department

PROCESSING DETAIL SHEET

The processing of PERSONAL DATA is carried out in accordance with the COMPANY's general data protection framework as outlined in the Privacy Notice ("NOTICE") set out above. This PROCESSING DETAIL SHEET serves as a supplement to the NOTICE, providing specific details regarding the collection, use, legal grounds, and disclosure of PERSONAL DATA. In case of any discrepancies, the NOTICE shall prevail unless otherwise specified herein.

Please note that the COMPANY may, from time to time, amend or revise this NOTICE, to be in compliance with the practice, requirements, and applicable law. Once the NOTICE is amended, the COMPANY will notify by the announcement via www.lorenz-partners.com. The NOTICE published on the website is the most updated version. The COMPANY recommends the data subject frequently visit the website to update the NOTICE.

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Annex 2 – Processing Detail Sheet (Candidates & Employees)

Data Subject	Collected Data	Purpose	Legal ground	Consequence of not providing the PERSONAL DATA	Disclosure to Third Party (if any)
Applicants	Name, ID card/number, passport, nationality, address, email, telephone number, educational records/certificates, picture, health record, criminal record, immigration documents	To process the hiring process, interview, evaluation, for signing of employment agreement	Legitimate interest Performance of contract	May not be able to process the hiring process, set up interview, and signing of employment agreement	3rd party recruitment company
Employees	Name, ID card/number, passport, nationality, address, bank account information, email, telephone number, educational records/certificates, social security number/information, picture, health record, medical certificate, criminal record, immigration documents	To undertake obligations and duties under employment relationship (e.g. to pay salary and benefits, issue certain documents), comply with the laws (e.g. labour, tax, immigration, and social security)	Legitimate interest Performance of contract	May not be able to make payments and provide benefits, issue labour-related documents, comply with laws (e.g. labour, tax, immigration, and social security)	Government authorities in relation to the employment, labour, and immigration (e.g. Labour Department, Social Security Office, Immigration authority, etc.)

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