

# Privacy policy

Last updated: 29 March 2021

## Introduction

Personal data is important. Therefore, S&P Syndicate Public Company Limited (the “**Company**” or “**we**”, or “**us**”, or “**our**”) has created this Privacy Policy to explain how we collect, use, disclose, transfer and process your personal data in order to access and use applications, websites, and other online services which the Company owns or operates, other services, or any other marketing activities and public relation activities which the Company operates, including but not limited to S&P Application in the mobile phones, [www.snp1344.com](http://www.snp1344.com), [www.snpfood.com](http://www.snpfood.com), and Call Center number 1344 (collectively referred to as the “**Services**”). We kindly ask you that you to read and understand this Privacy Policy before using the Services.

This Privacy Policy conforms to the Personal Data Protection Act 2019 (the "**Personal Data Protection Act**"), and takes effect on the date specified at the top of the document. This Privacy Policy is subject to revision, update and/or change to make it more complete, and we will announce any revised updated and/or amended version accordingly with the date of the latest update (the “**Effective Date**”) specifying at the top of this document. Therefore, we ask you to review this Privacy Policy from time to time for possible changes.

## Personal data collected by the Company

The personal data that we collect is data that can be used to identify you. We will collect your personal data when you apply for membership or use the Services. Your personal data that we collect is divided into three categories which are (A) personal data that you provide to us, (B) personal data that we collect by automated means, and (C) personal data that we collect from other sources as described below:

### **(A) Personal data that you provide to us** includes:

- Personal data that you provide when you apply for membership or use the Services or contact us by phone or via the Services’ channels or other means, such as your first name, last name, ID card number, mailing address, mobile phone number, email address, date of birth, or other contact information

- Transaction information, such as information about the products you have bought or are interested in, including prices, payment methods, other payment details, and point collection and redemption etc.
- Account information, such as your usernames, passwords, or other information that identifies you that you use to access the Services
- Other personal data that you provide in order to communicate with us.

#### **(B) Personal data we collect through automated means**

We may use automated technology to collect the Services usage information from the mobile devices that you use such as:

- Type of mobile device and settings
- Unique device identifier (UDID) or mobile device identifier (MEID) for your mobile device
- Serial numbers of devices
- Websites or applications referenced (Website or any links that brings you to us)
- Online activities on other websites, applications or social media
- Communication with us or online social media communication
- Activities related to the use of the Services.

#### **(C) Personal data that we collect from other sources**

We may collect your personal data from other entities in accordance with the Personal Data Protection Act. This may include collection of your personal data when you interact with us via online social media.

#### **How we use your personal data**

Your personal data that we collected will help us to provide the Services to you smoothly, effectively, and consistently with your experience to the best of your benefit. We may use your personal data that we collect about you to:

1. Create and manage your account
2. Execute orders, make payments and other transactions related to the Services
3. Respond to products and service requests from customers
4. Collect non-personally identifiable statistical and data and perform data analysis for internal or external use
5. Examine and analyze usage and trends to improve your experience with Services
6. Increase the efficiency and operation of the Services

7. Prevent fraud, check for theft, and prevent crime
8. Comply with applicable laws
9. Marketing objectives or product presentation such as:
  - a. Contact you to send you information about products and services you may be of interest to you
  - b. Offer new products, services and/or advice to you
  - c. Manage and oversee sweepstakes, promotions and contests
  - d. Send you targeted advertisements, coupons, news and other information about promotions or special events.

You may choose not to give your consent to the use of your personal data for the purposes indicated in this Clause 9. However, failure to give such consent may affect the offering of products or promotions to you.

#### **Disclosure of your personal data**

Your personal data that we hold about you may be disclosed to the following parties.

#### **Third party service providers**

We may disclose your personal data to third parties who provide services to us or on our behalf for the purpose of, for instance, the fulfillment of your orders, payment processing, data analysis, customer service, organizing promotions, contests, sweepstakes, and prize draw, research, or customer satisfaction surveys. These third parties are responsible for protecting your personal data to enable us to provide services to you efficiently.

#### **Affiliated companies of S&P Syndicate Public Company Limited**

We may disclose your personal data to affiliated companies within the S&P Syndicate Public Company Limited in order to enable us to provide you with accurate and complete services. However, our affiliated companies are not authorized to use or disclose your personal data, except as specified in this Privacy Policy.

#### **Other people**

We may be required to disclose your personal data in accordance with legal requirements, legal proceedings, litigation and/or claims by government authorities and public entities. In addition, we may disclose personal data about you if we believe that for national security, law enforcement, or other matters of public importance only to the extent that is necessary and appropriate. We may disclose

your personal data if we consider disclosure to be necessary to enforce the terms and conditions of services or protect our operations or users. In addition, in the event of any organizational restructuring, merger and acquisition, or sale of all or part of our business, we may transfer all or some of your personal data that we have collected to relevant parties.

### **Cookies and other technologies**

We and our vendors who provide services to us may use:

- "Cookies" are small data files created by a web browser or internet user's device to remember and/or receive information about users
- "Web beacons" are small objects or images that are placed on web pages, in applications, or email and are used to track activities. They are sometimes referred to as pixels and tags
- Other similar technologies

in the Services to

- Identify you or your device
- Allows you to access and use and properly run the Services
- Improve our products and services
- Monitor the performance of the Services (e.g. errors when there are many users, loading time, other popular sections)
- Remember your personal data for your convenience when you use the Services
- Improve our features to make it correspond with your experience
- Display advertisements by target groups
- Other purposes described in the section "How we use your personal data" of this Privacy Policy.

This will allow us to tailor our proposals more in line with your experience and interests. We will use cookies, web beacons, and other technologies to collect, use, disclose, transfer, and process data, specific to purposes described in this Privacy Policy.

### **Sending or transferring your personal data to other countries**

We may transfer or transmit your personal data to other countries for the purposes set out in this policy. We will ensure that the destination countries and the entities that receive your personal data have standards to protect your personal data that are adequate and equivalent to the protection under or of the same standards as personal data protection laws applicable to us.

## Your rights

You have the right to your personal data under the Personal Data Protection Act as follows:

### 1. Right to request access and obtain a copy of personal data

You have the right to request access and obtain a copy of your personal data that we hold about you or you may ask us to disclose the sources of where we obtained your personal data that you have not given consent.

### 2. Right to request to send or transfer personal data

You have the right to request us to send or transfer your personal data to other personal data controller via automated methods and have the right to request to see the personal data that the Company sends or transfers directly to other personal data controller, unless it is impossible due to technical conditions.

### 3. Right to object to the collection, use, or disclosure of personal data

You have the right to object to the collection, use, or disclosure of your personal data at any time, unless under the following cases:

3.1 It is for performing the duty for the public interest or the personal data controllers, or performing the duty of exercising the state power given to the personal data controllers

3.2 it is for the ground of legitimate interest of personal data controllers, unless such interest is lower than the basic rights in the personal data of personal data owners

3.3 it is for the purpose of direct marketing

3.4 it is for the purpose of scientific, historical, or statistical research.

### 4. The right to request to delete or destroy or anonymize your personal data

You have the right to request to delete or destroy or anonymize your personal data in the following cases when:

4.1 The personal data is no longer necessary for the purpose of which it was collected, used or disclosed

4.2 You have withdrawn your consent to collect, use or disclose personal data and the Company has no legal power to continue to collect, use or disclose

4.3 You have objected to the collection, use or disclosure of your personal data and the Company has no legal right to refuse

4.4 The collection, use or disclosure of personal data is unlawful under the Personal Data Protection Act.

#### 5. Right to restrict the use of personal data

You have the right to request us to restrict the use of your personal data in the following cases when:

5.1 It is under the pending examination process of reviewing whether the personal data is accuracy, up-to-date and complete or not

5.2 It is personal data that must be deleted or destroyed as it does not comply with law and you request to restrict it instead

5.3 The personal data is no longer necessary to retain for the purpose of which it was collected, but you still have the necessity to request the retention for the purposes of the establishment, compliance, and exercise of legal claims, or the defense of legal claims

5.4 The Company is pending verification in order to reject the objection request of the collection, use or disclosure of personal data.

#### 6. Right to withdraw consent

You have the right to withdraw your consent at any time, unless it is against the Company's policy.

#### 7. Right to request to rectify your personal data

The Company must ensure that personal data is accurate, up to date and complete, and does not cause misunderstandings. If the Company rejects your request, the Company will record the said refusal along with reasons in the transaction record.

#### 8. Right to lodge a complaint to the expert panel

You have the right to lodge a complaint in case where the Company, the personal data processors, including employees or contractors of the Company violating or not complying with the Personal Data Protection Act or other announcements issued under the Personal Data Protection Act.

#### Third party website

The Services may contain links to third party websites that are not related to us. If you visit these linked websites, you should read their privacy policies, services terms and conditions, and other policies. We are not responsible for the third parties' content or privacy policies, safety, and policies.

### **Security of your personal data**

We use reasonable security measures to protect your personal data in order to protect your personal data. Although, we have taken reasonable steps to protect your personal data, but we would like to inform you that there is no best security measure or error free. Therefore, if you have reasons to believe that your personal data has been compromised or if you have any questions regarding this Privacy Policy, please contact us for assistance and investigation.

### **Retention and integrity of your personal data**

Unless you have requested an extension of the data retention period, or you have requested the deletion of your personal data, which is a legal exercise of your right, we will keep your personal data throughout the period of your membership, as long as you are a user of the Services, or as long as necessary to fulfill the purpose specified in this Privacy Policy, or according to the time specified by law.

We are happy to keep your personal data accurate, complete and up to date. Nevertheless, you can update your data via the specified channel.

### **Contact us**

If you have comments, suggestions, questions, complaints or want to exercise your rights regarding your personal data, please contact our Data Protection Officer of the Company via email to [dpo@snpfood.com](mailto:dpo@snpfood.com), phone 0-2785-4000, Monday-Friday from 8:30 am. - 5:30 pm., or our head office located at No. 2034/100-103, 106-107, 23-24 Floor, Ital Thai Tower, New Petchburi Road, Bangkapi, Huaykwang, Bangkok 10310.