

PRIVACY POLICY FOR CUSTOMERS

SUPER TURTLE PUBLIC COMPANY LIMITED

Super Turtle Public Company Limited (the “**Company**”) recognizes the importance of the protection of personal data. The Company will adhere to security measures and prioritize the privacy of data subject (“**you**” or “**your**”) when collecting, using, disclosing, and/or transferring your personal data abroad (collectively referred to as “**Processing**”). This is to ensure that the Company handles and processes personal data appropriately in accordance with the Personal Data Protection Act B.E. 2562 and relevant subordinate laws (“**Data Protection Laws**”).

This privacy policy for customers (“**Privacy Policy**”) has been prepared to inform you that in order to provide the products and/or services by the Company, Super Turtle Group Companies, and BTS Group Companies, and/or to carry out activities related to the business operations of the Company, Super Turtle Group Companies, and BTS Group Companies, the Company may need to process your personal data. This includes data of customers of the Company, Super Turtle Group Companies, and/or BTS Group Companies, whether past, current, or potential customers, as well as individuals who contact the Company, Super Turtle Group Companies, and/or BTS Group Companies.

This Privacy Policy applies to the Company's business operations conducted through various channels, including websites, telephone, email, post, online social media, online communication channels, and any other channels or locations of the Company where personal data is received from you.

The Company may change and/or update this Privacy Policy from time to time. Therefore, the Company recommend that you regularly read the Privacy Policy and visit the Company’s website to review for any changes or updates that may be made by the Company to this Privacy Policy.

1. Personal Data Collected by the Company

For the purposes of this Privacy Policy, “**Personal Data**” means any directly or indirectly identified or identifiable information as listed below.

The Company may collect your Personal Data directly by the Company or indirectly from other sources, such as companies within Super Turtle Group Companies, BTS Group Companies the Company’s service providers (e.g., survey service providers, independent advisors, project advisors, financial advisors, legal advisors or accounting advisors), the Company’s business partners, other third parties (e.g. reference persons, employers, guardians), public domain (e.g. online social media), and third-party website or the relevant government agencies. The specific type of Personal Data which we collect will depend on the context of your relationship with us and/or BTS Group Companies, and the services or products you wish to receive from the Company, the Super Turtle Group Companies, the BTS Group Companies. The followings are examples of Personal Data which the Company may collect:

1.1 **Personal information**, such as title, name-surname, gender, age, occupation, date of birth, identifiable information on documents issued by government agencies (e.g., national identification card, passport, house registration, work permit), signature, photograph;

1.2 **Contact information**, such as postal address, house registration address, national identification card address, workplace address, phone number, email address, LINE user account, Facebook account, and other information related to online social media;

1.3 **Transaction information**, such as bank account information, information in transaction-related documents (e.g., contracts, invoices, receipts, tax invoices) and payment information;

1.4 **Technical information**, such as Internet Protocol (IP) address, web beacon, log, device model and type, hardware-based identifiers such as universal device identifier (UDID), media access control information, software-based identifier such as identifier for advertisers for iOS operation system (IDFA), or identifier for advertisers for Android operation system (AAID), connection information, access information, single sign-on (SSO) information, login log, access time, time spent on our webpage, cookies, login data, search history, browsing detail, browser type and version, time zone setting and location, plug-in browser types and versions, operating system and platform, and other technology on devices used to access the platform;

1.5 **Information relating to customer relationship management**, such as opening of customer account, dispute resolution information, reporting data, refund or product return requests, communication records with the Company, and consumption/usage behavior information;

1.6 **Information from Closed-Circuit Television (CCTV) cameras**, such as still images and video footage recorded by CCTV cameras. Please see the Company's "**CCTV Privacy Policy**" for more details on how the Company collect, use and/or disclose the information from CCTV cameras at https://drive.google.com/file/d/1_wxq0BdxrwcVmHn273XGi4BP38FTovTX/view.

The Company does not intend to collect sensitive personal information from you. However, in cases where it is necessary for the Company to collect sensitive personal information, such as religious affiliation (as indicated on a copy of your ID card), the Company will process such sensitive personal information only with your explicit consent or as permitted under data protection laws.

The Company does not intend to collect Personal Data from individuals under the age of 10 without obtaining consent from their parents or guardians as required by law, or from individuals deemed incapacitated or legally incapacitated without obtaining consent from their guardians or custodians (as applicable). However, the Company may process Personal Data of minors over the age of 10 without parental consent if it is specific to the minor's circumstances and necessary for their livelihood, and the minor is able to consent directly to the Company. Nevertheless, if the Company discovers that it has collected Personal Data from individuals under the age of 10 without parental consent as required by law, or from individuals deemed incapacitated or legally incapacitated without the consent of their guardians or custodians (as applicable), the company will promptly delete such Personal Data or process it only where the Company can rely on other legal bases apart from consent, or as permitted by applicable data protection laws.

Furthermore, if you have provided Personal Data of any third party other than yourself to the Company (e.g., a parent, spouse, emergency contact, or legal representative), such as their name, address, relationship, and contact information, the company will consider that you warrant and guarantee that you have the authority to do so by (1) informing the third party about this Privacy Policy, and (2) obtaining their consent (if required or necessary under data protection laws) so that the Company can use their Personal Data in accordance with this Privacy Policy.

2. THE PURPOSE FOR PROCESSING OF PERSONAL DATA

The Company may process Personal Data for the following purposes:

2.1 THE PURPOSES OF WHICH THE COMPANY RELY ON CONSENT:

The Company may rely on consent for the collection, use, and/or disclosure of sensitive data as shown in the government document (e.g., religion information shown on national identification card) for identification and verification.

The Company may rely on consent to collect, use, and/or disclose your Personal Data for the purposes of marketing communication, sales, special offers, promotions, announcements, and information about products and services from the group companies, external parties, and/or business partners, in cases where the Company cannot rely on other legal bases.

In cases where the Company relies on consent as the legal basis for processing Personal Data, you have the right to withdraw your consent according to the details for exercising rights as a data subject under this Privacy Policy. However, withdrawing consent will not affect the lawfulness of the Company's processing of Personal Data based on your consent given prior to the withdrawal. Nonetheless, if you do not consent to the processing or refuse to provide your Personal Data to the Company, or if you withdraw your consent later, the Company may not be able to provide services to you.

2.2 PURPOSES FOR WHICH THE COMPANY MAY RELY ON OTHER LEGAL BASES FOR PROCESSING PERSONAL DATA

The Company may process Personal Data based on the following legal bases: (1) For the Performance of a Contract: To assess, enter into, or fulfill a contract with the data subject. (2) To Comply with Legal Obligations: To perform the Company's legal duties. (3) For Legitimate Interests: To pursue the Company's or other parties' legitimate interests. The Company will take special care to ensure a balance and proportionality between these legitimate interests and your privacy. (4) To Prevent or Avert Harm: To protect or prevent harm to an individual's life, body, or health. (5) To Establish or Defend Legal Claims: For the establishment and defense of legal claims. The Company may process Personal Data for these purposes depending on your relationship with the Company.

- 1) **To register and verify identity**, such as for registering, recording and checking information, and proving and confirming identity.
- 2) **To Provide Products and/or Services**: For entering into and managing contractual relationships with you, including drafting contract details, financial transactions, and payment services. This includes verifying transaction records, ensuring accuracy, and processing cancellations. To issue receipts, invoices, price quotes, and outstanding payments. To process your subscription, maintain records, and track and verify access to relevant locations. To invite you to Company events and services, and to prepare events, venues, and other services for you.
- 3) **To communicate**, such as for contacting, sending information and updates, public relations, inviting to events, and coordinating.
- 4) **To manage customer relationships**, such as for handling complaints, resolving issues related to complaints, and improving service quality.
- 5) **To improve products and/or services**: such as, to analyze, evaluate, and prepare an internal report within organization to oversee operation, coordinate, monitor, examine, and control the operation within the group companies in order to comply with the policies, rules, and standards, and to evaluate the reliability and completeness of internal operation, to lay out the plans and strategies in relation to the public relations operation and organizational policies, and to improve the business operation or advance other lines of businesses;
- 6) **To ensure the function of our websites, applications, and platforms**: such as, to administer, operate, track, monitor and manage our websites, applications and platforms to facilitate and ensure that they function properly, efficiently and securely; to facilitate and enhance users experience on our websites, applications and platforms; to improve layout and content of our websites, applications and platforms;
- 7) **To manage IT-related matter**: such as, for IT management, management of communication system, IT security system and to control access to data and system and to conduct IT security audit; internal business management for internal compliance requirements, policies and procedures; and to revise and update our database;

- 8) **To comply with legal obligations and orders from government agencies**, such as in cases where there is a reasonable belief that compliance with the law and/or orders is required, or to cooperate as necessary to comply with legal proceedings or orders from government agencies, including government agencies outside of Thailand, and/or to cooperate with courts, regulators, government agencies, and law enforcement authorities to strictly adhere to legal provisions, legal processes, or government orders. This includes conducting internal investigations, preventing crime, fraud, and/or establishing legal claims.
- 9) **To protect the interests of the Company**, such as to ensure the security and integrity of business operations. To exercise legal rights and protect legitimate interests, such as to detect, prevent, and address fraud, misconduct, intellectual property violations, or legal breaches. To manage and prevent asset loss, detect and prevent wrongdoing on premises, ensure compliance with regulations or requirements, monitor and oversee events, prevent and report criminal activities, and safeguard business security and confidence.
- 10) **Business transfer or merger**: in case of sale, transfer, merger, organizational restructuring, or other event of the same nature, the Company may transfer your Personal Data to one or many other third party(ies) as part of such transaction;
- 11) **To manage risks**: such as, to perform performance monitoring, risk assessments and risk management;
- 12) **To provide security**: such as, to prevent or suppress a danger to a person's life, body, health, or asset, or for disease or epidemic control.

In cases where the Company needs to collect Personal Data to comply with the law or a contract, or to enter into a contract with you, if the Company does not receive your Personal Data as requested, it may not be able to fulfill the contract with you, provide goods and/or services to you, or achieve the purposes stated above.

3. PERSONS TO WHOM THE COMPANY MAY DISCLOSE YOUR PERSONAL DATA

The Company may disclose or transfer your Personal Data to the following third parties, who will process your Personal Data in accordance with the purposes outlined in this Privacy Policy. These third parties may be located either in Thailand or abroad. You can review the privacy policies of these third parties to understand how they process Personal Data, as the processing of your Personal Data will also be subject to their privacy policies.

3.1 Super Turtle Group Companies

The Company may disclose your personal data to its affiliates and subsidiaries ("**Super Turtle Group Companies**"). As part of the Super Turtle Group Companies, which may use some shared systems or manage data jointly, the Company needs to share, transfer, or jointly process your Personal Data to achieve the purposes outlined in this Privacy Policy.

The Super Turtle Group Companies under this Privacy Policy include Group Work Co., Ltd., Nation Global Edutainment Co., Ltd., and Super Rich Turtle Exchange Co., Ltd. The list of Super Turtle Group Companies may change or be updated in the future, and the Company will notify you of such changes by updating this Privacy Policy.

3.2 BTS Group Companies

As the Company is part of the BTS Group Companies, it may need to collaborate with other companies to jointly provide services to customers and share certain systems, such as service systems and systems related to websites. Therefore, the Company may need to transfer Personal Data to other BTS Group Companies or allow them to access Personal Data for the purposes outlined in this Privacy Policy. [Please refer to the list of BTS Group Companies for more details.](#)

3.3 Our service providers

We may engage other companies, agents or contractors to perform services on our behalf or to accommodate the provision of services. We may disclose Personal Data to the third-party service providers, including, but not limited to, (1) infrastructure, software, internet and website developers and IT service providers; (2) data storage and cloud service providers; (3) data storage and/or document destruction service providers; (4) warehousing and logistics service providers; (5) travel agencies or travel companies and/or (6) event organizers.

In the course of providing such services, the service providers may have access to Personal Data. However, we will provide the Personal Data only that is necessary for them to perform the services, and we ask them not to use your Personal Data for any other purposes. We will ensure that all service providers we work with will keep your Personal Data secure.

3.4 Business Partners or Business Allies of the Company

The Company may transfer Personal Data to its business partners or allies for the purpose of conducting business and providing services. This includes, but is not limited to, electronic payment service providers, data analytics service providers, payment system providers, campaign partners, manufacturers, suppliers of goods or services, banks, financial institutions, securities companies, and insurance companies, as well as individuals engaged in marketing or promotional activities with the Company, provided that such business partners or allies receiving the Personal Data agree to handle the Personal Data in accordance with this Privacy Policy.

3.5 Legal Authorities

In certain cases, the Company may need to disclose or share Personal Data with external parties for legal or regulatory purposes. Those external parties may include the securities and exchange commission, the stock exchange of Thailand, courts, embassies, consulates, or other government agencies, or any other external parties that the Company believes that it is necessary for legal or regulatory compliance, or to protect the Company's rights, the rights of third parties, personal safety, or to detect, prevent, or manage fraud risk, or for security-related purposes.

3.6 Expert advisors

We may have to disclose Personal Data to our expert advisors including, but not limited to, (1) independent advisors, project advisors, financial advisors; (2) legal advisors who assist us in our business operations and provide litigation services such as defending or initiating legal actions; and/or (3) auditors who provide accounting services or conduct financial audit for the Company.

3.7 Third parties connected with business transfer

We may disclose or transfer your Personal Data to our business partners, investors, major shareholders, assignees or transferees in the event of any reorganization, rehabilitation, amalgamation, business transfer in whole or in part, purchase or sale, establishing joint venture, assignment, or any similar event involving transfer or other disposition of all or any portion of our business, assets or stock. In case that such event happens, the receiving party will comply with this Privacy Policy to respect your Personal Data.

3.8 Other third parties

We may be required to disclose Personal Data based on the legal bases in accordance with the purposes as specified in this Privacy Policy to other third parties, such as the public, complainants or other third parties that we receive a request to access our CCTV records etc. (as the case may be).

The Company will ensure that any third parties or entities that receive Personal Data from the Company will adhere to this Privacy Policy to ensure strict protection of Personal Data.

4. TRANSFER OF PERSONAL DATA ABROAD

The Company does not have a policy of disclosing or transferring your Personal Data to recipients located abroad. However, if necessary to fulfill a contract with you or for your benefit, or if permitted by data protection laws, the Company may disclose or transfer Personal Data to recipients located abroad. The Company will ensure that such transfers are conducted securely and that the recipients of the Personal Data provide an adequate level of data protection.

5. RETENTION PERIOD FOR PERSONAL DATA

The Company will retain Personal Data for as long as necessary to achieve the purposes stated in this Privacy Policy. The retention period may be considered based on the relevance and compliance with contract durations and statutory limitation periods. Generally, the maximum retention period for personal data is 10 years, or longer if required by specific laws or to protect the Company's interests, such as for establishing or asserting legal claims. The Company will implement a system to review and delete or destroy Personal Data once the retention period for the data collection purposes has expired.

6. COOKIES AND HOW THEY ARE USED

Cookies is a technology that tracks certain information which will be used to analyze trends, administer our websites, track users' movements around the websites, or to remember users' settings. Some of the cookies are necessary because without them, the site would not be able to function properly. While some type of cookies will help users browse websites more convenient as such type of cookies will remember the users (in a secure manner) as well as language preferences of the service provider.

Cookies will gather or track specified information relating to your website usage and your computer. When you visit websites, the cookies will remember the users (in a secure manner) as well as your language preferences which will enable us to improve your website usage experience, modify the content to your preferences and make your website browsing more convenient.

Usually, most internet browsers allow you to control whether or not to accept cookies. If you reject cookies, it might affect your use of the websites and your ability to use some or all of the features or areas of our websites may be limited. Please see our "Cookie Policy" for more details at <https://www.superturtle.co.th/th/cookie-policy>.

7. SECURITY MEASURES

To protect the privacy of your Personal Data, the Company has implemented appropriate security measures, which include administrative, technical, and physical safeguards for accessing Personal Data. These measures are designed to prevent the loss, alteration, modification, misuse, disclosure, or unauthorized access to Personal Data in accordance with the standards set by data protection laws. This includes defining access rights and management of user data, assigning responsibilities to users to prevent unauthorized access or copying of personal data, protecting devices used for storing or processing Personal Data from theft, and conducting audits of access, modification, deletion, or transfer of Personal Data.

8. RIGHTS AS A DATA SUBJECT

Subject to applicable laws and exceptions thereof, a data subject may have the following rights to:

8.1 **Access** : Data subjects may have the right to request access to or obtain copies of the Personal Data processed by the Company, as well as to request disclosure regarding the acquisition of Personal Data that they did not consent to. For privacy and security reasons, the Company may request identity verification before providing the requested Personal Data.

8.2 **Correction** : Data subjects may have the right to request the Company to correct Personal Data that is incomplete, inaccurate, misleading, or outdated that the Company has processed.

8.3 **Data Portability** : Data subjects may have the right to obtain Personal Data relating to them in a structured, electronic format, and to transmit such data to another data controller, where this is (a) Personal Data which you have provided to us, or (b) if we are collecting, using and/or disclosing that data on the basis of data subject's consent or to perform a contract with the data subject;

8.4 **Objection** : Data subjects may have the right to object to the Company's processing of their Personal Data.

8.5 **Restriction**: Data subjects may have the right to restrict our use of Personal Data where the data subject believes such Personal Data to be inaccurate, that our collection, use and/or disclosure is unlawful, or that we no longer need such Personal Data for a particular purpose;

8.6 **Withdraw Consent**: For the purposes the data subjects have consented to our collection, use and/or disclosure of Personal Data, data subjects may have the right to withdraw consent at any time;

8.7 **Deletion**: Data subjects may have the right to request that we delete, destroy or anonymize Personal Data that we collect, use, and/or disclose, except we are not obligated to do so if we need to retain such Personal Data in order to comply with a legal obligation or to establish, exercise or defend legal claims; and

8.8 **Lodge a complaint**: Data subjects may have the right to lodge a complaint to the competent authority where the data subject believe our collection, use and/or disclosure of Personal Data is non-compliance with applicable data protection laws.

9. OUR CONTACT DETAILS

If you wish to contact us to exercise the rights relating to Personal Data or if there is any queries about your Personal Data under this Privacy Policy, please contact our Data Protection Officer (DPO) at:

Super Turtle Public Company Limited

333 Lao Peng Nguan 1 Tower, 24th Floor, Soi Choeiphuang,

Vibhavadi-Rangsit Road, Chomphon, Chatuchak, Bangkok 10900

E-mail legal@superturtle.co.th

This Privacy Policy shall become effective as from 7 August 2024.

- Signature -

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(Mr. Chaiwat Atsawintarangkun)
Chairman of the Board of Directors
Super Turtle Public Company Limited