

PRIVACY NOTICE FOR BUSINESS PARTNERS

A. INTRODUCTION

Scope of Privacy Notice

Weerawong Chinnavat & Partners (the “**Company**”) respects your privacy and is committed to protecting your personal data in accordance with the requirements of the Personal Data Protection Act B.E. 2562 and related notifications (the “**PDPA**”).

This privacy notice explains how and why the Company collects, uses, and/or discloses your personal data, and applies to:

- (1) Business partners of the Company in legal transactions, such as employees of partner companies, translators, other lawyers at other law firms, experts, and other consultants
- (2) Business partners of the Company in other matters such as service providers, building managers, and partner companies for employees’ benefits.

It is important that you read this privacy notice, together with any other processing notice we may provide on specific occasions when we are processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override or replace them.

Controller and Data Protection Officer

The Company is the controller and is responsible for your personal data.

We have appointed a data protection officer (“**DPO**”) who is responsible for overseeing questions and comments in relation to this privacy notice. If you have any questions or comments about this privacy notice, including any requests to exercise your legal rights, please contact the DPO, whose details are set out below.

Name: Thaya Uthayophas
Email: dpo@weerawongcp.com

Address: Mercury Tower Building floor 22
540 Phloen Chit Rd,
Lumphini, Pathum Wan District,
Bangkok 10330

Telephone: +662 264 8000

Changes to the privacy notice

This notice may be amended or updated from time to time, so please check back regularly for updates.

This version was last updated on 30 May 2022.

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your dealings with us by contacting the DPO.

B. PERSONAL DATA COLLECTED BY THE COMPANY

Definition of personal data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or the data of a deceased person. We may collect, use, store and transfer different kinds of personal data about you which we have grouped as follows:

- (1) Business partners of the Company in legal transactions, such as employees of partner companies, translators, other lawyers at other law firms, experts, and other consultants
- (2) Business partners of the Company in other matters such as building manager and service providers

Data Subject	Type of Data	This type of data includes personal data such as:
Partners in legal transactions (Employees in partner companies: translators, other lawyers at other law firms, experts, and other consultants)	Information of Partners in Legal Transactions	Invoices from other firms to pass on to client, including fee summary: names of lawyers, names of translators, names of lawyers at other law firms, experts' billing addresses. Invoices from partner companies: translators, lawyers, experts, and consultants for billing. Copies of Passports/ID Cards of all relevant parties for billing.
Service providers Building managers Partner companies for employees' benefits	Building Manager and Service Provider information	Personal Information, Identification Information, Contact Information

Collection of Minor, Incompetent, and Quasi-Incompetent Individuals' Data

Our services are not designed for, or intentionally target minor, incompetent, and/or quasi-incompetent individuals as defined by the Personal Data Protection Act B.E. 2562 and related laws. Consequently, we do not intentionally collect or maintain data about any minor, incompetent, and/or quasi-incompetent individuals in almost all cases.

An exception to this includes the collection of the personal data of minor applicants to the student scholarship program and data of minors, incompetent, and/or quasi-incompetent individuals as part of legal transactions or research.

If you fail to provide personal data

Where we need to collect personal data as required by law, or under the terms of a contract, and you fail to provide the data when requested, we may not be able to perform our obligations under the contract we have or are trying to engage in with you.

C. HOW IS PERSONAL DATA COLLECTED BY THE COMPANY?

The Company obtains personal data in the following manners:

A. Direct interactions

- You may give us your personal data by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data that you provide when you:
 - complete forms (including application or inquiry forms) or supply other documents to the Company
 - request communication updates from the Company;
 - fill in a survey conducted by the Company; or
 - give the Company feedback or contact us for another specific purpose.

B. Automated technologies or interactions.

- The Company may automatically collect personal data concerning your computer equipment, browsing activity and patterns by using internet cookies and other similar technologies.

C. Third parties or publicly available sources.

- The Company may receive personal data about you from various third parties and public sources. This includes personal data that you have provided when you:
 - complete forms or supply other documents to the Company or a third party that has a relationship with the Company.
 - use or request services from third party services related to the Company, such as applying for payment services from a company that has a relationship with the Company.
 - provide Personal Information publicly with your explicit consent.

D. PURPOSE AND LAWFUL BASIS FOR THE PROCESSING OF PERSONAL DATA

The Company has set out below a description of how we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified our legitimate interests where appropriate.

Note that the Company may process personal data based on more than one lawful basis depending on the specific purpose for which the Company is using the data. Please contact the DPO for more details on the specific legal bases which the Company is relying on to process personal data, where more than one of the bases as set out in the table below is referred to.

Lawful Basis	Description
Consent	The processing is based on consent obtained from you.
Contract	The processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract.

Legal Claims	The processing is necessary for the establishment, compliance, exercise or defense of our legal claims.
Legal Compliance	The processing is necessary for compliance with a law to which we are subject.
Legitimate Interests	The processing is necessary to protect our legitimate interests or the legitimate interests of another person or entity.

Data Subject	Purpose	Type of Data	Lawful Basis
As applicable for lawyer's research	<ul style="list-style-type: none"> Lawyers' legal research Lawyers' skills development 	Information obtained from public sources.	Legitimate Interests (see purpose)
Building Manager/Service Provider	<ul style="list-style-type: none"> Identification and contacting building manager and building service providers for Mercury Tower and Orakarn buildings 	Building Manager and Service Provider information	Legitimate Interests (see purpose) Contract
Partner Companies	<ul style="list-style-type: none"> Employee benefits (ex. Hotel benefits, movies) 	Partner Companies' info	Legitimate Interests (see purpose)
Partners in legal transactions: (translators, lawyers from other law firms, experts, and other consultants)	<ul style="list-style-type: none"> Billing clients 	Information of Partners in Legal Transactions	Legitimate Interests (see purpose) <u>Sensitive Data</u> Legal Claims Consent (ID card)
Related parties in Legal Transactions (case parties, experts, etc.).	<ul style="list-style-type: none"> Legal Cases Submission of documents to courts. 	Information in Court Documents:	Legitimate Interests (see purpose) <u>Sensitive Data</u> Legal Claims Consent (ID card)

Change of purpose

The Company will only use your personal data for the purposes for which we collected it as mentioned above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to be provided with an explanation as to how the new purpose is compatible with the original purpose, please contact our DPO.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

E. DISCLOSURE OF PERSONAL DATA

The Company may disclose your personal data to the following entities:

- Persons that we have legal relationship with, including our directors, executives, employees, staff, contractors, representatives, advisors.
- The Company's business partners, representatives or other organizations (such as independent Auditors, information and documents service providers, personal data processor service providers, and other service provider platforms that have a legal relationship with the Company and/or you.)
- Suppliers, agencies and professional associations of which we are a member.
- Government agencies and/or the agencies responsible for regulating the business of the Company
- Courts, organizations, or any entities to which the Company is ordered or consent was granted to disclose personal data in compliance with the law and/or relevant rules.
- In the case of rehabilitation, mergers, business transfers in whole or in part, selling, purchasing, joint ventures, delivering, sharing, or distributing in whole or in part the business assets share or other similar transactions, the Company may have legitimate reason to disclose personal data to a third party which is on the receiving end of the transaction or which is the intended recipient of the transferred rights of the Company.
- Data analyst service providers and search engine service providers which assisted with the development in order to increase efficiency for Company's platform.
- Social media service providers which have met the relevant standards or outsource advertising companies whose purpose is to provide you and other users with the relevant information and other related users of the Company's Platform whereby your online activities may be monitored in order to provide you with an effective advertising campaign that may be of interest. Our Company will not disclose any information that may lead to identifying any individuals, but the Company will provide only an overview of our users to the service providers or such relevant /companies.
- Other service providers of the Company which include but are not limited to:
 - Debt collectors
 - Internet service providers
 - Information technology service providers
 - Local or international cloud storage service providers
 - Lawyers, Consultants, auditors and/or other profession which supports or assists the business operation of the Company
 - Marketing and advertising companies, other relevant communications and creative service providers, including other related campaign activities
 - Payment service providers and payment systems service providers
 - Printing service providers
 - Security providers.
 - Storage service providers and/or document-shredding service providers
 - Telecoms and communication service providers
 - Website providers
- Attorney, sub-attorney, representative, or legal representative that legally represents you to perform any legal assignments.

- The Company's clients.

Note that we may also be required to share your personal data with third parties by law.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

F. INTERNATIONAL TRANSFER OF PERSONAL DATA

The Company transfers personal data outside of Thailand on an as needed basis.

Included below are the most common scenarios for when the Company will transfer your personal data outside of Thailand and the lawful basis for which the Company relies upon for compliance with the requirements of the PDPA:

Lawful Basis for Transfer of Data	Description
Adequacy of data protection standards	The destination country has adequate data protection standards, and the transfer is carried out in accordance with the rules for the protection of your personal data as prescribed by the Personal Data Protection Committee
Consent	The transfer is based on consent obtained from you.
Compliance with a contract to secure the interests of the Data Subject.	The transfer is necessary for the compliance with a contract between us and another entity to secure your interests.
Compliance with the law	The transfer is necessary for compliance with the law.
Necessary for the performance of a contract or in order to take actions prior to entering into a contract.	The transfer is necessary for the performance of a contract or in order to take actions prior to entering into a contract.

Purpose	Lawful Bases
Business Development staff working abroad	<ul style="list-style-type: none"> • Adequacy of data protection standards. • Necessary for the performance of a contract or in order to take action prior to entering into a contract; • Compliance with a contract for the interests of the Data Subject.
Sending legal work and billings.	<ul style="list-style-type: none"> • Adequacy of data protection standards. • Necessary for the performance of a contract or in order to take action prior to entering into a contract. • Compliance with a contract in the interests of the Data Subject.
Staff working on legal cases abroad.	<ul style="list-style-type: none"> • Adequacy of data protection standards. • Compliance with a contract in the interests of the Data Subject.

Transfer of items abroad	<ul style="list-style-type: none"> • Adequacy of data protection standards. • Where it is necessary for compliance with the law • Consent • Necessary for the performance of a contract or in order to take action prior to entering into a contract; • Compliance with a contract in the interests of the Data Subject.
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G. SECURITY OF PERSONAL DATA

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorized way, or altered or disclosed. In addition, we limit access to your personal data to employees, agents, contractors and other third parties on a need-to-know basis. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have security programs and procedures for any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

H. RETENTION OF PERSONAL DATA

Personal data are retained by the Company for as long as necessary for the purposes associated with them.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Below are estimates of the general time periods for which personal data are retained by the Company.

General (Email)

Email communications is one of the primary ways the Company collects data. Emails are archived every 6 months and reviewed for deletion every 10 years or when mailbox is full

Company Partners (Legal Transaction)

Data Subject	Retention Period
As applicable for lawyers' research	<ul style="list-style-type: none"> • Kept as permanent resource or publication online.
Partner in legal transactions: (Translators, lawyers from other law firms, experts, and other consultants)	<ul style="list-style-type: none"> • Retained for an estimated 10 years from last contact.
Related parties in Legal Transactions (case parties, experts, etc.).	<ul style="list-style-type: none"> • Electronic case data are kept for an estimated 10 years from case end and as long as necessary in case of further legal disputes. • Hard copy case data are kept in storage with DataSafe for an estimated 30 years from case end and as long as necessary in case of further legal disputes

Other Types of Company Partners

Data Subject	Retention Period
Building Manager/Service Providers	<ul style="list-style-type: none">• 2 years after end of service; reviewed for deletion every year
Partner Companies	<ul style="list-style-type: none">• Retained for an estimated 10 years from last contact.

I. LEGAL RIGHTS

Your legal rights

You have rights under the PDPA in relation to your personal data collected by the Company.

You have the right to:

- **Request access** to your personal data (commonly known as a "**data subject access request**"). This enables you to receive a copy of the personal data we hold about you. Additionally, you can also request the disclosure of the personal data obtained without your consent. These requests can only be rejected as permitted by law or pursuant to a court order, and where such access to and obtaining a copy of the Personal Data would adversely affect the rights and freedoms of others.
- **Request the transfer** of your personal data to you, unless it is impossible to do so because of technical circumstances, or to a third party in a format which is readable or commonly used by ways of automatic tools or equipment and can be used or disclosed by automated means. Note that this right only applies to information which you initially provided consent for us to use or where we used the information to perform a contract with you. The request shall also not apply to the sending or transferring of personal data by the Company which is the performance of a task carried out in the public interest or for compliance with the law, and such request shall not violate the rights and freedoms of others.
- **Object to processing** of your personal data where we are relying on legitimate interests (or those of a third party), where such processing is necessary for the performance of a task carried out in the public interest by us, or where it is necessary for the exercising of official authority vested in the Company, unless we can demonstrate that there are compelling legitimate grounds for the processing, or such processing is carried out for legal claims. You also have the right to object in the case that we are processing your personal data for direct marketing purposes. Additionally, you have the right to object if we are processing your personal data for the purpose of scientific, historical or statistic research, unless it is necessary for the performance of a task carried out in the public interest by the Company.
- **Request erasure** of your personal data. This enables you to ask us to erase or destroy, or anonymize personal data where the personal data is no longer necessary in relation to the purposes for which it was processed. You also have the right to ask us to delete or destroy, or anonymize your personal data where you have withdrawn your consent on which the processing is based on, and where we have no legal grounds for such collection, where you have successfully exercised your right to object to processing (see below), or where we may have processed your information unlawfully. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons of which you will be informed, if applicable, at the time of your request.

- **Request restriction on use** of your personal data. This enables you to ask us to suspend the use of your personal data in the following scenarios: (a) where we are in the examination period per your request to ensure that your personal data is accurate, up-to-date, complete, and not misleading (see below); (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, comply with, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it (does not apply to an objection in the case where we are processing your personal data for direct marketing).
- **Request correction** of the personal data that we hold about you. This enables you to have any data we hold about you corrected to be accurate, up-to-date, complete, and not misleading, though we may need to verify the accuracy of the new data you provide to us.
- **Request to withdraw consent** for the processing of your personal data. If we collected your personal data by obtaining your consent and you later wish to withdraw your consent, please contact us. We will strive to ensure that the withdrawal of consent is as easy as when you gave us consent, unless there is a restriction on the withdrawal of consent by law, or on the contract that gives benefit rights to you. Note, however, too that the withdrawal of consent shall not affect the processing of personal data that the data subject has already given consent legally.
- **Right to complain** to the Personal Data Protection Committee or their office in the event that we (including our employees or service providers) do not comply with the PDPA.

Exercising your legal rights

If you wish to exercise any of the rights set out above, please contact us via our DPO.

Email: dpo@weerawongcp.com

Telephone: +662 264 8000

You will generally not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request as permitted by law.

We may also need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

The DPO will request additional information if the Officer determines that you are unable to act with legal independence.

Finally, we try to respond to all legitimate requests as soon as possible and within 30 days. Occasionally, however, it may take us longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you informed.

J. AUTOMATIC COLLECTION OF PERSONAL DATA AND COOKIES POLICY

Automatic collection of personal data via Website

If you are an anonymous member of the general public and access the company's website, your Personal Information will not be stored or logged, it merely logs the IP address that is automatically recognized by the web server.

The system may record your email address and other information if volunteered to us by you. This shall be treated as proprietary and confidential. It may be used for internal review and to notify you about updates to the Company's website.

Cookies Policy

A cookie is a small piece of data (which often includes a unique identifier) that is stored on your computer, mobile phone or tablet. It is generated when users access a certain website. The cookie is stored on your browser and then sent back to the originating website on each subsequent visit.

Cookies that are generated through the use of this website are not used to identify you personally, but they are used to make the site work better for you by remembering activities and preferences chosen by you and your browser.

Cookies are used to improve the quality of your website experience by:

- Enabling a service to recognize your device so that you do not have to repeat any unnecessary actions.
- Measuring how many people are using our website services, and from where in the world they visit us. This enables us to tailor content more closely to the profiles of our users.
- Cookies might also be used occasionally to help gather feedback to help us understand how users interact with specific services, to inform future website development plans.

However, if you wish to control, block or delete any cookies which are generated by this website, or indeed any other website, you can do so through your browser settings. The "help" function on your browser will provide relevant instructions.

Please be aware that restricting cookies may impact the functionality of our website.

Types of Cookies used by our Website (Google Analytics)

Cookie	Description	Duration	Type
_utmt	The cookie is set by Google Analytics and is used to throttle request rate.	10 minutes	Performance
_utmz	This cookie is set by Google Analytics and is used to store the traffic source or campaign through which the visitor reached your site.	6 months	Performance
_utm	The cookie is set by Google Analytics and is deleted when the user closes the browser. The cookie is not used by ga.js. The cookie is used to enable interoperability with urchin.js which is an older version of Google Analytics and used in conjunction with the _utmb cookie to determine new sessions/visits.		Performance
_utmb	The cookie is set by Google Analytics. The cookie is used to determine new sessions/visits. The cookie is created when the JavaScript library executes and there are no existing _utma cookies. The cookie is updated every time data is sent to Google Analytics.	30 minutes	Performance
_utma	This cookie is set by Google Analytics and is used to distinguish users and sessions. The cookie is created when the JavaScript library executes and there are no existing _utma cookies. The cookie is updated every time data is sent to Google Analytics.	2 years	Performance