

# **Privacy Policy of Plizz (Thailand) Co.,Ltd.**

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## **1. Introduction**

Plizz (Thailand) Co.,Ltd. and its affiliates and subsidiaries (“Plizz”, “we” or “our”) takes its responsibilities under applicable privacy laws and regulations (“Privacy Laws”) seriously and is committed to respecting the privacy rights and concerns of all Users of our platform (the “Platform”). The Privacy Policy is designed to inform the User in rights and how we protect the Privacy Data of our users to assist the Users in making the decision before using our services (“Privacy Policy” or “Policy”). The User means the person who access the Platform, use the Platform, visit the Platform or register to open account with us (collectively as “User”, “you” or “your”).

We recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

Please read these Privacy Policy carefully before using the Platform or our services. By using the Platform, our services, registering for an account with us, visiting the Platform, or accessing our services, you acknowledge and agree that you accept the practices, requirements, and/or policies outlined in this Privacy Policy, and you hereby consent to us collecting, using, disclosing and/or processing your personal data as described herein. IF YOU DO NOT CONSENT TO THE PROCESSING OF YOUR PERSONAL DATA AS DESCRIBED IN THIS PRIVACY POLICY, PLEASE DO NOT USE OUR SERVICES OR ACCESS OUR PLATFORM.

If we change our Privacy Policy, we will post those changes or the amended Privacy Policy on our Platform. We reserve the right to amend this Privacy Policy at any time.

## **2. When will Plizz collect personal data?**

We will/may collect your personal data:

(1) when you access and/or use our services or our Platform, or register and/or open an account with us;

(2) when you submit or sync any financial information, including, but not limited to, applicable tax forms or other forms relating to any of our products and services, whether online or by way of a physical form;

(3) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our products and services;

(4) when you interact with us, such as via telephone calls (which may be recorded), letters, fax, face-to-face meetings, social media platforms and emails etc.;

(5) when you use our electronic services, or interact with us via our application or use services on the Platform including, without limitation, through cookies which we may deploy when you interact with our services or Platform;

(6) when you carry out transactions through our services;

(7) when you provide us with feedback or complaints;

(8) when you access or use other website and application which use and/or link with the Platform

(9) when you install the application to your computer, mobile phone or any devices (“device”) and/or use the device to access the Platform;

(10) when you connect your account of other website or application into your account of the Platform;

(11) when you submit your personal data to us for any reason

### **3. The purpose of collecting, using, disclosing and/or processing your personal data**

We may collect, use, disclose and/or process the personal data of User for one or more of the following purposes:

#### **3.1 Use our Service**

To service you whether through the Platform or any of our channels, we may collect, use, disclose and/or process your personal data:

- to storage and back up your information when you submit or sync any financial information, including, but not limited to, applicable tax forms or other forms relating to any of our products and services, whether online or by way of a physical form;
- allow you to use our services and/or to access our services and the Platform, and for this purpose we may verify, identify and check the accuracy of your data as well as contact you in needed;
- to manage, operate, provide and/or administer your use of and/or access to our services and Platform;
- to provide and support the clients of the Platform to process and manage the services regarding the consent
- to facilitate client services providing or analysis our services
- to deal with or complete a transaction as well as process the payment with third parties via the services

- to response and deal with your service requests and notify you of service issues and unusual account actions
- to follow up and inform the benefits, any modification of the service and to response your inquiries and notify in any kind of changes.
- We may collect the personal data to conduct research, analysis and development activities (including, but not limited to, data analytics, surveys, product and service development and/or profiling), to analyze how you use our services, to improve our services and/or to enhance your client experience;

### **3.2 To comply with relevant or applicable law (Legal Obligation)**

We may use your personal data to enforce or process to comply with or as required by any applicable law including, without limitation, meeting the requirements to make disclosure under the requirements of any law binding on Plizz.

### **3.3 To take any legitimate interests**

Plizz may process your personal data in accordance with the legitimate interests, such as;

- to prevent, handle and/or reduce the risk of illegal activities including discloser the personal data to third party to enhance our service standard
- to record voice conversation with call center or images from CCTV, to exchange ID cards before entering buildings
- to manage risks, monitor, manage within organization
- we may disclose the personal data to other service providers (Outsource) to store, and back up the

personal data by Cloud Computing and to develop the information technology system of Plizz

- to monitor the interaction through email or internet between our employee and you to prevent the disclosure of confidential information of Plizz to third parties.

#### **4. What Personal Data will Plizz Collect**

4.1 Personal data means data that can directly or indirectly identify you as following;

(1) Personal data that you give directly to or through the Plizz, or available to Plizz by your use of services, contact, visit, search via digital channels, website, Platform, call center, assigned persons or other means.

(2) Personal data received or accessed by Plizz from other sources not directly from you. For example, clients of our Platform, government entities, company partner, financial service providers, and information service provider, etc. Plizz will collect data from other sources only when your consent is given as consistent with laws unless where necessary for Plizz as permissible under laws.

(3) Your personal data that Plizz collects, uses and/or disclose are such as;

- Business information such as company name, capital, registration number, head office address, name of directors
- Personal information such as name, surname, age, date of birth, citizenship, marital status, national identification number, passport number, workplace, business;

- Contact information such as home address, current location, work address, telephone number, E-mail, LINE account ID;
- Transaction information such as invoice, bill payment, input and output transaction, income, cost, expenses;
- Financial information such as payment, bank account numbers, credit card numbers etc.;
- Information related to devices or machines such as, IP address MAC address Cookie ID;
- Other information such as website-visiting data, voice, still picture, moving picture, and other information deemed personal data under the Personal Data Protection Laws
- Records of correspondence with Plizz such as, through the website, e-mail where user information is stored and back up, etc.
- Criminal records including the alleged offenses which Plizz received from you and other involved person for providing our Services in accordance with this Privacy Policy and the applicable laws.
- Tax information such as, Tax identification number etc.

4.2 Sensitive Data is personal data that is specially categorized by law and will be collected, used and/or disclosed by Plizz only when we have obtained explicit consent from you or where necessary for Plizz as permissible under law. Plizz may collect, use and/or disclose biometric identifiers (Biometrics), e.g., facial recognition, fingerprint recognition, retina recognition, voice recognition for the purpose of verifying and confirming identity of applicants for services and/or transaction via digital channels or other channels, etc.

If you sign up, connect or sync to be a user of our Platform, link your Xero account to our Platform, link your account to your Social Media Account or use any Plizz features, we may access information about you which you have voluntarily provided to your Xero Account in accordance with such provider's policies, and we will manage and use any such personal data in accordance with this Policy at all times.

If you do not want us to collect the aforementioned information/personal data, you may opt out at any time by notifying our Data Protection Officer in writing via contact information in clause 11. Note, however, that opting out or withdrawing your consent for us to collect, use or process your personal data may affect your use of the Services and the Platform.

## **5. How Plizz disclose your personal data**

5.1 Plizz may need to disclose your personal data to third party parties to operate or service regarding the purpose of the Platform by receiving the consent from you or the matters allowed by laws. For example, inform your name, company name, director name, Tax ID, current address to service you as your requests. You have the right to share your personal data to process your transaction for any cases with any person and it is not responsible or involved by Plizz.

5.2 We, and third parties, may from time to time make software applications downloads available for your use via the Platform or through our services. These applications may separately access, and allow a third party to view, your identifiable information, such as your name, your user ID, your device's IP address or other information such as any cookies that you may previously have installed or that were installed for you by a third

party software application or website. Additionally, these applications may ask you to provide additional information directly to third parties. Third party products or services provided through these applications are not owned or controlled by Plizz. You are encouraged to read the terms and other policies published by such third parties on their websites or otherwise.

## **6. Disclaimer regarding security and third party sites**

6.1 We do not guarantee the security of personal data and/or other information that you provide on third party sites. We do implement a variety of security measures to maintain the safety of your personal data that is in our possession or under our control. Your personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the personal data confidential.

6.2 In an attempt to provide you with increased value, we may choose various third party websites to link to, and frame within, the Platform. We may also participate in co-branding and other relationships to offer e-commerce and other services and features to our visitors. These linked sites have separate and independent privacy policies as well as security arrangements. Even if the third party is affiliated with us, we have no control over these linked sites, each of which has separate privacy and data collection practices independent of us. Data collected by third party web sites (even if offered on or through our Platform) may not be received by us.

6.3 We have no responsibility or liability for the content, security arrangements (or lack thereof) and activities of these linked sites. These linked sites are only for your convenience and you therefore access them at your own risk. Nonetheless, we seek to



protect the integrity of our Platform and the links placed upon each of them and therefore welcome any feedback about these linked sites.

## **7. How does Plizz protect your Personal Data?**

Plizz has set out policies, rules and regulations on Personal Data protection including organizational measure, technical measure to prevent data receivers from using or disclosing the personal data outside the purposes or without authorization or unlawfully. For example, information technology system, measure on confidential information of user. Plizz has amended the policy, rule and regulation as frequently as necessary and appropriate. Moreover, the Plizz's executives, staffs, employees, agents, and data receivers are obligated to keep the Personal Data in confidence pursuant to confidentiality agreement provided by Plizz.

When it is necessary, Plizz may be required to deliver or transfer the personal data to other countries, do not maintain adequate standard levels, we will ensure that the sending and the transferring are in compliance with legal requirements and will put in place the Personal Data protection measures as necessary, appropriate and in consistent with confidentiality measures such as make the non-discloser agreement.

## **8. Cookies**

We may from time to time implement "cookies" or other features to allow us or third parties to collect or share information that will help us improve our Platform and services we offer, or help us offer new services and features. "Cookies" are identifiers we

transfer to your computer or mobile device that allow us to recognize your computer or device and tell us how and when the services or Platform are used or visited, by how many people and to track activity within our Platform. We may link cookie information to personal data. Cookies also link to information regarding what items you have selected for service and pages you have viewed. Cookies are also used to deliver content specific to your interest and to monitor usage of the services.

You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this you may not be able to use the full functionality of our Site or the Services.

## **9. How long does Plizz retain your Personal Data?**

Plizz will retain your Personal Data for as long as necessary during the period you are a client or under relationship with Plizz, or for as long as necessary in connection with the purposes set out in this Policy, unless law requires or permits longer retention period. For example, retention pursuant to Anti-money Laundering Law, retention for proving and examining in the event of dispute within legal prescription period of not over 10 years, etc.

We may erase destroy, or anonymize the Personal Data when it is no longer necessary or when the period lapses.

## **10. What are your rights related to Personal Data?**

Your rights described here are legal rights that you should be informed. You may exercise any of these rights within legal

requirements and policies at the present or as amended in the future as well as regulation set out by Plizz. In case you are under 20 years old or your legal contractual capacity is restricted, your father and mother, guardian or representative may request to exercise the rights on your behalf.

10.1 Withdrawal of consent: If you have given consent to Plizz to collect, use and/or disclose your Personal Data, you have the right to withdraw such consent at any time throughout the period your Personal Data available to Plizz, unless it is restricted by laws or you are still under beneficial contract.

Withdrawal of your consent may affect your use of services. For example, you may not receive privileges, promotions or new offers, etc. For your benefits, you are advised to learn and ask for consequences before withdrawing your consent.

10.2 Data Access: You have the right to access your Personal Data that is under Plizz's responsibility; to request Plizz to make a copy of such data for you; and to request Plizz to reveal as to how to Plizz obtain your Personal Data

10.3 Data Portability: You have the right to obtain your Personal Data if we organizes such Personal Data in automatic machine-readable or usable format and can be processed or disclosed by automatic means; to request Plizz to send or transfer the Personal Data in such format directly to other data controllers if doable by automatic means.

10.4 Objection: You have the right to object to collection, use and/or disclosure of your Personal Data at any time if such doing is conducted for legitimate interests of Plizz, corporation or individual which is within your reasonable expectation; or for carrying out public tasks. If you request to object, the Plizz will continue collecting, using and/or disclosing your Personal Data only when the Plizz can establish a legal basis that doing so is more important

than your fundamental rights; or to affirm legal rights; to comply with laws; or to defend a legal proceedings, depending on a case by case basis.

10.5 Data Erasure or Destruction: You have the right to request Plizz to erase, destroy or anonymize your Personal Data if you believe that the collection, use and/or disclosure of your Personal Data is against relevant laws; or retention of the data by Plizz is no longer necessary in connection with related purposes under this Policy; or when you request to withdraw your consent or to object to the processing as earlier described.

10.6 Processing Suspension: You have the right to request Plizz to suspend processing your Personal Data during the period where Plizz examines your rectification or objection request; or when it is no longer necessary and Plizz must erase or destroy your Personal Data pursuant to relevant laws but you instead request Plizz to suspend the processing.

10.7 Data Rectification: You have the right to rectify your Personal Data to be updated, complete and not misleading.

10.8 Complaint: You have right to complain to competent authorities pursuant to relevant laws if you believe that the collection, use and/or disclosure of your Personal Data is violating or not in compliance with relevant laws.

The exercise of rights above may be restricted under relevant laws and it may be necessary for Plizz to deny or not be able to carry out your requests, e.g. to comply with laws or court orders, public tasks, your request in breach of rights or freedom of other persons, etc. If Plizz denies the request, Plizz will inform you of the reason.

## **11. How can you contact Plizz and the Data Protection Officer?**

If you have any questions, concerns or inquiries regarding collection, usage and/or disclosure of your Personal Data as well as a request to exercise your rights under this Privacy Policy or to complaint, you may contact us via the following channel:

Head office address : .....

Telephone Number : .....

Email : .....