

**PERSONAL DATA PRIVACY NOTICE FOR PROCESSES RELATED TO CUSTOMERS
OF SIAM LAND FLYING COMPANY LIMITED**

1. General Provisions

For the purpose of complying with the Personal Data Protection Act B.E. 2562 (2019) and subordinate laws issued thereunder, including any amendments which may be made thereto, (**"Laws on Personal Data Protection"**) Siam Land Flying Company Limited (**"Company"**) has prepared this Personal Data Privacy Notice for processes related to customers of Siam Land Flying Company Limited (**"Privacy Notice"**) to inform you regarding how the Company handles information which can or may identify you, whether directly or indirectly, according to the Laws on Personal Data Protection (**"Personal Data"**), such as the methods by which Personal Data is collected, used, disclosed or dealt with, whether by manual or automated means, such as recording, organization, storage, adaptation or alteration, retrieval, sending, transfer, disclosure or making available by any means, alignment, combination, prohibition of access or restriction, erasure or destruction (**"Processing"**, **"Process"**, **"Processes"** or **"Processed"**), as well as to notify you of the purposes for such Processing, the retention period of Personal Data, and your rights as the data subject. In this regard, the Company recommends that you read and understand the following terms under the Privacy Notice:

2. Groups or Categories of Persons whom the Company Collects Personal Data

Under this Privacy Notice, groups or categories of persons from whom the Company collects and Processes Personal Data are as follows:

2.1 Customers which means persons who purchase products and/or use services of the Company and/or those who are expected to purchase products and/or use the services of the Company (prospective customers), or any other persons having similar characteristics, such as persons who participate in activities, seminars, or bids, website users, application users, persons who make contact to request to receive information or services from the Company, and persons who provide responses to surveys concerning products and/or services of the Company, etc.

2.2 Persons related to customers which means persons who are related to or are representatives of customers, such as executives, directors, employees, representatives, or personnel of customers who are juristic persons, including persons whose Personal Data appear in relevant documents and processes, such as managers, purchasers, consignees, and cheque payers, etc.

3. How the Company Collects and Receives your Personal Data

3.1 The Company collects and receives your Personal Data via the following methods:

(a) Personal Data which you directly provide to the Company

You may directly provide your Personal Data to the Company, such as

- When you engage in communications or make enquiries, provide comments or feedbacks to the Company, regardless of whether in written or oral communications through the website, application, by phone, e-mail, fax, mail, by face-to-face interaction or by any other means;

- When you express an intention to purchase products or use services of the Company, enter into a contract with the Company, or deliver documents containing Personal Data to the Company; and
- When you participate in marketing activities, lucky draws, events or any other activities organized by or on behalf of the Company, etc.

(b) Personal Data which the Company automatically collects from you

The Company may collect your Personal Data by automated means such as the use of Cookies or other similar technologies. For more details, please see the Company's Cookie Policy

(c) Personal Data which the Company receives from third parties

The Company may receive your Personal Data from third parties, such as

- The collection of information from various service providers of the Company, such as website service providers, application service providers, service providers for public relations and products/services recommendation, and data collection service providers, etc.
- In some cases, the Company may collect your Personal Data from public data sources, data sources containing information relating to your business, or sources containing information relating to trades, irrespective of whether you have disclosed the Personal Data by yourself or have provided consent to somebody else to disclose such Personal Data.

3.2 In collecting your Personal Data, you will be informed of the details as set out in this Privacy Notice, including but not limited to, the lawful basis for the collection, use, disclosure and/or Processing of Personal Data in accordance with the lawful purposes, or in the event that the Laws on Personal Data Protection require your consent for any Processing of Personal Data, the Company will request your explicit consent.

3.3 Where the Company has previously collected your Personal Data before the Laws on Personal Data Protection have become effective, the Company will continue to collect and use your Personal Data in accordance with the original purposes of collection. In this regard, you have the right to withdraw your consent by contacting the Company using the contact details set out in Clause 9 of this Privacy Notice. However, the Company reserves the right to consider your request for the withdrawal of consent and proceed in accordance with the Laws on Personal Data Protection.

4. Collected Personal Data

Your Personal Data that is collected and Processed under this Privacy Notice, regardless of whether such Personal Data was directly provided by you to the Company or automatically collected from you by the Company, or was provided to the Company by third parties, includes the following:

4.1 **Personal information**, such as first name, last name, nickname, date/month/year of birth, age, sex, national identification number, photograph, and signature, etc.

4.2 **Contact information**, such as address as stated on the national identification card, address as stated in the house registration book, delivery address, billing address, telephone number, fax number, e-mail, Line ID, and details of person who may be contacted in case of emergency, etc.

4.3 Customer business information, such as type of business, details concerning the customer's factory (such as name, registration number, location, and contact details, etc.), car number plate and type of car, and term of trading, etc.

4.4 Information concerning payment, such as the monetary amount, the credit limit, the payment terms, the account number, Personal Data which appears in the invoice, tax invoice, receipt, receipt voucher, and debit application form, etc.

4.5 Information that is used as supporting evidence in the Company's customer registration or execution of transactions, such as Personal Data which appears in a copy of the national identification card, copy of passport, copy of house registration book, copy of change of name certificate, copy of factory license, registration form, copy documents of title over land, customer's account opening form, documents certifying non-related parties, power of attorney, copy of company affidavit, copy of PhorPor. 09/20, map, security documents (such as title deed, bank guarantee, and personal guarantee), sale and purchase agreement or any other agreements relating to the transaction, and delivery order, etc.

4.6 Technical information, such as log file, IP Address, and information that the Company collects through the use of Cookies or other similar technologies, etc.

4.7 Other information, such as voice recording of conversations, and photo and video recording by means of CCTV, etc.

5. Purposes and Lawful Basis for the Collection, Use, Disclosure and Processing of Personal Data

5.1 The Company Processes your Personal Data for the purposes under lawful basis as follows (collectively, the "Purposes"):

No.	Purposes	Lawful basis of Processing
(a)	For the purpose of selection of bidders in the product selling of the Company and any management related to the auction	- Legitimate interest basis: The Processing of Personal Data of bidders or persons related to the bidders (in case bidders are juristic persons) is necessary for the legitimate interests of the Company in its auction management and related process, such as bidder qualification considerations, communications, auction summary, and evidence collection in relation to the winning bidders, etc. - Contractual basis: The Processing of Personal Data of bidder is necessary for the entering into a contract with bidder in case of winning, including buying and selling of products with the winning bidder, etc.
(b)	For the purpose of entering into agreements and providing collateral	Contractual basis: The Processing of Personal Data of customers or any other persons having similar characteristics is necessary for the entry into agreements and other relevant processes, such as checking of evidence for

		the entry into agreements, consideration of credit limit, and providing collateral, etc. • Legitimate interest basis: Where the customers or any other persons having similar characteristics are juristic persons, the Processing of Personal Data of persons related to the customers or any other persons having similar characteristics is necessary for the legitimate interests of the Company in its business operations, such as the management of contracts, verification of the identity of customers, consideration of the qualifications of customers, etc.
(c)	For the purpose of management of customer orders or any other persons having similar characteristics	• Contractual basis: The Processing of Personal Data of customers or any other persons having similar characteristics is necessary for the performance of obligations in a sales and service agreement to which the customer or any other persons having similar characteristics is a party, such as purchase via any means whether directly by the Company's method or third parties' method, such as via website or other means, etc. • Legitimate interest basis: Where the customer or any other persons having similar characteristics are juristic persons, the Processing of Personal Data of persons related to the customers or any other persons having similar characteristics is necessary for the legitimate interests of the Company in its business operations, such as management of customer's order, and verification of the identity of customers, etc.
(d)	For the purpose of product and/or service preparation and other relevant transactions	• Contractual basis: The Processing of Personal Data of customers or any other persons in similar manners is necessary for the performance of obligations in agreements to which the customer or any other persons having similar characteristics is a party, such as arranging shipments of products, billing, confirmation of outstanding debt, and delivery of receipts to the customers or any other persons in similar manners, etc. • Legitimate interest basis: Where the customer or any other persons having similar characteristics are juristic persons, the Processing of Personal Data of persons

		related to the customers or any other persons having similar characteristics is necessary for the legitimate interests of the Company in its business operations, such as communicating with customers, etc.
(e)	For the purpose of changing information relating to customers in the Company's system	Legitimate interest basis: The Processing of Personal Data of customers or persons related to the customers or any other persons having similar characteristics is necessary for the legitimate interests of the Company in facilitating customers, persons related to the customers, or any other persons having similar characteristics to edit their information in the Company's system in order to make it accurate, up-to-date, complete, and not to cause any misunderstanding.
(f)	For the purpose of receiving complaints from customers, persons related to the customers, or any other persons having similar characteristics	Legitimate interest basis: The Processing of Personal Data of customers or any other persons having similar characteristics is necessary for the legitimate interests of the Company in facilitating customers, persons related to the customers, or any other persons having similar characteristics in complaining or providing comments in order to improve the quality of services provided by the Company.
(g)	For the purpose of public relations and marketing activities of the Company	Consent basis: Where the Company proceeds with any marketing activities, such as sending marketing messages to customers, taking photographs or recording videos of customers in order to process and publicize marketing activities through various channels, the Company will undertake the activities by relying on the consent received from you.
(h)	For the purpose of analyzing your use of websites, applications, or other media in order to improve the quality of services of the Company or for marketing purposes	Legitimate interest basis: The Processing of your Personal Data from the use of website, application, or other media is necessary for the legitimate interests of the Company in its business operations and improvement of quality of services, such as improvement of website, application, or other means, improvement of product and service quality, as well as improvement of defects and problems in relation to the products and services.

		Consent basis: In case where the Company collects and Processes your Personal Data in order to analyze and advertise products/services based on your behavior, or conduct direct marketing campaigns, or in the case where the Laws on Personal Data Protection require your consent, the Company will undertake such actions by relying on the consent received from you.
(i)	For the purpose of communicating with customers or any other persons having similar characteristics	Legitimate interest basis: The Processing of Personal Data is necessary for the legitimate interests in communicating with you regarding the provision of services of the Company, such as performing according to the service request, answering your questions or comments, etc.
(j)	For the purpose of complying with the laws relating to the Company's business and legitimate orders of government agencies and relevant officers	Legal basis: To act in compliance with the applicable laws of the Company, such as taxation law, Laws on Personal Data Protection, and legitimate orders of government agencies and relevant officers, such as Office of the Personal Data Protection Commission (PDPC Office), etc.
(k)	For the purpose of establishment, compliance, exercise or defense of legal claims of the Company	Legitimate interest basis: The Processing of Personal Data is necessary for the establishment, compliance, exercise or defense of legal claims in various stages according to the law, such as investigation and/or inquiry by government officials, case preparation, prosecution and/or pursuit of the case in court, etc.
(l)	For the purpose of monitoring, protecting and ensuring the security of persons and properties of the Company	- Legitimate interest basis: The Processing of Personal Data is necessary for the legitimate interests of the Company in monitoring, protecting and ensuring the security of properties of the Company. For example, the CCTV footages can be used to prevent loss or damage to the Company's properties or to track properties or claim damages in case where the properties of the Company are lost or damaged, etc. - Preventing or suppressing danger to a person's life, body, or health basis: The Processing of Personal Data is necessary for the benefit in monitoring, preventing, or suppressing any circumstances which may be dangerous to person's life, body, or health.

(m)	For any transaction that is necessary and beneficial to you or those which are directly related to the purposes set forth above	Legitimate interest basis: The Processing of Personal Data is necessary for the legitimate interests of the Company in carrying out any transactions which are necessary for the Company and/or beneficial to you or directly related to the purposes set forth above. In this regard, where the Laws on Personal Data Protection require your consent for any Processing of Personal Data, the Company will explicitly request the consent from you.
(n)	For other purposes that the Company will notify you of	The Company will notify you of any other purposes that cause the Company to Process your Personal Data other than the purposes set forth above or when the Company changes the original purposes that were set forth. In this regard, where the Laws on Personal Data Protection require your consent for any Processing of Personal Data, the Company will explicitly request the consent from you.

5.2 Your Personal Data, which the Company will Process for the Purposes set forth in Clause 5.1 above that relate to the compliance with laws or contracts or are necessary for entering into contracts with you, is the data which is necessary for the achievement of the said Purposes. If you do not intend to provide such Personal Data to the Company, there may be legal implications or the Company may not be able to perform its duties pursuant to the contract which has been entered into with you or may not be able to enter into a contract with you (as the case may be). In such event, it may be necessary for the Company to decline to enter into the contract with you or to cancel the sale and purchase or the provision of any relevant services to you, whether in whole or in part.

5.3 In the event that the Company will Process your Personal Data in a manner and/or for purposes which are not consistent with the Purposes set forth above, the Company will put in place additional policies or notifications for the protection of Personal Data and/or send notice to you to provide explanations concerning such Processing of Personal Data. In this regard, you should review such additional policies or notifications in conjunction with this Privacy Notice (as the case maybe).

6. Disclosure of Personal Data

6.1 The Company may disclose your Personal Data in accordance with the Purposes and the rules prescribed under the laws to the following entities and persons:

- (a) Siam Land Flying Company Limited, including executives, directors, staff, employees and/or relevant in-house personnel, and as necessary on a need-to-know basis for the Processing of your Personal Data.
- (b) Business partners, service providers, and data processors designated or hired by the Company to perform duties in connection with the management/Processing of Personal Data for the

Company in the provision of various services, such as information technological services, data recording services, payment services, mailing services, delivery services, printing services, data analysis services, research services, marketing services, or any other services which may be beneficial to you or relevant to the Company's business operation.

(c) Advisors of the Company, such as legal advisors, lawyers, auditors, or any other internal and external experts of the Company.

(d) Relevant governmental agencies which have supervisory duties under the laws or which have requested the disclosure pursuant to their lawful powers or relevant to the legal process or which were granted permission pursuant to applicable laws, such as Revenue Department, Office of the Personal Data Protection Commission, Office of Trade Competition Commission, Royal Thai Police, Office of the Attorney General, and court, etc.

(e) Any persons or other entities that you have given consent to disclose your Personal Data to, such as the disclosure of processed images of activities through various media platforms of the Company to the general public.

6.2 The disclosure of your Personal Data to third parties shall be in accordance with the Purposes or other purposes permitted by law, provided that if the law requires your consent to be provided, the Company will request for your prior consent.

6.3 In the event that the Company discloses your Personal Data to third parties, the Company will put in place appropriate safeguards to protect the Personal Data that has been disclosed and to comply with the standards and duties relating to the protection of Personal Data as prescribed by the Laws on Personal Data Protection. Where the Company sends or transfers your Personal Data outside Thailand, the Company will ensure that the recipient country, the international organization or such overseas recipient has a sufficient standard for the protection of Personal Data. In some cases, the Company may request your consent for the transfer of your Personal Data outside Thailand, subject to the requirements under Laws on Personal Data Protection.

7. Retention Period

The Company will retain your Personal Data for the period necessary to fulfil the Purposes for which the Personal Data was Processed, whereby the retention period will vary depending on the Purposes for which such Personal Data was collected and Processed. The Company will retain Personal Data for the period prescribed under the applicable laws (if any) by considering the statute of limitations under the laws for any legal proceedings that may occur from or in relation to the documents or Personal Data collected by the Company and having regard to the Company's business practices and relevant business in relation to each category of Personal Data.

In this regard, the Company will retain your Personal Data for the period not exceeding 10 years, starting from the date your legal relations/transactions with the Company come to an end. However, the Company may retain your Personal Data for a longer period of such time prescribed if the laws permit or such retention of Personal Data is necessary for the establishment of the right of claim of the Company.

After the period of time set forth above has expired, the Company will delete or destroy such Personal Data from the storage or system of the Company and other persons providing services to the Company (if any) or anonymize your Personal Data, unless in the event that the Company can continue to retain such Personal Data as prescribed by the Laws on Personal Data Protection or other applicable laws. In this

regard, for additional details regarding the retention period of your Personal Data, you can contact the Company by using the contact details set out in Clause 9 of this Privacy Notice.

8. Your Rights in relation to Personal Data

As the data subject, you have the following rights in relation to your Personal Data, subject to the rules, methods and conditions under the Laws on Personal Data Protection. In this regard, if you wish to make a request to exercise your rights, you can contact the Company by using the contact details set out in Clause 9 of this Privacy Notice.

8.1 Right of Access You have the right to access your Personal Data and may request that the Company provide you with a copy of such Personal Data in accordance with the requirements under the Laws on Personal Data Protection.

8.2 Right to Data Portability You have the right to obtain your Personal Data, including to request that your Personal Data is transmitted to another data controller or to you, except where it is technically unfeasible, in accordance with the requirements under the Laws on Personal Data Protection.

8.3 Right to Object You have the right to raise an objection to the Processing of your Personal Data in certain circumstances prescribed under the Laws on Personal Data Protection.

8.4 Right to Erasure You may request that the Company delete, destroy or anonymize your Personal Data in certain circumstances prescribed under the Laws on Personal Data Protection.

8.5 Right to Restriction You have the right to request that the Company restrict the Processing of your Personal Data in certain circumstances prescribed under the Laws on Personal Data Protection.

8.6 Right to Rectification You have the right to request that your Personal Data be rectified if the Personal Data is inaccurate, not up-to-date, incomplete, or may cause a misunderstanding.

8.7 Right to Withdraw Consent If the Company relies on your consent as the lawful basis for Processing your Personal Data, you have the right to withdraw such consent which has been provided to the Company at any time.

8.8 Right to Lodge a Complaint If you have any concerns or questions about any aspect of the Company's practices in relation to your Personal Data, please contact the Company using the contact details set out in Clause 9 of this Privacy Notice. Where there is reason to believe that the Company is in breach of Laws on Personal Data Protection, you have the right to lodge a complaint to the expert committee appointed by the Personal Data Protection Committee in accordance with the rules and methods prescribed under the Laws on Personal Data Protection.

If you have any concerns or questions about any aspect of the Company's practices in relation to your Personal Data, please contact the Company using the contact details set out in Clause 9 of this Privacy Notice. Where there is reason to believe that the Company is in breach of Laws on Personal Data Protection, you have the right to lodge a complaint to the expert committee appointed by the Personal Data Protection Committee in accordance with the rules and methods prescribed under the Laws on Personal Data Protection.

9. How to Contact the Company

The Company has designated Siam Land Flying Company Limited as the coordinator for matters relating to the Company's Personal Data protection. If you have any questions or would like to exercise your rights

as set out in this Privacy Notice, you may contact the Company using the contact information provided below:

Data Protection Officer

E-mail: compliance@aircharterthailand.com
Address: Corporate Governance & Compliance Department
222 Don Mueang International Airport Office
Building 3rd Floor, Vibhavadi Rangsit Road,
Sanambin, Don Mueang, Bangkok 10210, Thailand
Office: +66 2535 6784-5 Fax: +66-2-535-4734

10. Changes to This Privacy Policy

The Company may make changes to this Privacy Policy from time to time to reflect any changes to our Processing of your Personal Data and to comply with any changes to the Laws on Personal Data Protection or any applicable laws. In this regard, the Company will notify you of any significant changes to the Privacy Policy and the amended Privacy Policy through appropriate means. The Company encourages you to review such communication in order to be aware of any changes made to this Privacy Policy from time to time.