

Vendors and Suppliers Privacy Notice

UPDATED ON: 15 May 2023

Deloitte Touche Tohmatsu Jaiyos Co., Ltd. (“**we**”, “**us**” or “**our**”) values your privacy and strives to protect your personal data or personal data relating to the individuals connected to your business (“**Personal Data**”) based on the Personal Data Protection Act B.E. 2562 (A.D. 2019) (“**PDPA**”). We, therefore, arrange to have and provide this Privacy Notice to you in order to notify our collection, use, and/or disclosure (collectively referred to as “**Processing**” or “**Process**”) of Personal Data.

This Privacy Notice explains the following:

- What kind of Personal Data do we collect? This includes what you tell us about yourself, or individuals connected to your business (“**you**”, “**your**” or “**yourself**”) and what we learn by having you as vendors/suppliers.
- How do we use your Personal Data?
- Who do we disclose your Personal Data to?
- Automated Decision Making
- Retention of Personal Data
- Accuracy of your Personal Data
- What are your privacy rights and how does the PDPA protect you?
- Security of your Personal Data
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1. What kind of Personal Data do we collect?

We may collect your Personal Data based on the **circumstances relating to procurement of products and/or services**.

We may collect your Personal Data from a variety of sources, as follows: -

- Directly from you as part of the process of becoming our vendor/supplier;
- When you provide us with identification documents (e.g., identification card, passport, etc.)
- Data that we have or may have received when you have entered into our systems, tools, websites, or other online channels;
- When you communicate with us (e.g., telephone or video calls, emails, instant messaging applications, etc.);
- From third parties as part of the process of becoming vendor/supplier;
- Any other assessments (e.g., CCTV, voice recording equipment, etc.) and/or
- When you manifestly publish your Personal Data, including via social media, we may collect your Personal Data from your social media profile(s) to the extent that you choose to make your profile publicly visible.

The categories of your Personal Data that we may collect, which are subject to the applicable laws, include, but not limited, to: -

- **Personal details:** Name and last name, nickname, gender, date of birth, personal identification number, passport number, other identification numbers issued by the authority including Personal Data that is presented on the documents issued by the authority, corporate documents issued by authorities (in case of a juristic person), copy of identification card, passport, bankbook, and house registration, tax identification number, tax invoice, nationality, photographs appeared on identification card, passport, social media account, signatures, photographs, products or services order information and details, money transfer slip or receipt, voices, video, and CCTV images or footages;
- **Contact details:** Addresses, location, telephone numbers, fax number and emails;
- **Contractual details:** The terms and conditions of your products and/or services; and/or
- **Financial details:** The details of your bank account, payment transaction and billing address;

Where you are required to provide Personal Data of third parties to us, you agree to notify such third parties that we may Process their Personal Data and inform the contents of this Privacy Notice to such third parties. You agree and confirm that you will comply to all the requirements under the PDPA. This includes the obligation to obtain consent prior to or during the collection of third parties' Personal Data.

2. How do we use your Personal Data?

We will use your Personal Data only if it is necessary and we have proper reasons to Process the Personal Data. When we Process your Personal Data, we will rely on one or more of the legal bases as follows: -

- **Contractual basis:** When it 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 obligation:** When it is necessary for us to Process your Personal Data in order to comply with the laws or legal obligations;
- **Legitimate interest:** When it is in our legitimate interest to Process your Personal Data for our benefit in compliance with the PDPA, as long as your fundamental rights are not overridden by our benefits; and/or
- **Consent:** When you give your consent to us and/ or have obtained consent from your data subject for us to Process your Personal Data for a stated purpose.

The PDPA and other regulations provide stringent protection for the Processing of sensitive Personal Data. We will not Process this type of Personal Data without your consent unless the PDPA allows us to do so.

The Processing of your Personal Data is subject to the applicable laws and therefore will only be Processed for the following purposes and by relying on the legal bases stated below:

Purposes of Processing Personal Data	Legal bases
Procurement of products and services	
<ul style="list-style-type: none"> • To prepare and enter into a contract with you including review of existing contract(s) we may have with you • To prepare and track the budget and costs of products and/or services from you • To communicate and consult with you about the products and/or services • To verify your identity • To make a decision about sourcing/procuring products and/or services from you • To register you as our vendor as well as prepare and update our vendor/supplier databases and contact information • To request products and/or services from you • To receive products and/or services from you • To perform quality assurance on products and/or services obtained or rendered by you • To make and manage payments as well as charges and interests due • To identify and communicate problems with existing products and/or services to you 	<ul style="list-style-type: none"> • Contractual basis • Legitimate interest • Consent
Business relationship	
<ul style="list-style-type: none"> • To manage a relationship between you or your business and us 	<ul style="list-style-type: none"> • Legitimate interest
Business operation and business improvement	
<ul style="list-style-type: none"> • To evaluate your suitability to be our vendor/supplier • To coordinate with you including quality assurance or audit 	<ul style="list-style-type: none"> • Legitimate interest
Risk and security management	
<ul style="list-style-type: none"> • To prevent crimes and manage the security of our premises and assets • To manage risk for you and us • To perform quality assurance, internal audits and reports • To detect, investigate, report, and seek financial crime prevention • To proceed with your request to exercise your rights with regards to your Personal Data in our possession • To comply with relevant laws and regulations • To make legal reports, prosecute, exercise or defend legal rights and any interests of you/us 	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest • Consent

Purposes of Processing Personal Data	Legal bases
(including debt collection and/or litigation arising from breach of contract)	

We will not Process your Personal Data for any purposes other than those mentioned to you in this Privacy Notice. Should we be required to process your Personal Data for any other purposes, we will notify you accordingly prior to Processing your Personal Data for any such additional purposes.

Refusal to provide Personal Data

Where it is necessary for us to collect your Personal Data in accordance with the PDPA or the terms of contract we have with you, and you refuse to provide us with your Personal Data, we may not be able to meet the obligations that have been agreed upon with you or to enter into a contract with you. In such case, we may refuse to procure and/ or terminate the products and/or services from you.

3. Who do we disclose your Personal Data to?

We will share your Personal Data only if it is necessary and we have proper reasons to Process your Personal Data, including where:-

- It is necessary to comply with the provisions of contracts;
- We have a legal obligation to assist and perform regulatory reports, litigations, detection and prevention of fraud, tax evasion, financial crime, assertions, or defense of legal rights and interests;
- We have legitimate business interests to do so (e.g., managing risks, conducting internal reports, performing data analysis, verifying identity, assessing your suitability for our products and/or services, etc.); and/or
- We request for your consent to share it, and you agree.

We may need to share your Personal Data for the purposes mentioned above with others, as follows: -

- Our group companies and any sub-contractors, agents, or service providers who work for us or provide the services to us or our group companies, including their employees, sub-contractors, service providers, directors, and officers;
- Anyone who provides instructions or operates on your behalf, e.g., Power of Attorney, lawyers, etc.;
- Your intermediaries, correspondent, and agent;
- Financial institutions, and payment service providers;
- Any persons or companies required in connection with a potential or actual corporate restructuring, merger, acquisition, or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you;
- Law enforcement, government, courts, dispute resolution bodies, regulators, auditors, and any parties appointed or requested to carry out investigations or audits of our activities;
- Other parties involved in any disputes with us;
- Fraud prevention agencies who will also use it to detect and prevent fraud and other financial crime and to verify your identity; and/or
- Anybody else who you have instructed us to share your Personal Data with.

We will not use the Personal Data for any purposes other than the purposes as described to you in this Privacy Notice. Should we intend to collect, use or transfer additional information, we will notify

you and obtain your consent prior to the collection, use and disclosure. You will also be given the opportunity to consent or to decline approval of such collection, use and/or transfer of your Personal Data.

Your Personal Data may be transferred to and stored/processed in other countries. Such countries may not have the same level of protection for the Personal Data. When we do this, we will ensure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer the Personal Data in this way to fulfill our legal obligations, protect the public interests and/or for our legitimate interests. In some countries, the law might compel us to share certain Personal Data, e.g., with tax authorities or central bank. Even in these cases, we will only share the Personal Data with people who have the right to see it. When we transfer your Personal Data to be stored/processed by our affiliate companies in other countries, we will ensure such affiliate company maintain level of protection as prescribed in our internal policy.

4. Automated Decision Making

We will make no automated decision that will have significant impact on you, unless such decision is permitted by applicable law or your explicit consent has been obtained.

5. Retention of Personal Data

We will retain your Personal Data for as long as it is necessary to carry out the purposes that are specified in this Privacy Notice so that we can continually perform our obligations to you. In any case, we will keep your Personal Data for the duration of our contractual relationship and for another 10 years after you stop being our vendor/supplier in order to fulfill our legal obligations, maintain our legitimate interests, and protect the public interests. In the event of regulatory or technical reasons, we may keep your Personal Data for longer than 10 years.

Where it is no longer necessary for us to retain your Personal Data, either for legal, technical reasons or otherwise, we will destroy, delete, or anonymize it, the anonymization of which aims to remove personal identifiers, and the remaining data does not identify any particular individuals. However, in the case where we are unable to destroy, delete or anonymize the Personal Data (e.g., the Personal Data is stored permanently in our backup database, etc.), we will ensure that your Personal Data will be protected with appropriate security measures, separated from further Processing activities, and destroyed, deleted, or anonymized as soon as we are able to do so.

6. What are your privacy rights and how does the PDPA protect you?

Your Rights

Rights regarding your Personal Data under the PDPA are as follows: -

- **Right to Withdraw Your Consent:** You can withdraw your consent given to our Processing of your Personal Data which you can do at any time by contacting us via the contact channels specified in *Article 10 Contact us* below. We may continue Processing your Personal Data if we have another legal basis to do so;
- **Right to Access Your Personal Data:** You can request for a copy of Your Personal Data in our possession or ask us to disclose the source from which we collect your Personal Data;

- **Right to Correct Your Personal Data:** You can have any incomplete or inaccurate Personal Data we hold about you corrected. Please refer to *Article 6 Accuracy of your Personal Data* for more details on the accuracy of your Personal Data;
- **Right to Erasure of Your Personal Data:** You can ask us to delete, destroy or anonymize your Personal Data where there is no good reason for us to continue Processing it. Nonetheless, we will consider a request to delete, destroy or anonymize carefully according to the laws;
- **Right to Object Processing of Your Personal Data:** You can object to the Processing of your Personal Data unless we have lawful grounds to deny your request;
- **Right to Restrict Processing of Your Personal Data:** You can ask us to suspend the Processing of your Personal Data temporarily or permanently, for example, if you want us to establish its accuracy or inform you of the purpose or legal basis for the Processing of your Personal Data;
- **Right to Portability of Your Personal Data:** In some cases, you have the right to request for a copy of your Personal Data in an electronic form or request for a transfer of your Personal Data to third parties; and
- **Right to Lodge a Complaint regarding Your Personal Data:** You can file a complaint with the relevant government authority, including, the Thailand Personal Data Protection Committee, when you see that we, our employees, or service providers violate or do not comply with the PDPA, or other notifications issued under the PDPA.

How to Exercise Your Rights

You may exercise your rights at any time by notifying us via the contact channels specified in *Article 10 Contact us* below, without having to pay any fees. However, we may charge a reasonable fee if your request does not have a rigid ground, is duplicated, or is more than necessary. We may also refuse to proceed with your request if we have reasonable grounds, where it is permitted by law or pursuant to a court order.

Our Process upon Your Request

Upon your notification, we may need to contact you to fill in our request form before we proceed with our internal processes. We may request certain information from you in order to verify your identity and guarantee your right under the PDPA which is considered a security measure to ensure that your Personal Data will not be disclosed to those who is not authorized to access your Personal Data. We may also contact you for more information about the request for a quicker response.

We will use our best endeavors to respond to your legitimate request within 30 days. Under some circumstances, we may take more than 30 days depending on the complexity or duplication of your request. In such case, we will keep you informed of the status of your request.

Handling of Complaints

Should you wish to make a complaint about how we Process your Personal Data, please contact us via the contact channels specified in *Article 10 Contact us* below and we will try to respond to your complaint as soon as possible. This does not prejudice your right to file a complaint with the relevant government authority or Personal Data Protection Committee.

7. Security of your Personal Data

Information is our asset and therefore we place great importance on ensuring the security of your Personal Data. We regularly review and implement up-to-date physical, technical, and organizational security measures when Processing your Personal Data. We have internal policies and controls in place to ensure that your Personal Data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by our employees in the performance of their duties. Our employees are trained to handle the Personal Data securely and with utmost respect according to our policies, failing which they may be subject to disciplinary action.

8. Revision of our Privacy Notice

We keep our Privacy Notice under a regular review and update, hence subject to regular changes. The date of last revision of the Privacy Notice can be found on the top of this Privacy Notice and you can, at all times, find the latest Privacy Notice via [Vendors and Suppliers Privacy Notice \(deloitte.com\)](#).

9. Contact Us

Should you have any questions regarding the protection of your Personal Data or wish to exercise your rights, please contact us through the following channels: -

- Email : THprivacy@deloitte.com