



Impact Electronics Siam Co., Ltd.

Personal Data Protection Policy

**(This policy was considered and approved by
the Company's Board of Directors No. 5/2023, on 20 September 2023)**

QR Code

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Definitions

No.	Word or Phase	Meaning
1	Company	Impact Electrons Siam Co., Ltd.
2	Subsidiaries	A company under common control of the Company, or a company in which the Company holds more than 50% of the shares.
3	Personal Data	The information about an individual that enables their direct or indirect identification, excluding data concerning deceased individuals in particular.
4	Sensitive Personal Data	Personal data concerning matters such as race, ethnicity, political opinions, philosophical beliefs, religious beliefs, ideological beliefs, sexual behaviors, criminal records, health data, disabilities, genetic data, biometric data, or any other data that impacts the personal well-being of the individual, as similarly defined by the Personal Data Protection Committee's declared regulations.
5	Processing of Personal Data	Any operations involving personal data, such as collection, recording, organizing, storage, maintenance, enhancement, alteration, usage, retrieval, disclosure, dissemination, transfer, consolidation, deletion, destruction, and the like.
6	The Personal Data Protection Committee	A committee duly appointed, vested with responsibilities and authority for overseeing, issuing guidelines, measures, or practices related to the protection of personal data in accordance with the Personal Data Protection Act of 2019 (B.E. 2562).
7	Data Subject	An individual who provides personal data to the Company for the purpose of collection, usage, or disclosure of Personal Data.
8	Data Controller	Individuals or legal entities, appointed by the Company, with the authority to make decisions regarding the collection, usage, or disclosure of Personal Data.
9	Data Processor	Individuals or legal entities, appointed by the Company, to act on behalf of or under the authority of the Data Controller in relation to the collection, usage, or disclosure of Personal Data. These individuals or entities are distinct from the Data Controller.

1. Objectives of the Policy

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Impact Electronics Siam Co., Ltd. (referred to hereinafter as the “**Company**” or “**IES**”) shall engage in the collection and compilation of Personal Data and other information of individuals (collectively referred to as “**Data**”). This shall be carried out with lawful and ethical purposes, within defined boundaries, and utilizing methods that are in accordance with the applicable law. The collection and compilation of such Data shall be conducted only to the extent necessary for the Company’s operational objectives. In this regard, the Company shall take steps to ensure that Data Subjects are informed and shall provide electronic consent or follow the Company’s prescribed procedures. In cases where the Company handles the Sensitive Personal Data of the Data Subject, explicit consent shall be obtained prior to collection, except where exemptions, are provided under the Personal Data Protection Act 2019 (B.E. 2562) (the “**PDPA**”) or any relevant laws.

Furthermore, the Company acknowledges the significance of Personal Data and aims to instill confidence in individuals that the Company upholds transparency and accountability in the collection, usage, and disclosure of data in compliance with the PDPA. This Personal Data Protection Policy (the “**Policy**”) has been formulated to outline the specifics of data collection, storage, usage, disclosure (collectively referred to as “**processing**”), as well as the various rights. The purpose of this Policy is to inform Data Subject comprehensively about these practices.

2. Collection of Personal Data

The Company may collect and acquire various types of Personal Data. It is conducted with lawful and ethical intentions, within defined boundaries, and utilizing methods that are in accordance with the law. The collection of such Data shall be carried out only to the extent necessary for the Company’s operational objectives. In this context, the Company shall undertake actions to ensure that the Data Subject is informed and provided electronic consent or adhere to the Company’s prescribed procedures. In cases where the Company handles the Sensitive Personal Data of the Data Subject, explicit consent shall be obtained before collection, except in cases where exemptions are provided under the PDPA or relevant laws. Such Data may be obtained from the following sources:

- 1) The Personal Data collected by the Company directly from Data Subject through various service channels, such as application processes, registrations, job applications, signatures on contracts, documents, survey submissions, or utilization of products, services, or other service-related avenues managed by the Company and etc.
- 2) The Data collected by the Company from the interactions with Data Subject by accessing to the Company’s website, products, or services in accordance with any agreements or terms, *i.e.* the encompasses monitoring usage behavior on the Company’s website, products, or services through mechanisms such as Cookies or software installed on the Data Subject’s devices.

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- 3) The Personal Data collected by the Company from sources other than the Data Subject directly, where such sources possess the authority, legal justification, or have obtained consent from the Data Subject to disclose the information to the Company, for instance, linking data from the Company to provide services to the Data Subject, receiving the Personal Data from other departments within the Company as part of the centralized data management efforts to support the Company's operations. In addition, this is also encompassing the cases where the external Data Subject who provided the Personal Data of external party to the Company, thus, the said external Data Subject is responsible to notify details as per this policy or the product or service disclosures, as the case maybe, and to obtain the consent from such external party before the disclosing information to the Company.

3. Objectives of Data Collection, Utilization, and Disclosure

The Company collects, utilizes, and discloses the Personal Data for the following purposes:

- For the benefit of facilitating of business coordination with the Company in various aspects
- For financial transactions and taxation purposes related to the Company's contractual obligations
- For the purpose of creating database for analysis and presentation of services or products offered by the Company and its affiliated entities or suppliers, agents, or individuals associated with the Company
- For the purpose of enhancing the quality of business operations, services, and business-related activities of the Company
- For analyzing and monitoring website usage and for investigating incidents of problematic usage
- For the purpose of access control, the controlling and preventing spread of diseases and the security of the Company's premises
- For the compliance with current and future laws or regulations enforce to to the Company

The Personal Data that the Company collects and processes for the aforementioned purposes are necessary for the performance of contractual obligations or compliance with various enforceable laws. If you do not provide the necessary Personal Data as mentioned, it may lead to a violation of the law, and the Company may be unable to manage contracts or provide entirely or a portion of services or conveniences to you.

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Hence, if the Policy has any changes or amendments, the Company will provide it on the Company's website (www.impactelectronics.com), which specified the amendment date, for your verification.

4. Duration of Personal Data Collection

The Company will retain the Personal Data for a period as long as the Data remains necessary according to the purposes of its collection, as outlined in the Policy.

Upon the validity and unnecessary of the Personal Data's retention per the aforementioned objectives, the Company will undertake measures to delete, destroy, or anonymize the said personal data in a manner that prevents further identification, in accordance with the formats and standards of data deletion and destruction that will be declared by relevant committees or by laws, or in line with international standards. In cases where the explicit duration for retaining personal data cannot be clearly determined, the Company will retain the Data for a period that can be reasonably estimated based on data retention standards (e.g., a maximum general statutory retention period of 10 years).

5. Security and Data Privacy Measures

The Company will not disclose the Personal Data of the Data Subject to any person without consent, unless it is within the specified purposes that have been notified. However, for the benefit of the Company's operations and the provision of services to the Data Subject, there may be caused of necessary to disclose the Personal Data to Subsidiaries or other inbound and outbound persons, such as a service provider who needs to operate in relation to the Personal Data. In cases where the Personal Data is disclosed to such entities or individuals, the Company will ensure that they will maintain the confidentiality of the Personal Data and will refrain from using it for purposes beyond those defined by the Company.

Furthermore, the Company may disclose the Personal Data of the Data Subject under the applicable laws, i.e. the disclosure information to government agencies, public authorities, regulatory bodies, and in cases where there are legal obligations.

6. Rights of the Data Subject

The following outlines of the Personal Data's rights:

- 1) Right to access and obtain copies of the Personal Data, including to request of disclosure of personal data which was unconsented.
- 2) Right to rectification the Personal Data
- 3) Right to erasure the Personal Data

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- 4) Right to suspense of the Personal Data's Processing
- 5) Right to object the Processing of Personal Data
- 6) Right to withdraw the Consent of Personal Data's Processing, however, it shall not affect the collection, usage, or disclosure of the Personal Data that was previously consented to.
- 7) Right to transfer the Personal Data

Although, the Data Subject can contact the Company through the communication channels which specified into Clause 10. of this Policy, for the purpose of the Data Subject's intents for further corporation with the Company.

7. Data Protection Officers ("DPO")

The Company has diligently complied with the provisions of the Personal Data Protection Act 2019 (B.E. 2562) (the "PDPA"), by appointing Data Protection Officer ("the DPO") for the purpose of monitoring the Company's activities in relation to the Data collection, usage, and disclosure of the Personal Data, to ensure the alignment with regulations stipulated in the Personal Data Protection Act 2019 (B.E. 2562).

8. Revision and Amendment of the Personal Data Protection Policy

The Company may periodically update or amend this policy to ensure its compliance with legal requirements, any changes in the Company's operations, as well as, any suggestion and feedback from various entities. Such updates will be announced into the Company's website, www.impactelectronics.com.

9. The Company's Communication Channel

If you have any questions, suggestions, or concerns regarding the collection, usage, and disclosure of the Personal Data by the Company, as well as any concern into this policy, or wish to exercise your right according to PDPA please contact:

Data Protection Officer

Impact Electrons Siam Co., Ltd.
999/9 The Offices at CentralWorld, 45th Floor
Rama 1 Road, Patumwan Sub-district
Patumwan District, Bangkok 10330
Telephone: +66 2825 9211
E-mail: PDPA@impactelectronics.com

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10. Penalty

The imposition of penalties upon individuals who commit violations will be carried out in accordance with the Company's Regulations and as stipulated by the applicable laws.
