

## Privacy Policy of True Digital Group Co., Ltd.

### Introduction

True Digital Group Co., Ltd. (“Company” or “We”) attach great importance to customer privacy, hence we provide this privacy notice to inform our customers ( “you” ) of our policy with regard to your personal data, the methods on how we collect, use and disclose your personal data, the types of personal data we collected, the purpose of personal data processing, the disclosure of your personal to third parties, the details on security measures in place for your personal data, the retention period of personal data, and the rights you have in accordance with Personal Data Protection Act, B.E. 2562 and other related laws and regulations ( “Personal Data Protection Law” )

You can contact us at True Digital Park, Griffin Building, 9-12 Fl, 101 Sukhumvit Rd, Bangchak, Phra Khanong, Bangkok 10260, Thailand or contact our data protection officer for more information about this privacy policy via [Dataprivacycenter@truedigital.com](mailto:Dataprivacycenter@truedigital.com)

### The Purpose of the Collection, Use and Disclosure of Personal Data

We will collect, use and disclose (collectively referred to as “process”) the personal data only in the case where it is necessary and permitted by law. We will process the personal data provided that there is a lawful basis to do so which includes processing of personal data in case it is necessary for the performance of contract we have with you, it is necessary for compliance with our legal obligations, it is of our legal interests, it is to prevent or suppress a danger to your or any other person’ s life, body and health, it is for carrying out a public interest task or for exercising official authority, it is to proceed according to your consent given to us, and/or other lawful basis as provided by the Personal Data Protection Law.

The law requires us not to collect sensitive personal data including but not limited to the data relating to the race, ethnicity, political views, ideological belief, religion or philosophy, sexual behavior, criminal history, health data, disability, Labor Union membership data, genetic data, biological data, or any other data which may affect you in the same manner, unless we have your explicit consent. We will not collect or use this type of data without your explicit consent unless the law permits us to do so.

We collect your personal data for processing for the following purposes:

2.1 To perform our obligations under the contract we have with you

We will process your personal data to deliver our service as applied or requested by you, and/or to fulfill contractual obligations we have with you, including but not limited to the following purposes:

For your subscription and sign-in to our account (such as TrueID account).

To authenticate your registration and to verify and authenticate your identity as well as contact channels.

To provide services for which you have subscribed, preferred, interested or requested, and/or to comply with the contract you made with us (such as signing up for TrueID, TrueYou, True Digital Academy, Online Station and other products and services).

To communicate for relevant products and services including sending notifications on service charges, goods and service purchase orders, reminders for payments of goods and services, and the receipts thereof.

To pay for our service charges and other fees associated with our services.

To remunerate or give rewards or other benefits/privileges to you

To answer your questions, provide support and information, receive complaints and solve problems and difficulties for you.

To carry out the company's business such as conducting analysis and research, measuring performance efficiency, ensuring development and maintenance of the existing services to be delivered properly.

To compensate you for damages.

To notify you of any change to our service and terms of service.

## 2.2 To Comply with our legal obligations

We have to comply with many laws and orders made by the legal authorities, hence we are required to collect, use and disclose your personal data, including but not limited to the following purposes:

To comply with the Personal Data Protection law.

To comply with laws related to us (such as Computer-related Crime Law, Electronic Transaction Law, Consumer Protection Law and other laws which we are bound to comply with.).

To comply with regulations and/or orders made by legal authorities (such as the court's orders, the government authorities' order and the orders made by the authorised government officials)

## 2.3 For legitimate interests of us and third parties

We process your personal data for our legitimate interests in consideration of our own interests or any other individuals or companies' interests and the fundamental rights to your personal data, including but not limited to the following purposes:

To prevent cheating and fraud including the enforcements of our terms, conditions, policies and/or the exercise of rights of claims under the relevant law.

To ensure security operations of the data and our service networks and to report you if any suspicious activity should be found such as an unusual attempt to sign in to your account.

To study how our customers use products and services from us and improve our standard of services, as well as planning and tracking down marketing campaigns and analysing and improving the services subscribed by you for effectiveness and meeting your needs.

To develop new products suitable for customers' needs and categorize customer types for new products or services.

To present our contents, offers and benefits based on your information and interests. However, if you would like to stop receiving our marketing communications, you are able to opt out at the setting page of the application you use, or you may unsubscribe our email communication through the provided unsubscription button in your email.

To contact you and record video or voice associated with arrangement of meetings, seminar, entertainment or booth exhibition.

To anonymise or de-identify personal data.

#### 2.4 To proceed according to your consent given to us

We may need your consent before processing your personal data, including but not limited to the following purposes:

To collect sensitive personal data, if necessary.

To offer relevant deals and promotion from selected partners and advertise all contents that match your interest and information about you.

To share your personal data to the companies within True Corporation Public Company Limited ( "True Group Companies" )\*, and/or the Company' s or True Group Companies' selected partners as well as Charoen Pokphand Group companies for analysing your behaviours in product and service usage and creating customer database, for researching and developing product and service as well as planning marketing strategies to achieve the greatest benefits in developing products and services which satisfy your needs, and for offering products, services and privileges of the Company, True Group companies, or selected partners of the Company and True Group companies as well as Charoen Pokphand Group companies which are properly personalised for you.

We may collect, use and disclose your personal data which is beneficial for you to better enjoy our products and services. We will provide you with clear details of the consent, such as a login to third-party service provider with TrueID' s user and account ID.

To send or transfer your personal data to other countries with inadequate standards of data protection (unless the Personal Data Protection Law provides that it could be proceeded without consent.)

In case you are a minor, incompetent or quasi-incompetent whose consent must be given by parents, guardian or curator (as the case may be) (unless the Personal Data Protection Law provides that it could be proceeded without consent.)

## Personal Data That We Collect

This Subject describes the types of personal data which is covered and protected by law.

We collect many types of personal data. With that being said, collection, use and disclosure of personal data may vary according to products and/or services which you opt for or used to opt for. In order to give you an overview of all the data we have collected, we have classified the types of data in groups as follows:

### Types of personal data

#### Details

##### Personal data

Including name, surname, sex, age, date of birth, nationality.

##### Contact data

Including current address, e-mail address, telephone number.

##### Official identity document data

Including identification number, passport number, a copy or photocopy of ID card and passport.

##### User account data

Including account name, account number, account password.

##### Financial data

Including payment data and payment confirmation.

##### Service usage data

Including products and services you have subscribed and used, the duration and date you have signed in and used the service, IP address, cookie data, usage activity data

##### Customer preference data

Including the content you like.

Market research and marketing data

Including customer opinion survey

Equipment, application and browser data

Including equipment identification number or other unique identifiers, equipment type, model and brand, application and browser details, operating system and platform.

Voice conversion data between you and our customer service division

Including voice recording data.

Location information

Including GPS information, information about objects nearby equipment (such as Wi-Fi access point, mobile phone signal tower and Bluetooth activation).

Social media data

Including social media account, your profile data, usage and contacts with our social media.

Other data

Including other data you give to us through any channels.

Sources of Personal Data We Collect

This Subject gives details of the personal data sources received by us.

Generally, we will collect personal data directly from you, and we will automatically collect your personal data when you use our services or contact us. In addition, we will collect personal data from our partners and from other sources which, in this respect, we shall adhere to and comply with the process defined by Law and in the case permitted by Law only, under the details as follows:

4.1 Personal data you create and provide to us

This data covers the data you provide to us and data given by people related to you or your business including those authorized by you or acting on your

behalf as the following cases:

When you have registered for using our services.

When you have communicated with us via website, application, email, social media and phone.

When you have answered our survey or joined our marketing promotions.

When you have agreed to receive news and information on the updates and benefits.

When you have conducted activities on our services including comments, uploading contents, images or videos on our service, profile updates and account settings.

In the event that you wish to establish a proof and a verification of your identity with us, we will request you to forward to us the additional government identity documents and other documents.

Upon your payments for our services, we shall keep the payment-related data.

#### 4.2 Personal data automatically collected by us

Upon your access to use our services and products through our websites and/or applications, we shall collect your data as follows:

Data on your service usage, your communications with us, applications and browsers including the electronic device-related data used in the services or communications with us.

When you use our services in which it is necessary to specify the location of your device, we shall collect data on your device's location enabling us to provide various features such as offerings on the services, discounts, and benefits for stores or restaurants near you. You can control the storage of these data through your device settings, which may differ depending on the operating system.

In addition, we use Cookie and other tracking technologies in collecting the data while you are using our websites or mobile applications. (You can learn more information about this in the "Cookies and use of cookies" section, section 9 of this notice.) You may opt out of collecting data through cookies via your browser setting. However, this may reduce full functionality of the use of our website and application.

#### 4.3 Personal data from other sources

The companies that introduce you to us.

True Group Companies and the Company's or True Group Companies' selected partners as well as Charoen Pokphand Group companies which are lawfully entitled to disclose personal data to us

Data we receive from the company in which you are a director, authorised person, agent, assigned or contact person.

Internet service providers and telecommunications service providers.

Social media service providers and other technology providers (for example: when you use user IDs or credentials to log into the service providers' account for using our services, we shall collect your profile data. (You may control any setting related to collecting of these data through the options that those service providers have granted

the rights in your user account).

Public data sources such as data from the open government sector databases.

Government agencies and law enforcement agencies such as the Department of Provincial Administration to check the status of ID cards.

#### Personal Data Sharing and Disclosure

We may share your personal data with the external individuals or organizations for various purposes specified in this Privacy Policy which, in this respect, the external organizations with which we may share your personal data can be categorized as follows:

True Group Companies, or the Company' s or True Group Companies' selected partners as well as Charoen Pokphand Group companies

Government agencies

Other service providers related to our products or services

The companies which we may desire to share your personal data due the reason that they are involved with our products or services and/or the fact that you have used our services and/or for the reason to comply with the contract which you have with us, and/or as requested by you.

#### Service providers supporting our business

The companies which we have used to help us in carrying out our business operations, business improvements and developments and that these service providers may need to have access to your personal and other data provided, however, that we do not allow such service providers to use or disclose your personal data for other purposes except only on those associated with the services which we have contracted them to carry on. These companies may include

The companies that introduce you to us.

The companies providing the customer management services.

The banks and providers of payment and transaction services.

Business consultants including law firms and information technology consultants.

Information technology service providers.

Advertising, marketing and social media service providers.

Consultants for litigations and debt payment demands including law firms.

Merger & acquisition of company and product and service possession and transfer  
Sharing and disclosure of anonymised data

We may share your anonymised data with the general public and/or our affiliates, partners, and other companies with whom we have relationships: for instance, we will share information to show the trend on our service usage in general in order to enable us to get to understand the market demand trends.

Sharing data to other third parties with your consent

We may share your personal and other provided data if you provide consent to us on a case-by-case basis such as binding your account with third-party platforms.

Personal Data Handling and Personal Data Retention

We have the effective security measures including organisational and technical measures to prevent personal data from being lost, accessible, used, altered, or disclosed without due authorization or illegally.

It is necessary for us to keep your different types of data under different periods of time. Generally, we will keep your personal data as long as you are our customer. However, we may keep it as long as up to 10 years after you have ceased on being our customer for the following purposes:

To establish legal claims in accordance with the law, comply with or exercise a right of claims according to the law, and raising defense against legal claims.

To carry on security operations and prevent illegal activities, prohibited activities, violations in order to protect you, others and us from any acts of misconduct.

To conduct study on customers' data as part of our own internal research.

For the purpose of making the accounts, settling the disputes and compliance with tax requirements.

After your personal data is no longer needed to be kept, we will delete it from our server or store it in the form of anonymised data.

In the Event You Prefer Not to Provide Your Personal Data to Us

We need to collect personal data according to the law or for use in entering into the contract which we have with you. If you prefer not to provide us with this personal data, we may not be able to provide services to you including our actions to probably cancel the products or services we provide to you.

In some cases, we may ask for personal data which will be useful to allow you to use our products or services better. We shall specify expressly clear details when we need to ask for those personal data. You have a right to choose not to provide these additional details to us and it will not affect the main products or services that you have had with us.



## Your Rights to Have Control over Personal Data

Once the provisions of Data Subject Rights in accordance with the Personal Data Protection Law become effective, you are able to exercise the right associated with your personal data in accordance with the requirements and conditions specified, under the details as follows:

### Right to consent withdrawal

If you grant consent to us for a particular purpose, you may withdraw the consent at any time unless there is a restriction according to the law, or it is a consent in connection with an agreement which is beneficial to you.

You have the right to withdraw a consent at any time. You can also make changes to the consent preference through the application you use our services.

Your consent withdrawal may disallow us to deliver some products and services to you and we will notify you of them in detail.

### Right to notify us of inaccurate personal data

You have the right to notify us of how your personal data is inaccurate or incomplete or out-of-date. We will investigate and rectify it to ensure accuracy.

This includes your right to rectify and update your personal data through the application you use.

### Right to access, obtain a copy and transfer of your personal data

You have the right to access and obtain a copy of your personal data from us, including requesting your personal data in an electronic format or delivering it to other organisations or companies to the extent specified by the Personal Data Protection Law.

### Right to objection of processing, restriction, erasure or destruction of personal data

You have the right to submit a complaint to object the processing of your personal data,

to restrict the use of your personal data, and to erase or destroy your personal to the extent specified by the Personal Data Protection Law.

You could contact our staff to proceed with submission of complaints as above through [dataprivacycenter@truedigital.com](mailto:dataprivacycenter@truedigital.com). We reserve the right to dismiss the complaints which are unjustifiable, beyond the extent provided by law and/or impractical to satisfy. Moreover, we reserve the right to dismiss the complaints subject to the extent provided by law; however, you may file a complaint to the Office of Data Protection Commissioner through the channel established by the announcement.

#### Cookies and Use of Cookie

We may collect, use and disclose the cookies and other similar tracking technologies when you use our services and products, including when using our website and application, for the following purposes:

To prevent you from fraudulent activities and to enhance the ongoing security.

To study how visitors use our website and application as well as other services so that we are able to make an appropriate improvement.

To make a decision on which of our products or services may relate to you

To tailor our marketing campaign that you may see on social media applications and websites.

You may deny all cookies through your browser setting; however, this setting may reduce full functionality of the use of our website and application.

#### Minors

We have no intention to collect personal data from minors, which means those who do not reach their legal age of 20 years old or who are not of their legal age by marriage as defined by the law, (“Minors”). We also have no intention to allow Minors to subscribe for using or purchasing our products, goods or services unless we obtain their sole consent (as permitted by the law) or we obtain consent from their parents or guardians who can act on behalf of the Minors or we could rely on other legal basis.

If you are parents of a Minor, or guardians who can act on behalf of the Minor and are aware that your Minor under your custody has provided us with his/her personal data, please contact us and that, in this regard, you may request for the exercise of your right within the scope of the Personal Data Protection Law and the provisions stipulated by

the other relevant Laws.

If you are a Minor and necessarily require to receive our services and products, we request you to ask for consent from your parents or your guardians who can act on behalf of you to give us your personal data by contacting us as detailed above.

In the event that the Company require a Minor' s consent in order to use personal data for the purpose that would not be permitted by the Minor' s sole consent in accordance with the provisions of the Civil and Commercial Code, the Company will obtain consent from the Minor' s parents or guardians who can act on behalf of the Minor subject to the criteria specified by the Personal Data Protection Law.

#### Use of Personal Data for the Original Purposes

We are entitled to collect and use your personal data which were previously collected by us before the effective date of the Personal Data Protection Law in connection with collection use and disclosure. We are able to continue collecting and using such personal data according to the original purposes. If you no longer wish us to continue collecting and using such personal data, you may make changes to your consent preference setting via the application you use.

#### Changes in Privacy Policy

We will update and alter this Privacy Policy from time to time to be compatible with the changing laws, regulations or operational requirements. We shall make the express announcements accordingly on our websites and/or notify you via e-mail. If you do not wish to acknowledge or accept any amendment to this Privacy Policy, you are entitled to cancel the use of our services.

#### \*Remarks

True Group Companies includes True Corporation Public Company Limited, True Move H Universal Communication Co Ltd., True Distribution & Sales Co Ltd., True Music Co Ltd., Telecom Asset Management CO Ltd., True International Communication Co Ltd., BFKT (Thailand) Co Ltd., Clearing House for Number Portability Co Ltd., True Vision Group Co Ltd., TrueVisions Public Company Limited, Cineplex Co Ltd., True Visions Cable Public Company Limited, Satellite Service Co Ltd., Panther Entertainment Co Ltd., AP&J Production Co Ltd., True Media Solutions Co Ltd., True United Football Club Co Ltd., SM True Co Ltd., Thai News Network (TNN) Co Ltd., True4You Station Co Ltd., True CJ Creation Co Ltd., True GC Co Ltd., True Touch Co Ltd., Asia Wireless Communication

Co Ltd., True Voice Co Ltd., True Multimedia Co Ltd., True Internet Corporation Co Ltd., True Life Plus Co Ltd., True Axion Interactive Co Ltd., Internet Knowledge Service Center Co Ltd., KSC Commercial Internet Co Ltd., True Internet Gateway Co Ltd., True E-Logistics Co Ltd., True Icontent Co Ltd., True Digital Park Co Ltd., True Internet Technology (Shanghai) Co Ltd, True Digital Group Co Ltd. (formerly named as “ True Digital and Media Platform Co Ltd.” ), Crave Interactive Limited, Crave Interactive B.V., Crave Interactive Inc, PT True Digital Indonesia, True Digital Philippines Inc., True Digital Vietnam Joint Stock Company, Telecom Holding Co Ltd., Bangkok Inter Teletech Public Company Limited, K.I.N. (Thailand) Co Ltd (registered overseas), MKSC World Dot Com Co Ltd., True Incube Co Ltd., True Trademark Holdings Company Limited, Gold Palace Investments Limited, Golden Light Co Ltd., Goldsky Co Ltd., Transformation Films Co Ltd., Queue Q (Thailand) Co Ltd., True-Kona Cayman GP and LINE Games-True-Kona Global Fund Limited Partnership.

As at present, the Privacy Policy has been last reviewed on 25 June 2021.