

Privacy Policy

Siam Rivea Company Limited (the “**Company**”, “**we**”, “**us**”, or “**our**”), as an operator of “*Blue by Alain Ducasse*” restaurant, respects the importance of the protection of your rights regarding information relating to any identified or identifiable natural person (“**Personal Data**”) from our products and services. We understand that you would like to receive the required level of protection as required by the Thai applicable data protection laws for how information about you is collected, used, disclosed, and/or transferred outside of Thailand. The information you share with us allows us to provide the products and services that suit your specific needs appropriately, both from the Company, affiliates and subsidiaries in the Siam Piwat group (“**Siam Piwat Group**”). We provide Personal Data protection measures which includes the protection of your Personal Data from being used without your consent beforehand.

This privacy policy (this “**Privacy Policy**”) applies to our retail stores, websites, mobile applications, social networking sites, online communication channels, rewarding programs, events and activities, and other locations where we collect your Personal Data. However, please read this Privacy Policy in conjunction with the terms and conditions of particular service that you use, which may set out separately regarding the Personal Data we collect about you.

We may amend or change this Privacy Policy at any time we deem necessary with or without notice, so we suggest you read this Privacy Policy every time before doing any transaction with us. We will also provide additional notice of significant updates to this Privacy Policy.

1. What Personal Data we collect

We may collect, maintain, and use the following types of information which may include your Personal Data, directly or indirectly, from you, other sources, or from Siam Piwat Group, business partners, and/or communications between us. The specific type of Personal Data collected will depend on the communication and interaction between you and us, including the services or products you desire from us and Siam Piwat Group.

- 1) **Personal details**, such as title, full name, gender, age, blood type, nationality, date of birth, educational background, occupation, position, workplace, information on government-issued cards (e.g., national identification number, passport number, driver’s license details, government official identification card, or similar identifiers), photograph, CCTV records, vehicle details (e.g., copy of vehicle registration book, license plate number, brand, and color) , and/ or other physical characteristics;
- 2) **Contact details**, such as postal address, delivery details, billing address, telephone number, email address, LINE ID, and/or other ID from social networking sites;
- 3) **Financial details**, such as credit card information (e.g., name and number on the credit card), financial status, income and/or other financial related information;
- 4) **Transaction details**, such as details about payment to and from you, payment date and time, purchased items, payment amount, branch that you received product or service, address/ date and time for pick up or delivery, acknowledgement of receipt, receipt, invoices, transaction history, and/or transaction status;

- 5) **Computer system, device and equipment details**, such as User ID, PIN, type of device, geography location, operating system, network information of the mobile, computer traffic information, and/or information of the use of service on website and application (e.g., searching history, date, and time);
- 6) **Behaviour details**, such as information about your behavior, lifestyle, opinion, interaction and/or your location data in our building;
- 7) **Membership details**, such as membership card number, membership password or username, purchasing behaviour, and/or other details of products and services you have purchased, filed complaints about, claimed, complimented, and suggested; and
- 8) **Marketing and communication details**, such as your preference in receiving marketing from the Company, Siam Piwat Group, third parties, business partners and/ or your communication preferences.

If you provide Personal Data of any third party to us (e.g., name, surname, address details, telephone number for emergency contact, family member income), please provide this Privacy Policy for their acknowledgement and/or obtaining consents where applicable.

We will only collect, use, and/or disclose sensitive data on the basis of your explicit consent or where permitted by law.

We only collect the information of children, quasi-incompetent persons, and incompetent persons where their parent or guardian has given their consent. We do not knowingly collect information from customers under the age of 20 without their parental consent when it is required, or from quasi-incompetent persons and incompetent persons without their legal guardian's consent. In the event we learn that we have unintentionally collected personal information from anyone under the age of 20 without parental consent when it is required, or from quasi-incompetent persons and incompetent persons without their legal guardians, we will delete it immediately or collect, use and/or disclose only part that we can rely on other legal bases apart from consent.

2. Why we collect, use, and/or disclose your Personal Data

2.1 The purpose of which you have given your consent:

- 1) **Marketing and Communications:** To provide marketing communication, privileges, sales, discounts, public relations, notices, news, promotions, special offers, campaign, events, marketing activities, advertisement and direct marketing and information about the products and services from the Company, Siam Piwat Group, and/or business partners which we cannot rely on other legal bases; and
- 2) **Data Analytics Businesses:** To conduct data analytics businesses.

2.2 The purposes we may rely on and other legal grounds for collection, use and/or disclosure of your Personal Data

We may also rely on (1) contractual basis, for our initiation or fulfilment of a contract with you; (2) legal obligation, for the fulfilment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties; (4) vital interest, for preventing or suppressing a danger to a person's life, body, or health; and/or (5) public interest, for the performance of a task carried out in the public interest or for the exercising of official authorities or other legal grounds permitted under applicable data protection law as the case may be, depending on the context of the interactions with us.

We may collect, use, and/or disclose your Personal Data for the following purposes:

- 1) To provide products and services to you**, such as to enter into a written or unwritten contract and manage our contractual relationship with you; to process on your member registration, card registration, purchasing and activation; to carry out contract details, financial transactions, and services related to payments; to provide updates on your orders; to remind you of your membership and gift voucher expiration; to check card balance and points collection; to offer and provide services or products related to financial products, banking loans, asset management, investments, insurance, electronic transactions, credit cards, cash cards, property, shipping, delivery services, travel services and travel agencies; to process on invoice and receipt issuance; to exchange or return purchased products and refund the purchased price; to redeem points for gifts; to grant you access and to provide free Wi-Fi within the building area; to allow you to park your vehicle and take your vehicle out of parking area in case of lost parking ticket/card; to facilitate you on business trips; to deliver or return your items in case of lost & found and/or to provide aftersales services;
- 2) Marketing and communications**, such as to communicate, provide marketing communication, offer, public relations, information dissemination, promotion, marketing privileges, and product display; to provide or support special activities, direct marketing, and/or invitation to participate in the activities for sale of products, services, or fame from the Company, Siam Piwat Group and/or business partners as you specify your needs or have received the service before, directly or indirectly, without relying on your consent;
- 3) Loyalty programs, rewarding programs, lucky draw and other offers**, such as to earn, redeem, and exchange points/coins; to provide product display, procurement and support, special activities, rewarding programs, point earning and redemption, lucky draw, and/or other related services;
- 4) Recommendations and personalization**, such as to recommend products and services that might be of interest to you; to identify your preferences, and/or personalize your experiences in order to provide suitable products or services to you;
- 5) Registration and authentication**, such as to register, verify, identify, and/or authenticate you or your identity;
- 6) To contact and communicate with you**, such as to communicate with you regarding products and services that you have received from us; to process and update your information; to handle customer service- related queries, requests, feedback, complaints, warranty claims, disputes and/ or indemnity;

- 7) **Profiling and data analytics**, such as to analyse your Personal Data (e.g., your behaviour, purchased products and services, purchased price, locations) for marketing activities, and development of our products and services; to conduct a profiling and data cleansing; to conduct market research, survey, behaviour tracking, statistics, segmentation, and consumption trends; to improve business performance and better adapt our content to your identified preferences; to forecast the product demands; to determine the effectiveness of our promotional campaigns; For such purposes, we will collect and disclose your Personal Data for your interests and benefits, or for legitimate interests or business operations of the Company, Siam Piwat Group, and/or business partners, where such interests and businesses are not overridden by your fundamental rights to Personal Data;
- 8) **To improve business operations, products, and services**, such as to manage and improve our services, products, and business operations for you and all customers within the Company, Siam Piwat Group, and business partners; to assure quality of our products and service; to conduct legal consulting; to create dashboard and customer-spending reports; to identify and resolve of issues which may occur from our existing products and services; to track, manage and facilitate your experience on our sites, application and platform, and/or to provide additional offer and services which may occur in the future;
- 9) **To learn more about you**, such as to learn more about the products and services you have received, and other products and services you may be interested in receiving, for example, by looking at the types of products and services that you have received from us, how frequently you access our building, and how you would like to be contacted; to learn more from your satisfactions, compliments, suggestions, and/or complaints;
- 10) **Compliance with regulatory and compliance obligations**, such as to comply with legal obligations, legal proceedings, or government authorities' orders; to cooperate with courts, regulators, government authorities, and law enforcement bodies when we reasonably believe we are legally required to do so, and when disclosing your Personal Data is strictly necessary to comply with the said legal obligations, proceedings, or government orders; to handle tax payment, VAT refunds, and/or other fees;
- 11) **Protection of our interests**, such as to protect the security and integrity of our business; to exercise our rights or protect our interests where it is necessary and lawful to do so, for example, to detect, prevent, and respond to fraud claims, intellectual property infringement claims, legal proceedings or violations of law; to manage and prevent loss of our assets and property; to secure the compliance of our terms and conditions; to process on IT security and IT system operation; to detect and prevent misconduct within our organizations which includes our use of CCTV; to follow up on incidents, and/or to prevent, and report criminal offences;
- 12) **Fraud detection**, such as to detect and prevent the use of the service without permission, or fraudulent or illegal means; to conduct legal and other regulatory compliance checks (e.g., to comply with anti-money laundering regulations); to perform internal audits and record checks, and other business controls;
- 13) **Corporate transaction**, such as in the event of sale, transfer, merger, reorganization, or similar event we may transfer your information to one or more third parties as part of that transaction; and/or
- 14) **Life**, to prevent or suppress a danger to a person's life, body, or health.

If you fail to provide your Personal Data when requested, we may not be able to provide our products and services to you.

3. To whom we may disclose or transfer your Personal Data

We may disclose or transfer your Personal Data to the following third parties who collect, use and/or disclose Personal Data in accordance with the purposes under this Privacy Policy. These third parties may be located in Thailand or outside of Thailand. You can visit their privacy policies to learn more on how they collect, use, and/or disclose your Personal Data as you are also subject to their privacy policies.

3.1 Siam Piwat Group

As Siam Rivea Company Limited is part of Siam Piwat Group which all collaborate and partially offer services, products, and systems to customers, including website-related services and systems, we may need to transfer your Personal Data to, or otherwise allow access to such Personal Data, by other companies within Siam Piwat Group for the purposes set out in this Privacy Policy. This will allow other companies in Siam Piwat Group to rely on consent obtained from the Company as well. Nevertheless, we will protect your information and disclose your Personal Data to provide interests to you from receiving services from Siam Piwat Group.

3.2 Our service providers

We may use other companies, agents, or contractors to perform services on behalf of the Company or to assist with the provision of products and services to you. We may share your Personal Data to our service providers or third-party suppliers, including, but not limited to (1) bank and financial institution; (2) logistic and courier service providers; (3) marketing, advertising media, and communications agencies; (4) event organizers; (5) telecommunications and communication service providers; (6) outsourced administrative service providers; (7) data storage and cloud service providers; (8) insurance company; (9) risk management service provider; (10) travel agencies; (11) building renovator; (12) gift card issuance service provider; and/or (13) internet, software, digital media, IT system service providers, and IT support company.

In the course of providing such services, the service providers may have access to your Personal Data. However, we will only provide our service providers with the Personal Data that is necessary for them to perform the services, and we ask them not to use your information for any other purposes. We will ensure the service providers we work with will comply with the requirements under the data protection laws.

3.3 Our business partners

We may transfer your Personal Data to our business partners. We may cooperate with our business partners (e.g., shop tenants, rewarding program partners, credit card partners), whom we may jointly offer products or services, or whose products or services may be offered to you.

3.4 Third party sites

We may have advertisements which link to the other websites, mobile applications, social networking sites, online communication channels and such website, mobile application, social networking site, online communication channel may have its own terms of use or policy related to the use of the service and privacy policy which differ from the Company's Privacy Policy and terms of use. We suggest you review such terms of use or privacy policy of such website personally.

3.5 Third parties required by law

In certain circumstances, we may be required to disclose or share your Personal Data in order to comply with legal or regulatory obligations. This includes any law enforcement agency, court, regulator, government authority or other third parties where we believe it is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise address fraud, security, or safety issues.

3.6 Professional advisors

This includes legal consultants, auditors or other consultants who assist in running our business, and the defending or bringing of any legal claims.

3.7 Assignee of rights and/or obligations

Third parties as our assignee, in the event of any reorganization, merger, business transfer, whether in whole or in part, will comply with this Privacy Policy to respect your Personal Data.

3.8 Other third parties

We may disclose Personal Data under legal bases for the purposes specified in this Privacy Policy to other third parties, such as, individuals, complainants, or any third party who requests to obtain the information from the CCTV records, etc. as the case may be.

4. The collection of the Personal Data of Siam Gift Card's customers

We may collect your Personal Data from the business provider who is licensed to undertake the electronic payment services for the issuance of electronic gift card under "**Siam Gift Card**", for the purposes of providing electronic gift card services, including the communications, marketing, provision of privileges to you, and other purposes under this Privacy Policy. We will request your consent where it is required by law.

5. International transfers of your Personal Data

We may disclose or transfer your Personal Data to third parties or servers located overseas, which the destination countries may or may not have the same data protection standards. We take steps and measures to ensure that your Personal Data is securely transferred and that the receiving parties have in place suitable data protection standards or other derogations as allowed by laws. We will request your consent where consent to cross-border transfer is required by law.

6. How long do we keep your Personal Data

We shall retain your Personal Data for as long as is reasonably necessary to fulfil the purpose for which we obtained it, and to comply with our legal and regulatory obligations. However, we may have to retain your Personal Data for a longer duration, as required by applicable law.

7. Cookies and cache file and how they are used

If you visit our websites and applications, we will track, collect, and record certain Personal Data by using cookies or other tracking technology. For the applications, cookies will start tracking when you log into the applications, where cookies will remember you and keep you logged in with your username and password every time you use the application unless you log out. In case we have no control over cookies, we will not collect information from cookies or access to cookies.

We shall use a cache data to record your data. In case you use other devices to connect with our websites or applications, your data may be stored and recorded in form of a cache file, or the part of your data might be duplicated on the computer or mobile device for using next time, provided that we have no control related to the data or access of the cache file.

8. Your rights as a data subject

Subject to applicable laws and exceptions thereof, you may have the following rights to:

- 1) **Right to access:** You may have the right to access or request a copy of the Personal Data we are collecting, using, and/or disclosing about you. For your own privacy and security, we may require you to prove your identity before providing the requested information to you.
- 2) **Right to rectification:** You may have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data that we collect, use, and disclose about you rectified.
- 3) **Right to data portability:** You may have the right to obtain Personal Data we hold about you, in a structured, electronic format, and to send or transfer such Personal Data to another data controller, provided, that (a) such Personal Data shall be Personal Data you have provided to us, and (b) we have obtained your consent for collecting, using, and/or disclosing such Personal Data, or for performing our contract with you.
- 4) **Right to objection:** You may have the right to object to certain collection, use, and/or disclosure of your Personal Data, such as objecting to direct marketing.
- 5) **Right to restriction:** You may have the right to restrict the use of your Personal Data in certain circumstances.
- 6) **Right to withdraw consent:** For the purposes you have consented to our collecting, using, and disclosing of your Personal Data, you have the right to withdraw your consent at any time.
- 7) **Right to deletion:** You may have the right to request that we delete or de-identify Personal Data that we collect, use, and disclose about you. However, we are not obligated to do so if we need to

retain such data in order to comply with legal obligations or to establish, exercise, or defend legal claims.

- 8) Right to lodge a complaint:** You may have the right to lodge a complaint to the competent authority where you believe our collection, use, and/or disclosure of your Personal Data is unlawful or noncompliant with applicable data protection law.

9. Security Measures

We maintain appropriate security measures for Personal Data, which cover administrative, technical and physical safeguards in relation to access control to protect the confidentiality, integrity, and availability of Personal Data against any accidental loss or unlawful or unauthorized access, use, alteration, correction or disclosure of Personal Data, in compliance with the applicable laws.

We have implemented measures on controlling access and use of devices for storing and processing Personal Data which are secured and suitable for our collection, use and disclosure of Personal Data. We also have measures on restricting access to Personal Data and the use of storage and processing equipment by imposing users' access rights, users' permission rights to the authorized personnel, and users' duties and responsibilities to prevent unauthorized access, disclosure, perception or unlawful duplication of Personal Data, or theft of device used to store and process Personal Data. This includes measures on the re-examination in relation to access, alteration, erasure, or transfer of Personal Data which are in accordance with methods and channels used to collect, use or disclose Personal Data.

10. Our Contact Details

If you wish to contact us to exercise the rights relating to your Personal Data or if you have any queries about your Personal Data under this Privacy Policy, please contact us or our Data Protection Officer at:

1) Siam Rivea Company Limited

- No. 989, Siam Piwat Tower, Rama 1 Road, Pathumwan, Bangkok 10330
- Contact Number: 02-658-1000 ext. 5148 / E-mail: dpoteam@siampiwat.com

2) Data Protection Officer

- Ketsirin Karnchanaphakul
- No. 989, Siam Piwat Tower, Rama 1 Road, Pathumwan, Bangkok 10330
- Contact Number: 02-658-1000 ext. 5148 / E-mail: ketsirin.k@siampiwat.com
