

## Privacy Policy

We, Origin Property Public Company Limited and its affiliates (hereinafter called “ORI”), take our user’s privacy seriously and we will only collect, record, hold, store, disclose, transfer and use your personal information when using our service and browsing [www.origin.co.th](http://www.origin.co.th), as outlined below.

Data protection is a matter of trust and your privacy is important to us. We shall therefore only use your name and other information which relates to you in the manner set out in this Privacy Policy. We will only collect information where it is necessary for us to do so and we will only collect information if it is relevant to our dealings with you.

We will only keep your information for as long as we are either required to by law or as is relevant for the purposes for which it was collected.

You can visit the Platform (as defined in the Terms of Use) and browse without having to provide personal details. During your visit to the Platform you remain anonymous and at no time can we identify you unless you have an account on the Platform and log on with your username and password.

If you have any comments, suggestions or complaints, you may contact us (and our Data Protection Officer) at ORI Call Center 02 0300000

### Collection of Personal Information

When you create an ORI account, or otherwise provide us with your personal information through the Platform, the personal information we collect may include yours:

- Name
- Email
- Contact Number
- Mobile phone number

You must only submit to us, our authorized agent or the Platform, information which is accurate and complete and not misleading and you must keep it up to date and inform us of changes (more information below). We reserve the right to request for documentation to verify the information provided by you. We will only be able to collect your personal information if you voluntarily submit the information to us. If you choose not to submit your personal information to us or subsequently withdraw your consent to our use of your personal information, we may not be able to provide you with our Services. You may access and update your personal information submitted to us at any time as described below. If you provide personal information of any third party to us, we assume that you have obtained the required consent from the relevant third party to share and transfer his/her personal information to us.

If you sign up for our services using your social media account or link your account to your social media account or use certain other social media features provided by us, we may access information about you which you have voluntarily provided under your social media account via that social media provider in accordance with the provider's policies and we will manage your personal data which we have collected in accordance with ORI’s privacy policy.

### Use and Disclosure of Personal Information

The personal information we collect from you will be used, or shared with third parties (including related companies, third party service providers, and third party sellers), for some or all of the following purposes:

- To facilitate your use of the Services (as defined in the Terms of Use) and/or access to the Platform;
- To process orders you submit through the Platform, whether the products provided by ORI or a third party seller. Payments that you make through the Platform for products, whether sold by ORI or a third party seller, will be processed by our agent;
- To compare information, and verify with third parties in order to ensure that the information is accurate;
- Further, we will use the information you provide to administer your account (if any) with us; verify and carry out financial transactions in relation to payments you make online; audit the downloading of data from the Platform; improve the layout and/or content of the pages of the Platform and customise them for users; identify visitors on the Platform; carry out research on our users' demographics and behavior; provide you with information we think you may find useful or which you have requested from us, including information about our or third party sellers' products and services, provided you have indicated that you have not objected to being contacted for these purposes;
- When you register an account with ORI or otherwise provide us with your personal information through the Platform, we will also use your personal information to send you marketing and/or promotional materials about our or third party sellers' products and services from time to time. You can unsubscribe from receiving marketing information at any time by using the unsubscribe function within the electronic marketing material. We may use your contact information to send newsletters from us and from our related companies; and
- In exceptional circumstances ORI may be required to disclose personal information, such as when there are grounds to believe that the disclosure is necessary to prevent a threat to life or health, for law enforcement purposes, or for fulfillment of legal and regulatory requirements and requests.;

ORI may share your personal information with third parties and our affiliates for the abovementioned purposes, specifically, completing a transaction with you, managing your account and our relationship with you, marketing and fulfilling any legal or regulatory requirements and requests as deemed necessary by ORI. In sharing your personal information with them, we endeavor to ensure that the third parties and our affiliates keep your personal information secure from unauthorised access, collection, use, disclosure, or similar risks and retain your personal information only for as long as they need your personal information to achieve the abovementioned purposes.

ORI does not engage into the business of selling customers' personal information to third parties.

### **Withdrawal of Consent**

You may communicate your objection to our continual use and/or disclosure of your personal information for any of the purposes and in the manner as stated above at any time by contacting us at our e-mail address below. Please note that if you communicate your objection to our use and/or disclosure of your personal information for the purposes and in the manner as stated above, depending on the nature of your objection, we may not be in a position to continue to provide our products or services to you or perform on any contract we have with you. Our legal rights and remedies are expressly reserved in such event.

### **Updating or changing your personal information**

You can update or change your personal information anytime by accessing your account on the ORI's Platform. If you do not have an account with us, you can do so by contacting us at our ORI Call Center 02 0300000.

We take steps to share the updates to your personal information with third parties and our affiliates with whom we have shared your personal information if your personal information is still necessary for the above stated purposes.

## **Security of Your Personal Information**

ORI ensures that all information collected will be safely and securely stored. We protect your personal information by:

- Restricting access to personal information
- Maintaining technology products to prevent un-authorized computer access
- Securely destroying your personal information when it is no longer needed for any legal or business purpose

If you believe that your privacy has been breached by ORI, please contact us at our e-mail address below. Your password is the key to your account. Please use unique numbers, letters and special characters, and do not share your ORI password to anyone. If you do share your password with others, you will be responsible for all actions taken in the name of your account and the consequences. If you lose control of your password, you may lose substantial control over your personal information and other information submitted to ORI. You could also be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason or if you have grounds to believe that your password has been compromised, you should immediately contact us and change your password. You are reminded to log off of your account and close the browser when finished using a shared computer. ORI or our authorized service providers may use cookies, and other similar technologies for storing information to help provide you with a better, faster, safer and personalized experience when you use the Services and/or access the Platform.

When you visit ORI's servers, our company servers will automatically record information that your browser sends whenever you visit a website. This data may include:

- Your computer's IP address
- Browser type
- Webpage you were visiting before you came to our Platform
- The pages within the Platform which you visit
- The time spent on those pages, items and information searched for on the Platform, access times and dates, and other statistics.

This information is collected for analysis and evaluation in order to help us improve the Platform and the services and products we provide.

Cookies are small text files (typically made up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message. They allow us to recognize a particular device or browser and help us to personalize the content to match your preferred interests more quickly, and to make our Services and Platform more convenient and useful to you.

You may be able to manage and delete cookies through your browser or device settings. For more information on how to do so, visit the help material of your browser or device.

Web beacons are small graphic images that may be included on our Service and the Platform. They allow us to count users who have viewed these pages so that we can better understand your preference and interests.

## **No Spam, Spyware, or Virus**

Spam, spyware or virus is not allowed on Platform. Please set and maintain your communication preferences so that we send communications to you as you prefer. You are not licensed or otherwise

allowed to add other users (even a user who has purchased an item from you) to your mailing list (email or physical mail) without their express consent. You should not send any messages which contain spam, spyware or virus via the Platform. If you would like to report any suspicious messages, please contact us at our email address below.

### **Changes to the Privacy Policy**

ORI shall regularly review the sufficiency of this Privacy Policy. We reserve the right to modify and change the Privacy Policy at any time. Any changes to this policy will be published on the Platform.

### **ORI's Right**

YOU ACKNOWLEDGE AND AGREE THAT ORI HAS THE RIGHT TO DISCLOSE YOUR PERSONAL INFORMATION TO ANY LEGAL, REGULATORY, GOVERNMENTAL, TAX, LAW ENFORCEMENT OR OTHER AUTHORITIES OR THE RELEVANT RIGHT OWNERS, IF ORI DIGITAL HAS REASONABLE GROUNDS TO BELIEVE THAT DISCLOSURE OF YOUR PERSONAL INFORMATION IS NECESSARY FOR THE PURPOSE OF MEETING ANY OBLIGATIONS, REQUIREMENTS OR ARRANGEMENTS, WHETHER VOLUNTARY OR MANDATORY, AS A RESULT OF COOPERATING WITH AN ORDER, AN INVESTIGATION AND/OR A REQUEST OF ANY NATURE BY SUCH PARTIES. TO THE EXTENT PERMISSIBLE BY OR APPLICABLE LAW, YOU AGREE NOT TO TAKE ANY ACTION AND/OR WAIVE YOUR RIGHTS TO TAKE ANY ACTION AGAINST ORI. FOR THE DISCLOSURE OF YOUR PERSONAL INFORMATION IN THESE CIRCUMSTANCES.

### **Contacting ORI**

If you wish to withdraw your consent to our use of your personal information, request access and/or correction of your personal information, have any queries, comments or concerns, or require any help on technical or cookie-related matters, please feel free to contact us (and our Data Protection Officer) at ORI Call Center 02 0300000

#### **A. COLLECTION OF PERSONAL DATA**

We may obtain your Personal Data from various sources (e.g. from you or through third parties), including:

1. Information obtained (directly or indirectly) when you register as a user of ORI payment account, including your name, address, telephone number, email address and device information (collectively, "Registration Information").
2. Information obtained (directly or indirectly) during your use of ORI payment account, including your bank account numbers, billing and delivery information, billing address, transaction data, credit/debit card numbers and expiration dates and other information from cheque or money orders (collectively, "Account Information").
3. Registration Information, Account Information or other information may be accessed or collected (automatically or manually) during your registration as a user of ORI payment account and/or using of ORI payment account.

The above information obtained by us may constitute your Personal Data. We have taken steps to ensure that we do not collect more information (whether or not such information constitutes Personal Data) from you than is necessary for us to provide you with our services, to perform the functions set out in Part B of this notice, to protect your account, comply with our legal obligations, protect our legal rights, and to operate our business.

## **B. USE OF PERSONAL DATA**

We may use the Personal Data that we obtain about you for the following purposes:

1. Verifying your identity, including during your registration as a user of ORI payment accounts.
2. Verifying your eligibility to register as a user of ORI payment account or to use any of the features and functions of ORI payment accounts.
3. Processing your registration as a user, allowing you to log-in using your ORI log-in ID and maintaining and managing your registration.
4. Providing you with ORI payment account and related customer services, including facilitating the settlement of purchase services and products, sending notices about your transactions, and responding to your queries, feedback, claims or disputes.
5. Improving, and expanding our offerings by way of research and development of new functions of, your ORI payment account or other new products and services that we may offer from time to time.
6. Performing research, statistical analysis or surveys, whether verbal or written, in order to manage and protect our business including our information technology infrastructure, to measure the performance of ORI payment accounts and other services we offered and to ensure your satisfaction with our services.
7. Analyzing trends, usages and other behaviors (whether on an individualized or aggregated basis), which helps us better understand how you and our collective user base access and use of ORI payment account and the underlying activities conducted, including for purposes of improving our services and responding to customer queries and preferences.
8. Managing risk, performing creditworthiness and solvency checks, or assessing, detecting, investigating, preventing and/or remediating fraud or other potentially prohibited or illegal activities and otherwise protecting the integrity of our payment platform.
9. Detecting, investigating, preventing or remediating violations of the Terms and Conditions, any applicable internal policies, relevant industry standards, guidelines, laws or regulations.
10. Making such disclosures as may be required by any law or regulation of any country applicable to us or our affiliate, government official or other third party, including any card association or other payment network. Disclosures may also be made pursuant to any subpoena, court order, regulatory requests or other legal process or requirement in any country applicable to us or our affiliate.
11. Making any disclosure to prevent any harm or financial loss, to report any suspected illegal activity or to deal with any claim or potential claim brought against us or our affiliates.
12. Any other legitimate business purposes, such as protecting you and other users of ORI payment accounts from losses, protecting lives, maintaining the security of our systems and products, and protecting any of our other rights and/or properties.

We may also use your Personal Data in other ways for which we provide specific notice at the time of collection or for which you have subsequently consented.

## **C. DISCLOSURE OF PERSONAL DATA**

Your Personal Data held by ORI will be kept confidential but ORI may provide such information to the following parties (whether within or outside your country of residence) for the purposes set out in B above:

1. The company wholly or partly owned by ORI
2. ORI and its group companies.
3. Any agent, contractor or third party service provider that we work with in providing you with our services, including for fraud prevention, bill collection, data entry, database management, promotions, marketing, customer service, technology services, products and services alerts and payment extension services.
4. Entities with whom ORI maintain business referral or other commercial arrangements, including third parties and entities belonging to ORI.
5. Merchants and other organizations, such as card associations, payment networks or financial institutions, to whom or through which payments are made using the ORI payment account, or such other entities to enable your use of the ORI payment account.
6. Third party financial institutions, banks, collection agents and credit agencies.
7. Professional advisers, law enforcement agencies, insurers, government and regulatory authorities or any other organizations to which ORI is under an obligation to make disclosures under the requirements of any applicable law, regulation or commercial arrangement, including arrangements with any card association or payment network.

#### **D. SECURITY MEASURES AND RETENTION**

We take all reasonable steps, including technical, administrative and physical safeguards to help protect your Personal Data that we process from loss, misuse and unauthorized access, disclosure, alteration and destruction.

We will retain and procure our service providers to retain your Personal Data only for so long as is necessary for the purposes set out in this notice and in accordance with all ORIplicable laws and regulatory requirements.

We recommend that you do not divulge your password to anyone. Our personnel will never ask you for your password in an unsolicited phone call or in an unsolicited email. If you share a computer with others, you should not save your log-in information (e.g., user ID and password) on that shared computer.

#### **E. INTERNATIONAL DATA PROCESSING**

Your Personal Data may be processed outside your country of residence (including outside Thailand), wherever ORI, other members of the ORI Group, and other third parties to whom we may disclose Personal Data under C above operate. The countries where your Personal Data may be processed may not have the same data protection laws as the laws of your country of residence (including Thailand).

#### **F. THIRD PARTY SERVICES AND WEBSITES**

ORI payment account may provide links to other websites and services (including apps operated by third parties) for your convenience and information. These services and websites may operate independently from us and may have their own privacy notices or policies, which we strongly suggest you to review before you use any of their services or conduct any activities on those websites. To the

extent that any linked websites you visit are not owned or controlled by us, we are not responsible for their contents, their privacy practices and the quality of their services.

**G. CHANGES TO THIS NOTICE**

ORI reserves the exclusive right to change, amend or revise this notice from time to time.

**H. FURTHER INFORMATION**

If you wish to contact us, including if you wish to exercise any rights you may have under applicable law (such as exercising any right to opt-out of data processing), please do so by contacting the Data Protection Officer by the following means: ORI Call Center 02 0300000

ORI may charge a reasonable fee for processing any of your requests if permitted by applicable law.