

Announcement of SWITCH UNIVERSAL CO., LTD.

October 1, 2024

Personal Data Protection Policy

SWITCH UNIVERSAL CO., LTD. (“SWITCH”, “Company” or “The Company”) recognizes the importance of protecting your personal information. (as defined below) in this Privacy Policy (the “Policy”) describes the collection, use, disclosure and/or international transfer of your Personal Data obtained from various sources, as well as your rights. and practices regarding such information.

1.) About the Company

SWITCH is the data controller who collects, uses and discloses your personal data.

SWITCH UNIVERSAL CO., LTD. is a juristic person incorporated under the laws of Thailand. Its head office is located at:

199/231 Soi Ruam Mit Phatthana Yaek 10 ,Khwaeng Tha Raeng, Khet Bang Khen, Krung Thep Maha Nakhon 10220.

2.) How to contact the company

If you have any further questions or want to exercise your rights under this policy, you can contact the company.

Website : <https://switch-zev.com//en/pdpa-en/>

Email to the company at : Support@switchzev.com

by telephone, contact the company at the number : 02-007-2113 (Customer Service Center, working hours: Mon. – Fri. 8.30 a.m. – 5.00 p.m.)

Postal Mail to : SWITCH UNIVERSAL CO., LTD (Head Office)

Unit 123, 24th FL. Chamchuri Square ,

Phayathai Rd, Phatumwan Bangkok 10330

3.) What is personal information?

“**Personal Information**” means any information about an individual. which makes it possible to identify that person either directly or indirectly but does not include the information of the deceased in particular.

4.) What personal data is collected

- 4.1) The personal information we collect depends on your relationship with us. and services or products you need from the company Personal data about you that the Company may collect, use, disclose and/or transfer internationally. Including but not limited to the following types of personal data:
 - (a) personal details such as title, first name, last name, gender, age, occupation, job title, workplace, position, education, nationality, date of birth, marital status Government-issued card information (e.g. ID number, passport number taxpayer identification number product driver’s license information, etc.), signatures, sound recordings Recording of telephone conversations, photographs, CCTV recordings, household registration and other identity information.
 - (b) contact details such as address, telephone number fax number Location information, email address, LINE ID, Facebook account, Instagram ID, and other IDs from social networking sites.
 - (c) product details, such as serial numbers. Product license plate number Make Model Year Color Engine number vehicle chassis number product type Mileage in kilometers, battery, voltage, brake wear. Location and movement information (e.g. time, location, speed), product insurance details Details of accessories such as transceivers, SIM cards, details of information obtained from the use of the service, GPS information and the location of the product. and other product-related information such as maintenance information. and repair information, etc.
 - (d) transaction details such as payment details Date and/or time of payment Payment amount, payment method, details about refund request, registration, interest, installments and number of installments. Application form, subscription form, acknowledgment form, receiver’s signature Receipts, invoices, transactions, transaction history, transaction status and other details of the services or products you have purchased.
 - (e) Marketing and communication details, such as your options to receive marketing information from the Company. Our affiliates, partners and your communication choices
 - (g) profile details such as service accounts Registered name or application user name, history of using services and products of the company, photographs, contact history complaint history Your interests, needs, feedback and responses to the satisfaction questionnaire.

- (h) Technical details such as Internet Protocol (IP) address, browser type and version. Your browsing behavior and patterns; cookies; device ID; device model and device type; Time and place of access
 - 4.2) Provision of personal information of other persons such as name, surname, address details and a telephone number for emergency contact to the company. or family members who use your car You must ensure that you have the authority to do so and that the Company is legally permitted to use their personal information in accordance with this Policy. to them for their acknowledgment and/or their consent. (or use other legal grounds as an exception to consent) to deliver such information to the Company in accordance with this policy.
- 4.3) The company will not use personal data that is sensitive such as race, ethnicity, political opinions. doctrine religion or philosophy sexual behavior Criminal record Health information Disability union information Genetic information, biological information, etc., unless the law allows the company to do so. or when you have given your explicit consent

You must ensure that all personal information provided is complete, accurate and truthful.

5.) Method of receiving and collecting personal information

The Company may obtain and collect your personal information in the following ways:

- (a) Personal Data You Provide to the Company: You may provide your Personal Data directly to the Company. It will happen when you contact the company when making inquiries. Fill out online forms or fill out paperwork. Applying for membership or registering to receive or request information about products, services or benefits from the Company, or when you give feedback to the Company.
- (b) Personal Information We Automatically Collect From You: We may collect certain technical information about your device. your browsing behavior and style which are personal data stored by cookies (Cookies) and other similar technologies, which the Company will notify you before use.
- (c) Personal Information Obtained From Third Parties: Sometimes we obtain personal information about you from others, such as our affiliates. product distributor company service provider or company partners If those companies are permitted to disclose your personal information to them in accordance with their privacy policies. and/or that you have given your consent to disclose information
- to such person as the case may be

6.) Purposes and legal bases for collecting, using and disclosing personal data

6.1)The Company collects, uses and discloses personal information for the following purposes. (collectively referred to as “Purpose”)

- (a) To provide products and services to you: to administer enter into a contract and perform the duties of the company according to the contract or any obligations that the Company has with you or the organization you represent, such as a trial product delivery Compliance with product sales contracts payment related services This includes reviewing, confirming and canceling transactions. Product Warranty Insurance negotiations and other services related to insurance Registration of services related to other products and services after sales service To locate your products, to provide services to you, such as emergency assistance. Services to facilitate and solve various problems, as well as check history and product information. to process payments for the use of the Services; to issue receipts, outstanding amounts, invoices and proof of purchase; Including providing other services according to the company and the dealer. as a service provider or requested by you, etc.
- (b) Registration and Verification: To conduct verification and verification of your identity. To register and access various services from the company
- (c) to improve business operations Products and Services: To assess, analyze, administer, improve, conduct research, plan, conduct surveys and statistical analysis. to develop the system Quality and safety of the company’s products and services, such as satisfaction with the product. Distributors’ satisfaction with sales of products or services. to assess the effectiveness of the Company’s products, digital media and marketing campaigns; consumption patterns and trends, behavior, etc., as well as information about your preferences and interest in the Company’s products or services. or to create aggregated and anonymous reports. to know the problem and how to fix it or for employee training and evaluation of the performance of employees to improve business products and services
- (d) to manage relationships with you: to communicate with you about the products and services you receive from the Company; Affiliates product distributor company service provider or from the Company’s business partners to notify you, including notification of renewal of use To process and update your information as a member of the company. To provide you with information about the products you use. Provide travel reports and check status and product information. To maintain relationship with the company’s customers To facilitate you in using products and services in order to provide assistance, coordination, listening to opinions or responding to inquiries related to the Company’s products and services.
- (e) Marketing and Communications: To inform news. public relations, communication and promotion of products or services of the Company and/or

product distributor Service providers of the company, partner companies, to send letters inviting you to attend company events. through the Company's contact channels and/or product distributor Service providers of the company, partner companies, including websites, email, telephone, fax, post, SMS, MMS or various social media, etc.

- (f) Information technology management: to administer information technology operations communication system management Information technology security and auditing and auditing of information technology security Business Management for Compliance, Policies and Internal Procedures
- (g) Legal Compliance: To comply with laws, regulations, rules, orders, requirements and statutory obligations of the Company.
- (h) Risk: To manage risk, review performance. and assess risks
- (i) Protecting the interests of the company: for security purposes such as taking pictures and recording videos. To exercise our rights and protect our interests when necessary and lawfully, for example, to detect, prevent and respond to complaints. to manage and prevent the loss of assets To detect and prevent wrongdoing within the company's premises or computer systems.
- (j) Fraud detection: to verify your identity. to verify compliance with other laws and regulations (e.g. to comply with anti-money laundering regulations); and anti-fraud) including conducting internal audits and records. property management Database of fraud, systems and other business controls
- (k) Corporate Transactions: In the event of a sale, transfer, merger, rehabilitation, or other similar cases The Company may send or transfer your information to one or more third parties as part of such processing.
- (l) life: to prevent or suppress a danger to a person's life, body or health

6.2) The Company collects, uses, discloses and/or transfers your personal data under legal criteria or bases. one of the following

- (a) to comply with the laws to which the Company is subject
- (b) to perform the contract you or the organization you represent As a party to a contract with the Company or to be used to process your request before entering into that contract
- (c) it is necessary for the legitimate interests of the Company and third parties
- (d) to prevent or suppress a danger to a person's life, body or health
- (e) for the public interest for carrying out missions in the public interest or the exercise of the rights of government officials
- (f) In the event that your consent is required for certain activities related to the collection, use or disclosure of your personal data. The company will ask for your consent before using your personal data.

6.3) In the event that the Company may use your personal data for other operations not specified above The Company will provide a notice to you for further information. It will indicate the information used in connection with such operations and will ask for your consent first in the event that your consent is required.

6.4) In the event that the company needs to collect personal data from you in order to comply with the law or contract or it is necessary to provide personal data to enter into a contract. then you may not provide personal information to the Company upon request The Company may not be able to fulfill the above related objectives.

7.) Disclosure of Personal Information

- 7.1) The Company may disclose your personal information to third parties who collect it. use or disclose personal information For the purposes of this Policy, you may read the privacy policies of those third parties to learn more about how they collect. can use or disclose your personal information You, too, are subject to those separate privacy policies.
- 7.2) The Company may disclose your personal information under the purposes of to the following third parties
 - (a) as it may be necessary for the Company to transfer your personal data to our affiliates; and/or business partners business partners
 - (b) Company Service Providers: The Company may share your personal information with third party service providers or service providers to perform services on our behalf or to assist in providing products and services to.
 - (c) Business Partners of the Company: Both domestic and international, such as financial institutions. retail business telecommunication business restaurant business, etc. that the company may jointly offer or offer products or services to you
 - (d) Third parties as required by law: In some cases, the Company may be required to disclose or share your personal information in order to comply with the law. This includes compliance with law enforcement agencies, courts, officials, government authorities or other third parties where the Company believes it is necessary to comply with a legal or regulatory obligation. or to protect the rights of the Company other person's rights or for personal safety or to investigate, prevent, or address fraud issues. or security or safety
 - (e) Counsel: This includes an attorney. technical staff and auditors who assist in the business operations of the company and exercise legal claims and defend legal claims.
 - (f) Assignee of rights and/or obligations: In the case of business rehabilitation merger All or part of a business transfer, sale, purchase, joint venture, grant, transfer or disposal of all or part of a business, property or stock or any other similar transaction.
- 7.3) The Company may disclose your personal information to third parties where required or permitted by law. Therefore, if the law requires your consent The company will ask for your consent first.

8.) Transfer and protection of personal data

- 8.1) Because the company Your personal information may be transferred or transferred between affiliated companies. and/or partners, alliances for the collection, use and disclosure of personal data under the above purposes. so that you can access the services of the company to provide customer care to make decisions about improving the Service; for content development or for other purposes specified in this policy
- 8.2) When your personal data is transferred to affiliated companies And / or business partners, alliances, the company will comply with the laws related to your personal information. Including the company will follow security measures to ensure that there is an adequate level of protection for your personal data. and the company will also ensure that Overseas data transferees will protect your personal data with the same protection standards as protection under the laws of Thailand. if necessary
- 8.3) In the event that the Company needs to transfer your personal data to foreign countries If the company finds that the personal data protection standards in foreign countries are inadequate in accordance with the rules for personal data protection announced by the Commission The Company will obtain your consent or rely on other relevant legal bases as permissible in order to transfer your Personal Data out of Thailand.

9.) Data storage period

- 9.1) The company will keep personal data for as long as necessary. to carry out the purposes set out in this policy and according to the duties of the company under the law After your personal data is no longer necessary or legal to be able to collect. The Company will delete or destroy that personal information. without notifying you
- 9.2) The retention period may differ depending on the purpose of collecting personal data. In the event that personal information will be used for a short period of time, for example, for a particular task marketing activities or for recruitment purposes The Company may delete or destroy such information after the expiration of such period.
- 9.3) You have the right to have the Company delete, destroy or make your personal data in some cases non-identifiable. Unless the company has a necessity to keep your personal data as required by law.

10.) Minor Privacy Policy Virtually incompetent and incompetent person

products Our Services and Websites do not aim or knowingly collect personal information from minors under 20 years of age, quasi-incompetent persons or persons under the age of 20.

and incompetent persons If you are a minor incompetent person or incompetent persons who wish to contact the Company You must obtain parental consent as required by law. legal guardian or guardian before contacting the Company or providing your Personal Data to the Company

11.) SWITCH Product Distributor

SWITCH and its distributors are separate entities and each have their own privacy policies. If you have any questions about the personal data protection practices of distributors Including if you do not want to receive information notifications. Publicity, communication and promotion of Distributor products or services that are not affiliated with the Company. Please contact the dealer directly.

The distributor will disclose your personal information to the company. The Distributor and the Company are separate legal entities and you should read the Distributor's Privacy Policy to ensure that you understand the Distributor's personal information protection practices and practices. In addition, because dealers are generally your first contact point. Distributors are therefore able to provide answers to you regarding personal data protection practices, and although SWITCH encourages Distributors to ensure compliance with data protection laws. fully involved personal The Company has also provided information about its obligations to protect personal information to the distributors, but the Company is not responsible for the distributors' compliance with relevant laws.

12.) Your personal data rights

You have the following rights in relation to your personal data in our possession. If you wish to request the right You can contact the company as detailed in the topic. "How to contact the company" above.

- **12.1) Right of access**
 - You may request access to or obtain details of the personal information you have provided to the Company, unless this is a refusal by law or court order, or such access or request would have the effect that it may cause damage to the rights and freedoms of others
- **12.2) Right to rectification**
 - You have the right to request correction of your personal data if the personal data in our possession is inaccurate or incomplete.
- **12.3) Right to request deletion or destruction of data**
 - You have the right to ask the Company to delete or destroy. or make your personal information non-identifiable. In the following cases
 - (a) Personal data that is no longer necessary for the purpose of collection or use.

- (b) personal data that you have revoked consent for the company to store, use and disclose and the company has checked There are no legal grounds for the Company to collect or use any more.
- (c) Personal data that you have objected to the Company from collecting or using any longer. and the Company cannot reject a request for objection pursuant to applicable legal exceptions.
- (d) personal data that you object to the collection, use or disclosure of your personal data for direct marketing purposes
- (e) The personal data is unlawfully collected, used and disclosed.

You have the right to request the erasure or destruction of the personal information you have provided above. Unless there are legal exceptions such as collecting personal data is necessary for the purpose of the performance of the contract. or for the purpose of establishing legal claims, complying with, exercising legal claims or raised against legal claims or other purposes specified by law.

○ **12.4) Right of Restriction**

- You have the right to ask the Company to suspend the use of your personal information in the following cases
 - (a) You have requested the Company to correct your personal information to be accurate, current, complete and the Company is in the process of reviewing your request.
 - (b) You have requested to suspend the use of information that the Company may collect, use or disclose unlawfully. instead of deleting or destroying such personal data.
 - (c) The company has no need to collect your personal data for the purpose of collection. But you need to ask the company to keep it for use in establishing legal claims. Compliance with or exercising legal claims or raising up against legal claims for your benefit
 - (d) you have objected to the collection, use or disclosure of your personal data on the basis of public interest or use of state power or legitimate interests And the company is in the process of reviewing your request.
 - (e) you have objected to the collection, use or disclosure of your personal data based on or based on scientific research. Historical or statistical (if applicable) and the Company is in the process of reviewing your request.

○ **12.5) Right to object**

- You have the right to object to the collection, use or disclosure of personal data. In the following cases
 - (a) for the legitimate interests of the company or another person
 - (b) is an action in the public interest. or the use of government powers given to the Company
 - (c) in the event that the Company collects, uses or discloses your personal information for direct marketing purposes

- (d) for the purpose of scientific research. history or statistics (if applicable)

If you exercise your right to object to the collection, use or disclosure of such personal data. You have the right to request that the Company delete or further restrict the use of your personal data.

- **12.6) Right of transfer**
 - You have the right to obtain your personal data that the company has collected. By requesting the Company to send such data to you in the form of a document or electronic data by automatic means, except that the request for transferring such data cannot be carried out under the limitation of the Company's methods.
- **12.7) Right to withdraw consent**
 - You have the right to withdraw your consent to the collection, use or disclosure. If it is the case that you have previously given consent to the company Unless there is a limitation on the right to withdraw consent by law. or performance of the Company's contractual obligations that are beneficial to you. However, the withdrawal of your consent will not affect Collection, use, or disclosure of personal data for which you have already given your consent.
- **12.8) Right to complain**
 - You have the right to complain about the collection, use, and disclosure of personal data. In the event that the Company violates or fails to comply with the law You can make a complaint through the company's contact channels. And you may complain about such cases to the Personal Data Protection Committee.

However, the Company may deny the exercise of the above rights of the Personal Data Subject in accordance with the criteria set by the Company without being contrary to the law. The company will provide a channel for the owner of personal data to contact the company. in order to submit a request to perform the above rights In the event that the company Reject the above request, the company will notify the data subject of the reason for the refusal. The owner of personal data has the right to complain to the Personal Data Protection Committee in the event that the company The personal data processor, the company's employee or contractor Violation of non-compliance with the Personal Data Protection Act B.E. 2562 or announcements issued under such Act.

13.) Amendments to this Policy

- 13.1) The company may amend the policy. from time to time to reflect changes in our use of your personal information. and to comply with applicable laws. The company will notify you of the changed policy through the company's contact channel.
- 13.2) The Company will use the latest version of this Policy for reference on the methods for collecting, using and disclosing your personal data

The Policy comes into effect on October 1, 2024 and supersedes all previously imposed privacy policies.