

# Data Protection Policy



**Grandline Innovation Company Limited**

## **Data Protection Policy**

Grandline Innovation Company Limited (“**the Company**”) is fully committed to protecting your confidentiality. The Company implements the following protocols to safeguard the Personal Data you have provided to the Company. The protocols incorporate the collection, usage, and disclosure of Personal Data, collectively referred to as (“**Processing**”), during your visit to our website <https://www.gli.co.th> or our applications and your requests for services. This Data Protection Policy extends to any information (“**Data**”) or (“**Personal Data**”) relating to you, which enables the identification of you, whether either directly or indirectly, and whether received directly from you or indirectly transmitted by third parties. In addition to compliance with this Data Protection Policy, the Company is abided by the provisions of the relevant laws, rules, regulations, or orders of the related regulatory authorities until further amendments. The Company, as the Data Controller of your Personal Data, have published this privacy policy which underlies the terms and conditions in using our website’s service. You are deemed to have read and agreed to this Data Protection Policy each time of using our service, which has the following details:

### **Collection of Personal Data**

The Company may collect information regarding what services you use and how you use such services, including but not limited to devices used in accessing websites, electronic traffic data (log), interactions and communication patterns with other users, and histories such as device identifiers, computer IP address, Device ID, types of device, network providers, connection information, geographic location information, types of browser, website logs, referring websites, browsing histories, login histories, customer behavioral patterns, website access statistics, access time, search histories, functions used in website, and other information the Company collected by using Cookies and other similar technologies.

### **Collected Personal Data**

The Company may collect your Personal Data from different sources by compiling only relevant Personal Data to achieve the specified purpose of collection from online and offline activities such as websites, applications, social media, customer engagement, office building access, and associated activities (such as workshops and seminars)

The Company may collect your Personal Data only when, for example:

- You visit and provide information on the website and the Company's social media platforms
- You participate in marketing activities or any corporate joint activities and visit physical set-up booth, including workshop, exhibition, survey, prize draw etc.
- You apply for a job position/internship with Grandline Innovation Company Limited

Amount of your Personal Data we may request and/or record depends on the requirement of use. Types of Data the Company will collect are first and last name, company name, job position, telephone number, e-mail address etc.

### **Use of Personal Data**

The Company processes your Personal Data for the following purposes:

- To perform related marketing activities, after-sales, and customer relations such as sending promotional campaigns, promotional products and services, support-sales activities, and its business partner.
- To answer questions or respond to complaints as a communication channel.

- To conduct customer satisfaction survey, market research, statistical analysis, including Data processing and computation for products and services improvement or new products and services development for the greater benefit of its users.
- To promote public relations activities and corporate image by uploading photos of activities featuring you or your comments on the Company's websites and other social media platforms.
- To determine the most appropriate decision regarding job application/training, selection of potential candidates/training, interviews, and other related recruitment/training activities.
- To comply with the duties under the relevant laws, regulations, orders, or rules to which the Company is subject, including requests from government agencies such as compliance with subpoenas, or court order, or other legal requests.

### **Disclosure of Personal Data**

The Company shall not distribute, disclose and/or transfer Data and Personal Data of its users or administrators to any juristic entities or persons both inside Thailand and outside Thailand for independent use, exclusive of

1. Any individuals whom you have given your consent to receive your Personal Data.
2. The Data distributed is intended to facilitate the successful initiation of a transaction of its user or administrator.
3. The Data distributed to any juristic entities or persons who are a contractual party of the Company is purposed for Data analysis and/or service improvement.
4. Data disclosure is permitted or stipulated by applicable laws. The disclosure of Data follows the court order or the request of relevant governmental authorities purposefully for investigations or legal proceedings for which the service provider can lawfully disclose such Data.

### **Links to Third Party Sites**

Provision of our services, such as the Company website and mobile application, may link to third parties' websites, applications, products, and services. This Data Protection Policy is solely applied to the processing of Personal Data under the purpose specified by the Company and shall be ineffective for third-party websites. Please note that the Company is not responsible for your Personal Data collected by third parties of which beyond our control.

### **Retention of Personal Data and safety**

The Company is aware of how significant to exercise safety retention on your Personal Data. For this reason, the Company has established appropriate mechanisms to retain your Personal Data safely and securely, considering the confidentiality of your Personal Data. The safeguards aim to prevent loss, access, erasure, misuse, alteration, or disclosure of your Personal Data unauthorizedly or unlawfully. The retention of Personal Data shall be in line with the Company's policy and guidelines regarding information technology security procedures.

### **Rights of Data subject**

1. Right to Withdraw Consent: You have the right to withdraw your consent at any time unless otherwise required by applicable laws, providing that such withdrawal of consent will not affect the processing of your Personal Data for which you have legally given consent prior to such withdrawal.
2. Right of Access: You have the right to access your Personal Data and may request the Company to provide you with a copy of such Personal Data, which is the responsibility of the Personal Data controller who collected the Data under this policy.

3. Right to Rectification: You have the right to request the Company to rectify inaccurate information or to fill in incomplete Data.
4. Right to Erasure: You have the right to request the Company to delete, destroy or anonymize your Personal Data subject to the applicable laws.
5. Right to Restriction: You have the right to request a restriction to the processing of your Personal Data in certain circumstances.
6. Right to Data Portability: You have the right to request the transfer of your Personal Data provided to the Company to another Data controller or to you for some specific reasons
7. Right to Object: You have the right to raise an objection to the processing of your Personal Data for any given reasons.

You can request to exercise the rights of Data subject by submitting a written notification attached with the copied proof of identity, such as a copy of identification card, a copy of passport or a copy of official evidence, and your contact information to email [info@gli.co.th](mailto:info@gli.co.th).

### **Security measures**

The Company strictly attaches great importance to the security of your Personal Data and relevant implemented systems. The Company has appointed a Personal Data protection officer to monitor the retention of your Personal Data on a regular basis, including security measures for any associated unfortunate incidents and consequential punishment to its employees/staff/related persons for non-compliance with this Data Protection Policy.

### **Amendments to Data Protection Policy**

The Company may regularly review the Data Protection Policy concerning its consistency with relevant legal guidelines, laws, and applicable regulations. In this regard, the Company will promptly inform any significant changes by posting updated amendments on the Company's website [www.gli.co.th](http://www.gli.co.th). If you have enquiries, suggestions, and complaints relating to this Data Protection Policy, please contact us via Email: [dpo@gli.co.th](mailto:dpo@gli.co.th) or call 02-5397999.

This Data Protection Policy shall be effective as of 1 June 2022 onwards.

( Chaitaphat Laosirirat )  
Chief Executive Officer  
Grandline Innovation Company Limited