

## **Privacy Policy, Thailand**

This Privacy Policy sets out what happens to any personal data that you provide to us, Lucy Group Ltd or any of our subsidiaries whose websites you access (“Lucy Group”), or that we collect from you whilst you visit any of our websites. We at Lucy Group respect your concerns about privacy and are committed to safeguarding and preserving the privacy of the visitors to our website. Be assured, we will only use your personal data in accordance with and as explained in this Privacy Policy. By using our site, you accept the terms of our Privacy Policy.

### **INFORMATION WE COLLECT**

We may collect and process the following data about you:

- Your name, company details, job title
- Contact information including:
  - Work and/or personal email
  - Work telephone or mobile number
  - Home telephone or personal mobile number
- Location information such as address and postcode
- Information about your use of our website, pages viewed and resources that you access. Such information includes traffic data, location data, device specific information and other communication data.

### **USE AND DISCLOSURE OF YOUR INFORMATION**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where it is necessary for performing the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is in the public interest to do so; or for official purposes.
- For our legitimate interests.
- Where you have provided your consent.

There can be rare occasions where it becomes necessary to use your personal information to protect your interests (or someone else's interests).

We may collect and use your personal information for the following purposes:

- To fulfil orders of products, services and digital content. We collect this information to deliver your order, to obtain payment, to communicate with you about the status of your order and for contract management purposes.
- To process job applications from candidates.

- To address your requests for information. If you contact us, we keep a record of your correspondence or comments, including personal information, in a file specific to you. We use this information to help us provide you better service in the event you contact us again.
- To provide you with the technical support you request from us. Personal information is necessary to identify your systems, understand the configuration of the products, diagnose your questions, and provide solutions.
- For relationship management purposes. This includes communicating with you about the products, services and digital content you have acquired to ensure you use them in the best way possible, including via emails and newsletters. For instance, location data may be used to suggest sources of products or support near you.
- To improve our products, services and digital content; for instance, we analyse the use of our applications and sites in order to identify areas and functionalities where users have difficulties, and we redesign them.
- To learn about your browsing and searching activity. We collect certain personal information when you visit our digital content or click on links for products and services. We collect this information to improve your user experience for your next visits (e.g., country selection or profile-focused content), help the sites run more efficiently, to gather broad demographic information to analyse the sites' activity and performance, and to evaluate the effectiveness of our advertising. We may use cookies and other identifiers or similar technologies (referred to hereinafter as "Cookies") to obtain information on the referring website, type of browser used, the content viewed as well as the date and time of your access to the digital content. You may read our [Cookie Policy](#) for more information on our use of Cookies and your options for managing Cookies.
- To manage your account. When you register, we use your personal information to give you access to digital content and our services, authenticate you and interact with you about it.
- For us (including our subsidiaries) and selected third parties to send you marketing information by mail, fax, phone, text messages, email and electronic communications about promotions, news and new products or services that we think may be of interest to you in compliance with applicable opt-in and opt-out requirements.
- To comply with legal obligations to which we are subject. For example accounting and tax obligations.
- Any other purpose otherwise conveyed to you.

## **DATA TRANSFERS**

We operate globally including in countries which may not have equivalent standards for the protection of personal information as in the country where you are located. If we transfer your data to locations outside the country where you are located, we will seek to ensure reasonable steps are taken so that your data is treated and stored securely and we will always comply with all applicable laws and regulations, including Thailand's Personal Data Protection Act.

## SECURITY OF PERSONAL INFORMATION

We will take reasonable technical and organisational precautions to prevent unauthorised access or disclosure, loss, misuse or alteration of your personal information, this includes storing all the personal information you provide on our secure servers.

By agreeing to this policy and using our website, app or other interactive services you acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

## LINKS TO OTHER WEBSITES

On occasion we include links to third parties on our website. Where we provide a link, it does not mean that we endorse or approve that site. You should review their Privacy Policy before sending them any personal data.

## RIGHTS OF ACCESS, CORRECTION ERASURE AND RESTRICTION

### Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access to your personal information.** This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it as long as such access does not adversely affect the rights or freedoms of others. We are permitted to refuse to comply with this where such refusal complies with law or a court order.
- **Request rectification of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where you have withdrawn your consent and we have no legal ground to collect, use or disclose your personal data, or your personal data is no longer necessary for the purpose it was collected.
- **Object to processing of your personal information.** Your consent to us processing your data can be withdrawn at any time. You also have the right to object to us processing your data where (i) the data was collected without consent due to tasks carried out in the public interest or based on our legitimate interest or that of a third party, (ii) the processing of your personal data is for direct marketing purposes; and (iii) the processing of your personal data is for scientific, historical or statistical research purposes.
- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer of your personal information to another party.** This enables you to receive your personal data in a structured, commonly used, and machine-readable format when the processing is based on consent, contract, or a legitimate ground.

If you have agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to us at the address below or by emailing us at [Group.Marketing@lucygroup.com](mailto:Group.Marketing@lucygroup.com). To withdraw consent that you have given us in any other circumstances and/or to exercise any other of these rights, please see the 'How to Contact Us' section of this Privacy Policy.

## **DATA RETENTION**

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **UPDATES TO OUR PRIVACY POLICY**

This Privacy Policy may be updated periodically, and the latest version will always be available on our website.

This version is dated 14 August 2025.

## **HOW TO CONTACT US**

If you have any questions or comments about this Privacy Policy or if you would like us to provide you with a copy of the information, we hold on you or to update information we have about you, please contact us by email at: [Legalteam@Lucygroup.com](mailto:Legalteam@Lucygroup.com) or [SalesThailand@lucyelectric.com](mailto:SalesThailand@lucyelectric.com).

You may also write to us at our head office:

Lucy Electric (Thailand) Ltd, 388 Exchange Tower, 37th Flr Unit 3702, Sukhumvit Road, Klongtoey Sub district, Klongtoey District, Bangkok, 10110, Thailand

Or telephone: +66 (02) 663 4290