

**Privacy Policy
for
Clients and Perspective Clients**

NARIT & Associates Ltd.

We, **NARIT & Associates Ltd.** (“**We**” or the “**Firm**”) are committed to protecting the Personal Data of Firm’s clients and perspective clients (“**You**” or the “**Client**”) in accordance with the requirements laid down by the Personal Data Protection Act, B.E. 2562 (2019) (the “**PDPA**”).

Whereas the Firm, in the course of carrying on its business, may collect, use, or disclose your Personal Data as the “Personal Data Controller” or the “Controller” under the PDPA, and a person whose Personal Data is collected, used, or disclosed is the “Personal Data Subject” or the “Data Subject/Owner” under the PDPA.

In performing Controller’s statutory duty to inform the Data Subject of the requisite information under the PDPA, the Firm, therefore, issues this Privacy Policy for Clients and Perspective Clients (the “**Policy**”) to clarify natures and reasons of collecting, using, and disclosing (“**Processing**”) of your Personal Data and your statutory rights to our Processing of your Personal Data as well as to lay down the operating procedure for your Personal Data.

The Firm may update the Policy from time to time as the Firm deems appropriate. Once there has been any update(s) made to the Policy, you can find the updated Policy on Firm’s website. This Policy will become effective immediately on the date of announcement.

The Firm encourages you to read this Policy thoroughly. Should you have any questions, comments, or would like to exercise your statutory rights in connection with the Policy, you are welcomed to contact the Firm through the following channels at your earliest convenience:

Personal Data Controller: NARIT & Associates Ltd.

Address: 65/101 Chamnan Phenjati Business Center
11th Floor, Rama IX Road,
Huay Khwang, Huay Khwang,
Bangkok 10310, Thailand

Telephone: +66 2248 2872

Website: www.naritlaw.com

Email: enquiry@naritlaw.com

Announced/updated on: June 17, 2024

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1. Definitions

Unless otherwise defined herein, the following words shall have the meaning assigned below.

The “**Personal Data**” means any information relating to a person, which enables the identification of such person, whether directly or indirectly, but not including the information of a deceased person in particular.

The “**Sensitive Personal Data**” means the Personal Data pertaining to a race, ethnicity, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data or any data that may affect the Personal Data Subject in the same manner as prescribed by the Personal Data Protection Committee under the PDPA.

the “**Client**” means any of the following persons:

- (i.) an individual person who purchases or will purchase the products and/or obtains or will obtain the services from the Firm either for person’s own behalf or on behalf of person’s organization;
- (ii.) an individual person who contacts and enquires about information on Firm’s products and/or services;
- (iii.) a person who receives information of products and/or services through relevant medias;
- (iv.) a person who receives advertisement and public relations pertaining to Firm’s products and/or services; and

In case of the aforesaid persons is a juristic person, a person shall be an individual person who is involved with or is an agent of such juristic person, i.e. Directors, officers, employees, agents, representatives or any other individual person as well as an individual person whose Personal Data appears in the relevant documents with respect to the transaction between the Firm and such juristic person, i.e. a coordinator, a person issuing purchase orders, a person receiving products, and a check payer, etc. and a person whom such juristic person has provided the Firm with the data.

2. Personal Data Collected by the Firm

In general, the Firm will collect your Personal Data by directly requesting or inquiring about such data from you. Nonetheless, there may be some circumstances that the Firm collects your Personal Data from any other third party, such as the Firm that you are positioned in, your employee, secretary or coordinator, government authorities or state authorities or other sources of publicly disclosed information, such as website and searchable data on the Internet, etc. In this regard, the Firm proceeds to collect your Personal Data as follows:

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Type of Personal Data	non-exhaustive list of Personal Data
Identity Data	a first name, a last name, a middle name, a nick name, a honorific (a common title), an identification card number, a passport number, a date of birth, gender, age, nationality, a signature, photos, marital status, an identity number of a professional license, a driving license.
Contact Data	an address, a copy of household registration, a copy of identification card, phone numbers, facsimile number, emails, geolocation, emergency contact persons, place of work, a position of work, social media accounts, WhatsApp/LINE ID (or other Chat Applications), secretary information.
Financial Data	bank account numbers, billing address.
Communication Data with the Firm	information concerning a date, time and a place having contact with the Firm, information of the recording of video and/or voice upon having contact with the Firm, opinions, recommendations and complaints, data pertaining to the participation of meetings, trainings, seminars, activities, or other projects held by the Firm as there may be the recording of photo, video or voice during such meetings, trainings, seminars or activities.

In addition to the aforementioned Personal Data, the Firm sometimes may have acquired your Sensitive Personal Data unintentionally. For example, you have provided the Firm with the copies of your government issued documents or any other personal document (e.g. your identification card, household registration, passport, work permit, etc.) in which your Sensitive Personal Data may have been included, such as your religious, blood type, health data, or criminal records. In that case, it is requested that you conceal such data prior to furnishing us with the aforesaid documents. If you do not conceal such data, it shall be deemed that you authorized the Firm to conceal those data and it shall be deemed that such document with concealed data be valid and legally enforceable in all respects. In case that the Firm is unable to conceal those data due to some technical limitation, the Firm will collect and use such data as a part of your identification documents only. In case that it is necessary for the Firm to collect your Sensitive Personal Data, unless otherwise prescribed/allowed by laws, the Firm will request your express consent on a case-by-case basis.

3. Purpose and Lawful Basis for Firm's Processing of Personal Data

In accordance with the PDPA and/or other laws, the Firm will collect, use, or disclosure your Personal Data by relying on the following legal bases:

- **Consent:** where the Firm is unable to rely on any other legal basis and your consent shall be provided to the Firm prior to or at the time of Processing your Personal Data;

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- **Contractual Performance:** where it is necessary for Firm's performance of contract to which you are a party, or in order to take steps at your request prior to entering into a contract with the Firm;
- **Legal Compliance:** where it is necessary for the compliance with a law to which the Firm is subject to;
- **Legitimate Interests:** where it is necessary to protect Firm's legitimate interests; and
- **Legal Claim:** Where it is necessary for the establishment, compliance, and exercise or defense of legal claims.

It is noteworthy that the Firm may rely on more than one legal basis in Processing your Personal Data for any purpose.

The Firm will collect, use, or disclosure your Personal Data for the following purposes:

3.1 Business Operation Management

The activities under this purpose are including but not limited to:

- Proposing fee/quotation;
- Opening and managing Client's matter files;
- Contacting Client's related personnel;
- Issuing invoices, processing invoices, and collecting payment;
- Preparation of receipts/tax invoices as well as VAT report;
- Providing legal update alerts and newsletter and
- Hosting seminars;

3.2 Legal Services

The activities under this purpose are including but not limited to:

- Performing legal works under our contracts with the Client;
- Providing legal opinion per Client's instruction(s);
- Conducting due diligence;
- Translating documents;
- Reviewing document or contracts;
- Conducting legal search;
- Filing applications with the relevant governmental agencies; and
- Taking any legal action on behalf of the Client.

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In the event that the Personal Data processed by the Firm for the aforementioned purposes is either relied on the legal basis of contractual performance or legal compliance, if you refuse to provide the Firm with such Personal Data, the Firm may not be able to consider entering into a transaction or perform administration according to the agreement with you (as the case may be).

In case that you have provided the Firm with the Personal Data of other persons, you shall be responsible for notifying such persons of this Policy and/or carrying on with seeking a consent for the Firm (if necessary).

4. Change of Purpose

The Firm will process your Personal Data in accordance with the specific purposes set out and informed to you only, except where the Firm has reasonably determined that it is necessary to process such Personal Data for any other purpose compatible with the original purpose. In case of the Processing of your Personal Data is in contrast to the original purpose, the Firm will notify you and seek your consent prior to such Processing.

5. Retention Period of Personal Data

The Firm will retain your Personal Data for a period necessary to achieve the objectives in accordance with each type of Personal Data unless any law allows a longer retention period or any law/legal system requires the Firm to prove any fact to protect Firm's legitimate interests or to protect other person's legitimate interest (including but not limited to the anti-money laundering law, the tax law and the law pertaining to litigation or making a claim in connection with a contract) that makes it necessary for the Firm to have a longer retention period. In the event that it is impossible to identify the retention period of the Personal Data clearly, the Firm will retain your Personal Data for a period expected to be retained according to the collection standards.

The Firm has established an auditing system to delete or destroy your Personal Data when the retention period expires or when it becomes irrelevant or unnecessary for the purpose of collecting that Personal Data.

6. Disclosure of Personal Data

The Firm will collect and keep your Personal Data confidential. And to extent that the law allows the Firm will only disclose or transfer such Personal Data to Firm's carefully selected third parties, business partners, professional advisors, licensees, joint venture partners, and/or service providers to achieve the purposes provided herein.

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In addition, the Firm may be required to disclose your Personal Data to government authorities including but not limited to law enforcement agencies, courts, arbitration institution, regulators, or other third for the compliance with legal or regulatory obligations.

7. International Transfer of Personal Data

Under certain circumstances, the Firm may be required to transfer your Personal Data to foreign countries, which may have standards of Personal Data protection different from Thailand. Furthermore, the Firm may store your Personal Data on computer servers or in the cloud of overseas service providers and there might be the Processing of data by using programs or applications of the overseas service providers. In this regard, for the deliver or transfer of your Personal Data to foreign countries in whatsoever case, the Firm will take reasonable steps and measures to ensure that your Personal Data is transferred in conformity with the PDPA.

8. Security Measures

The Firm will maintain the appropriate organizational, technical and administrative security measures to prevent your Personal Data from facing any accidental, unlawful, or unauthorized destruction, loss, access, use, alteration, or disclosure.

From time to time, the Firm will review and update Firm's security measures as necessary or upon development of the relevant technology to ensure effective and appropriate security measures and being in line with the minimum legal requirements as prescribed by the relevant governmental agencies.

9. Cookies

Cookies are small text files that are generated when you visit our website and placed or stored on your device, such as computers, mobile phones, or tablets. Certain cookies are deleted after leaving our website, whilst others remain on your device so that you can be recognized when returning to our website.

We use cookies for several purposes. Those cookies may be operational cookies that are required for the operation of our websites, or analytical or performance cookies that help us understand how you navigate through our websites, or functional cookies that enhance our website's performance and improve your browsing experience more efficiently.

If cookies are used, you can easily configure the operations of those cookies either to enable, disable, block or even delete any cookies by going through your Internet browser setting, under sections "help" or "Internet Options". However, if you chose to disable or delete certain cookies in your Internet browser settings, you might not be able to access or use

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important functions or features of our websites, and you may be required to re-enter your login details.

10. Your Statutory Rights Pertaining to the Personal Data

Subject to the conditions laid down by the PDPA, you have the rights as the Data Subject as follows:

- to withdraw the consent you have given to the Firm for Processing your Personal Data under Section 19, paragraph five of the PDPA;
- to access and request a copy of the Personal Data that is related to you and is in the responsibility of the Firm or request to disclose a source that your Personal Data is obtained without your consent under Section 30, paragraph one of the PDPA;
- to request the Firm to send or transfer the Personal Data in the format in which is readable or commonly used by ways of automatic tools or equipment (in an electronic form) to another Personal Data Controller under Section 31, paragraph one of the PDPA;
- to oppose the collection, use, or disclosure of the Personal Data that is related to you under Section 32, paragraph one of the PDPA;
- to request the Firm to delete or destroy or make the Personal Data non-personally identifiable (anonymous) information under Section 33, paragraph one of the PDPA;
- to request the Firm to suspend the use of the personal data under Section 34, paragraph one of the PDPA;
- To request the Firm to make the Personal data correct, current, complete, and not cause misunderstanding under Section 36, paragraph one of the PDPA; and
- to complain to the Personal Data Protection Committee in the event that the Firm or Firm's Personnel Data Processors including Firm's employees, or Firm's contractors violate or do not comply with the PDPA under Section 73, paragraph one of the PDPA.

The Firm will consider your petition to exercise such right(s), notify a result of the consideration, and proceed according to a request (if appropriate) within 30 days from the date the Firm receives the petition, provided that it shall be proceeded in accordance with the PDPA and relevant laws and regulations.