

Privacy Policy for Esimo Website

Global M Connect (Thailand) Co., Ltd. (“**Esimo**,” “**we**,” “**us**,” and/or “**our**,”) recognizes the importance of the protection of your personal data provided for using our Platform Service. Therefore, we established this Privacy Policy to help you understand your privacy choices when you visit our Website by using any devices and to ensure that your personal data will be collected, processed, used, and shared in the appropriate manner and in accordance with the purpose we set out as follows.

This Privacy Policy is applied to the Website or any accessible applications in relation to the Platform Service and incorporated into and forms an integral part of Esimo’s Term of Service. All capitalized terms have the meanings ascribed to the Definitions section of our Term of Service unless otherwise defined herein.

Esimo encourages you to read this Privacy Policy carefully. Esimo reserves the right to amend this Privacy Policy from time to time. Any amendment to this Privacy Policy will become effective when posted on our Website. You may access our Website to see the latest version of this Privacy Policy.

Definition and Interpretation

Personal Data shall mean any information relating to an individual who can be identified particularly by reference of certain information given by such individual as requested by Esimo from specific purposes contained in this Privacy Policy.

Sensitive Data such as race, religion, political opinions, fingerprints, facial recognition, biometric data, health condition, genetic data, medical history, disability and criminal records.

1. What Personal Data we collect

- (1) **Personal details** such as title, full name, gender, age, occupation, qualifications, job title, position, business type, company name, nationality, country of residence, date of birth, marital status, information on national identification card, social security number, passport number, tax identification number, signature, photograph, facial features for recognition, insurance details, license plate details, house registration, household income, salary and personal income;
- (2) **Contact details** such as postal address, delivery details, billing address, residential address, workplace address, address on national identification card, telephone number, fax, email address, LINE ID, Facebook account, Facebook ID, Google ID, Twitter ID, and other ID from social networking applications or platforms, your contact person details and any other contact details you provided to Esimo;

- (3) **Financial details** such as debit and credit card or bank information, debit and credit cards number, credit card type, issuance and expiration date, cycle cut, account details, prompt pay number payment details and records, your information in relation to the risk profile for the business, credit rating and solvency and any other financial details;
- (4) **Transaction details** such as payment information, payment date and time, payment amount, details about refund, refund amount, date and location of purchase, order number, address/date and time for pick up delivery, acknowledgement of receipt, warranty details, complaints and claims, booking details, rental details, transaction history, transaction status and any other details in relation to the transactions that occurs on Esimo's platform;
- (5) **Technical details** such as Internet Protocol Address (IP address) and its location, cookies, media access control (MAC) address, web beacon, log, device ID, device model and type, browser information, browser type and version, network, connection details, access details, log in data, access time and location, time spent of Esimo's platform, search history, operating system and platform and other technology on devices you use to access the platform, including any other technical information arising from using Esimo's platform;
- (6) **Profile details** such as username, password, profile details and picture, purchase history, orders, financial records;

2. For what purpose does Esimo collect and use your Personal Data

Esimo shall collect and use your Personal Data for the following purposes:

- For providing the Platform Service to you (as defined in our Term of Service);
- For the registration and authentication of your Account: We collect and use your Personal Data to register, verify, prove, affirm, identify and authenticate your identity;
- For processing payment and communicating with you about products and services together with the promotional offers;
- For providing troubleshooting and improvement of our Platform Service including performance analysis, errors fixing, usability testing and any other activities for increasing the efficiency of our Platform Service;
- For recommendation of our features, products and services that you might be interested including the identification of your preferences;
- For compliance with the legal requirements, legal proceedings, laws and regulations and governmental authorities' orders;
- For communicating with you in relation to the Platform Service via different channels (e.g., mobile phone or email);
- For advertising such as providing of privilege, sales promotion, special offer and any other marketing communications in relation to our services; and
- For prevention and detection of fraudulent or suspicious transactions in order to protect the customer (for example, to comply with the Anti-Money Laundering regulations and any other prevention measures);

3. Does Esimo share your Personal Data

Esimo may disclose or transfer your Personal Data only as described below with the third party which are following this Privacy Policy or the practices at least as protective as those described in this Privacy Policy:

- We make available to services, products, applications, or skills provided by third parties for use on or through the Platform Service. For example, you can purchase the products, services, applications and/or skills from third parties through our Website or Platform Service. We also offer services or sell products jointly with third parties' businesses and share your Personal Data to such third parties;
- We shares the Personal Data among Esimo's affiliates and subsidiaries for the purposes described in this Privacy Policy;
- We employ other companies or individuals to perform functions on our behalf or to assist with the provision of our Platform Service including but not limited to (1) Information technology services; (2) warehouse and logistics services; (3) payment service providers; (4) research agencies; (5) analytic service providers; (6) auditors; (7) marketing, advertising media, and communications agencies; (8) campaign and event organizers; (9) sale representative agencies; (10) telecommunication service providers; (11) Authentication and dip chip service providers and/or; (12) data storage and cloud service providers. In the course of providing such services, the service providers may have access to your Personal Data. However, we will only provide the Personal Data that is necessary for them to perform the services and we request them not use your Personal Data for any other purpose;
- We might sell or develop our business or our Platform Service. In such transactions, we will transfer your Personal Data that is generally deemed to be the transferred business assets; and
- In any event that we obtain consent from you.

4. Legal basis

Esimo can collect, use or disclose your Personal Data without any encumbrance or obligation to you by the following grounds:

- We collect, use or disclose your Personal Data to perform any contractual obligation with you;
- We collect, use or disclose your Personal Data in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are. For instance, we may rely on our legitimate interests when responding to your queries, improving and personalizing our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities (e.g. checking your identity, fraud prevention);
- In certain circumstances, we may be required to collect, use or disclose your Personal Data in order to comply with legal requirements or regulations including but not limited

to law enforcement agencies, court or governmental authorities orders or other third party where we believe it is necessary to comply with legal or regulatory requirements, or otherwise to protect our rights or the rights of third parties, or to detect, prevent, or otherwise address fraud, security, or safety issues; and

- We have your consent to do so and not overridden your rights; and
- We may collect, use or disclose your Personal Data to protect your vital interests or those of another person.

5. Security of your Personal Data

Esimo considers the importance of protecting your Personal Data by developing the security measures for protection of your Personal Data appropriately and in accordance with the procedural safeguards of Personal Data in order to prevent loss, unauthorized or unlawful access, destruction, misuse, alteration or disclosure. We ensure that we will follow our information security policy and guidelines.

6. How long do we keep your Personal Data

We retain your Personal Data as long as is reasonably necessary to fulfill the purpose for which it was collected and to comply with legal requirements or obligations. However, we may have to retain your Personal Data for a longer period, as required by applicable law.

7. Cookies and other Identifiers

To enable our systems to recognize your browser or device and to provide and improve our Platform Service, we use cookies or similar technologies. If you visit our Website, we will gather certain information from you automatically.

Cookies are files with small amount of data and are typically carried by the device when you visit the Website and are used to store or track information about your use of the Website and used in analyzing trends, administering of the Website, tracking users' movements around the Website or to remember users' settings. Some cookies are strictly necessary for making the Website functions properly, if you reject, remove or block cookies, it can affect your user experience or limit your use of some or all features or functions of the Website.

8. Your rights as the owner of Personal Data

Subject to applicable laws and exceptions thereof, you may have the following rights in relation to your Personal Data:

- (1) **Access:** You may have the right to access or request a copy of the Personal Data we are collecting, using, or disclosing about you. For your own privacy and security, we may require you to prove your identity before providing the requested information to you.
- (2) **Rectification:** You may have the right to have incomplete, misleading, not up-to-date or inaccurate Personal Data that we collect, use or disclose about you rectified.
- (3) **Data Portability:** You may have the right to obtain the Personal Data we hold about you, in a structured, electronic format, and to send or transfer such Personal Data.
- (4) **Objection:** You may have the right to object to the certain collection, use, or disclosure of your Personal Data.
- (5) **Restriction:** You may have the right to restrict the use of your Personal Data in certain circumstances.
- (6) **Withdraw Consent:** For the purpose you have consented to our collection, use, or disclosure of your Personal Data, you have the right to withdraw your consent at any time.
- (7) **Deletion:** You may have the right to request Esimo to delete or de-identify your Personal Data that we collect, use, or disclose about you, except we are not obligated to do so if we need to retain such data in order to comply with legal requirements or obligations.
- (8) **Lodge a complaint:** You may have the right to lodge a complaint to the competent authority where you believe our collection, use or disclosure of your Personal Data is unlawful or noncompliant with applicable data protection law.

9. Contact Esimo

If you wish to contact us in relation to the exercising of your rights in relation to your Personal Data or if you have any query about your Personal Data under this Privacy Policy, please contact us at:

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