



Information Notice on Personal Data Processing
(Privacy Notice)

1. Preamble

Home Products Center Public Company Limited together with its subsidiaries (“**Company**”) aim to protect your privacy on personal data collected by the Company to be safe, stable and transparent.

This information notice on personal data processing (“**notice**”) indicates the reason why we have to collect your personal data provided that it explains on personal data that has been collected from customers and other persons engaging in business with the Company and methods how the Company collects, uses and discloses (“**processing**”) such data.

2. Enforcement

This notice is used for personal data processed by the Company including the Company’s service such as:

- “**Company’s service**” e.g. sale of goods or provide service of the Company to the Company’s customer
- “**Trading partner’s service**” e.g. sale of goods or provide service to the Company by the Company’s trading partner or service provider such as goods delivery, goods installation, goods maintenance to the Company’s customer
- “**Service for visitor**” e.g. facilities provided by the Company including but not limit to meeting room and related facilities and services arranged for the visitor in control of the Company’s office including customer or other visitors

This also includes any data processing which is relating to services mentioned above, the Company’s internal management and establishment of legal right of claim, compliance or exercise on legal right of claim or raising the Company’s legal right of claim.

Reference to the word “you” or “your” in this notice is made to a person whose personal data is processed by or on behalf of the Company with respect to the Company’s service, trading partner’s service or visitor’s service.

- Reference to the word “customer” or “trading partner” in this notice shall include staff, employee, director or representative of the customer or trading partner who is a juristic person in which personal data of such person is processed by or on behalf of the Company and
- This notice is used for personal data processing of a person (including staff or employee of such person) who might be a party in any transaction or a party in any lawsuit or a party to the dispute in any legal proceeding related to the Company.

Reference to the word “Company” or “we” or “our” in this notice is made to Home Products Center Public Company Limited together with its subsidiaries.

3. Your personal data collected by the Company

Your personal data (“data” or “personal data”) includes any data related to you which is able to identify you but not including personal data which is unable to identify a person who is the owner of data (anonymous data)

Sensitive personal data means your personal information with respect to race, origin, political opinion, the belief in doctrine, religion or philosophy, sexual behavior, criminal background, health data, disability, labor union information, genetic information, biometric data or any information which similarly affects the information owner as indicated by Personal Data Protection Committee in which the Company may collect sensitive personal data in restricted case e.g. religion information. Please consider the details on data collection of such case in clause 4 (objective and lawful basis in the use of your data by the Company) for more details.

The Company may collect sensitive information in restricted case in order to comply with law and regulation (e.g. in case the Company has to comply with the money laundering law) or in case you provide information which is necessary for some certain services of the Company or you allow the Company for collection.

The Company may receive your personal data from various channels for example:

- The Company directly collects your personal data when you apply for Home Card or Home Service membership with the Company or when you apply for any service on website, application or service point of the Company or from your communication in all channels.

- The Company may receive your personal data from the third party or public source or any legal source e.g. subsidiary, business partner, financial institution, financial consultant, government agency or competent authority, social media service provider etc.
- The Company may receive your personal data from any transaction made between you and the Company or as collected by the Company e.g. goods purchasing and service history, the Company's website or the Company's CCTV.

Type of personal information used by the Company

The Company collects, gathers, uses and discloses your information. However, the Company divides your information into each type as defined below in which the Company or on behalf of the Company specifies provisions on how to use each type of information and those provisions are used in this notice.

Details relating to identity and contact

- Basic information relating to you such as name, sex, date of birth, address, residential information, residential condition, number of resident, details on how to travel to your residence, photograph of your residence, your photograph, nationality, family income, education level, occupation etc.
- Information in your identification card, passport, Home Card or Home Service membership card or other identity documents such as (1) name and last name (2) identification card number or passport number or Home Card or Home Service member card number (3) date of birth (4) address (5) card holder's photograph (6) blood group and (7) religion including customer code, Home Card or Home Service account password and taxpayer identification number.
- Information used for contact such as (1) telephone number (2) facsimile number (3) email (4) address (5) latitude-longitude, project location, construction area, other projects including photo and map of project location or such location as well as information obtained from your social media used to contact with the Company such as account name or photograph.
- Personal information in the company's affidavit issued by the Ministry of Commerce such as name and last name of director, shareholder and address of director and shareholder.

- Information in house registration such as (1) house code (2) address (3) type and style of house (4) nationality (5) sex (6) name and last name of biological parents (7) identification number of parents (8) nationality of parents and (9) previous place of residence of parents.

Information relating to transaction made with us

- Information relating to transaction history made between you and us such as purchasing history, service history, product return and exchange history including visit product or service on our website history.
- Information relating to membership's privilege such as Home Card point, point collection, point exchange for discount or promotion including information obtained from Home Service Card.
- Information relating to communication made between you and us in every channel which also includes conversation history via audio file, conversation details such as contact details, problem, complaint as well as personal information provided in complaint document with respect to the use of our product or service e.g. settlement letter, letter issued from related government authority such as the Office of Consumer Protection Board, the Royal Thai Police, court's document and medical certificate which may have your personal information such as health information, criminal record.
- Information relating to your participation in our sale promotion activity in which this may include your incentive to purchase our product or service.
- Information relating to your health which is needed to be kept in order to be used for transaction made with the Company or under the law.

Financial information for debt repayment

- Information that you have given to the Company with regard to bank account and electronic card for payments.

Information obtained from cctv

- Photo received from the Company's cctv
- Your face photo and facial recognition

Information on website

- Information received from cookies that the Company has collected while you visited the Company's website such as your last visit product, selected language, you product in basket.

The Company has no intention to provide service to minor, incompetent person or quasi-incompetent person to communicate or take any action to the Company and via any channel. If you have intention to take any action to the Company, you are acknowledged that you must obtain legal consent. However, the Company may carry on such personal information processing when the Company provides service to the customer and such information will be processed by the Company only for the necessary and benefit in specialized field in which the Company has provided or obtained only.

4. Objectives and legal base why the Company using your personal information

- The Company provides the details with respect to the use of your information and legal base used for the use of that information as shown in the table here below. The Company indicates the legal benefit of the Company used as your information processing base in related case.
- The Company may process your personal information more than one legal base or in difference from the details shown in the below table. In this regard, it depends on objective on your information processing of each case. Please contact data_privacy@homepro.co.th if you need more information on legal base used by the Company for your information processing in case there is more than one legal base as provided in the below table for reference.

For the Company's service		
Objective and/or activity	Type of Information	Legal base used for processing
In order to provide service and sell product to the customer such as providing product's details through every communication channel including the Company's website, delivery of goods to the customer as well as proceeding any customer's request e.g. product installation, goods exchange or return, reparation or other services offered by the Company through every channels which also includes the disclosure of good delivery to the Company, manufacturer, supplier, service provider, the disclosure of information relating to the exchange, return or repair of product for the Company's trading partner, the exchange of sale promotion product, deposit and return of customer's goods at the branch, damage warranty and to contact customer in any case mentioned above	<ul style="list-style-type: none"> ● Details relating to person and contact ● Details relating to transaction made with us ● Financial details for debt repayment 	<ul style="list-style-type: none"> ● In order to comply with the contract ● For legal benefit i.e. to identify your identity or your authority in order to act on behalf of the company who is the Company's customer or as a party to enter into a contract with the Company
To provide service for Home Card and Home Service card member in order to manage the member's privilege e.g. to collect Home Card or Home Service Card point, to exchange point to get discount or promotion	<ul style="list-style-type: none"> ● Details relating to person and contact ● Details relating to transaction made with us ● Financial details for debt repayment 	<ul style="list-style-type: none"> ● In order to comply with the contract ● For legal benefit i.e. to identify your identity or your authority in order to act on behalf of the company who is the Company's

For the Company's service		
Objective and/or activity	Type of Information	Legal base used for processing
		customer or as a party to enter into a contract with the Company
To issue a document as requested by the customer or by law e.g. receipt, tax invoice, credit note etc.	<ul style="list-style-type: none"> ● Details relating to person and contact ● Details relating to transaction made with us ● Financial details for debt repayment 	<ul style="list-style-type: none"> ● In order to comply with the law ● In order to comply with the contract
In order to identify your identity or your authority to act on behalf of the company who is our customer or as a party to enter into a contract with us or might be a party in any transaction or a complainant in any legal proceeding related to the Company	<ul style="list-style-type: none"> ● Details relating to person and contact ● Details relating to transaction made with us 	<ul style="list-style-type: none"> ● For legal benefit i. e. to identify your identity or your authority in order to act on behalf of the company who is the Company' s customer or as a party to enter into a contract with the Company
For marketing purposes such as to analysis your purchasing behavior, customer grouping for promotions, to communicate about privilege to Home Card and Home Service Card member, to inform information and contact to customer in order to offer product or service or to offer promotion suitable for you, to coordinate with our alliance to jointly arrange a campaign, to	<ul style="list-style-type: none"> ● Details relating to person and contact ● Details relating to transaction made with us ● Detail relating to cctv 	<ul style="list-style-type: none"> ● Consent ● For legal benefit i. e. to develop the Company's service in the future

For the Company's service		
Objective and/or activity	Type of Information	Legal base used for processing
monitor service qualification and evaluate the customer's satisfaction.		

For service providing to trading partner		
Objective and/or activity	Type of Information	Legal base used for processing
In order to accept you as a new trading partner and to enter into a contract with trading partner as well as to open account with trading partner, to check information according to the Money Laundering law, terrorism law, screening on punished person, fraud and to examine other basic information and to identify your identity or your authority in order to act on behalf of the company who is a trading partner of the Company or as a party to enter into a contract with the Company.	<ul style="list-style-type: none"> ● Details relating to person and contact 	<ul style="list-style-type: none"> ● In order to comply with the contract ● For legal benefit i. e. to assure that the Company does not get involve with any money receiving from criminal or support any illegal activity or fraud such as terrorist
To coordinate, arrange time, monitor and perform to comply with the contract with you	<ul style="list-style-type: none"> ● Details relating to person and contact 	<ul style="list-style-type: none"> ● In order to comply with the contract ● For legal benefit
Payment management, fee, fine and charge and collection debt fee of the Company	<ul style="list-style-type: none"> ● Detail relating to person and contact ● Financial details for debt repayment 	<ul style="list-style-type: none"> ● In order to comply with the contract

For service providing to the Company's visitor		
Objective and/or activity	Type of Information	Legal base used for processing
To provide service for visitor and for the safety of using location	<ul style="list-style-type: none"> ● Details relating to person and contact ● Details on cctv 	<ul style="list-style-type: none"> ● In order to comply with the contract ● For legal benefit, to check and protect the access to place of business and restricted area of the Company without permission

For the use of other information of the Company which relate to the Company's service mentioned above i.e.

Objective and/or activity	Type of Information	Legal base used for processing
<p>To deal with complaint, monitor and resolve the complaint and to establish the legal claim or to raise the legal claim</p>	<ul style="list-style-type: none"> ● Details relating to person and contact ● Information relating to transaction made with us ● Other information which may relate to the complaint such as health information, criminal record ● Information relating to cctv 	<ul style="list-style-type: none"> ● For legal benefit i. e. to identify your identity or your authority in order to act on behalf of the company who is the Company's customer or as a party to enter into a contract with the Company, to exercise the right or defend the case in legal proceeding or examination carried by the related government authority and in order to deal with the complaint and to improve our service ● To establish the legal claim
<p>To manage information kept by the Company e.g. to keep information in the form of document with warehouse service provider or cloud</p>	<ul style="list-style-type: none"> ● Details relating to person and contact ● Information relating to transaction made with us ● Financial information for debt repayment ● Information relating to cctv ● Other information which may relate to the complaint e. g. health information, criminal record 	<ul style="list-style-type: none"> ● For legal benefit i. e. for the benefit of Company's information management

“CCTV Information” will be used to detect and prevent criminal, to detect and prevent any incident for safety, to detect and prevent any access to the Company’s area and restricted area without permission, to detect and prevent any serious misbehavior, to support any investigation for security, safety and internal affair, to support criminal investigation and to investigate any incident in security and safety as well as to practice for safety training. In some cases, cctv will be hided in order to be used for the purpose mentioned above. In this regard, cctv information processing for the purposes mentioned above is necessary for the legal benefit of the Company.

In addition, the Company may use cctv information to identify VIP customer for providing service and for marketing purpose such as to provide special service when VIP customer enters into the branch, to group VIP customer for arranging promotion and communicating their privilege, to inform any message, to offer any product or service or offer any promotion arranged especially for VIP customer, to monitor service qualification and evaluate VIP customer’s satisfaction.

In case you have not disclosed your information to the Company

In case the Company is obliged to collect and gather your information as required by law or is necessary to collect and gather your information as required in the contract made between you and the Company but you have not disclosed your information as requested, the Company may not be able to comply with the contract made by the Company or to be entered into with you (e.g. to provide service for you). In such case, the Company may have to reject to provide you the service or receive related service. However, the Company will notify you if there is such case when your information is collected e.g. the Company will not be able to provide you the delivery service to your address if the Company has not received information with regard to name, address and telephone number as the Company has to use such information to provide such service to you.

5. Use of cookies on the Company’s website

The Company uses tracing technology such as cookies or tags to collect and gather information in order to understand how the visitor using the Company’s website.

Tracing technology helps us to manage and increase the efficiency of the Company’s website such as it can help us investigating whether there is any communication made between you and us in the pass or not in order to record purchasing history or website visiting history, how to set up your language for your convenient when you get back to use our website.

Once you save your cookies setting, such setting will be used for visiting the Company's website in the future. However, there might be a technical reason beyond the Company's control. Therefore, we can not guarantee these cases e.g. you set up your new browser, delete cookies or visit the Company's website from other browsers or tools and your saved cookies might be lost.

In many cases, you are able to control tracing technology by using your browser. Please check to assure that your browser is set as you wanted whether there must be a warning or an acceptance of tracing technology e.g. cookies or not. If it is possible, you can find your browser's specialize and suggestion from manual or your supporting file.

To reject, restrict or close the tracing technology may cause the reduction in service efficiency of the Company's website or some part of the Company's website might not be working correctly.

6. Your information collection period

The Company will collect such information only for necessary period in order to reach the purpose of that information collection. In this regard, it also includes other cases such as to collect data for the compliance of legal requirement, regulation, accounting or report or for legal performance, to establish the right of legal claim or to raise the right of legal claim.

To indicate your suitable information collection period, the Company will consider on quantity, type and how sensitive of your information, risk of damage which may occur due to the use or disclose of your information without permission, the purpose of your information processing and whether the Company may achieve such purpose by using other methods or not as well as enforcing legal requirement.

Generally, the Company will collect your information throughout the period of HomeCard or Home Service membership (in case you are membership) or until the end of transaction made between you and us and throughout the maximum legal prescription (in Thai law, the maximum of general prescription is not over 10 years from the date of contract expiration). However, the Company may collect your information in shorter period in some cases.

In case of data obtained from cctv, the Company will collect such data only 30 days. If such image data is relevant to any incident, the Company may have to collect such related data longer than mentioned above e.g. for criminal investigation within branch area, using image data as evidence for the hearing.

If you need more information with regard to your data collection period, please contact the Company at data_privacy@homepro.co.th or find from Terms and Conditions in related service.

7. Disclosure of your information

The Company may have to exchange your information with other juristic persons or other persons as indicated below in order to comply with data collection purpose as provided in Clause 4 (Objectives and legal base why the Company using your personal information).

- Your data will be disclosed within the Company, its subsidiaries (“**Company Group**”). However, the Company will disclose your data to the Company Group in order to support the efficiency of the Company’s operation and to provide you our service with highest quality.
- The Company may disclose your data to the following persons if there is occurrence of event (subject to business requirement which the Company may enter into with you) as follows:
 - (1) The Company’s trading partner e.g. a company, who is a manufacturer, supplying, exchanging, returning or repairing product or a business alliance coordinating or jointly arranging marketing activity with the Company
 - (2) The insurance company for product liability or other insurance companies having the Company as a party
 - (3) A person or juristic person who the Company is obliged or requested by the court having jurisdiction to disclose information or government authority, tax authority or supervision authority, law enforcement authority or similar authority
 - (4) Consultant or advisor on the Company’s profession together with lawyer, banker, auditor, accountant and insurer who gives suggestion, legal advice, banking information, examination, accounting or insurance for the Company
 - (5) Financial institution that provides the Company investment fund
 - (6) Service provider who provides an information technology service and system supervision for the Company including warehouse or data keeping service e.g. cloud
 - (7) External auditor who is obliged to act as independent auditor to examine your file which is considered as an integral part of the consideration of the Company’s operation standard

- The Company may disclose your data to the third party Group provided that the Company may sell or transfer its business or some part of properties or, on the other hand, the Company may plan to take over or joint venture with the third party. However, if there in any change in the Company's business in term of selling, receiving or joining with another company (as the case may be), there might be the use of your data in similar way as defined in this notice.

The Company may request any person or juristic person who is disclosed your data by the Company to respect in such confidentiality and safety of your data and to handle your data in compliance with the law and regulation.

The Company may need to transfer your personal data to a person, international affairs department or international organization in which the Personal Data Protection Committee has not yet indicated that they have appropriate safeguard. However, once we have sent your personal data outside Thailand for processing, we will provide you appropriate measures to protect your personal data according to the Personal Data Protection Act B.E. 2562 or any announcement issued under this Act.

8. Your right

In some situations, you have the right under personal data protection law in the part related to your information. In this regard, the Company has its policy to respect your right and the Company will, immediately, comply with laws, rules or regulations relating to your data processing.

Your rights have details as follows:

- **Right to withdraw consent (opt-out):** In case the Company processes your data based on your consent, you may withdraw your consent at anytime.
- **Right to access information (opt-in):** You are entitled to request for confirmation whether the Company has processed your data or not and to access your data and details how the Company uses your data.
- **Right to relocate data (transferred to third party or other service providers):** In some cases, you are able to request for a copy of your data in electronic form that is able to read and use in general. It is the right to exercise with your data given to the Company. The Company has the right to relocate this data only if you give consent for data processing or the data processing is needed for the performance of contract.

- **Right to object to personal data processing in some cases:** You are entitled to object to data processed by the Company in the following cases (a) if the Company processes your data based on legal benefit or public benefit (b) if the Company directly uses your data for marketing benefit or (c) if the purpose of data processing is relating to science study, history or statistic.
- **Right to delete personal data in some cases:** You are entitled to request the deletion of some information held by the Company. However, such right does not cover the deletion of all data. The Company will consider the request in details for the compliance of processing purpose as informed earlier and legal requirement related to your data processing.
- **Right to restrain personal data processing in some cases:** You are entitled to restrain your personal data processing in some situations. However, such right will occur if you dispute against the correction of your data, if you object to data processing, if your data processing is illegal and the deletion or destroying is needed but you request to restrain, if the Company is no longer need to keep your data but you request us to keep your data in order to establish the right of legal claim, the exercise of right for legal claim or to defend for right of legal claim or if the Company has to use your data in order to investigate for the objection of data processing as your request.
- **Right to amend incorrect personal data:** You are entitled to request the amendment of incorrect or incomplete personal data. If the Company has reasonable reason not to amend your personal data as requested, you are entitled to request the Company to record your request in the Company's record with respect to data processing and
- **Right to complain:** You are entitled to submit the complaint if you consider that the Company or the Company's employee violates or does not comply with the Personal Data Protection Act B.E. 2562 or any announcement issued under this Act.

You may exercise any of your right at any time by using the Company's contact information as provided in Clause 9 below. In this regard, you need not to pay for any fee if you need to access to your data (or to exercise in any other rights). However, there might be some fee payment required (as the case may be) if it is found that your complaint has no ground, is double request or over necessary. The Company may deny performing your request if it is in such case.

The Company may be in need to request certain information from you in order to assist the Company to identify your identity and your right to access your data (or any other rights). It is safety measures to prevent your data be disclosed to unauthorized person. The Company may contact you for more information related to your request and for the Company to serve your request quickly.

The Company tries to respond all legal requests within 30 days. However, it might take longer than 30 days in some cases if your request is complicated or you submit many requests. In this case, the Company will inform and keep reporting you the progression for your acknowledgment.

9. To contact the Company if you have any question

If you have any question about this notice and your request, please contact the Company's personal data protection staff with the following details:

Company's personal data protection staff

Home Products Center Public Company Limited No. 31 Prachachuen-Nonthaburi, Tambon Bangkhen, Amphoe Muang, Nonthaburi province, Thailand

Email: data_privacy@homepro.co.th

10. Amendment of notice

This first notice is made on 31st March 2021 and the latest amendment is made as shown in " the date of amendment" (if any) . You can receive the previous notice by contact data_privacy@homepro.co.th.

The Company may adjust this notice from time to time and the Company will announce the adjustment on the Company's website for 30 days. In this regard, if you use the Company's service after the expiration of such period, you will be considered that you confirm and agree with this notice and any amendment.

If this notice is significantly amended, the Company may inform you via the Company's website (www.homepro.co.th/data-privacy), public relation media, online media or any other contact channels.