

## PRIVACY POLICY FOR CUSTOMERS UD TRUCKS

This Privacy Policy has been prepared to explain how UD Trucks (Thailand) Co., Ltd., UD Trucks Corporation (Thailand) Co., Ltd, Thai-Swedish Assembly Co., Ltd., TMBP Limited, TSA Land Co., Ltd. (“**UD Trucks**”) collects, uses, and discloses (“**process**” “**processing**”) the Personal Data under the Personal Data Protection Act, B.E. 2562 (2019) (“**PDPA**”).

It is necessary for you to read and understand this Privacy Policy where it relates to you. The content of this Privacy Policy is as follows.

### 1. Application of this Privacy Policy

This Privacy Policy applies to you if you are an individual customer, or a person associated with a corporate client (including the authorized director(s), authorized representative(s) and/or the contact person(s) of a corporate client) (“**Associated Person**”), who purchase or use UD Trucks’ products and services, and it also applies to you as our prospective customers, who is interested in our products or services, and guarantors of the customers.

Furthermore, this Privacy Policy also applies to the website/application’s users, who visit UD Trucks’ website/application.

### 2. The Types of Personal Data that We Process

In general, UD Trucks will collect and process the following types of your Personal Data:

Types of Personal Data	Details
<b>Identification and contact information</b>	Full name, date of birth, address, office telephone number, mobile phone number, email addresses, place of work, employment status, occupation, work position, identification card number, passport number
<b>Financial information</b>	Bank account number, bank account name, and other information in relation to the payment
<b>Corporate related information</b>	The information appearing in the corporate documents of a juristic person, e.g., Company Affidavit, List of Shareholders, Memorandum of Association, VAT certificate, bank statement, Power of Attorney, and other documents (if any)
<b>Product related information</b>	Vehicle number, model, color, and any other information, which is related to the vehicles, which you or your organization purchases from UD Trucks, or for which UD Trucks provide services. This type of the Personal Data includes telemetric related data.
<b>Information collected when you visit</b>	Voice records, images, and motions collected via the installed CCTV when you enter our premises.
<b>Transactional information</b>	Any information, which is required in order to enter into an agreement between UD Trucks and you or your company.

Types of Personal Data	Details
<b>Order/Service information</b>	Order number, purchase history, service history, and other information, which is related to the provision of the services by UD Trucks, or the products purchased.
<b>Website related information</b>	Cookies, IP address, interactions with our websites/application, log-in information, and other information, which is related to the use of our website/application.
<b>Sensitive Personal Data</b>	<p>In the case where UD Trucks collects a copy of Thai identification card, which contains religion and/or blood type data, which are considered as Sensitive Personal Data under the PDPA.</p> <p>In this regard, UD Trucks does not have an intention to collect or process such Sensitive Personal Data, which is appeared on the copy of my national identification card, i.e., religion and/or blood type. Therefore, unless the copy of the Thai identification card is to be passed to local authority(ies) as required by law or such authority (ies), UD Trucks requires you to omit, blind or cross out the information about your religion and/or blood type, before surrendering/providing a copy of the Thai identification card to UD Trucks.</p> <p>In the case where the full copy of the Thai identification card is collected, whereby the Sensitive Personal Data still appears on such Thai identification card, UD Trucks may, at any time, blind or cross out the information about my religion and/or blood type from such document in order to comply with the PDPA that requires UD Trucks to collect personal data to the extent that is necessary and relevant for its business operations.</p>

In the case where UD Trucks will collect the Personal Data other than those proscribed in this Privacy Policy, UD Trucks will inform you about the collection or the processing of the Personal Data, in accordance with the conditions prescribed by the PDPA.

### 3. The Methods for the collection of your Personal Data

In general, UD Trucks will collect the Personal Data through the following methods:

- (a) Collect the Personal Data directly from you through various methods, e.g., CCTV, communications between you and our personnel, our website or application, and our internal dealers.
- (b) From other sources or third parties, such as our authorized dealers, your organization, and commercial banks.

In the case you provide the Personal Data of any other persons to us, you warrant that you have informed such person about the processing of his/her Personal Data by UD Trucks as explained in

this Privacy Policy. In addition, if the consent for the processing of the Personal Data is required, you agree to assist UD Trucks in obtaining the valid and enforceable consent from such person.

#### 4. Purposes for Processing your Personal Data

In general, UD Trucks will process your Personal Data for the following purposes:

Purposes	Details
<p><b>To enter into a contract or establish a legal relationship between UD Trucks and you</b></p>	<p>Your Personal Data is necessary for UD Trucks to enter into an agreement with you.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Financial information</li> <li>• Corporate related information</li> <li>• Product related information</li> <li>• Transactional information</li> <li>• Order/Service information</li> <li>• Sensitive Personal Data i.e., religion and/or blood type data in the Thai identification card (if required)</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Contractual necessity (for the processing of general Personal Data in the case of individual customers)</li> <li>• Legitimate Interest (for the processing of the general Personal Data, and in the case of corporate customers, which UD Trucks needs to process the Personal Data of the Associated Persons of such corporate customers)</li> <li>• Explicit consent (for the processing Sensitive Personal Data)</li> </ul> <p><b><u>Remark:</u></b> If you do not provide any Personal Data that is necessary for entering into a contract, we may not be able to enter into a contract with you.</p>
<p><b>To perform rights and obligations under a contract or within the legal relationship between UD Trucks and you</b></p>	<p>After entering into a contract, UD Trucks may need to process your Personal Data to perform its rights and obligations under the contract, e.g., to provide you with the products purchased, to provide services, to proceed with the payment/repayment process, and to deliver the products.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Financial information</li> <li>• Corporate related information</li> <li>• Product related information</li> <li>• Transactional information</li> <li>• Order/Service information</li> <li>• Sensitive Personal Data, i.e., religion and/or blood type data in the Thai identification card (if required)</li> </ul> <p><b><u>Lawful basis</u></b></p>

Purposes	Details
	<ul style="list-style-type: none"> <li>• Contractual obligation (for the processing of general Personal Data in the case of individual customers)</li> <li>• Legitimate Interest (for the processing of the general Personal Data, and in the case of corporate customers, which UD Trucks needs to process the Personal Data of the Associated Persons of such corporate customers)</li> <li>• Explicit consent (for the processing Sensitive Personal Data)</li> </ul> <p><b>Remark:</b> If you do not provide any Personal Data that is necessary for entering into a contract, we may not be able to enter into a contract with you.</p>
<p><b>To verify a person or his/her authorization</b></p>	<p>Before entering into a transaction or contract with you, whether you act on behalf of your organization or on your own interest, UD Trucks may need to undertake a process for verify your identity and/or your authorization.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Corporate related information</li> <li>• Transactional information</li> <li>• Sensitive Personal Data, i.e., religion and/or blood type data in the Thai identification card (if required)</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Explicit consent (for the processing Sensitive Personal Data)</li> </ul>
<p><b>To communicate, contact, and coordinate</b></p>	<p>UD Trucks will need to process your Personal Data in order to communicate, contact, or coordinate with you.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Corporate related information</li> <li>• Transactional information</li> <li>• Order/Service information</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Legitimate interest</li> </ul>
<p><b>To ensure safety at our branches, premises, or other properties of UD Trucks</b></p>	<p>In order to ensure safety at our branches, premises, or other properties of UD Trucks, as well as life and body of our employees, contractors, customers, and any visitors, including you, UD Trucks has installed CCTV cameras around its premises, whereby your pictures, videos, and sound may be recorded when you visit such locations.</p>

Purposes	Details
	<p>In addition, when you visit our office, factories, or premises, you may be required to identify yourself before entering our buildings.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Information collected when you visit</li> <li>• Sensitive Personal Data, i.e., religion and/or blood type data in the Thai identification card (if required)</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Explicit consent (for the processing Sensitive Personal Data)</li> </ul>
<p><b>To undertake any administration and management activities within UD Trucks and its group company</b></p> <p>For example,</p> <ul style="list-style-type: none"> <li>• Create customer ID;</li> <li>• Manage customers' accounts; and</li> <li>• Onboard a new customer when applying for credit lines.</li> </ul>	<p>In operating the business of UD Trucks, your Personal Data may be processed as part of our internal processes or of the administration and management work. For example, to manage data for the purpose of managing, storing, recording, backing up, or destroying Personal Data.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Financial information</li> <li>• Corporate related information</li> <li>• Product related information</li> <li>• General information collected when you visit</li> <li>• Transactional information</li> <li>• Order/Service information</li> <li>• Website related information</li> <li>• Sensitive Personal Data, i.e., religion and/or blood type data in the Thai identification card (if required)</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Explicit consent (for the processing Sensitive Personal Data)</li> </ul>
<p><b>To undertake any analysis activities</b></p>	<p>In operating the business, UD Trucks may conduct the data analytics, market analysis, or any other analysis and analytic related activities, whereby your Personal Data may be part of such activities. Such activities may include the creating of statistics concerning the provision/sale of products and services, the conducting market surveys, meta-analysis, and statistical research, and reporting or assessing our financial, sale, and work performance.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Financial information</li> <li>• Corporate related information</li> <li>• Product related information</li> <li>• Transactional information</li> </ul>

Purposes	Details
	<ul style="list-style-type: none"> <li>• Order/Service information</li> <li>• Website related information</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Legitimate interest</li> </ul>
<p><b>To provide supporting services and relevant activities</b></p> <p>For example,</p> <ul style="list-style-type: none"> <li>• Investigate defects of products in the product recall process;</li> <li>• Conduct product recalls process, e.g., communicate with customers, send notification letter to customers; and</li> <li>• Investigate customers' vehicles accident</li> </ul>	<p>It may be necessary for UD Trucks to process the Personal Data of Customers to provide supports to Customers after the sale of our products and services</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Corporate related information</li> <li>• Product related information</li> <li>• Transactional information</li> <li>• Order/Service information</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Legitimate interest</li> </ul>
<p><b>To improve, develop, and create products and services</b></p>	<p>UD Trucks always wishes to improve, develop, and create products and services, which could provide the customers with the best experiences in using our products and services.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Financial information</li> <li>• Corporate related information</li> <li>• Product related information</li> <li>• Transactional information</li> <li>• Order/Service information</li> <li>• Website related information</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Legitimate interest</li> </ul>
<p><b>To negotiate, plan, or undertake necessary activities in relation to restructuring of the business</b></p>	<p>UD Trucks may negotiate, plan, or undertake necessary activities in relation to restructuring of the business, as well as entering into such transactions as business acquisition, merger, and sale of any part of the business.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Financial information</li> <li>• Corporate related information</li> <li>• Product related information</li> <li>• General information collected when you visit</li> <li>• Transactional information</li> <li>• Order/Service information</li> <li>• Website related information</li> </ul>

Purposes	Details
	<ul style="list-style-type: none"> <li>Any other Personal Data, which may be related to you.</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>Legitimate interest</li> </ul>
<p><b>To conduct marketing activities</b></p>	<p>UD Trucks may use your Personal Data to provide privileges or offer sales promotions, including in collaboration with our business partners, or other business operators, as well as to conduct any other marketing activities, and sending news, updates, articles, and any marketing materials.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>Identification and contact information</li> <li>Financial information</li> <li>Corporate related information</li> <li>Product related information</li> <li>Transactional information</li> <li>Order/Service information</li> <li>Website related information</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>Legitimate interest (for corporate customers, and existing customers)</li> <li>Consent (for individual prospective customers)</li> </ul>
<p><b>To operator the website, application, or any online platforms</b></p>	<p>To provide services through electronic communication channels via the Internet, such as to enable you to access our website content, social media platforms, or any of our services in particular, including to process your website or social media platform usage behavior in order to analyze your usage behavior, understand your preferences, customize our website or social media platforms, or to assess, operate and improve our website or social media platforms.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>Identification and contact information</li> <li>Website related information</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>Legitimate interest</li> <li>Contractual obligation</li> </ul>
<p><b>To comply with laws</b></p>	<p>UD Trucks may be required to process your Personal Data for complying laws, regulations, orders, notifications, or other rules issued by authorities. For example, complying with the PDPA by fulfilling your requests in respect to your Personal Data.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>Any information as required by law</li> </ul> <p><b><u>Lawful basis</u></b></p>

Purposes	Details
	<ul style="list-style-type: none"> <li>Legal obligation</li> </ul> <p><b>Remark:</b> If you do not provide any Personal Data that is necessary for compliance with the law concerning the provision of our products or services, we may be unable to provide products or services to you, or enter into a contract with you.</p>
<p><b>To establish, exercise, comply or defend legal claims</b></p>	<p>Your Personal Data may be processed as part of the establishment, exercising, compliance or defense of legal claims.</p> <p><b>Types of Personal Data Processed</b></p> <ul style="list-style-type: none"> <li>Any information as required by law</li> </ul> <p><b>Lawful basis</b></p> <ul style="list-style-type: none"> <li>Establishment of claims</li> </ul>

## 5. Website related processing

### 5.1 Use of Cookies

#### (a) What is a cookie?

Cookies are small text files that are used to store web browser usage data and enable websites to remember user preferences.

#### (b) For what purposes do we use cookies?

We use cookies to, for example, provide services to you on web browsers, display website content correctly, enable our website to function, allow the exchange of information and communication between your web browser and our web server, and between the website and you, as a website user, and to remember your visits to our website through a web browser.

It is necessary for UD Trucks to use cookies, as described above, in order to provide you with services through website. These cookies, which are used for the purpose of providing services through website, are used immediately when you access UD Trucks' website through a web browser.

You may block cookies in your browser settings, by declining either all cookies or only some types of cookies. However, please note that if you block all cookies, which include cookies that are necessary for the functioning of our website, you may be unable to access our website, in whole or in part.

Whenever you wish to withdraw your consent to the use of cookies, you may set your browser so that it deletes cookies from each of the web browsers that you use.

### 5.2 Links to Other Websites

In cases where our website contains links to other websites, we will not be responsible for your usage of another website. In such event, we suggest that you also study and understand the conditions and terms of use of such website, and particularly those related to personal data protection.



## **6. Disclosure of Your Personal Data**

In Processing Personal Data for the above purposes, it may be necessary for us to disclose your Personal Data to third parties, as follows:

- (a) to any of UD Trucks' affiliates or group companies, both within and outside Thailand, for the purpose of internal management and administration work, to provide you with our services and/or products, to perform our contractual obligations, and for other purposes as identified in this Privacy Policy;
- (b) to third-party dealers;
- (c) to third party vendors who provide services to UD Trucks, such as logistic service providers, and cloud services;
- (d) to commercial banks and financial institution or companies, in the case your products and services are related to financial supports;
- (e) to external legal counsels in the case of debt collection, legal proceedings and legal execution;
- (f) to general counsels, advisors, auditors, and other experts;
- (g) to any competent regulatory, prosecuting, tax or governmental agencies, courts or other tribunals in any jurisdiction, including the Revenue Department;
- (h) to UD Trucks' business partners;
  
- (i) to third parties in connection with a change of ownership in UD Trucks, or any of its assets or properties; and
- (j) to any other persons or entities to whom UD Trucks is required to make disclosure by applicable law.

## **7. The Cross-Border Transfer of The Personal Data**

UD Trucks regularly transfers your Personal Data to its affiliates and group companies, and in certain circumstances, to third parties (e.g., service providers), located outside Thailand, which may have different data protection standards to those prescribed by the data protection authority in Thailand.

In addition, most of our servers, which we use to process and store your Personal Data for the purposes prescribed herein this Privacy Policy, are located outside Thailand.

Notwithstanding that, UD Trucks ensures that it will protect your Personal Data by implementing adequate personal data protection standards for the transfer of your Personal Data outside Thailand. UD Trucks shall also ensure that any third parties to whom your Personal Data will be disclosed, shall implement adequate personal data protection standards, and where your Personal Data will be transferred within UD Trucks' affiliates or group companies, UD Trucks shall use permitted data transfer mechanisms, e.g., binding corporate rules.

## **8. Retention of the Personal Data**

UD Trucks retains your Personal Data for as long as is required in order to fulfil our contractual obligations, or the performance of our services to you or our customers, and for 10 (ten) years after the cessation of our contractual relationship, or the last performance of our services, unless otherwise required or permitted by applicable law.

We may retain your Personal Data longer than the above period, only as otherwise permitted or specified by the applicable law.

## 9. Your Rights to Personal Data

You have the following rights with respect to your Personal Data:

- (a) To withdraw your consent, or to request a change to the scope of your consent;
- (b) To request that we confirm to you whether we have in possession any Personal Data that is related to you, to access or to obtain a copy of any such Personal Data, to request information about how we have processed or are processing your Personal Data, and to request that we disclose the source(s) of your Personal Data which has been obtained without your consent;
- (c) To request that we correct any Personal Data that is related to you;
- (d) In certain circumstances, to request that we delete or destroy your Personal Data;
- (e) In certain circumstances, to request to object the Processing of your Personal Data;
- (f) In certain circumstances, to request that we transfer your Personal Data; and
- (g) In certain circumstances, to request suspension of the Processing of your Personal Data.

We reserve the right not to comply with your request if this is appropriate, and as permitted by the applicable law.

In addition to the rights above, you have the right to file a complaint in relation to our Processing of your Personal Data with an expert committee, in accordance with the procedures set out in the PDPA.

As far as permitted by the applicable law and regulations, we may be entitled to charge reasonable expenses incurred in respect to handling any of the above requests.

## 10. Contact Us

If you have any inquiries in relation to your Personal Data, or you would like to exercise any of your Data Subject Rights, you may contact us at:

**UD Trucks Corporation (Thailand) Co., Ltd**  
199 Moo 1, Bangna-Trad Highway,  
T. Srisajorrakaeyai A., Bangsaothong District,  
Samutprakan 10570

Tel. + 66 2 021 9500

Email : [dpo\\_thailand@udtrucks.com](mailto:dpo_thailand@udtrucks.com)

**Contact details of our Data Protection Officer (DPO)**

**Thitaree Thitiworanon**

**UD Trucks Corporation (Thailand) Co., Ltd**  
199 Moo 1, Bangna-Trad Highway,  
T. Srisajorrakaeyai A., Bangsaothong District,

Samutprakan 10570

Tel. + 66 2 021 9500

Email: [dpo\\_thailand@udtrucks.com](mailto:dpo_thailand@udtrucks.com)

**11. Changes to this Privacy Policy**

UD Trucks may amend, change, or update this Privacy Policy from time to time, whereby UD Trucks will update the changes on UD Trucks' website. In the event that the amendment, change, or update will affect the purposes for which your Personal Data has originally been collected, UD Trucks will notify you about such changes, and obtain your consent (*if required by law*), prior to such changes becoming effective.

This Privacy Policy shall take effect from June 1, 2022 onwards.