

Privacy Policy

T&B Media Global (Thailand) Company Limited and Translucia Company Limited (will be known as “**T&B**”, “**Company**”, “**Us**”, “**We**”) understands the importance of your privacy and will provide the information regarding the privacy policy on how your personal information is gathered, used, and analyzed (in general known as personal data processing) whether the process is done through our website, application, or other platforms (“**Our Services**”)

The Privacy Policy is used for visitors, users, or other persons who use Our Services which will be referred to as “**You**”, or the “**User**.” Personal information means any information that can be used to discern the owner of such information whether directly or indirectly such as name, email, phone number, hardware information, tools (IP Address), and information relating to the User’s choices.

The Privacy Policy will contain the following topics:

- What type of personal data is collected by the Company
- How the Company stores your personal data
- How the Company processes your personal data
- Who will the Company share your personal data with
- How long will the Company retain your personal data
- Your Privacy Rights and how can you exercise them
- Protecting your personal data
- Changes to the Policy
- How to contact us

What type of personal data is collected by the Company

The Company may be required to collect, compile, or process your personal data which includes the following information

- Contact information (including your full name, email, and/or phone number)
- Other information that the owner has provided for competitions, promotions, product exhibitions, any other activities that are related to the services of the company. Information provided through surveys, questionnaires, through the “**Contact Us**” services, or other similar ways whether online or offline.

How the Company stores your personal data

The Company collects and gather your personal data from many sources which are

- The Company may collect your personal data directly when you participate in a questionnaire, competition, apply for promotional offers, or other processes using our services.

- The Company may collect your personal data from other sources including publicly accessible sources, business partners, other related persons to the personal data owner (example such as other service providers that have provided services to the owner of the personal data).

How the Company processes your personal data

In general, the Company will process your data for the following purposes

- For recommending products or providing services to the user and assist the user in using our services.
- To improve our services and communication standards.
- To contact the user when they have participated in a competition, survey, or questionnaire with the Company.
- To reply or follow up your requests and complaints.
- To comply with the obligations required by law such as to follow the terms and conditions in the Company financial statements that are set by the auditor and/or government agency and to cooperate with the court, governmental agency or regulatory body in trials or investigations.
- To analyze and proceed with the Company's events and activities (replying to customers, sales, customer appointments or customer phone calls).
- To send promotional offers and updates to our services.
- For other purposes that the Company will notify the users when the Company requires your consent for data collection.

The Company may process your personal data for other purposes not within the terms above. When the company receives the approval from the user or when the process is authorized or when it is required by law which also includes the following purposes.

- (a) To operate according to the Company's regulations
- (b) To protect or suspend from life threatening harm to the wellbeing of an individual
- (c) For the benefit of the public or to comply with orders of the competent officer.
- (d) For the benefit of legitimate interest of the Company or others where the Company will use discretion in using the personal data (For example, to sell any part of our business or its assets or to enable the acquisition of our businesses or assets, in whole or in part, by third parties, to prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture, and networks)

However, the Company may use the personal data that has been processed as Anonymized data for other purposes that do not require the user's consent.

Who will the Company share your personal data with

The Company will not share, sell, or disclose your personal data to other parties without the consent from the users except as permitted or required by law and to the extent the disclosure serves the purposes as abovementioned.

In the course of our business activities and to fulfill the purposes, your personal data may be disclosed or transferred either in, or outside The Kingdom of Thailand, to the potential recipients (in each case including its respective employees, agents and directors) as follows:

- Our suppliers or service providers (such as IT systems providers, marketing service providers cloud service providers, database providers and consultants providing services in relation to any matter on which the Company instructs them), where disclosure to that provider of services is considered necessary to fulfill the purposes set out above;
- Our business partners who offer services jointly with us;
- Potential parties with whom the Company intends to merge or to sell in whole or in part of the Company; or
- Government authorities or government officers by virtue of the provisions of specific laws to maintain the stability of the state, or to maintain public order or good morals, and fully comply with the procedures as prescribed by such laws.

Where the Company discloses or transfers Personal Data to any third parties, the Company will enter into an agreement with the third party setting out the respective obligations of each party in place to protect Personal Data against unauthorized or accidental use, access, disclosure, damage, loss, or destruction.

How long will the Company retain your personal data

We will only retain the Personal Data for as long as you continue to use the Service, or for as long as necessary to fulfill the purposes (as set out above) for which we collected it, and to the extent permitted by relevant data protection laws or other applicable laws. We may continue to retain your Personal Data even after you cease to use the Service if such retention is reasonably necessary to comply with our legal obligations, to resolve disputes, prevent fraud and abuse, enforce our Terms and Conditions or other agreements, and/or protect our legitimate interests.

You may request to remove your personal data from our storage through wasin@tandbmediaglobal.com, your data will be removed within 1 (one) year from the requested date.

Your Privacy Rights and how can you exercise them

Under the relevant data protection law, you have the following rights that you may exercise in relation to your Personal Data processed by us. You may make a request to exercise any of these rights regarding your Personal Data within legal requirements and policies/ regulations currently in force or as amended in the future. If you are not of legal age in your country or have a limited legal capacity, your father, mother, guardian or legal representative may request to exercise the right on your behalf.

- The right to request receipt of a copy of your Personal Data processed by us and to obtain other information about how we collect/process your Personal Data and why we process your Personal Data. Your Personal Data will generally be provided to you in electronic form.
- The right to request the rectification of inaccurate, incomplete, or misleading Personal Data relating to you.
- The right to request the erasure, destruction, anonymization of your Personal Data.
- The right to request to restrict the processing of your Personal Data. You have right to request us to restrict the use of your Personal Data when we are in the process of reviewing your request to correct your Personal Data or your objection, as well as in any other event where you request the restriction of the use of your Personal Data instead of deleting or destroying the Personal Data that is no longer necessary.
- The right to data portability: You have the right to request receipt of your Personal Data that we have arranged it in the format which is readable or used by ways of automatic tools or equipment and can be used or disclosed by automate means. You are also entitled to request us to directly send or transfer your Personal Data in such format to other data controller unless it cannot be done due to technical reasons.
- The right to object to any processing which is based on legitimate purposes or other legal grounds.
- The right to withdraw your consent: If you have given us consent to collect, use and/or disclose your Personal Data (whether before or after the effective date of relevant applicable personal data protection law), you have right to withdraw your consent at any time throughout the period your Personal Data available to us. However, even after you have withdrawn your consent, we may continue processing your Personal Data based on another legal basis.

Withdrawal of your consent will not affect the collection, use or disclosure of your Personal Data that we have done according to your given consent. The withdrawal may affect your use of our Services. For example, you may not receive privileges, promotions, news, services that are enhanced and consistent with your needs or you may no longer be able to use our Services. Therefore, after we receive your request to withdraw the consent, we will notify you the potential consequences of withdrawing your consent for you to reconsider your withdrawal.

- **Right to lodge a complaint:** You also have the right to lodge a complaint to the data protection authorities if your request is rejected and you are dissatisfied with our reasons or the response is not provided to you within the period and if you believe that the collection, use and/or disclosure of your Personal Data is violating or not in compliance with relevant laws.

If you would like to exercise your rights, ask questions, or file a complaint about unlawful processing, you may send your request by emailing to wasin@tandbmediaglobal.com. We will require you to identify yourself before attending your request. Any request made pursuant to the rights as described above must be made in writing. Please provide as clear details and circumstances surrounding your request relating to the Personal Data. We will use our best effort to take action and clarify within 30 days or not exceeding the period specified by law.

The exercise of rights listed above may be restricted under relevant laws and it may be necessary for us to deny or not be able to carry out your requests such as to comply with laws or court orders, public tasks, or there is an overriding interest for us to retain and processing Personal Data to protect rights and freedoms of others. If we deny the request, we will inform you of the reason.

Protecting Your Personal Data

The Company has implemented appropriate safety measures for both physical and technical areas of your personal data from unauthorized, unlawful, or accidental destruction, loss, changes, disclosure, access, or use.

Changes to the Policy

We reserve the right to update this policy for any reason, including but not limited to complying with relevant laws, government policy, regulatory and other obligations of a similar nature.

Any updates will appear on our website at <https://www.translucia.com/static/privacy-policy.pdf>. Any changes to this Privacy Policy will become effective upon publishing the Privacy Policy.

How to Contact Us

The Company is considered as the data controller under the Personal Data Protection Act B.E. 2562, if there are any questions or any requests to use your personal rights you can contact us through the following address

To: DPO Team

Address: No. 101 True Digital Park, 4th Floor, Room 408, Sukhumvit Road, Bang Chak Sub-district, Phra Khanong District, Bangkok, Thailand 10260

Email: wasin@tandbmediaglobal.com