

Privacy Policy

Studist (Thailand) Co., Ltd. ("Company") strongly recognizes the importance of the protection of personal data.

The Company establishes a management system for personal data protection for each service of the Company (collectively, "Service", users of the Service shall hereinafter be referred to as "Service Users") and each business activity of the Company while appropriately and carefully handling personal data.

Article 1 (Comply with Laws and Regulations)

The Company will comply with the Personal Data Protection Act B.E. 2562 (2019) and the subordinate regulations and notifications issued thereunder regarding the handling of personal data ("PDPA") and keep the management system for personal data protection current.

Article 2 (Scope of Application)

- 1 This Privacy Policy ("Policy") applies to the use of the Service and business activities of the Company, and if the Company stipulates other provisions for the handling of personal data concerning the Service Users, its clients, and employees, the person who has resigned the Company, job applicants, and stakeholders (collectively, "Users") on the website operated by the Company, in other privacy policies issued by the Company, and other privacy regulations, or in the terms of use of the Service, such provisions shall also apply, and if such provisions conflict with the Policy, such provisions shall prevail.
- 2 Provisions under the Policy shall not apply to the affiliate services provided by a third party that is being used in tandem with the Service ("Affiliate Services") and any services provided by any third parties (collectively, "External Services"). Please refer to the privacy policy separately set forth by the provider of such External Services with regard to the handling of data of the Users by the provider of the External Services.

Article 3 (Acquisition of Personal Data and Retention Period)

The Company may acquire data of the Users including the Personal Data ("Personal

Data”, as defined in Section 6 of the PDPA, shall apply hereinafter) set forth below for the Service and business activities of the Company. The Company will properly acquire such data and the Personal Data, not by deceit or other wrongful means, in compliance with the PDPA. If the Company acquires the Personal Data in other manners other than through the Service or business activities of the Company, the Company will give prior notice of the utilization purpose of the Personal Data to the Users, unless otherwise provided by the PDPA.

(1) Data to be collected by the Company.

The Company will acquire name, gender, date of birth, phone number, email address, and the name of company and/or department that the Users are assigned to, and other data that the Users, at the User’s option, enter or provide throughout the Service and business activities of the Company, to the extent necessary for the provision of the Service and business activities of the Company, for compliance with the law or contracts, or for the legitimate interests of the Company or other persons. In case that the Personal Data is required for the necessity to comply with the law or contracts or is necessary for entering into a contract with the Users, if the Users fail to provide the Company with such Personal Data, there may be a legal impact on the Users or a third person, or the Company may not be able to perform its legal obligations under the contract entered into with the Users or may not be able to enter into the contract with the Users.

(2) Other data to be collected by the Company for the use of the Service by the Service Users.

The following data will be included in the data to be collected by the Company.

- Terminal data

If the Service Users use the Service on a terminal or a cell phone, the Company may collect any terminal data used by the Service Users (including ID to identify the terminal) to maintain and improve the Service, or for unauthorized act prevention.

- Log data, action history, and data concerning the usage of the Service

The Company may collect IP address to be automatically created and saved in using the Service, date and time when the Company receives requests from the Service Users, data concerning operation history created in the Service, and data concerning the usage of the Service by the Service Users to maintain and improve the Service, or for unauthorized act prevention.

- Cookie and Anonymous ID (hereinafter collectively referred to as “Cookie, etc.”)

The Company may use a technology called “Cookie” and a similar technology in the

Service. Cookie is a globally standard technology that allows a webserver to identify the Service Users' electronical terminal. Cookie may identify the Service Users' electronical terminal, but not the Personal Data of the Service Users. Cookie may be disabled by changing the setting on the Service User's electronic terminal, but by doing so the Service Users may not be able to access the whole or a part of the Service.

- Data to be acquired in tandem with the External Services

The Company may acquire ID used by the Service Users in the External Services in tandem with the Service and also data that the Service Users allow the provider of the External Services to disclose in accordance with the privacy setting of other external services.

- Content of Telephone Calls

During telephone conversations with the Users, the Company may record the calls in order to accurately understand the content of orders, opinions, requests, and inquiries, as well as to improve the services in the future.

- (3) The Personal Data will be retained for the period necessary for the achievement of the purposes for which it was collected. The Company may retain your Personal Data for a longer period if it is permitted or required by the laws, or the Personal Data may be the subject of a legal claim or may otherwise be relevant for future litigation. After the retention period has passed or the Personal Data becomes unnecessary, the Company will delete, destroy, or anonymize it as the Company deems appropriate.

Article 4 (Utilization Purpose of Personal Data)

1. The Company will utilize the Personal Data of the Users to the extent for the purposes set forth below or in cases where the purpose of use is found to be clear in light of the circumstances of the acquisition, and the Company will not use the Personal Data of the Users for other purposes without the Users' consent, unless otherwise permitted by the PDPA or other laws.

- (1) Personal Data collected through the inquiries in relation to the Service, and request for data material or/and a free trial of the Service.

- Sales and marketing activities.

- The Company will analyze the acquired data, such as browsing history, and use it for advertisements related to new products and services according to interests and preferences.

- The Company will analyze the acquired behavioral history and other data to calculate a score of interest in the Service, and then provide services that match that score.
- The Company will analyze the status of mail opening and click history, etc., and use the data to adjust the frequency and content of email distribution.
 - Responding to inquiries in relation to the Service, request for information material, and a free trial of the Service.
 - Provision of information on the Company's products, the Company's information, the Company's services, and its related information.
 - Data is collected through a questionnaire to reflect requests from customers in the Company's products and services, planning solutions, development, advertisement, and sales and service activities.
- (2) Personal Data collected through sales activities (business negotiations, seminars, and exhibition) in relation to the Service.
 - Sales and marketing activities.
 - This data will be used to provide detailed information on the Service and information on related new products and services.
 - Confirmation of participation in seminars and business communication
- (3) Personal Data of the Service Users.
 - Identify verification and authentication for the use of the Service.
 - The contents of contracts for the Service, contract management including the status of payment.
 - Reviewing the status of utilization of the Service for the purpose of planning, development, maintenance, and improvement of the Service.
 - Reviewing the status of utilization of the Service for the purpose of supporting the operation of the Service and investigating defects of the Service.
 - Creation and utilization of statistical data in relation to the Service.
 - Notification of important news about the Service.
 - Announcement of the Service and responding to inquiries in relation to the Service.
- Notification of information and notices regarding services related to the Service, other services provided by the Company, or the Affiliate Services.
 - Sending an announcement of the Service and products, other campaigns, questionnaire, and direct e-mails.

- Identification of acts in violation of the Company's terms of the Service, and actions such as suspension of use of the Service.
- (4) Personal Data of clients
 - Management of clients' data and transactions.
 - Achievement of transaction.
 - Notification including announcement and data in relation to the Service.
 - For the purpose of planning, development, maintenance, and improvement of the Service.
- (5) Personal Data of employees of the Company and individuals who have resigned from the Company.
 - Employment and human resources management.
- (6) Personal Data of applicants
 - Data management and contact in relation to employment screening and its results.
- (7) Personal Data of shareholders
 - Execution of rights of stakeholders and performance of the Company's obligation.
 - Data provided by the Company to shareholders, provision of convenience.
 - Implementation of measures to smoothen the relationship between shareholders and the Company.
 - Creation of data pursuant to laws and regulations, and management of shareholders.
- 2. If there are temporary purposes of collecting the Personal Data other than the foregoing, the Company shall notify the Users thereof prior to or at the time of the collection. The Company may change the utilization purpose provided for in the preceding paragraph to the extent that such change is reasonably deemed to be related to the original utilization purpose upon which the Company shall notify the Users of such change, as well as acquire consent from the Users in relation to the new utilization purpose, unless otherwise permitted by the PDPA or other laws.

Article 5 (Provision of Personal Data to Third Parties)

1. Unless otherwise provided in this Policy, the Company will not disclose and provide any Personal Data to any third parties; provided, however, that this shall not apply to the following cases.
 - (1) cases based on laws and regulations.
 - (2) cases in which there is a need to protect human life, body, or fortune, and when

it is difficult to obtain a principal's consent.

(3) cases in which there is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain a principal's consent.

(4) cases in which there is a need to cooperate in regard to a central government organization or a local government, or a person entrusted by them performing affairs prescribed by laws and regulations, and when there is a possibility that obtaining a principal's consent would interfere with the performance of the said affairs.

(5) cases in which there is business succession including the transfer of the Personal Data of the Users that is caused by a merger, company split, business transfer, or other reasons.

(6) cases in which the acquisition and disclosure of the Personal Data is based on the prior consent of the Users.

2. The Company may provide the Personal Data to third parties including Studist Corporation which is a parent company of the Company. The country-specific data that should be used as a reference in such cases is as follows at this time.

(1) Country to which the data is provided: Japan

(2) Personal data protection system of Japan

Please see the following link for information provided by the Personal Information Protection Commission, Government of Japan.

<https://www.ppc.go.jp/en/index.html>

(3) Personal Data protection measures taken by third parties

The recipient of the data is subject to the same level of measures as the Company. In the case that the Company sends or transfers the Personal Data outside of Thailand, the destination country or international organization that receives the Personal Data shall have in place adequate data protection standards and shall be carried out in accordance with rules for the Personal Data protection as prescribed by the Personal Data Protection Committee ("PDPC"), unless certain exemptions as provided by the PDPA apply.

Further, the Company may put in place a Personal Data protection policy regarding the sending or transferring of the Personal Data to another data controller or data processor who is in a foreign country and is in the same affiliated business or is in the same group of undertakings in order to jointly operate the business or group of undertakings. If such Personal Data protection policy has been reviewed and certified by the PDPC, the Company will send or transfer the Personal Data to a foreign country in accordance with such reviewed and certified Personal Data protection policy even though the destination country or international organization

that receives the Personal Data does not have adequate data protection standards as provided by the PDPC.

Nonetheless, the Company may send or transfer the Personal Data to a foreign country in exemption to compliance with the PDPA if the Company provides suitable protection measures which enable the enforcement of the data subjects' rights including effective legal remedial measures according to the rules and methods as prescribed and announced by the PDPC.

Article 6 (Proper Protection of Personal Data)

The Company will take appropriate actions to handle the Personal Data appropriately and keep it accurate and current in accordance with the PDPA and the Policy, and the Company will properly and safely control the Personal Data of the Users for the prevention of leakage, loss, or damage and the protection thereof. In order to handle the Personal Data appropriately, the Company will implement the following security control measures to ensure the safety of data systems that process the Personal Data in accordance with the minimum standards specified and announced by the PDPC.

(1) Formulation of Basic Policy

The Company has established basic policies, including data security regulations, to ensure the proper handling of the Personal Data.

(2) Establishment of Rules for Handling of the Personal Data

The Company has established rules for the handling of the Personal Data concerning basic matters for ensuring the proper handling of the Personal Data.

(3) Organizational Security Control Measures

The Personal Data Protection Manager will supervise the operations related to measures for the management of the Personal Data. The Personal Data Protection Manager will appropriately confirm that the Personal Data is handled in accordance with the handling methods stipulated in the rules for the handling of the Personal Data, and implement improvements as necessary. The Personal Data Protection Manager will establish and regularly check a reporting system in the event of an incident such as the leakage of the Personal Data. The Personal Data Protection Manager will conduct regular audits of the operation of the Personal Data handling system based on the rules for the handling of the Personal Data.

(4) Human Security Control Measures

The Company will provide employees with training on the protection and proper handling of the Personal Data.

(5) Physical and Technical Control Measures

The Company will manage access to the Personal Data by, for example, limiting the number of persons authorized to access the data and promptly deleting the accounts of those who leave the Company or are transferred. The Company will implement measures to prevent the Personal Data from being taken out of the Company, such as encrypting PCs and prohibiting the use of USB memory sticks and other portable storage media. The Company will implement the Mobile Device Management (MDM) to allow for remote wipe. The Personal Data Protection Manager will check the disposal of equipment or electronic media. The Company will implement measures to prevent unauthorized access from outside, such as the introduction of WAF and IPS/IDS.

(6) Understanding of the External Environment

The Company will implement security control measures based on understanding of the system related to the protection of the Personal Data in the United States, where the Personal Data is stored. Please refer to Article 8 below for data on the system regarding the protection of the Personal Data in the United States. In order to ensure that these security control measures are properly implemented, the Company has obtained the Information Security Management System Certification under the law of Japan and regularly reviews the management system. In the event of a Personal Data breach such as a leakage of the Personal Data, the Company will report such incident to the regulatory authorities in accordance with the PDPA and related guidelines, and take necessary measures, including measures to prevent similar incidents from occurring or recurring, in accordance with the instructions of the relevant regulatory authorities.

Article 7 (Procedures Concerning User's Demand)

The Company is responding to (1) demand for disclosure, (2) demand for the notification of utilization purpose, (3) demand for correction, (4) demand for additional contents, (5) demand for deletion, and (6) demand to cease or erase the utilization, (7) demand to withdraw consent, (8) demand to access and obtain copy, (9) demand to transfer to other data controllers, (10) demand to object the collection, utilization or disclosure, (11) demand for destroy, delete or anonymization, (12) demand for restriction of utilization and (13) complaint of violation, of any Personal Data of the Users held by the Company. For details of the procedures, please contact the following contact information.

E-mail: privacy@studist.jp

Address: 952 Ramaland Building 13 Fl, Rama IV Rd, Suriyawongse, Bang Rak, Bangkok 10500, Thailand

Fees will be charged when the request for disclosure and the notification of the utilization purpose are made, and the Company may not proceed with those procedures if the Company is not liable for those obligations under the PDPA and other laws and regulations or if the request falls into the exemptions provided by the PDPA.

Article 8 (Supervising Outsourcing Contractors)

The Company may entrust outsourcing contractors with the handling of the Personal Data, in whole or in part, collected from the Users to the extent necessary for the achievement of the utilization purpose. In such a case, the Company will thoroughly screen for the eligibility of the outsourcing contractors, stipulate matters concerning confidentiality for concluding contracts, and conduct necessary and appropriate supervision for establishing a system to manage the Personal Data. In principle, data pertaining to the Service is stored in servers in Japan, but there are cases in which the storage of the Personal Data is entrusted to a subcontractor located in Virginia, USA. Please refer to the website of the Personal Information Protection Commission for information on the system regarding the protection of personal information in the United States.

[In the case that such outsourcing contractors are regarded as the Data Processor (“Data Processor” as defined in Section 6 of the PDPA, shall apply hereinafter) for the Company, the Company will enter into a data processing agreement in accordance with the PDPA to ensure that such Data Processor will process the Personal Data in accordance with the Policy and its obligations under the PDPA.]

Article 9 (Joint Use)

The Company will jointly use the Personal Data between the Company and our parent company, Studist Corporation ("Studist Group") only when necessary within the scope described below.

- (1) Items of the Personal Data to be jointly used
Items stated in “Article 3 (Acquisition of Personal Data)”
- (2) Scope of joint users
The Studist Group
- (3) Purpose of use
Items stated in “Article 4 (Utilization Purpose of Personal Data)”
- (4) Chief Administrator
Studist Corporation

Article 10 (Disclaimer)

The Company assumes no responsibility for the acquisition of the Personal Data by any third parties for the following cases.

- (1) cases in which the Users use functions of the Service or other methods to disclose the Personal Data to a third party.
- (2) cases in which an individual becomes identifiable by the data entered in the Service by the Users.

Article 11 (Utilization of Statistical Data)

Based on the Personal Data of the Users acquired by the Company, the Company may create statistical data that is processed to make it impossible to identify a specific individual. The Company may use such statistical data without limitation.

Article 12 (Use of Cookie, etc.)

When the User agrees to the Policy and enters or registers the Personal Data on a website operated by the Company, or when the User accesses a website operated by the Company from a URL that appears in an email or similar message sent by the Company, the Company may associate the Cookie, etc. with the User's Personal Data. In light of the fact that the Cookie, etc. associated with the User's Personal Data are the User's Personal Data, the Company will manage such Cookie, etc. in accordance with the provisions of the Policy.

Article 13 (Inquiry Regarding Personal Data)

For any inquiries or complaints regarding the handling of the Personal Data or the handling of the Personal Data of the Users, please contact the following contact information.

E-mail: privacy@studist.jp

Address: 952 Ramaland Building 13 Fl, Rama IV Rd, Suriyawongse, Bang Rak, Bangkok 10500, Thailand

Article 14 (Revision of the Policy)

The Policy may be revised. The Company will notify the Users of the fact that the Company made a significant change in the Policy, in an easy-to-understand manner.

Establish on May/1/2021.

Revised on May/1/2022

Revised on Dec/1/2022

Revised on Feb/1/2024