



Customer Privacy Notice Version [2]

This privacy notice ("Privacy Notice") outlines how Erawan Hotel Public Co., Ltd. (Public Company) and its affiliates listed in the attached annex ("Company", "Erawan Hotel", "We", or "Our") collect, use, or disclose personal information of individual customers or customer contacts (in the case of corporate customers) and any individuals whose personal data we receive ("You"). It also informs You of Your rights regarding personal data protection.

This Privacy Notice explains Erawan Hotel 's practices for collecting personal data from the following channels:

- When You contact us for services related to office space rental, retail space, storage space, sub-space, or advertising space (including billboards);
- Through various forms of communication and interaction with us (e.g., via sales representatives or customer service centers); and
- Any other channels where You may provide personal data to us.

1. Personal Data We Collect from You

"**Personal Data**" in this Privacy Notice refers to any information that can directly or indirectly identify You, which You voluntarily provide to us through various means such as verbally, in writing, or via electronic methods as specified below.

"**Sensitive Personal Data**" refers to personal information classified as sensitive by law. We will only collect, use, disclose, or transfer sensitive personal data to other countries with Your explicit consent or as permitted by law.

We may collect various types of personal data, including but not limited to the following:

1. **Personal Information, Identification, and Contact Details:** This includes Your full name, title, gender, nationality, date of birth, address, phone/mobile numbers, fax numbers, email address, work address, insurance information, government-issued identification (e.g., ID card number, driver's license, taxpayer identification number), signature, house registration information, immigration details, passport and visa information, mailing addresses, billing addresses, and contact details of Your representatives (e.g., phone numbers and communications history).
2. **Payment Information:** Includes credit card, debit card, or bank account information, card numbers, card types, billing cycles, bank account details, and payment history.

3. **Information collected from your electronic devices**, such as IP address, cookies, Media Access Control (MAC) address, logs, device identification code, device model and type, connection data, network, access information, date and time of access, time spent on our web pages, login details, browsing history, browser details (including browser type and version), time zone settings and location, browser plug-in type and version, operating system and platform, and other technologies used on devices to access our platform. This also includes your usage information on the website and website traffic data (e.g., the content you viewed, links clicked, and other related information).
4. **Behavioral data**, including information on your purchasing behaviors and data obtained from your use of our products and services.
5. **Profile information**, such as profile details and images, order history, service booking history, financial details, interests, preferences, comments, survey results, customer satisfaction surveys, social media interactions, details of participation in events, usage of promotional codes or discounts, service order descriptions, customer service information, participation in exhibitions or fairs, litigation, trials, and service simulations.
6. **Marketing and communication information**, such as data provided through participation in activities, surveys, competitions, and promotional events.
7. **CCTV information**, such as images and videos recorded by CCTV and internet systems on our premises.
8. **Other information**, such as business registration data (for corporate customers), police reports (for office space tenants), personal data arising from the relationship you have with us, such as signatures and communication with us.
9. **Sensitive personal data**, such as health information (e.g., allergies), disability information (e.g., hearing, movement, or visual impairments, or the need for a wheelchair), sensitive personal data from identification documents (e.g., religion, race, ethnicity), and religious information.

We will only collect, use, or disclose sensitive personal data with your explicit consent or as permitted by law.

If you provide personal data of others to us or our service providers, please inform them of this privacy policy and obtain their consent if necessary or rely on another legal basis.



2. Purposes and Legal Bases for Collecting, Using, or Disclosing Your Personal Data

Except in certain specific cases where we rely on your consent, we collect, use, and/or disclose your personal data based on the following legal bases: (1) Contractual Necessity: For the initiation or performance of a contract with you. (2) Legal Obligation: To fulfill our legal duties. (3) Legitimate Interest: For the legitimate interests of our company or third parties, where such interests are balanced against your fundamental rights and freedoms to personal data protection. (4) Vital Interest: To protect or prevent harm to the life, body, or health of an individual. (5) Public Interest: To carry out tasks for public benefit or exercise of state authority. (6) Legal Claims: For the establishment, exercise, or defense of legal claims, or to raise defenses against legal claims.

2.1. Purposes Requiring Your Consent

We may rely on your consent for the following purposes:

1. **Marketing and Communications:** For marketing, communication, sales, special offers, promotions, notifications, updates, and providing product and service information from us, affiliates of The Erawan Group, and/or third parties where no other legal basis applies.

2. **Purposes for Using Sensitive Personal Data Requiring Your Consent**

The following purposes involve the collection, use, disclosure, and/or transfer of sensitive personal data, which requires your explicit consent:

- 2.1 **Disability Information:** This includes data such as hearing, mobility, or visual impairments, or the need for a wheelchair. It is collected to provide appropriate accommodations and services to customers, as well as for customer data management purposes.
- 2.2 **Religious Information:** This data is used to provide appropriate accommodations and services to customers and for customer data management purposes.
- 2.3 **Biometric Data:** For example, facial recognition or fingerprints are used for the purposes of crime prevention and security measures.

If we rely on your consent, you have the right to withdraw your consent at any time by contacting our Data Protection Officer via email at dpo@theerawan.com. Withdrawing your consent will not affect the collection, use, or disclosure of personal data that has already been consented to lawfully.



In the event that you provide a copy of your identification card or any other identification documents containing sensitive personal data, such as religion, race, ethnicity, or blood type, Erawan Hotel generally does not intend to collect or use such sensitive data for any specific purposes. If you submit a copy of your identification card or other identification documents to the company, please ensure that this sensitive data is obscured. If you do not obscure the sensitive data, it will be considered that you have given the company permission to obscure the information. The documents with the obscured data will remain valid and legally binding in all respects. If, due to technical limitations, the company is unable to obscure this information, the company will collect and use such sensitive data solely as part of your identity verification.

2.2. Purposes for Which We Rely on Other Legal Bases

We may collect, use, or disclose your personal data for the following purposes:

1. **Provision of Services as Requested by You:** This includes services such as office space rental, facilitating identification and verification processes, responding to service requests and customer inquiries, preparing quotations, issuing receipts, invoices, refunds, and payments, providing services tailored to your preferences, entering into rental agreements with office tenants, and conducting various activities such as product and service returns or exchanges. We also manage and operate our website and platform to ensure proper functioning, efficiency, and security, facilitate website navigation, and improve the structure and content of our platform.
2. **Marketing and Communications:** To provide special offers, promotions, updates, sales notifications, advertisements, alerts, news, and marketing information about our products and services, as well as those of our affiliates and subsidiaries within The Erawan Group. This is based on our legitimate interests or your preferences, expressed either directly or indirectly.
3. **Customer Satisfaction Monitoring:** To enhance our services, we may send customer satisfaction surveys, quality assurance surveys, and make adjustments to our operations in line with customer preferences.
4. **Business, Product, and Service Development:** We may evaluate the effectiveness of our business operations, improve performance, assess the services we provide to you, recommend products or services of interest, identify your preferences, and provide services accordingly. We also generate anonymized reports, measure marketing campaign performance, study customer interests, analyze data, perform profiling, conduct market research, assess behavior, statistics, and data classification, as well as analyze consumption trends and patterns. Profiling may involve assessing the types of products and services you use and the ways in which you prefer to be contacted.



5. **Security, System Monitoring, and IT Management:** We ensure the safety and security of our customers, employees, and hotel or office contacts by identifying and verifying individuals, controlling system access, and maintaining logs. We also monitor systems, devices, and internet usage, ensuring technological security, managing business operations, including communications systems management, and overseeing security-related operations and internal business management.
6. **For other business purposes,** such as granting access to our offices, handling lost and found requests, recording, updating, and sharing data, collecting parking information, conducting market research and analysis, and carrying out or expanding our business activities.
7. **To enforce and protect our legal rights and claims,** including dispute resolution, contract enforcement, and establishing, exercising, or defending legal claims.
8. **To protect our interests,** such as exercising and defending our rights and the interests of our affiliates or related parties when necessary and lawful. This includes detecting, preventing, and responding to complaints related to fraud, intellectual property infringement, or legal violations, as well as managing and preventing loss of assets, monitoring situations, preventing and reporting crimes, and ensuring the security and integrity of our business.
9. **To comply with legal obligations and government orders,** such as maintaining records and submitting reports, complying with legal proceedings or government orders, including those from outside Thailand, and cooperating with courts, regulators, and law enforcement authorities when necessary. This also includes disclosing your personal data to comply with tax regulations, financial regulations, and other laws, as well as for criminal investigations or prevention.
10. **For corporate transactions,** such as in the event of a sale, purchase, transfer, or disposal of assets, mergers, reorganizations, or similar transactions, we may transfer your personal data to one or more recipients as part of such transactions.
11. **To manage risk, conduct performance audits, and assess risks.**
12. **To prevent or mitigate harm to life, body, or health.**

If we are required by law or contract to collect, use, or disclose your personal data, and you are unable to provide such data when requested, we may be unable to fulfill the stated purposes.

In cases where your consent is required for the collection, use, or disclosure of your personal data, we will seek your consent for each specific activity.



3. Disclosure of Your Personal Data

We may disclose or transfer your personal data to the following parties:

- **Affiliates within The Erawan Group:** Your personal data may be accessed or disclosed to our affiliates or subsidiaries within The Erawan Group (as listed in the annex) for the purposes stated in this Privacy Policy.
- **Partners:** Including relevant agents, both for the purposes mentioned above and to facilitate our business operations.
- **Our Clients or Other External Parties:** For our business activities, we may engage third-party companies, agents, or contractors to provide services on our behalf or facilitate the delivery of products and services to you. Your personal data may be disclosed to external service providers or suppliers, including but not limited to: (1) infrastructure, internet, website, software, and IT service providers; (2) document storage and/or destruction and cloud service providers; (3) telecommunications and communication service providers; (4) logistics and warehouse service providers; (5) payment service providers; (6) research agencies; (7) data analysis providers; (8) survey agencies; (9) auditors; (10) communications, advertising, and marketing agencies; (11) call center service providers; (12) event organizers; (13) sales representative agencies; (14) travel or ticket booking providers; (15) insurance companies; (16) banks, financial institutions, or payment and identity verification service providers; (17) external management service providers; (18) Thailand Securities Depository Co., Ltd.; and/or (19) healthcare or hospital service providers.
- **Consultants:** Including lawyers, technical experts, or auditors who assist in our business operations and protect or claim legal rights.
- **Government Authorities, Law Enforcement, Courts, and Regulators:** Such as immigration offices, the Department of Provincial Administration, police, or the Revenue Department, to comply with legal requests, proceedings, or orders and fulfill legal or regulatory obligations. We may also disclose personal data to protect our rights or when your actions violate our product and service terms or policies.
- **Third-Party Rights or Duty Assignees:** In the event of organizational restructuring, mergers, sales, acquisitions, joint ventures, rights transfers, or similar transactions, your personal data may be transferred to one or more assignees as part of the transaction.

Personal data may be disclosed to individuals or organizations located outside Thailand, where the destination country may have higher or lower personal data protection standards. In such cases, we will ensure that appropriate data protection measures are in place, or that the recipient complies with this Privacy Policy and applicable data protection laws, including implementing sufficient security measures. We will seek your consent for cross-border data transfers as required by law.



4. Minors, Incapacitated Persons, and Persons with Limited Capacity

If you are a minor under the age of 20, or an incapacitated person or person with limited capacity, you may not be able to provide personal data to us without the prior consent of your legal guardian, curator, or custodian, as required by applicable law. We do not intend to collect, use, or disclose the personal data of minors under the age of 20 or incapacitated persons unless we have received consent, or unless the law permits us to do so without such consent.

In cases where we become aware that we have inadvertently collected personal data from such individuals, we will immediately delete the personal data or continue processing it only if we can rely on a legal basis other than consent.

5. Retention Period for Your Personal Data

We will retain your personal data for as long as necessary to fulfill the purposes stated in this Privacy Policy and to comply with legal and regulatory obligations. We may retain your personal data for a longer period if required by applicable law.

6. Rights of Data Subjects

Under the provisions of the Personal Data Protection Act B.E. 2562 (PDPA), you have the following rights:

1. **Right of Access:** You have the right to access your personal data, including the right to request a copy and verify how we obtained the personal data if it was not provided by you.
2. **Right to Data Portability:** You have the right to receive your personal data in electronic form and/or request us to transfer it to another data controller.
3. **Right to Object:** You can object to the collection, use, or disclosure of your personal data in certain circumstances, including when we use it for direct marketing.
4. **Right to Erasure:** You can request the deletion, destruction, or anonymization of your personal data if there is no legal basis for its continued processing.
5. **Right to Restriction:** You have the right to request that we restrict the processing of your personal data.
6. **Right to Rectification:** You have the right to request the correction of inaccurate or outdated personal data to ensure it is complete and up-to-date.
7. **Right to File a Complaint:** You have the right to lodge a complaint with the relevant government authority responsible for personal data protection.



- 8. Right to Withdraw Consent:** You may withdraw your consent at any time for the collection, use, or disclosure of your personal data based on consent. Withdrawing consent will not affect the legality of any processing carried out prior to the withdrawal.

The Erawan Group and its affiliates may have collected personal data before June 1, 2022. The company continues to process this data in compliance with the PDPA. You have the right to withdraw consent for data collected prior to June 1, 2022, by submitting a request to dpo@theerawan.com.

7. Links to Other Websites

This website may contain links to third-party websites. We do not disclose your personal data to these third parties, and we are not responsible for their privacy practices unless specified in this Privacy Policy. Therefore, we recommend that you review the privacy policies of such third-party websites.

8. Changes to This Privacy Policy

We may update or modify this Privacy Policy from time to time. If any significant changes that impact you as a data subject are made, we will notify you in advance where appropriate. We recommend that you periodically review this Privacy Policy to stay informed of any changes.

9. Contact Us

If you have any questions or concerns regarding this Privacy Policy, or if you wish to exercise your rights as a data subject, please contact us via the following channels:

Erawan Hotel Co., Ltd. (Public Company)

494 Ploenchit Road, Lumpini, Pathumwan, Bangkok, Thailand

Phone: +66 (0) 2254 1234

Website: www.erawanbangkok.com

For details on contacting the personal data protection officer, email address : dpo@theerawan.com

Effective date: September 2024.



Annex

Lists of Affiliated Companies

Company	Address and Contact
The Erawan Group Public Company Limited	6 th Floor, Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khe Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Hotel Public Company Limited	494 Ploenchit Road, Kwang Lumpkini, Khet Pathumwan, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Hop Inn Co., Ltd.	5 th Floor, Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2659 -2899
Taveesapanan Co., Ltd.	5 th Floor, Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2659 -2899
Erawan Phuket Co., Ltd.	Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Rajdamri Co., Ltd.	Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Chaophraya Co., Ltd.	Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Growth Management Co., Ltd.	Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Commercial Management	Ploenchit Center , 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2257-4588
Erawan Budget Hotel Co., Ltd.	5th Floor, Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok Thailand Telephone : 66 (0) 2659 -2899
The Reserve Co., Ltd.	494 Ploenchit Road, Kwang Lumpkini, Khet Pathumwan, Bangkok Thailand Telephone : 66 (0) 2257-4588