

**PRIVACY POLICY FOR WEBSITE**  
**Buddybooster.net**

We, [Buddybooster.net] (the “Company,” “we,” “us,” “our,” or “ours”), value your rights in respect to your Personal Data, and we are committed to the responsible collection, use, and disclosure (“process” “processing”) of your Personal Data. We have adopted this Privacy Policy (“Privacy Policy”) to explain the processing of your Personal Data under Thailand’s Personal Data Protection Act B.E. 2562 (2019) (“PDPA”).

The Company recommends that you 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 the processing of the Personal Data of all website users.

**2. Key Definitions**

“Personal Data” means any information relating to a natural person that enables such person to be identified, whether directly or indirectly, but not including the information of a deceased person in particular.

“Sensitive Personal Data” means any Personal Data as described in Section 26 of the PDPA, as amended from time to time, as well as any other applicable laws and regulations, which includes Personal Data pertaining to race, ethnicity, political, religious, or philosophical beliefs, sexual behavior, criminal records, health data, disability, labor union, genetic data, biometric data, or any other data that may similarly affect data subjects.

“PDPA” means the Personal Data Protection Act B.E. 2562 (2019), as amended from time to time, as well as any subordinate laws issued by virtue of the PDPA.

“PDPC” means the Personal Data Protection Commission.

**3. The Types of Personal Data that we Process**

In general, the Company will collect and process the following types of the Personal Data:

<b>Types of Personal Data</b>	<b>Details</b>
<b>Identification and contact information</b>	Full name, date of birth, address, office telephone number, mobile phone number, email address, place of work, employment status, occupation, work position, identification card number, passport number.
<b>Product/Service related information</b>	The information in respect to your purchase of the Company’s products and the use of our services, e.g., purchase history, order information, order confirmation.
<b>Website related information</b>	Cookies, IP address, interactions with our websites/application, login information, and other information, which is related to the use of our website/application.
<b>Information as required by law</b>	Any information required by the applicable laws, which the Company has to comply with. In this case, we will notify you if we need to collect certain Personal Data from you.
<b>Legal claim related information</b>	Any information, which may be necessary for the Company to establish, exercise, comply, or defense

Types of Personal Data	Details
	any legal claims. In this case, we will notify you if we need to collect certain Personal Data from you.

In the case where the Company will collect Personal Data other than those prescribed in this Privacy Policy, the Company will inform you about the collection or the processing of the Personal Data, and may request for your consent (if required), in accordance with the conditions prescribed by the PDPA.

**4. The Source of the Personal Data**

In general, the Company collects the Personal Data directly from you our websites, applications, and social media platforms.

In the case where 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 the Company, as explained in this Privacy Policy. In addition, if consent for the processing of the Personal Data is required, you agree to assist the Company in obtaining valid and enforceable consent from such person, in accordance with the requirements prescribed in the PDPA.

**5. Purposes for Processing your Personal Data**

In general, we will process your Personal Data only in the case the Personal Data is necessary for the operation of our business and relevant purposes, which are, for example, as follows:

Purposes	Details
To enter into a contract or establish a legal relationship between the Company and you, and to perform rights and obligations under a contract, or within the legal relationship between the Company and you.	<p>The Company may need to process your Personal Data to take steps to enter into a contract or 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>• Product related information</li> </ul> <p><b><u>Lawful basis</u></b></p> <p>Contractual obligation</p> <p><b><u>Remark:</u></b> If you do not provide any Personal Data that is necessary for the purpose of entering into a contract or performing our obligations under the contract, we may not be able to enter into a contract with you or perform our obligations as specified under said contract (either in whole or in part).</p>
To verify a person or his/her authorization	<p>In using our website, the Company would need to process your Personal Data to verify your identity before entering into any transactions with you.</p> <p><b><u>Types of Personal Data Processed</u></b></p>

Purposes	Details
	<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> <p>Legitimate interest</p>
To communicate, contact, and coordinate with you	<p>The Company 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>• Product/Service related information (as applicable)</li> </ul> <p><b><u>Lawful basis</u></b></p> <p>Legitimate interest</p>
To undertake any administration and management activities within the Company and our group company	<p>In operating the business of the Company, your Personal Data may be processed as part of our internal processes or administration and management work. For example,</p> <ul style="list-style-type: none"> <li>• To manage data for the purpose of managing, storing, recording, backing up, or destroying Personal Data;</li> <li>• To create a user profile in the Company’s system; and</li> <li>• To manage and maintain the customer profiles and accounts.</li> </ul> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Product/Service related information</li> <li>• Website related information</li> <li>• Any Personal Data, which the Company may collect or be disclosed with, during the provision of our products and services.</li> </ul> <p><b><u>Lawful basis</u></b></p> <p>Legitimate interest</p>
To undertake any analysis activities	<p>In operating the business, the Company may conduct 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 creation of statistics concerning the provision/sales of products and services, 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>• Identification and contact information</li> <li>• Product/Service related information</li> </ul>

Purposes	Details
	<ul style="list-style-type: none"> <li>• Website related information</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Research or statistics</li> <li>• Legitimate interest</li> </ul>
To improve, develop, and create products and services	<p>The Company always wishes to improve, develop, and create products and services, which can provide the customers with the best experience in regard to using 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>• Product/Service related information</li> <li>• Website related information</li> </ul> <p><b><u>Lawful basis</u></b> Legitimate interest</p>
To negotiate, plan, or undertake necessary activities in relation to restructuring of the business	<p>The Company 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>• Product/Service related information</li> <li>• Website related information</li> <li>• Any Personal Data, which the Company may collect or be disclosed with, during the provision of our products and services.</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Legal obligation (if applicable)</li> </ul> <p><b><u>Remark:</u></b> If you do not provide any Personal Data that is necessary for compliance with the law, which is applicable to us, we and/or you may be unable to comply with the laws, and that may affect the necessary processing of your Personal Data as well as may result in the violation of applicable law.</p>
To conduct marketing activities and providing benefits	<p>The Company may use your Personal Data to provide privileges, benefits, 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>The benefits include travel packages, online marketing activities (e.g., activities on Facebook), provision of gifts, special deals or other benefits, providing fee services or products (e.g., assurance programs), and sending news,</p>

Purposes	Details
	<p>articles, promotions, special offers, and any information, which may be of your interest.</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>• Product/Service related 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 certain cases, e.g., marketing activities for existing customers/users)</li> <li>• Consent (for individual prospective customers)</li> </ul>
To manage our website	<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>
To comply with the law	<p>The Company may be required to process your Personal Data for compliance with 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>• Information as required by law</li> </ul> <p><b><u>Lawful basis</u></b></p> <ul style="list-style-type: none"> <li>• Legal obligation</li> </ul> <p><b><u>Remark:</u></b> If you do not provide any Personal Data that is necessary for compliance with the law, which is applicable to us, we and/or you may be unable to comply with the laws, and that may affect the necessary processing of your Personal Data as well as may result in the violation of applicable law.</p>
To establish, exercise, comply or defend legal claims	<p>Your Personal Data may be processed as part of the establishment, exercising, compliance or defense of legal claims.</p> <p><b><u>Types of Personal Data Processed</u></b></p> <ul style="list-style-type: none"> <li>• Legal claim related information</li> </ul>

Purposes	Details
	<u>Lawful basis</u> <ul style="list-style-type: none"> <li>Establishment of claims</li> </ul>

## 6. Website related processing

### 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.

The cookie is also an element of data that a website can send to your browser, which may be stored on your computer, device or system. Cookies allow us to better serve visitors to our website by offering a tailored experience.

#### (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 the Company to use cookies, as described above, in order to provide you with services through the website. These cookies, which are used for the purpose of providing services through the website, are used immediately when you access the Company's website through a web browser.

The cookies may also be used to collect the information about the profile of the Company's website visitors, their behavior, preferences, and interests in regard to individual products. The cookies may enable the display of ads and marketing offers, and the analysis of information relating to your interests in respect to the displayed materials.

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 includes 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 (in the case where consent is required), you may set your browser so that it deletes cookies from each of the web browsers that you use.

## 7. 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.

## 8. Disclosure of Your Personal Data

In general, the Company will keep your Personal Data confidential and will not disclose it to any persons.

However, in certain circumstances, 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 the Company's 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 partners or contractors, which are related to our products/services and marketing activities;
- (c) To general counsels, legal counsels, advisors, auditors, and other experts;
- (d) To any competent regulatory, prosecuting, tax or governmental agencies, courts or other tribunals in any jurisdiction, including the Revenue Department;
- (e) To third parties in connection with a change of ownership in the Company, or any of its assets or properties; and
- (f) To any other persons or entities to whom the Company is required to make disclosure by applicable law, or whom the Company is permitted by you or your organization to disclose your Personal Data.

## **9. Cross-Border Transfer of Personal Data**

In general, the Company does not transfer the Personal Data to any persons or entities outside of Thailand. If it is necessary for the Company to transfer the Personal Data to any persons/entities outside Thailand, the Company will ensure that it will protect your Personal Data by implementing adequate personal data protection standards for the transfer of your Personal Data outside Thailand, as prescribed under the PDPA.

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

The Company retains your Personal Data for as long as is required in order to fulfil our contractual obligations, to provide our products/services to you, and to maintain relationships between you. However, in general, the Company will retain your Personal Data for ten (10) years after the cessation of our contractual relationship, the last performance of our services, or our last communications.

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

## **11. 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 the 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 the 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.

## **12. Our Contact Details**

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:

Buddy Booster  
130-132, 9th Floor Sindhorn Tower 2, Wittayu Road, Rumpini, Patumwan, Bangkok, Thailand  
10330  
admin@buddybooster.net  
+6626515018

## **13. Changes to this Privacy Policy**

The Company may amend, change, or update this Privacy Policy from time to time, whereby the Company will update the changes on its website.

In the event that the amendment, change, or update will affect the purposes for which your Personal Data has originally been collected, the Company will notify you about such changes, and obtain your consent (if required by law), prior to such changes becoming effective.