

# WEBSITE PRIVACY POLICY

of

## Sojitz Automotive Group (Thailand) Co., Ltd.

*Please review this Privacy Policy carefully*

Your privacy is important to Sojitz Automotive Group (Thailand) Company Limited ("SAGTh" "we," "us" or "our") and its affiliate companies, as is your trust in Hyundai's products and services. We recognize the importance of your privacy and we are committed to complying with our obligations under the Thai Personal Data Protection Act B.E. 2562 ("PDPA"), while providing an enjoyable website experience that offers information, products, and services that are relevant and useful to you. SAGTh will handle personal information relying on the related bodies corporate exemption and the employee records exemption in the PDPA and any other applicable laws.

### 1. APPLICATION TO THIS PRIVACY POLICY

The purpose of this Website Privacy Policy (this "Privacy Policy") is to notify and inform you of how we collect, use and share information across our website (the "Site"), Facebook, LINE, Instagram applications or other applications (the "Apps"), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Services").

You can visit the Site to read about our vehicles or use our online tools without providing any personal information. You may also choose to participate in activities and obtain services on the Site for which we may collect personal information. We also collect non-personal information automatically when you use the Site.

By using the Site, you accept the terms of this Privacy Policy and consent to our collection, use, disclosure and retention of your information as described in this Privacy Policy to the maximum extent permitted by law. **IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY, THEN PLEASE DO NOT USE THE SITE OR APPS.** The Site and information on it is intended for use and access by Thai residents only. SAGTh does not knowingly collect, process, access or intend to access the personal information of persons residing outside Thailand. If you do not reside in Thailand, you should stop accessing these sites. Instead, you should visit the Hyundai-affiliated website that is applicable to your country or region.

### 2. TYPES OF DATA WE COLLECT

The personal data we collect can include the following:

#### Contact Details

- Name
- Phone numbers
- Email addresses
- other similar data

#### Website and Communication Usage

- How you use our Site and whether you open or forward our communications, including information collected through cookies and other tracking technologies.
- Identifiers assigned to your computer or other internet connected device including your IP address.

- Your device's location.
- Log files

### **Sales and Services**

- Information relating to purchases and services, including complaints and claims

## **3. COLLECTION OF YOUR PERSONAL DATA**

### **3.1 Information You Provide to Us**

We collect information that you provide to us when you use the Site. The information that we collect and how we process it depends on how you use the Site. We may collect personal information when you participate in certain activities on the Site or request certain services, including:

- a) When you contact us
- b) When you otherwise voluntarily provide your personal information.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### **3.2 Information We Collect Automatically**

We also collect certain information from users of the Site automatically when they visit, use or navigate the Services or Apps. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information such as IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services or Apps and other technical information. This information is primarily needed to maintain the security and operation of our Services or Apps, and for our internal analytics and reporting purposes. We may collect such information in the following ways:

### **3.3 Cookies**

We may collect certain preference information of website users through the use of HTTP cookies which are small files stored on your web browser in order to collect and store your information as well as to optimize the design of the Site. Cookies enable us to track and aggregate user behavior data so that we may better target the interests of our users and enhance their experience on the Site. Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. You can set your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies.

### **3.4 Web Beacons**

Some of our web pages, commercial email messages and/or newsletters may contain electronic images known as web beacons, which are also called single-pixel GIFs. Web beacons collect information including a cookie number, time and date of a page view and a description of the page on which the web beacon resides. Web beacons are a technique we may use to enhance and personalize the Site and the products and Services we offer, to provide product information and advertisements that are more relevant to your interests, compile aggregated statistics about the usage of the Site and to track the number of users who have opened and acted upon our commercial email messages.

### **3.5 Web Analytics and Interest-Based Advertising**

A number of technologies exist to analyze use of the Site, assess consumer behavior and serve relevant ads to consumers online. We employ a variety of these technologies, including web beacons, third-party analytics services, and third-party interest-based advertising services. These technologies allow us to assess consumer behavior and to understand how we can better serve our customers. Many of these technologies are provided to us via third party providers specializing in behavioral marketing and consumer behavior. For example, our analytics service providers may use cookies or other technologies to collect non-personal

information about Site visitor behavior. The information generated by your browser use, stored via cookies, log files, and other information sources (including IP address), is transmitted to our analytics service providers. We may also obtain information from our advertising partners about your interaction with our marketing campaigns across websites, devices, platforms, and environments. This information is then used to evaluate visitors' use of the Site, to compile statistical reports on website activity for us, and to review the efficacy of marketing campaigns. We may aggregate this non-personal information with other information for analytics purposes. Our third-party advertising partners on this Site may also use browser and device tracking technologies (HTTP cookies, web beacons, advertising IDs, etc.) to collect and measure non-personally identifiable data about your browsing behaviors. We use these interest-based advertising vendors serve relevant advertising across the Internet and other platforms and environments (including television). If you would like to know more about interest-based advertising, or opt-out of interest-based advertising conducted by our partners, please visit the Network Advertising Initiative or the Digital Advertising Alliance.

### 3.6 Third Party Advertisers

Some banner ads provided by third parties may be displayed on the Site. These ads contain cookies and may also contain web beacons. Unlike cookies and web beacons used by us in content it controls on the Site, cookies or web beacons received with banner ads are collected by our advertisers and we do not have access to this information. We use third parties to serve some or all of the advertisements that are placed within the Site and they may use information (not including personal information) about your visits to the Site and other websites to assist in serving advertisements to you. These companies may employ cookies, web beacons and action tags to measure advertising effectiveness. They may share certain information with their clients such as date and time the banner ad was shown you, the specific ad shown and the IP address.

### 3.7 Log Files

Like most websites, we collect log information to analyze trends, administer the sites, track users' movement around the Site and gather broad demographic information for aggregate use in improving the sites. IP addresses are not linked to personal information.

### 3.8 Information We Obtain from Other Sources

We may also obtain information about you and your vehicle in a number of other ways. For example, we may obtain information about you or your vehicle when you provide it to us at an event such as an auto show, from business reply cards, sweepstakes entries, test-drive incentive applications, surveys, vehicle sales records and other public sources. Such information may include:

- A. Contact information (name, address, city, state and zip code, email address, telephone number);
- B. Vehicle information (vehicle identification number (VIN), make, model, model year, selling dealer, date of purchase or lease, etc.);
- C. Demographic information (age range, marital status, household composition, etc.);
- D. Non-credit-related marketing information (when you plan to purchase or lease, the vehicle in which you are interested, etc.); and
- E. Relationships you have with Hyundai affiliates and business partners such as call center service and roadside assistance programs

## 4. GROUNDS AND PURPOSES OF PERSONAL DATA PROCESSING

We may use your information collected via our Services or Apps individually or combine it with other information to generate aggregate statistical information. The primary uses of your information include:

Purpose	Legal basis
To fulfill a specific product or service you have requested	Contractual Obligations
To provide product information	Contractual Obligations

To operate, improve, enhance and personalize the Site and the products and services we offer, and to give each user a more consistent and personalized experience when interacting with us	Legitimate Interests Consent
To answer your questions or address any complaints you may have made	Contractual Obligations
To let you know about marketing and promotional communications or added vehicle services or functions	Legitimate Interests Consent
To show advertisements that are more relevant to your interests and to evaluate our marketing campaigns across platforms and environments	Legitimate Interests Consent
To request feedback and to contact you about your use of our Services or Apps	Legitimate Interests Consent
To send you product, service and new feature information and/or information about changes to our terms, conditions, and policies	Legitimate Interests Consent
To respond to legal requests and prevent harm	Legitimate Interests Legal Obligations
For other Business Purposes, such as marketing research, data analysis, identifying usage trends, and to evaluate and improve our Services or Apps, products, marketing and your experience	Legitimate Interests
For customer service, security, to detect fraud or illegal activities, or and for archival and backup purposes	Legitimate Interests

## 5. SHARING YOUR DATA

We may need to process your data or share your personal information in the following situations:

### 5.1 Third Party Service Providers, Affiliates, Business and Marketing Partners

We may share Personal information and Non-Personal information, including website user or vehicle owner information, with third parties including our service providers, affiliates, authorized dealers, licensees, business partners, marketing partners, and suppliers so that they can provide services on our behalf. In addition, user or vehicle owner data may be used by our suppliers to provide services for us and by our business partners, including marketing and promotional partners, to conduct joint marketing programs with us, show you advertisements about our products and services on third party sites, and to offer you other valuable products and services. If you wish to opt-out of receiving third party commercial communications, you may exercise this right by following the opt-out procedures contained in any email or written communication we sends you, or by following the procedures set forth in the “Unsubscribe or Opt-Out” section of this Privacy Policy.

### 5.2 For Audit and Legal Purposes

We may disclose any Personal information or Non-Personal information collected to any person performing audit, legal, operational or other similar services for us. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. We may also disclose any personal information or non-personal information when required to do so by subpoena, court order, or warrant. We will also disclose any personal data or non-personal data deemed necessary to protect the safety of an individual, the public, or the security and reliability of us and the Site.

### 5.3 With Your Consent

Other than the cases above, we won’t disclose your personal data for any purpose unless you consent to it in some way, including by your continued use of the Site after notice.

## 6. DATA TRANSFERRED OUTSIDE THAILAND

Our servers are in Thailand. If you are accessing our Site, Services, or Apps from outside Thailand, please be aware that your data may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal data in Japan, South Korea, Singapore, and other countries.

## **7. RETENTION PERIOD**

We will only keep your personal data for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymize it, or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

## **8. PROTECTING YOUR DATA**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, data destruction and abuse. we have implemented the following processes and measures:

Where we share your data with third parties, we provide written instructions to them to ensure that your data are held securely and in line with PDPA requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

## **9. YOUR PRIVACY RIGHTS**

9.1 You have certain rights under PDPA. These may include the right (i) to request access and obtain a copy of your personal data, (ii) to request rectification or erasure; (iii) to be informed about data collection and processing; and (iv) to restrict or object the processing of your personal data. To make such a request, please use form.

If we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

9.2 You may choose to share your personal data with us. However, your participation in using our websites and providing personal data is completely voluntary. You can unsubscribe and opt-out to certain communications and access, or update and delete your contact information, by contacting us at the email address, number or address specified below.

We offers you the opportunity to opt-out from receiving commercial email, calls, or mail from us about our products and services.

- A. You may opt-out of emails at any time by using the unsubscribe mechanism within the email. The unsubscribe mechanism allows you to manage your subscription preferences to email alerts and special offers. Notwithstanding the above, this mechanism does not allow you to opt-out of receiving non-commercial email, such as registration confirmation, vehicle updates and responses to direct requests.
- B. You also may call, email, or write to us directly if you wish to opt out or request that we cease sending you commercial or other information via call, mail or email. Such request can be made via the "Contact Us" form on our official website or call +662-089-1600. Your information about how the information will be used will be explained at the time the data is collected from you.

## **10. CHANGE OF PERSONAL DATA**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

## **11. MAKING A COMPLAINT**

The supervisory authority in the Thailand for data protection matters is the Office of the Personal Data Protection Committee (“**PDPC Office**”). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the PDPC Office.

## **12. EFFECTIVE DATE AND CHANGES TO PRIVACY POLICY**

The Effective Date of this Privacy Policy is set forth at the top of this webpage. We reserves the right to change this Privacy Policy at any time. We will use, share, and disclose all personal and other user data in accordance with the Privacy Policy in effect at the time the data is collected. We will post any changes to this Privacy Policy on this page so check back frequently so that you are always aware of what data we collect, how we use it and under what circumstances we may disclose it. Continued use of this Site following changes to these terms will mean that you accept the changes.

## **13. CONTACT US ABOUT THIS POLICY**

If you have questions or comments about this Privacy Policy, you may contact our Data Protection Officer (DPO) by email at [dpo@sagth.co.th](mailto:dpo@sagth.co.th), or by post to:

Sojitz Automotive Group (Thailand) Co., Ltd.  
No.858/6-8, Moo 1, Bang Pu Mai, Muang Samut Prakan,  
Samut Prakan 10280 Thailand

Last updated 1<sup>st</sup> March 2022