



Privacy Notice on Fingerprint Data Collection

This Privacy Notice ("Privacy Notice") describes how the Erawan Hotel Company Limited ("the Company," "Erawan Hotel," "we," or "ours"), collects, uses, or discloses the personal information of individuals and any other persons from whom we have obtained personal information ("you"), and informs you of your rights regarding the protection of personal data.

This Privacy Notice ("Privacy Notices") describes the privacy practices of Erawan Hotel for data that we collect:

- When you contact us for office space rental services, retail space, storage room space, and locker space.
- Any other channels through which you may provide personal information to us.

1. Personal data to be collected

"Sensitive Personal Information" refers to personal data that the law categorizes as sensitive personal information. We collect, use, disclose, and/or transfer sensitive personal information to foreign countries when we have obtained explicit consent or as required by law. We collect sensitive personal information, including fingerprint data.

If you have provided us, or a company authorized to act on our behalf, with someone else's fingerprint data as personal information, please inform those individuals about this Privacy Notice and/or obtain their consent.

2. Purpose and Legal Basis for Collecting, Using, or Disclosing Your Personal Information

Except in limited instances when we indicate that certain information is based on your consent, we collect use, and/or disclose your Personal Data on the legal basis of (1) contractual basis, for performance of activity in relation to the our business relationship; (2) legal obligation, for fulfilment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties, proportionate to your interest and fundamental rights and freedoms to the protection of your Personal Data; (4) vital interest, for the prevention or suppression of danger to a person's life, body, or health; (5) public interest, for the performance of task carried out in the public interest or for exercising of official authorities or duties; and/or (6) the reason for an establishment and defenses of legal claims in the future.



2.1. Purposes Requiring Your Consent such as Biometric data (fingerprint)

We process activities requiring your consent for purposes such as biometric data for verifying identity in accessing our provided spaces, crime prevention, and ensuring safety and security.

2.2. Purposes Based on Other Legal Grounds

- To provide services related to the use of locker spaces.
- For other business purposes, such as handling operations related to lost and found property.
- To enforce and protect our legal rights and claims, such as managing and resolving disputes, fulfilling contractual obligations, and establishing, exercising, or defending legal claims.
- To protect our interests, such as exercising our rights and protecting our, our affiliates', or other related parties' interests when necessary and legally justified. This includes detecting, preventing, and responding to complaints of fraud, intellectual property infringement, or legal violations; managing and preventing asset loss; monitoring various situations to prevent and report crimes; and maintaining the security and integrity of our business.
- To comply with legal duties and orders from governmental authorities, such as fulfilling legal requirements including recording and reporting daily logs, conducting proceedings, or complying with orders from domestic or international governmental agencies. This also involves cooperating with courts, regulators, governmental agencies, and law enforcement authorities when there is reasonable belief that such actions are necessary, and when disclosing your personal information is essential to comply strictly with the law, legal processes, or governmental orders. This includes recording and monitoring communications and interactions with law enforcement or other governmental entities and for investigations, inquiries, or crime prevention.
- To manage risk, audit performance outcomes, and assess risks.
- To prevent or mitigate harm to life, body, or health of individuals.

If we are required by law to collect, use, or disclose your personal information, or to enter into or fulfill a contract we have with you, but you are unable to provide the requested personal information, we may be unable to proceed with the objectives outlined above. In cases where we need to obtain your consent for activities involving the collection, use, or disclosure of your personal information, either we or a company acting on our behalf will request your consent.



3. Disclosures of Your Personal Data

We may transfer or disclose your Personal Data to the following:

- The Erawan Group PCL. and its affiliated. Your Personal Data may be accessible to or shared with the Erawan Group PCL and other entities that are our affiliates and subsidiaries under The Erawan Group (as listed in the annex) for the purposes set out in this Notice;
- Other third parties. We may use other companies, agents or contractors to perform services on behalf or to assist with the provision of products and services to you. We may share your Personal Data to our service providers, or third-party suppliers, or business partners including, but not limited to (1) infrastructure, internet, infrastructure technical, software, website developer and IT service providers; (2) data storage and cloud service providers; (3) auditors; (4) outsourced administrative service providers;
- Professional advisors. This includes lawyers, technicians and auditors who assist in running our business, and defending or bringing any legal claims;
- Courts, government authorities and regulatory agencies (e.g., Immigration Bureau, Department of Provincial Administration, Police) in order to respond to subpoenas, court orders, or legal processes and to comply with existing requirements under law and regulation, or to exercise our legal rights when we find that your actions violate our terms and conditions, or our hotel policies for specific products and or services;

Some of the recipients we may share your Personal Data with may be located outside Thailand which the destination countries may or may not have the same equivalent level of protection for Personal Data protection standards. In such case, we ensure appropriate safeguards are in place, and oblige the recipients to protect your Personal Data in accordance with this Privacy Notice and as allowed by applicable law using appropriate security measures.

4. Minor, quasi-incompetent or incompetent person

If you are a minor under the age of 20, quasi-incompetent or incompetent person, you may not be able to provide your Personal Data to us before we obtain parental or guardian consent in accordance with the applicable law. We do not intend to collect, use, and disclose Personal Data of individual who are considered minors, quasi-incompetent, or incompetent person (under the applicable law) unless we have obtained parental or guardian consent, or unless said parental or guardian consent in not required under the applicable data protection law. In the event we learn that we have unintentionally collected Personal Data from the minor, quasi-incompetent or incompetent person, we will delete it immediately or we will process it only if we can rely on other legal basis apart from consent.



บริษัท โรงแรมเอราวัณ จำกัด (มหาชน) 494 ถนนเพลินจิต แขวงลุมพินี เขตปทุมวัน กรุงเทพมหานคร 10330

ERAWAN HOTEL PUBLIC CO.,LTD. 494 Ploenchit Rd., Lumpini, Pathumwan, Bangkok 10330 | BRN. 0107537002061 | TEL. +66 (0) 2257 4588 | FAX. +66 (0) 2257 4577



5. Retention and protection of Personal Data

Subject to applicable data laws, we will retain your Personal Data for as long as necessary to fulfill the purposes for which it was collected or to comply with legal, regulatory, and internal requirements. However, we may have to retain your Personal Data for a longer duration, as required by applicable law.

6. Your rights and a data subject

Subject to the applicable conditions under the Thai Personal Data Protection Act B.E. 2562, you have the right to:

- The right to access your Personal Data. This also enables you to receive a copy of the Personal Data we hold about you and to check on how we acquire certain Personal Data without your consent;
- The right to port your Personal Data to another party. This means to receive copies of your Personal Data in an electronic format and/or ask us to transfer it to another party;
- The right to object to the collection, use and disclosure of your Personal Data for certain cases, including when we use your Personal Data for direct marketing purposes;
- The right to delete, destroy or anonymize your Personal Data. This enables you to ask us to delete, destroy or anonymize Personal Data where there is no valid ground for us to continue the collection, use and disclosure of such Personal Data;
- The right to restrict the use of your Personal Data. This enables you to ask us to suspend the collection, use and disclosure of your Personal Data;
- The right to rectify the Personal Data we hold about you. This enables you to have any inaccurate, outdated, incomplete, and misleading Personal Data we hold about you rectified;
- The right to make a complaint to a competent authority under the applicable data protection law; and
- The right to withdraw your consent at any time where we collect, use and disclose your Personal Data based on your consent. This will not affect the lawfulness of the processing based on consent before the withdrawal.

7. Changes to this Privacy Policy

We may occasionally amend this Privacy Policy. If such amendments significantly affect you as the personal data owner, we will notify you in advance as appropriate. We recommend that you periodically review this Privacy Policy for any changes.



8. Contact us

If you have any questions or concerns about this policy, or if you wish to exercise your rights as a personal data owner, please contact us through the following channels:

Erawan Hotel Company Limited, a public company limited by shares

494 Ploenchit Road, Lumpini, Pathumwan, Bangkok

Telephone: 66 (0) 2254 1234

For other affiliated companies, please refer to the annexed document.

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

February 2024

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ERAWAN BANGKOK

ERAWAN
BANGKOK

บริษัท โรงแรมเอราวัณ จำกัด (มหาชน) 494 ถนนเพลินจิต แขวงลุมพินี เขตปทุมวัน กรุงเทพมหานคร 10330

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Annex

List of The Erawan Group Public Company Limited and its Affiliates

Company	Address and Contact
The Erawan Group Public Company Limited	6 th Floor, Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok, Thailand Telephone: 66 (0) 2257 4588
Erawan Hotel Public Company Limited	494 Ploenchit Road, Kwang Lumpini, Khet Pathumwan, Bangkok, Thailand Telephone: 66 (0) 2257 4588
Erawan Hop Inn Co., Ltd.	1 st Floor, Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok, Thailand Telephone: 66 (0) 2659 2899
-vTaveesapanan Co., Ltd.	1 st 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.	Ploenchit Center, 2 Sukhumvit Road, Kwang Klongtoey, Khet Klongtoey, Bangkok, Thailand Telephone: 66 (0) 2257 4588
The Reserve Co., Ltd.	494 Ploenchit Road, Kwang Lumpini, Khet Pathumwan, Bangkok, Thailand Telephone: 66 (0) 2257-4588