

Notice of Processing on Personal Data

(Guests/ Potential Guests)

Dusit Thani Public Company Limited (“**Dusit**”), as a controller of Personal Data, is bound by Personal Data Protection Act B.E. 2562 (2019) (“**PDPA**”). In processing¹ individual’s Personal Data, Dusit is required to comply with PDPA, including the obligation to notify the data subject of his legal rights pursuant to this document, and for certain cases, obtaining consent from data subject.

1. Collection of Personal Data

Dusit may collect Personal Data directly and indirectly from data subject, his representative or other related persons, through Dusit’s business partners, other hotels in Dusit Group, Dusit’s phone services and digital services (including website and application) as well as other reliable sources (such as association, governmental organization, governmental body, private organization, seminars, training workshops, exhibitions) organized either by Dusit, governmental or private sector including social media.

2. Types of Personal Data Collected

- **Personal details of guests, family members and companions:** Full name, contact information (mailing address, email address, phone number), nationality, date of birth, gender, payment card information, Dusit Gold number, passport, visa or other government – issued identification card information, preferred language and Sensitive Personal Data (such as health information and food allergy)

- **Accommodation Related Information:** Room preference, room selection and assignment, personal preferences (e.g. special anniversaries, type of activities you prefer to take part in when staying with us and your hobbies), arrival time, check-in and check-out information, additional guest name, corporate number and name, travel agent number and name, airline partner number and name, membership or loyalty program data (including co-branded payment cards,

¹ Processing means any operation which is performed on Personal Data, such as collection, recording, organisation, storage, alteration, use, disclosure, forward, dissemination or otherwise making available

travel partner program affiliations), travel itinerary, tour group, or activity data, vehicle information

- **Online and Digital Information including the Use of IT System:** Internet or other electronic network activity information (including information regarding guests/customer's interaction with Dusit websites, applications or advertisements, IP addresses. booking engine, device information, social media information, description of a complaint that you make to us), profile photo and other data publicly, or data made available by linking your social media and loyalty accounts, family members and companions (such as names and ages of children), customer rating and survey responses, free form textual feedback, images and video and audio data via security cameras located in public area, such as hallways and lobbies, in our properties

3. Retention Period

Dusit will retain your Personal Data as long as it is necessary for the purpose of data processing. After that, Dusit will erase and destroy your Personal Data except as may be required, by applicable laws, or for protection of our interest. In general, your Personal Data will be kept for a maximum period of 10 years or otherwise longer if it is specifically provided by law.

4. Purposes of Use and Disclosure

Dusit will use and disclose your Personal Data for the following purposes:

- Fulfill guest reservations
- Send guests communications relating to their reservations
- Administer membership and activity in the Dusit Gold loyalty program
- Provide customer service and support
- Verify identity
- Send marketing communications via email, direct mail, and social media
- Perform analytics in order to provide guests with personalized offers and content
- Respond to service concerns in order to better serve our guests

- Perform analytics to improve business operations
- Determine guests' eligibility for special or promotional rates
- Process payments
- Process transactions with partners
- Administer contests and sweepstakes
- Detect and prevent fraud
- Comply with applicable laws that require us to process certain Personal Data
- Comply with inspection, analysis and preparation of documents upon request of governmental organizations and regulatory bodies
- Better serve our guests and improve guest's experience
- Properly attribute reservations to travel agents
- Properly attribute points to guests who participate in airline loyalty programs
- Participate in our business partners loyalty program or scheme eligible to our guests
- Enable guests to park vehicle at our properties
- Show you targeted advertisements on media
- Support marketing efforts
- Troubleshoot and resolve website issues

In the case where Dusit appoints third party service provider(s) to process your Personal Data, Dusit will process your Personal Data for the purposes of performing Dusit's contractual obligations, compliance with legal obligations, based on Dusit's legitimate interests or based on your consent (if necessary). Dusit will not disclose or permit the disclosure or make available your Personal Data other than in accordance with the relevant ground unless a prior consent of data subject has been given to Dusit or PDPA allows Dusit to do so without obtaining consent from data subject.

If any data subject could not share Personal Data necessary for Dusit to process Personal Data based on the ground specified above, Dusit will not be able to perform its contractual obligations with such subject matter nor able to comply with legal obligations.

Dusit will process Personal Data in strict compliance with applicable laws. In case where you have given a consent to any data processing activity, you may withdraw your consent at any time.

5. Disclosure

Dusit will not disclose your Personal Data without any legal basis. Your data may be disclosed or transferred to governmental organizations, governmental bodies or third parties including:

- **Dusit Group:** Dusit may disclose your Personal Data to other companies within Dusit Group for the purposes described in this Notice, such as providing and personalizing the Services, communication with you, facilitating the loyalty programs and to accomplish our business purposes. Dusit share your Personal Data used for making a reservation with the applicable property and Dusit entity to fulfill and complete your reservation.
- **Service Providers:** Dusit may disclose Personal Data to third party service providers including, for example, companies that provide website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing and other services.
- **Franchisees:** Dusit may disclose Personal Data to Franchisees of Dusit Portfolio of Brands' properties for the purposes described in this Notice. Franchisees have a limited right to use certain Personal Data for their own purposes and therefore qualify as independent data controllers for the following processing: Franchisees manage and coordinate your stay at hotels that they operate so they may use your Personal Data for that purpose. Franchisees may also use your Personal Data for complying with their own legal obligations, for compliance with their own legal obligations, including maintaining books & records.
- **Property Owners:** Dusit may disclose Personal Data to Property Owners of Dusit Portfolio of Brands' properties for the purposes described in this Notice. Property Owners have a limited right to use certain Personal Data for their own purposes and therefore qualify as independent data controllers for the following processing: Property Owners may use your Personal Data for complying with their own legal obligations, including maintaining books & records.

- **Property Management Companies:** Dusit may disclose Personal Data to Property Management Companies and their service providers for the purpose described in this Notice, such as providing, facilitating, and personalizing the Services, facilitating the loyalty programs and their own marketing.
- **Authorized Licensees:** Where allowed by law, Dusit may disclose Personal Data to our Authorized Licensees for the purposes described in this Notice, such as providing and personalizing the Services, fulfilling your requests and providing their own marketing. For example, this sharing enables you to purchase Dusit branded goods and services, including time share properties.
- **On-Property and/or Travel Partners:** Dusit may share your information with spa, restaurant, health club, concierge and other outlets at our properties to provide you with services and their own marketing when you stay at one of our properties. This sharing also enables us to provide you with a single source for purchasing packages that include travel-related services, such as airline tickets, rental cars and vacation packages.
- **Strategic Business Partners:** As allowed by applicable law, Dusit may disclose Personal Data with select Strategic Business Partners who provide goods, services and offers that we believe will be of interest to you. By sharing data with these Strategic Business Partners, Dusit will be able to make personalized services and unique travel experiences available to you.
- **Third-Party Hotel:** Dusit may share your information with another hotel when it is necessary to provide you with an alternative accommodation place in a situation where we are not able to provide accommodation services to you for whatever reason. For example, in the case where our hotel is overbooked. In this case, Dusit will notify you and request for your consent before sharing your information to such hotel.
- **Linked Accounts and Promotional Activity Partners:** Dusit partner with certain third parties that allow you to enroll in their services or participate in their promotions. For example, certain companies allow you to use your loyalty program number or Online Services login to receive or

register for their services. These companies include airlines and credit card company, as well as sponsors of social events, sweepstakes and contests. Additionally, your social media account provider allows you to connect your social media account to your online services account or log into your Online Services account from your social media account. When you enroll in those services, we disclose your Personal Data and other information to those third parties. If you do not want us to share your Personal Data or other information in this way, do not provide your loyalty program number to third parties, do not use your online services login to register for third-party promotions, and do not connect your online services account with accounts on third-party services. Information shared in this way will be governed by the third party's privacy policy and not this Notice.

- **Social Media Platforms:** Where you choose to interact with us through social media, your interaction with these programs typically allows the social media company to collect some information about you through digital cookies they place on your device and other tracking mechanisms. In some cases, the social media company may recognize you through its digital cookies even when you do not interact with their application. Please visit the social media companies' respective privacy policies to better understand their data collection practices and controls they make available to you.
- **Financial Institutions:** Dusit may share Personal Data to any financial institutions, charge or credit card issuing companies, credit information or reference bureau, or collection agencies necessary to establish and support the payment of any services being requested. Personal data may also be disclosed to any person or persons that have a right under local law to gain access to such information provided they are able to prove their authority to access such information

Dusit will disclose your Personal Data to the recipient outside of Thailand only where it is permitted by PDPA or other applicable laws.

In the event where Dusit is required to disclose your Personal Data to a third party, Dusit will follow appropriate procedures to ensure that the third party will properly handle your Personal Data in order to prevent data loss, unauthorized access, improper use, modification, disclosure or processing.

6. Data Security Measure

Dusit adopts the high-standard security system in both technology and procedures to prevent any possible data theft. Dusit implements various measures to protect its computer system (such as Network Firewall, Intrusion Detection, Threat Prevention, URL Filtering, Application Control, Email Security, Server and Endpoint Protection, Secure Socket Layer, Cookies), through substantial investments, effort and human resources as to ensure that Dusit achieves high-standard measures and your personal data remains safe.

Although Dusit makes its best efforts to protect personal data with our technical mechanism along with the management by our personnel to control access and keep personal data against unauthorized access, Dusit cannot always guarantee the security and confidentiality of personal data from every incident that may arise, such as virus threat and unauthorized access. A data subject should regularly keep up with technology news, install personal firewall software to prevent his computer from threat or data theft.

7. Right of Data Subject

In exercising any right under Clause 7, data subject shall comply with criteria and procedures specified in Clause 8 of this document. However, the rights specified in this Clause are subject to change as the relevant law may be amended from time to time by the government. Dusit will inform you about the changes.

7.1 Right to be notified: if Dusit wishes to collect, store, use or disclose your Personal Data in any manner beyond the intended purposes or your given consent, Dusit will notify and/or seek your prior consent with respect to such additional scope.

7.2 Right to Access to your Personal Data: You may request for a copy of your Personal Data and request to disclose about the source of your Personal Data.

7.3 Rectification of the Personal Data: To ensure that your Personal Data is accurate, up-to-date, complete and not misleading, you may file a request to rectify any of your Personal Data that has been changed by following the procedures specified in Clause 8.

7.4 Right to data portability: In case where it is technically available, you may request to receive your Personal Data in a commonly used or readable by the automatic device or to automatically

transfer.

7.5 Right to erasure of your Personal Data: You may request to erase or make your Personal Data pseudonymised under any of the following circumstances: (a) your Personal Data is no longer needed to be collected, stored, used or disclosed for the intended purposes, (b) you withdraw your consent for your Personal Data to be collected, stored, used or disclosed and Dusit no longer has any legal right to process your Personal Data for the intended purposes, (c) you object to Dusit's processing of your Personal Data, or (d) your Personal Data was processed in contravention of the PDPA.

7.6 Request to suspend the use of your Personal Data: You may request Dusit to suspend its use of your Personal Data in any of the following events:

(1) when Dusit is in the process of verifying certain information for the purpose of rectifying, updating, completing or avoiding any misleading about your Personal Data upon your request;

(2) when your Personal Data is to be erased under Clause 7.5 but you instead request to suspend its use;

(3) when it is no longer necessary to store your Personal Data, but you request Dusit to continue the storage of your Personal Data for establishing legal claims, legal compliance, exercise of legal rights or defenses; or

(4) when Dusit is in the process of verifying its legitimate rights in its data collection or processing for purposes specified by law.

7.7 Right to object the processing of Personal Data: You may object to the collection, storage, use or disclosure of your Personal Data in any of the following events:

(1) In case where your Personal Data was collected by Dusit for the purpose of (a) Dusit's compliance with a governmental order or (b) any legitimate interest of Dusit or other legal entity;

(2) In case where Dusit has processed your Personal Data for the purpose of direct marketing; and

(3) In case where Dusit has processed your Personal Data for any research purposes as specified in relevant laws, including for statistical purpose.

7.8 **Right to withdraw consent:** You may withdraw your consent at any time. Your withdrawal will not have any effect on Dusit’s previous data processing. If your withdrawal will affect any part of your Personal Data, Dusit will notify you of such effect at the time you make such withdrawal.

However, Dusit may deny your request to withdraw consent if the processing is for the purpose of, or for complying with, applicable law or court order, the withdrawal may adversely affect and harm the rights and freedom of the data subject himself or other people, the processing is for research purposes that has appropriate protection for Personal Data, or the processing is for establishing legal claims, legal compliance, exercise of legal rights or defenses.

8. **Criteria and Procedures for Exercise of Your Rights**

<p>❶</p>	<ul style="list-style-type: none"> ▪ If you wish to exercise your right, please submit your request via e-mail at customerservices@dusit.com ▪ Alternatively, you may contact our Data Protection Officer at the following: Dusit International 319 Chamchuri Square Building 29th Floor, Phayathai Road, Pathumwan, Bangkok 10330, Thailand Tel: 02200-9999 Ext 3662 e-mail: dpo@dusit.com ▪ Please mark as “Personal Data Request from a Guest” with your first name, last name and contact information.
<p>❷</p>	<ul style="list-style-type: none"> ▪ Your request will be sent to Dusit’s data protection officer for verification of your identity. We will require you to produce some form of photo identification (copy of a government-issued identification with signature, passport, driver’s license or Student ID Card), home or business address, phone number, information of your stay with Dusit Hotels & Resorts, and details of products purchased. You will also be asked to sign a request form.
<p>❸</p>	<ul style="list-style-type: none"> ▪ The data protection officer will consider your request by considering various factors such as its legitimate reasons, its negative effect on a third party etc. and

	whether the PDPA provides for any exemptions.
④	<ul style="list-style-type: none"> ▪ If your request is approved, the data protection officer will proceed and report the result to you without delay via the channel you have specified in your request.
⑤	<ul style="list-style-type: none"> ▪ If your request is denied, the data protection officer will notify you with explanation without delay via the channel you have specified in your request. You may make an appeal to the authority as prescribed by the PDPA which Dusit will inform you in Dusit's notification of such denial.

Remark:

1. The procedures above will take no more than 30 (thirty) days following the receipt of your request and all supporting documents.
2. Dusit's process will not incur any costs to you. But if there is any cost, Dusit will notify you prior to taking any action.

9. Contact Information

If you have any questions relating to an exercise of your rights or your given consent, you may contact us at:

Name: Suwat Itsarothaikul (Data Protection Officer)

Address: Dusit International

319 Chamchuri Square Building, 29thFloor,

Phayathai Road, Pathumwan,

Bangkok 10330, Thailand Telephone: 02200-9999 Ext 3662

E-mail: dpo@dusit.com