

PRIVACY POLICY ZECK TSE INTERNATIONAL LTD.

1. AN OVERVIEW OF DATA PROTECTION

General information

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit this website. The term “personal data” comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

Data recording on this website

Who is the responsible party for the recording of data on this website (i.e., the “controller”)?

The data on this website is processed by the operator of the website, whose contact information is available under section “Information about the responsible party (referred to as the “controller” in the General Data Protection Regulation “GDPR” and the Personal Data Protection Act of Thailand “PDPA”)” in this Privacy Policy.

How do we record your data?

We collect your data because of your sharing of your data with us. This may, for instance be information you enter in our contact form.

Other data shall be recorded by our IT systems automatically or after you consent to its recording during your website visit. This data comprises primarily technical information (e.g. web browser, operating system, or time the site was accessed). This information is recorded automatically when you access this website.

What are the purposes we use your data for?

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyze your user patterns.

What rights do you have as far as your information is concerned?

You have the right to receive information about the source, recipients, and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency.

Please do not hesitate to contact us at any time if you have questions about this or any other data protection related issues.

Analysis tools and tools provided by third parties.

There is a possibility that your browsing patterns will be statistically analyzed when your visit this website. Such analyses are performed primarily with what we refer to as analysis programs.

For detailed information about these analysis programs please consult our Data Protection Declaration below.

2. HOSTING

External Hosting

This website is hosted by an external service provider (host). Personal data collected on this website are stored on the servers of the host. These may include, but are not limited to, IP addresses, contact requests, metadata and communications, contract information, contact information, names, web page access, and other data generated through a website.

The host is used for the purpose of fulfilling the contract with our potential and existing customers (Art. 6(1)(b) GDPR / Section 24(3) PDPA) and in the interest of secure, fast, and efficient provision of our online services by a professional provider (Art. 6(1)(f) GDPR / Section 24(5) PDPA). If appropriate consent has been obtained, the processing is carried out exclusively based on Art. 6 (1)(a) GDPR, Section 24 PDPA), § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time. Failure to provide personal data may result in improper or interrupted web using experience.

Our host will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

We are using the following host:

REUNION SOLUTION CO., LTD.
64/1 Soi Punnavithi 21, Sukhumvit 10 Rd., Bangjak, Pharkhanong, Bangkok 10260

Data processing

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR and the PDPA.

3. GENERAL INFORMATION AND MANDATORY INFORMATION

Data protection

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection laws, regulations, and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e., through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third-party access.

Information about the responsible party (referred to as the “controller” in the GDPR, also known as the data controller under the PDPA)

The data processing controller on this website is:
ZECK TSE International Ltd.
52, Mu 1, Samnak Bok Sub-district, Mueang Chon Buri District
Chon Buri Province 20000 Thailand
Phone: 02 38 19 5768-9
E-mail: info@zeck.co.th

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g., names, e-mail addresses, etc.).

Storage duration

Unless a more specific storage period has been specified in this privacy policy, your personal data will remain with us until the purpose for which it was collected no longer applies. If you assert a justified request for deletion or revoke your consent to data processing, your data will be deleted, unless we have other legally permissible reasons for storing your personal data (e.g., tax or commercial law retention periods); in the latter case, the deletion will take place after these reasons cease to apply.

General information on the legal basis for the data processing on this website

If you have consented to data processing, we process your personal data based on Art. 6(1)(a) GDPR / Section 19 and 24 PDPA or Art. 9 (2)(a) GDPR / Section 19 and 26 PDPA, if special categories of data are processed according to Art. 9 (1) GDPR / Section 26 PDPA. In the case of explicit consent to the transfer of personal data to third countries, the data processing is also based on Art. 49 (1)(a) GDPR / Section 28 (2) PDPA.

If you have consented to the storage of cookies or to the access to information in your end device (e.g., via device fingerprinting), the data processing is additionally based on § 25 (1) TTDSG. The consent can be revoked at any time. If your data is required for the fulfillment of a contract or for the implementation of pre-contractual measures, we process your data based on Art. 6(1)(b) GDPR / Section 24(3) PDPA. Furthermore, if your data is required for the fulfillment of a legal obligation, we process it based on Art. 6(1)(c) GDPR / Section 24(6) PDPA. Furthermore, the data processing may be carried out based on our legitimate interest according to Art. 6(1)(f) GDPR / Section 24(5) PDPA). Information on the relevant legal basis in each individual case is provided in the following paragraphs of this privacy policy. Failure to provide personal data may result in improper or interrupted web using experience.

Information on data transfer to the USA and other non-EU countries

Among other things, we use tools of companies domiciled in the United States or other from a data protection perspective non-secure non-EU countries. If these tools are active, your personal data may potentially be transferred to these non-EU countries and may be processed there. We must point out that in these countries, a data protection level that is comparable to that in the EU cannot be guaranteed. For instance, U.S. enterprises are under a mandate to release personal data to the security agencies and you as the data subject do not have any litigation options to defend yourself in court. Hence, it cannot be ruled out that U.S. agencies (e.g., the Secret Service) may process, analyze, and permanently archive your personal data for surveillance purposes. We have no control over these processing activities.

Revocation of your consent to the processing of data

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR / Section 32(2) PDPA)

IN THE EVENT THAT DATA ARE PROCESSED ON THE BASIS OF ART. 6(1)(E) /Section 24(4) PDPA) OR (F) GDPR / Section 24(5) PDPA), YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA BASED ON GROUNDS ARISING FROM YOUR UNIQUE SITUATION. THIS ALSO APPLIES TO ANY PROFILING BASED ON THESE PROVISIONS. TO DETERMINE THE LEGAL BASIS, ON WHICH ANY PROCESSING OF DATA IS BASED, PLEASE CONSULT THIS DATA PROTECTION DECLARATION. IF YOU LOG AN OBJECTION, WE WILL NO LONGER PROCESS YOUR AFFECTED PERSONAL DATA, UNLESS WE ARE IN A POSITION TO PRESENT COMPELLING PROTECTION WORTHY GROUNDS FOR THE PROCESSING OF YOUR DATA, THAT OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR IF THE PURPOSE OF THE PROCESSING IS THE CLAIMING, EXERCISING OR DEFENCE OF LEGAL ENTITLEMENTS (OBJECTION PURSUANT TO ART. 21(1) GDPR / Section 32(1) PDPA).

IF YOUR PERSONAL DATA IS BEING PROCESSED IN ORDER TO ENGAGE IN DIRECT ADVERTISING, YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR

AFFECTED PERSONAL DATA FOR THE PURPOSES OF SUCH ADVERTISING AT ANY TIME. THIS ALSO APPLIES TO PROFILING TO THE EXTENT THAT IT IS AFFILIATED WITH SUCH DIRECT ADVERTISING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR DIRECT ADVERTISING PURPOSES (OBJECTION PURSUANT TO ART. 21(2) GDPR / Section 32(2) PDPA).

Right to log a complaint with the competent supervisory agency

In the event of violations of the GDPR or the PDPA, data subjects are entitled to log a complaint with a supervisory agency, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

Right to data portability

You have the right to demand that we hand over any data we automatically process based on your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

SSL and/or TLS encryption

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses either an SSL or a TLS encryption program. You can recognize an encrypted connection by checking whether the address line of the browser switches from “http://” to “https://” and by the appearance of the lock icon in the browser line.

If the SSL or TLS encryption is activated, data you transmit to us cannot be read by third parties.

Information about, rectification and eradication of data

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, access to such information, copy of your personal data, their source, and recipients as well as the purpose of the processing of your data. You may also have a right, subject to the applicable laws, to have your data rectified, eradicated, and/or anonymized. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time. In case we do not take action regarding your request, we shall record such request together with reasons accordingly.

Right to demand processing restrictions

You have the right to demand the imposition of restrictions as far as the processing of your

personal data is concerned. To do so, you may contact us at any time. The right to demand restriction of processing applies in the following cases:

In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.

If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of this data.

If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.

If you have raised an objection pursuant to Art. 21(1) GDPR / Section 32(1) PDPA, your rights and our rights will have to be weighed against each other. If it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons, cited by the European Union, a member state of the EU, or Thai authority.

Rejection of unsolicited e-mails

We herewith object to the use of contact information published in conjunction with the mandatory information to be provided in our Site Notice to send us promotional and information material that we have not expressly requested. The operators of this website and its pages reserve the express right to take legal action in the event of the unsolicited sending of promotional information, for instance via SPAM messages.

4. RECORDING OF DATA ON THIS WEBSITE

Contact form

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6(1)(b) GDPR / Section 24 (3) PDPA, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6(1)(f) GDPR / Section 24 (5) PDPA) or on your consent (Art. 6(1)(a) GDPR / Section 24 PDPA) if this has been requested; the consent

can be revoked at any time. Failure to provide personal data may result in improper or interrupted web using experience or in the situation that we may not be able to contact you in relation to your queries.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g., after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions, in particular retention periods.

Request by e-mail, telephone, or fax

If you contact us by e-mail, telephone or fax, your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent.

These data are processed based on Art. 6(1)(b) GDPR / Section 24 (3) PDPA if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed based on our legitimate interest in the effective handling of inquiries submitted to us (Art. 6(1)(f) GDPR / Section 24 (5) PDPA) or on the basis of your consent (Art. 6(1)(a) GDPR / Section 24 PDPA) if it has been obtained; the consent can be revoked at any time. Failure to provide personal data may result in the situation that we may not be able to contact you in relation to your queries.

The data sent by you to us via contact requests remain with us, until you request us to delete, revoke your consent to the storage, or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

5. ANALYSIS TOOLS AND ADVERTISING

Matomo

This website uses the open-source web analysis service Matomo. Matomo uses technologies that make it possible to recognize the user across multiple pages with the aim of analyzing the user patterns (e.g. cookies or device fingerprinting). The information recorded by Matomo about the use of this website will be stored on our server. Prior to archiving, the IP address will first be anonymized.

Through Matomo, we are able to collect and analyze data on the use of our website-by-website visitors. This enables us to find out, for instance, when which page views occurred and from which region they came. In addition, we collect various log files (e.g. IP address, referrer, browser, and operating system used) and can measure whether our website visitors perform certain actions (e.g. clicks, purchases, etc.).

The use of this analysis tool is based on Art. 6(1)(f) GDPR / Section 24 (5) PDPA. The website operator has a legitimate interest in the analysis of user patterns, in order to optimize the operator's web offerings and advertising. If appropriate consent has been obtained, the processing is carried out exclusively based on Art. 6(1)(a) GDPR / Section 24 PDPA), and

§ 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

Subject to relating legal obligations, the data use for analysis tool will be stored by us for the maximum of 2 years after collecting, or until you revoke your consent.

Hosting

We host Matomo exclusively on our own servers so that all analysis data remains with us and is not passed on.

6. NEWSLETTER

Newsletter data

If you would like to receive the newsletter offered on the website, we require an e-mail address from you as well as information that allows us to verify that you are the owner of the e-mail address provided and that you agree to receive the newsletter. Further data is not collected or only on a voluntary basis. For the handling of the newsletter, we use newsletter service providers, which are described below.

CleverReach

This website uses CleverReach for the sending of newsletters. The provider is the CleverReach GmbH & Co. KG, Schafjückenweg 2, 26180 Rastede, Germany (hereinafter "CleverReach"). CleverReach is a service that can be used to organize and analyze the sending of newsletters. The data you have entered for the purpose of subscribing to our newsletter (e.g., e-mail address) are stored on servers of CleverReach in Germany or in Ireland.

Newsletters we send out via CleverReach allow us to analyze the user patterns of our newsletter recipients. Among other things, in conjunction with this, it is possible how many recipients opened the newsletter e-mail and how often which link inside the newsletter has been clicked.

With the assistance of a tool called Conversion Tracking, we can also determine whether an action that has been predefined in the newsletter occurred after the link was clicked (e.g., purchase of a product on this website). For more information on the data analysis services by CleverReach newsletters, please go to: <https://www.cleverreach.com/en/features/reporting-tracking/>.

The data is processed based on your consent (Art. 6(1)(a) GDPR / Section 24 PDPA). You may revoke any consent you have given at any time by unsubscribing from the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place prior to your revocation.

If you do not want to permit an analysis by CleverReach, you must unsubscribe from the newsletter. We provide a link for you to do this in every newsletter message.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from

the newsletter distribution list after you unsubscribe from the newsletter. Data stored for other purposes with us remain unaffected.

After you unsubscribe from the newsletter distribution list, your e-mail address may be stored by us or the newsletter service provider in a blacklist if such action is necessary to prevent future mailings. The data from the blacklist is used only for this purpose and not merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6(1)(f) GDPR / Section 24 (5) PDPA). The storage in the blacklist is indefinite. You may object to the storage if your interests outweigh our legitimate interest.

For more details, please consult the Data Protection Provisions of CleverReach at: <https://www.cleverreach.com/en/privacy-policy/>.

Data processing

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR and the PDPA.

7. PLUG-INS AND TOOLS

YouTube

This website embeds videos of the website YouTube. The website operator is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

If you visit a page on this website into which a YouTube has been embedded, a connection with YouTube's servers will be established. As a result, the YouTube server will be notified, which of our pages you have visited.

Furthermore, YouTube will be able to place various cookies on your device or comparable technologies for recognition (e.g. device fingerprinting). In this way YouTube will be able to obtain information about this website's visitors. Among other things, this information will be used to generate video statistics with the aim of improving the user friendliness of the site and to prevent attempts to commit fraud.

If you are logged into your YouTube account while you visit our site, you enable YouTube to directly allocate your browsing patterns to your personal profile. You have the option to prevent this by logging out of your YouTube account.

The use of YouTube is based on our interest in presenting our online content in an appealing manner. Pursuant to Art. 6(1)(f) GDPR (Section 24 (5) PDPA), this is a legitimate interest. If appropriate consent has been obtained; the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR / Section 24 PDPA, and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

For more information on how YouTube handles user data, please consult the YouTube Data Privacy Policy under: <https://policies.google.com/privacy?hl=en>.

Google Maps

This website uses the mapping service Google Maps. The provider is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

To enable the use of the Google Maps features, your IP address must be stored. As a rule, this information is transferred to one of Google’s servers in the United States, where it is archived. The operator of this website has no control over the data transfer. In case Google Maps has been activated, Google has the option to use Google web fonts for the purpose of the uniform depiction of fonts. When you access Google Maps, your browser will load the required web fonts into your browser cache, to correctly display text and fonts.

We use Google Maps to present our online content in an appealing manner and to make the locations disclosed on our website easy to find. This constitutes a legitimate interest as defined in Art. 6(1)(f) GDPR / Section 24 (5) PDPA. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR / Section 24 PDPA, and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user’s end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission and comply with Section 28 PDPA. Details can be found here: <https://privacy.google.com/businesses/gdprcontrollerterms/> and <https://privacy.google.com/businesses/gdprcontrollerterms/sccs/>.

For more information on the handling of user data, please review Google’s Data Privacy Declaration under: <https://policies.google.com/privacy?hl=en>.

8. CUSTOM SERVICES

Handling applicant data

We offer website visitors the opportunity to submit job applications to us (e.g., via e-mail, via postal services on by submitting the online job application form). Below, we will brief you on the scope, purpose and use of the personal data collected from you in conjunction with the application process. We assure you that the collection, processing, and use of your data will occur in compliance with the applicable data privacy rights and all other statutory provisions and that your data will always be treated as strictly confidential.

Scope and purpose of the collection of data

If you submit a job application to us, we will process any affiliated personal data (e.g. personal information, contact and communications data, application documents, notes taken during job interviews, etc.), if they are required to decide concerning the establishment or an

employment relationship. The legal grounds for the aforementioned are § 26 GDPR according to German Law (Negotiation of an Employment Relationship), Art. 6(1)(b) GDPR / Section 24 (3) PDPA (General Contract Negotiations/performance of a contract) and – provided you have given us your consent – Art. 6(1)(a) GDPR / Section 24 PDPA. You may revoke any consent given at any time. Within our company, your personal data will only be shared with individuals who are involved in the processing of your job application. Failure to provide personal data may result in improper handling of your application, inability to contact you regarding your application, or inability to undertake further processes, e.g. interview, employment, etc. If your job application should result in your recruitment, the data you have submitted will be archived on the grounds of § 26 GDPR and Art. 6(1)(b) GDPR / Section 24 (3) PDPA for the purpose of implementing the employment relationship in our data processing system.

Data Archiving Period

If we are unable to make you a job offer or you reject a job offer or withdraw your application, we reserve the right to retain the data you have submitted on the basis of our legitimate interests (Art. 6(1)(f) GDPR / Section 24 (5) PDPA) for up to 6 months from the end of the application procedure (rejection or withdrawal of the application). Afterwards the data will be deleted, and the physical application documents will be destroyed. The storage serves in particular as evidence in the event of a legal dispute. If it is evident that the data will be required after the expiry of the 6-month period (e.g., due to an impending or pending legal dispute), deletion will only take place when the purpose for further storage no longer applies.

Longer storage may also take place if you have given your consent (Article 6(1)(a) GDPR / Section 24 PDPA) or if statutory data retention requirements preclude the deletion.

Admission to the applicant pool

If we do not make you a job offer, you may be able to join our applicant pool. In case of admission, all documents and information from the application will be transferred to the applicant pool in order to contact you in case of suitable vacancies.

Admission to the applicant pool is based exclusively on your express consent (Art. 6(1)(a) GDPR / Section 24 PDPA). The submission of consent is on a voluntary basis and has no relation to the ongoing application procedure. The affected person can revoke his/her consent at any time. In this case, the data from the applicant pool will be irrevocably deleted, provided there are no legal reasons for storage.

The data from the applicant pool will be irrevocably deleted no later than two years after consent has been granted.