



OUTWITTRADER

PRIVACY POLICY

VERSION.1

ISSUE DATE 1 MARCH 2025



1st Issue Date: 1 March 2025

Privacy Policy

Outwittrader.com website ("Service Provider") realizes the importance of privacy and personal data protection of customers, service users (collectively referred to as "you"). Therefore, the Service Provider has provided the Privacy Policy to inform you about the Service Provider's practices in collecting, using and disclosing personal data so that you can use the current and future services of the Service Provider, including but not limited to any services related to the use of applications, websites and any channels provided by the Service Provider (collectively referred to as the "Services") with confidence.

Personal Data

Personal Data means information about an individual that can identify that individual, whether directly or indirectly, but does not include information about a deceased person in particular, such as name-surname, ID card number, address, telephone number, financial information, etc.

Personal Data may include Sensitive Personal Data, which includes any information you provide to the Service Provider and/or in the Service Provider's possession and/or that the Service Provider has collected from other sources or other persons in accordance with the law.

In the event that the Service Provider needs to collect, use or disclose your personal data differently from that specified in this Policy, the Service Provider will inform you of the different nature at the time or before such action is taken.

Types of personal data that the service provider collects, uses or discloses

- Information according to the national ID card, passport and/or other evidence issued by the government, such as national ID number, name, surname, title
- Information necessary to contact you, such as contact address, mobile phone number, email
- Personal characteristics, such as status, biometrics
- Information about education and/or employment
- Information about financial status, such as transaction records that you provide to the service provider to participate in various projects such as the Affiliate Program or other services, credit card information, deposit account information
- Information about your device, system and usage behavior, including but not limited to numbers used to identify devices connected to the network (e.g. IP address, MAC address, Device ID), advertising account numbers connected to mobile devices (Advertisement ID)
- Network information, connection information, information about the mobile device operating system, information about mobile network service providers, location, details of device usage, cookies, application usage information, statistical information

"For the necessity to provide additional services beyond the basic services of the service provider or in cases where sensitive personal data is collected, used or disclosed in addition to those specified above, the service provider will only proceed under the various bases specified by law. The service provider will inform the purpose, and the types of personal data to be collected, used or disclosed before or while such action is being taken" Basis for collecting, using or disclosing your personal data and purposes of the process



The service provider will collect, use or disclose your personal data under the following legal bases and purposes:

- Necessary basis for the performance of the contract to which you are a party or for the purpose of taking action at your request prior to entering into the contract, including but not limited to
- Considering requests to register to use the website or join the affiliate program
- Granting access to related services from the service provider
- Providing contact services, contacting for information, answering questions, receiving news or for contacting related to the service
- Developing, improving the quality of the service, increasing the efficiency of the service and facilitating you in receiving the service
- Data processing to provide the service
- Any purpose related to the service that you may be interested in or beneficial to you through the service provider's notification channels and contact channels that you have provided, which the service provider has the legal right to do so
- Any action related to the provision of the service and may be beneficial to you
- Legal basis including but not limited to
 - Compliance with laws related to the service provider, which the service provider is obliged to comply with in order to comply with standards, regulations, rules, practices or guidelines issued by any legal authority with regulatory authority, such as by court order or regulatory agency
 - The service provider may disclose your personal data to government agencies, regulatory agencies Or a related person who is responsible
 - The legitimate interests of the service provider, including but not limited to
 - Data inspection and analysis for product and service development, including research and development and data management to provide services that meet the needs of users
 - Statistics preparation, market trend analysis and marketing plan development
 - The legitimate interests of the service provider, unless such interests are less important than your fundamental rights in personal data, including but not limited to
 - Crime and fraud prevention
 - System and network security to meet international standards
 - Fraud prevention and account security
- Important public interests, where the service provider has provided appropriate measures to protect your fundamental rights and interests, including but not limited to

Identity verification/authentication to prevent crime and fraud

In addition, if your personal data is collected, used or disclosed for other purposes under such bases, the service provider will do so within the scope prescribed by law and notify you in advance if necessary
Disclosure of your personal data to third parties and collection of personal data from other sources In order to perform the purposes and under the legal bases of the service provider above, the service provider may collect from and/or use, send, transfer, process and/or disclose personal data to the following persons:

- Related persons within the service provider group or under the control of the service provider Including persons under the same control as the service provider
- Any juristic person or other person in which the service provider is a shareholder or has a legal relationship with the service provider, including other service providers related to the provision of services, such as cloud providers or technology infrastructure providers



• Auditors, external auditors of the service provider, government agencies, assignees of claims, and other persons or agencies that the service provider deems necessary to submit personal data to comply with the law

Duration of retention of your personal data

• The service provider is required to collect your personal data for the period necessary for the period during which you are still using the service or have a relationship with the service provider or until the period necessary to achieve the purpose related to the service of the service provider has expired. It may be retained for a longer period than the law requires if necessary or for the purpose of verification in the event of a dispute within the statute of limitations as prescribed by law. However, the service provider will retain your personal data for a period not exceeding 5 years.

• The service provider will delete or destroy your personal data or anonymize your personal data when the need for such data ceases as specified.

Your rights under the personal data protection law

As a data subject under the personal data protection law, you have the following rights:

1. The right to withdraw your consent

• You have the right to withdraw your consent to the processing of your personal data that you have given to the service provider for the duration that your personal data is with the service provider.

2. The right to request access to and request a copy of your personal data

• You have the right to request access to the personal data you have provided to the service provider or request the service provider to copy such personal data in a format that is generally readable or usable by automatic tools or devices.

3. The right to request the correction of personal data

• You have the right to request the service provider to correct inaccurate personal data or complete incomplete data.

4. The right to request the deletion or correction of personal data Or divide personal data into an unidentifiable form

• You have the right to request the service provider to delete, destroy, or divide personal data into an unidentifiable form if there is no reason to continue to keep the data under the law.

5. Right to request to suspend the use of personal data

• You have the right to request the service provider to suspend the use of personal data that you have provided to the service provider for certain reasons as specified by law.

6. Right to object to the processing of personal data

• You have the right to object to the service provider's processing of personal data that you have provided to the service provider for certain reasons as specified by law.

7. Right to file a complaint in case the service provider violates or fails to comply with the personal data protection law.

• You have the right to file a complaint with the data protection supervisory authority if you find that there has been an illegal act regarding your personal data, including the right to file a complaint in court.

• If you wish to exercise these rights, you can contact the service provider's data protection officer to submit a request for the service provider to investigate and take action as required by law by contacting outwittrader.service@gmail.com.

• Note: Exercising your rights may affect the service of the service provider. Therefore, the service provider reserves the right to notify you of the possible impact from exercising your rights.



Security

The service provider acknowledges and realizes the importance of your personal data. The service provider has therefore improved and developed the security system for your personal data to comply with the standards and be up-to-date to ensure security at all times.

The Service Provider will take strict measures to prevent unauthorized access to your personal data, including preventing the loss, access, use, alteration or disclosure of your personal data without authorization.

Measures to protect your personal data

- In the event that the service provider needs to transfer your personal data to a third party, the service provider will take appropriate measures to prevent data leakage.
- The service provider will not transfer your data to a country that does not have adequate data protection standards, unless with your consent.

Responsibilities of the service provider

- The service provider is not responsible for incidents resulting from hacking, data theft, database destruction, or password mining by third parties.
- If such incidents occur, the service provider will take necessary measures and notify you as soon as possible.

Personal data of persons who lack legal capacity

- If you are a minor who has not reached the legal age, such as a person under 20 years of age or a person who cannot exercise legal capacity, a legal person must provide consent on your behalf.
- The service provider will collect, use, or disclose your personal data only in accordance with the law and under the specified protection standards.

Language

- Any translation of this Privacy Policy, regardless of language, is provided for convenience only. In the event of any conflict between the Thai version and other translations, the Thai version shall prevail.

Revisions to the Policy

- Any use of the service of the service provider is considered acceptance of this Privacy Policy. The service provider reserves the right to change this policy in the future. We will notify you before the change.

- If there is a significant change, the service provider may notify you via email or other relevant channels.

Contact

- If you have any questions or concerns about this Privacy Policy or the exercise of your rights under the law, please contact the service provider's Data Protection Officer at:

-  Email: outwittrader.service@gmail.com