

EMIL PRECIOUS

Privacy Policy

Privacy Policy / Privacy Notice

Document Controller	EMIL PRECIOUS CO., LTD. Company Registration No. 0105535059144
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1. Introduction and Scope

EMIL PRECIOUS CO., LTD. (the "Company", "we", "us" or "our") respects the privacy rights of website visitors, enquirers, service users, customer representatives, business partners and other persons who contact the Company. This Policy explains how we collect, use, disclose, transmit or transfer, and retain personal data in connection with <http://www.emil.co.th/> and the Company's gemstone examination, analysis and certification services.

This Policy applies to information received through the website, telephone, email, in-person contact at our office, job receipt documents, delivery, payment and the Company's other communication channels. Where a specific activity has its own privacy notice, that notice applies together with this Policy and, in the event of inconsistency, the activity-specific notice prevails.

2. Personal Data Controller

The personal data controller under this Policy is EMIL PRECIOUS CO., LTD., Company Registration No. 0105535059144, with its office at 119 BIS Building (formerly Warner Building), Phase 2, 4th Floor, Room 4F4, Mahesak Road, Suriyawong, Bang Rak, Bangkok 10500. Contact details appear in the Contact section at the end of this document.

3. Personal Data We May Collect

- Identification data: title, first name, surname, signature and identity-verification information as necessary.
- Contact data: address, email address, telephone number, account or username on communication channels, and preferred language.
- Customer and organization data: organization name, position, duties, tax identification number, tax invoice address and authority to act on behalf of another person.
- Service and submitted-property data: request details, quotations, job receipts, job numbers, gemstone or jewellery type, photographs, weight, characteristics, defects, packaging condition, delivery information, analysis results, and certificate numbers and copies. Information about a gemstone is personal data when it can be linked to an individual.
- Transaction data: payment information, proof of transfer, coupon balance, billing records and accounting or tax data. We do not retain full payment-card data unless necessary and protected by appropriate safeguards.
- Communication data: email and message content, contact records, complaints, data-subject requests and information you voluntarily provide.

- Technical and website usage data: IP address, device or browser type, operating system, date and time of access, pages viewed, referring URL, and cookie or similar technology data generated by the website or infrastructure providers.

As a general rule, the Company does not intend to collect sensitive personal data such as race, religion, political opinions, health data, biometric data or criminal records. Please avoid submitting such data. Where necessary, we process it only where a lawful basis exists and with appropriate safeguards.

4. Sources of Data

- Directly from you when you make an enquiry, request a quotation, submit a gemstone for examination, make payment, request a certificate, submit a complaint or exercise your rights.
- From your representative, employer, customer, business partner, supplier, courier or another person you authorize, provided that the person supplying the data has the right to disclose it to us.
- From website systems, servers, security devices and relevant technology service providers.
- From public sources or legally authorized bodies where necessary to verify identity, prevent fraud, comply with law, or establish, exercise or defend legal claims.

5. Purposes and Lawful Bases

We process personal data only as necessary, relying on one or more lawful bases appropriate to the activity:

- 1 To answer questions, provide information, assess work, prepare quotations, make appointments and take steps at your request before entering into a contract (pre-contractual steps and/or legitimate interests).
- 2 To receive, identify, track, examine and analyse property; prepare examination results; issue or reissue certificates; return property; provide status updates; and deliver after-sales service (performance of a contract).
- 3 To receive payment, administer coupons, issue receipts or tax invoices, maintain and audit accounts, and comply with law or orders of public authorities (performance of a contract and legal obligations).
- 4 To verify the authority of the person submitting property, prevent fraud, protect persons, premises, systems and property, investigate irregularities, and establish, exercise or defend legal claims (legitimate interests and/or legal obligations).
- 5 To manage quality, train personnel, prepare internal statistics, and improve methods and services, using only necessary data and anonymizing it where appropriate (legitimate interests).

If we intend to use data for a new purpose incompatible with the original purpose, we will provide details and obtain consent or rely on another lawful basis before proceeding as required by law.

Certain information is required to enter into a contract, provide services or comply with law. If you do not provide it, we may be unable to verify identity, issue a quotation, accept work, issue a certificate, return property, issue tax documents or provide certain services.

6. Cookies, Usage Logs and Third-Party Services

The website may use cookies or other necessary technologies to operate, prevent malfunction and maintain security. It may also contain third-party content or resources such as maps, fonts, software libraries or content-delivery networks. Those providers may receive technical data such as IP address, browser type, referring URL and access time under their own policies.

We will not use cookies for analytics, advertising or cross-site tracking based on implied consent. If such technologies are added, we will provide a cookie notice and choices to accept, reject or configure them before activation as required by law. Disabling necessary cookies may impair parts of the website.

7. Disclosure of Data

We may disclose data as necessary to the following persons, taking account of their roles, confidentiality duties and appropriate safeguards:

- Directors, employees and personnel who need the data to perform their duties.
- Providers of website, hosting, cloud, email, accounting, payment, printing, backup and information-security services.
- Experts, laboratories or partners assisting with analysis or verification of results, only where necessary for the service and under appropriate arrangements.
- Transport companies, couriers, insurers, banks, auditors, accountants, lawyers and professional advisers.
- Government authorities, courts, officials or persons legally entitled to receive the data, including in a lawful restructuring, business transfer or corporate transaction.

We do not sell personal data for money and do not permit processors to use it for their own purposes beyond what is agreed and permitted by law.

8. International Data Transfers

Some technology providers, online-content providers, experts or business partners may be located or store data outside Thailand. Where data is transferred internationally, we comply with personal data protection law, including by considering the destination country's protection standards, using appropriate contractual clauses and safeguards, or obtaining consent where required.

9. Retention Periods

We retain data no longer than necessary for the purposes concerned, taking account of limitation periods, accounting and tax obligations, certificate verification, dispute resolution and orders of public authorities. After the applicable period, we securely delete, destroy or anonymize the data.

- Enquiry and contact data: for as long as necessary to respond, follow up and evidence communications.

- Job receipts, analysis results, certificates, gemstone images and traceability records: for as long as necessary to provide services, verify accuracy and satisfy relevant limitation periods.
- Accounting, tax and payment records: for the periods required by accounting or tax law or orders of public authorities.
- Website system and security logs: for as long as necessary to maintain security, investigate incidents and comply with law.
- Dispute and data-subject request records: until the matter is completed and the relevant statutory or limitation period expires.

10. Security

We apply organizational, technical and physical measures appropriate to the risk, including role-based access controls, authentication, backups, incident logging and review, confidentiality obligations for personnel and service providers, and a data-breach response process. No system, however, can be completely secure.

If a personal data breach occurs, we assess the risk, record the incident, take remedial action, and notify the Personal Data Protection Committee and/or affected data subjects within the legally prescribed timeframe where the notification criteria are met.

11. Rights of Data Subjects

Subject to the conditions and exceptions under applicable law, you may have the right to:

- Withdraw consent where processing is based on consent.
- Request access, obtain a copy, and learn the source of data not collected directly from you.
- Receive or transmit data in the format required by law where the right to data portability applies.
- Object to processing, particularly direct marketing or processing based on legitimate interests.
- Request deletion, destruction or anonymization of data.
- Request restriction of the use of data.
- Request correction so that data is accurate, current, complete and not misleading.
- Lodge a complaint with the Personal Data Protection Committee if you believe processing is unlawful.

We may request information to verify your identity and the scope of the request, and may refuse or limit a request where permitted by law. We will explain the reason and respond within the legally prescribed period. Good-faith exercise of rights is free of charge unless the law permits a fee in a specific case.

12. Minors and Persons Unable to Consent Independently

Our services are not intended for minors to provide information independently. Where it is necessary to collect data of a minor, incompetent person or quasi-incompetent person, we will proceed through, or obtain consent from, the person exercising parental power, the custodian or the curator, as required by law.

13. Third-Party Links and Services

The website may link to or embed third-party services. This Policy does not cover processing for which a third party acts as an independent controller. You should read that provider's privacy policy before using its service.

14. Updates to this Policy

We may amend this Policy when our services, technology, processes or applicable law change. The current version and revision date will be displayed on the website. If a change is material, we will notify you through an appropriate channel and obtain fresh consent where required by law.

Contact Details

If you have questions about this Policy, wish to exercise your rights, or wish to complain about personal data processing, please contact the Company using the subject line "PDPA Rights Request" and provide sufficient information to verify your identity and locate the relevant records.

Operator: EMIL PRECIOUS CO., LTD.

Company Registration No.: 0105535059144

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Email: info@emil.co.th and micky@emil.co.th

Website: <http://www.emil.co.th/>