

Privacy Policy

Effective Date: December 1, 2019

Welcome to Thailand Commercial! Our services are provided to you by Commercial Services Co., Ltd., a Thailand company (herein referred to as "Thailand Commercial" and collectively "Thailand Commercial," "we," "us," "our") through our website located at www.ThailandCommercial.com (the "Site," including mobile sites and mobile applications and affiliate websites), subject to the Terms of Service, located at <https://www.ThailandCommercial.com>. This Privacy Policy is incorporated by reference into our Terms of Service and your access to and use of this Site is subject to the Terms of Service. BY USING THE SITE AND ITS SERVICES, YOU AGREE TO THESE TERMS AND THIS PRIVACY POLICY; IF YOU DO NOT AGREE, DO NOT USE THE SITE OR ANY OTHER THAILAND COMMERCIAL SERVICES.

In addition, when using certain services and/or features, you shall be subject to any additional terms applicable to such services that may be posted on the Site from time to time, including, without limitation, this Privacy Policy. All such terms are hereby incorporated by reference into the Terms of Service. Thailand Commercial is a limited company located in the Kingdom of Thailand. Our address is 38/217 Asoke Place Building, Sukhumvit 21 Rd., Klongtoey nua, Wattana, Bangkok 10110 Thailand. Such address may be changed from time to time without prior notice to you.

Thailand Commercial offers an online real estate service for individuals and businesses to post properties for sale and/or rental; provide agents and others the ability to transact business; offer investment advice; and provide property management services including a digital real estate management and follow-up communications platform, accessible via computer, mobile applications and wireless devices or otherwise, as well as certain other media and content we may provide, including via Thailand Commercial Blog (together with the Site, the "Service"). When you use Thailand Commercial Services you may provide us with information, including but not limited to personally identifiable data, such as your name, email address, postal address, phone number and credit card information, deposit account, IP address, your address book and your photographs, and your User Content (defined below) (collectively, "Personal Data"), and other information that is collected from Site visitors. This Privacy Policy is meant to help you understand what data we collect, why we collect it, and what we do with it. When you visit the Site or use the Thailand Commercial Services, please be advised that your information is controlled by Thailand Commercial.

Information we collect

When you interact with Thailand Commercial through the Site, we may collect and store Personal Data and other information from you, as further described below:

Information you give us

Your Personal Data: We collect and store Personal Data from you when you voluntarily provide such information, such as when you contact us with inquiries, respond to one of requests, register for an account to access the Thailand Commercial Services ("Member"), sign up for a subscription or purchase products on the Site, upload your address book, post photographs or use the Thailand Commercial Services to create property listings, videos, business cards, personalized stationery, flyers and brochures, announcements, and send, receive and/or respond to any inquiry and follow-up communications through the Service.

Personal Data about others: We collect and store Personal Data about other people that you provide to us through your use of the Thailand Commercial Services. We use guests' contact information to, among other things, send your Thailand Commercial listings, and allow them to respond to and comment on the property, and at your request, send follow-up communication.

Information others share about you

We receive certain Personal Data about you from other users when they upload your contact information, send you messages, post a listing, or tag you in a photo from an event that you attended, or comment, message, review your services, or provide other information about you on the Site.

User Content and Listing Photos/Videos: Where permitted by law, we may also collect and store Personal Data intended for public consumption that you or others upload, post, publish, or display on the Site, including photos and videos from a listing, comments, likes, text, video, gif, messages, graphics, or other materials ("User Content").

Demographic or other data: We may also collect and store demographic or other data, such as age, gender, zip code or similar information, from you when you voluntarily provide such information. Where permitted by law, we may also receive information about you from other sources, online or offline, and add it to the information you provided to us.

Information we get from your use of our Service

Unregistered Users: If you are not yet a registered Member of Thailand Commercial, but have received messages and/or responded to or otherwise interacted with the Site, we collect information about you. This data is associated with the receiver's email address, mobile phone number, device identifier or any other identifier ("Receiver"). Once a Receiver registers with the Site, he or she can save favorites archived in their dashboard and see the applicable listing.

Device information: When you use the Site via a mobile device, we may collect and store certain information about the device you are using, including, without limitation, the applicable device identifier. We may collect and use this information to help us manage and improve the Thailand Commercial Services and deliver a more customized experience to you.

Location information: The web requests you make to Thailand Commercial contain your IP address. We may use such IP address for various purposes, including to: analyze and report upon the usage of our Site and any content, features and services made available through the Site; diagnose and prevent service or technology problems affecting our Site; determine geographic location you are accessing our Site; and monitor and prevent fraud and abuse. Certain services, disclosures, features and third-party content made available through the Thailand Commercial Services may only be available to users in certain geographic locations. Your IP address may be used to determine your location in order to determine which services, disclosures, features, third party content will be available to you.

Cookies and similar technologies:

Automatically Collected Data: In addition to the Personal Data that we collect, when you interact with Thailand Commercial through the Site, we automatically receive and store certain information about your visit and use of the Thailand Commercial Services ("Automatically Collected Data"). Automatically Collected Data is collected passively using various technologies such as web beacons that access or set cookies (see Cookies below) and may be used to track usage of the Site, determine whether listings, messages or marketing emails have been opened or acted upon or customize Thailand Commercial Services. The Site may use and share such Automatically Collected Data and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, and the domain names of our visitors' Internet service providers. We may share Automatically Collected Data with our affiliates and our current or prospective business partners, but do not share Automatically Collected Data that can be used to identify you. We do not share Personal Data with third parties except as described in this Privacy Policy.

Cookies: In operating the Site, we may use standard technologies, including “cookies.” Additionally, third-party widgets may install cookies depending on their configuration. We may (and we may allow third party service providers to) use cookies or similar technologies to collect information about your browsing activities over time and across different websites following your use of the Site. A cookie is a piece of information that the computer that hosts our Site gives to your browser when you access the Site. Our cookies help provide additional functionality to the Site and help us analyze Site usage more accurately. For instance, our Site may set a cookie on your browser that allows you to access the Site without needing to remember and then enter a password more than once during a visit to the Site. You have a variety of tools to control cookies and similar technologies, including browser controls to block and delete cookies. On most browser toolbars and within your device menu, you will find a “help” or “privacy settings” section. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Site’s features.

Our Use of Tracking Technologies

We use tracking technologies for other reasons, including the following representative list:

Site operation purposes: For example, enabling you to navigate around the Site, managing your login session so you can move easily from one page to another within the Site and your page requests are loaded in smooth and secure manner these cookies are also essential for you to access secure areas of the Site for example to use shopping baskets or make payments.

Performance: For example, collecting statistical information about how you use the Site so that we can improve the Site; this means we can identify the number of unique visitors we receive to different parts of the Site. We use Google Analytics to collect and provide this information by reference to a cookie id and IP of your device and the log information about the use of the Site to measure those activity levels.

Functionality: For example, remembering the settings applied for a Member at login; to calculate frequency of user visits to the Site; storing your preferences, favorites and selections; and customizing elements of the layout and/or content of the pages of the Site for you.

Targeting and retargeting: For example, working with partners to manage our advertising on other websites. This may involve gathering information about the pages through our advertising partners, on other websites that you visit, and to understand when you have clicked on our advertising, it may also involve using partners to retarget our advertising to you on other websites across the internet based on your past visits to our Site and your interest in our service.

Information through third party services

Third-Party Applications and Services: Thailand Commercial may allow you to login to our Site using Facebook, Google, or other third-party services (the “Login Third Party Services”). When you login through the Login Third Party Services, it may authenticate your identity and share your email address with us, which we can use to create an account for you. If you connect with our Site using your credentials for a Login Third Party Service, we may collect certain information consistent with your privacy settings on such Service, such as your birthday, and we may provide such Service with access to data, including but not limited to your Personal Data, related to your use of the Thailand Commercial Services. In some cases, Thailand Commercial allows you to share information with certain recipients of your listing using Facebook Messenger, LINE, BahtSold, ProperDee, ProperDi, Whatsapp, and/or other third-party services, and also allows you to publicly post the listing using Facebook, LINE, Twitter, and/or other third-party services. Please remember that the manner in which the providers of third-party services use, store and disclose your information is governed by their terms of service and privacy policies, and that we will have no liability or responsibility for the privacy practices or other actions of providers of third-party services.

Information you share

Thailand Commercial Services lets you share information with others through the Services and Site including listings, analysis, reports, messages, follow-up communications, photos, videos, and User Content.

How we use and share information we collect

Thailand Commercial uses the Personal Data we collect to provide Thailand Commercial Services which you can access on the Site. In addition, Thailand Commercial may use and/or share your Personal Data with certain third parties, as described further below:

To provide and improve the Thailand Commercial Services

Your Personal Data: We use your Personal Data to provide the Thailand Commercial Services. If you provide Personal Data in order to register with Thailand Commercial, we will use your Personal Data to provide you access to such Services, to monitor your use of such Services and to contact you regarding your use of such Services. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, where you post a listing including any follow-up communication through Thailand Commercial, we will identify you to the recipient as the sender of the email. If you contact us by email, we will use the Personal Data you provide to answer your question or resolve your problem. If you make a purchase on the Site, Thailand Commercial or its authorized service provider may use financial information or payment method to process such payment, to protect against or identify possible fraudulent transactions, and otherwise as needed to manage our business.

Personal Data about others: We use Personal Data about others to provide the Thailand Commercial Services in sending, receiving and responding to inquiries, listings, postings, and messages. You or a guest who is a logged in can submit a property listing and upload Photos, Videos and Attachments to the Site. Any guest or Member can view or contact Members. Members may have access in their account history to certain information regarding other guests. Thailand Commercial may use guests' contact information to offer Members and guests the opportunity to contact each other through the Site.

Site analytics: Thailand Commercial and its subsidiaries and affiliates may also use your Personal Data and other information collected through the Site for analytics for the internal purpose of improving Thailand Commercial Services including content and functionality, and to better understand our users.

Transactional and marketing emails and other communications from Thailand Commercial and certain third parties: If your interaction with the Site includes providing your email and/or another person's email, Thailand Commercial in providing its Services, may use those emails to send transactional emails to both Members and Receivers, including sending and responding to messages, emails, follow-up communications, and account-related emails to Members. Sending, receiving and responding to transactional email communications is inherent in Thailand Commercial's Services.

Regarding other non-email communications Members and Receivers agree that Thailand Commercial, its subsidiaries, affiliates and current or prospective business partners may use Personal Data to tell you about products and services you have expressed interest in, or for which we believe you will be interested in the future, including but not limited to serving off-site advertisements related to such products and services.

For external processing

Aggregated Data: In an effort to understand and serve the needs of the users Thailand Commercial Services, Thailand Commercial analyzes customer demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis

(the "Aggregate Data"), and Thailand Commercial may share this Aggregate Data with its affiliates, agents and business partners. Thailand Commercial may also disclose Aggregate Data in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

Agents, consultants and related third parties: Thailand Commercial, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include delivering our communications, maintaining databases, analyzing data, marketing, and processing payments. When we do retain another company, we only provide them with the information that they need to perform their specific function, and they may only use such information for our benefit and the purposes for which they were engaged.

Business partners: Thailand Commercial may offer certain functionality or third-party products or services for which we or your agent thinks you may be interested. For example, we offer web-to-print product for business cards through a link to printers and stores, and our Site contains links to certain third-party products or services. Thailand Commercial may receive compensation in connection with the offering and/or your purchase of such functionality, products or services and may share information for the purpose of verifying any compensation we may receive.

Business transfers: If we are involved in a merger, acquisition, due diligence, reorganization, bankruptcy, receivership, sale of company assets or transition of service to another provider, your information, including Personal Data, may be sold or transferred as part of such a transaction as permitted by law and/or contract.

For legal reasons

Thailand Commercial may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation or a government request, (ii) verify compliance with or enforce our Terms of Service or protect and defend the rights or property of Thailand Commercial, users of the Site or others (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (iv) protect against legal liability.

Information security

Thailand Commercial takes reasonable steps (including physical, electronic and procedural measures) to protect the Personal Data provided via the Site from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Thailand Commercial uses industry-standard SSL-encryption to protect data transmissions. Please note that this is not a guarantee that such information may not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. No Internet or email transmission or electronic storage of information is ever fully secure or error free. In particular, information sent to or from this Site via email may not be secure. Therefore, you should take special care in deciding what information you send via the Site or the Thailand Commercial Services. Please keep this in mind when disclosing any Personal Data to Thailand Commercial via the Internet.

When this Privacy Policy applies

This Privacy Policy applies when you are using or visiting Thailand Commercial Sites and Services globally. If you are using or visiting the Site from a country outside the Kingdom of Thailand, you acknowledge and agree that Personal Data and other information may be transferred from your current location to the offices and servers of Thailand Commercial and its authorized third-party business vendors located globally, including in the Kingdom of Thailand, and processed globally. By accessing the Site, using the Thailand Commercial Services, or otherwise providing your information to Thailand Commercial, you consent to any transfer and processing in accordance with this Privacy Policy.

Do Not Track

The Site currently does not respond to “Do Not Track” (DNT) signals and operates as described in this Privacy Policy whether or not a DNT signal is received.

Children

Thailand Commercial does not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, you may not submit any Personal Data through the Site. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data on this Site without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to Thailand Commercial through this Site, please contact us, and we will endeavor to delete that information from our databases.

Links to other websites

This Privacy Policy applies only to the Site. This Site may contain links to other web sites not operated or controlled by Thailand Commercial (the “Third Party Sites”). The policies and procedures we described here do not apply to the Third-Party Sites. The links from this Site do not imply that Thailand Commercial endorses or has reviewed the Third-Party Sites. We suggest contacting those sites directly for information concerning their privacy policies.

Changes

The Site and our business may change from time to time. As a result, at times it may be necessary for Thailand Commercial to make changes to this Privacy Policy. Thailand Commercial reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued use of the Site after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

Access to information

If you have a registered account with the Thailand Commercial Site, you may keep your Personal Data accurate, current, and complete by logging into your account. You may also contact us as specified below. We will take reasonable steps to update or correct Personal Data in our possession that you have previously submitted through the Site. You also may choose to close your account at any time by submitting a request under your “Account Information” on the Site. After you close your account, you will not be able to log into the Site or access any of your information. However, you can open a new account at any time, or if you want to re-open closed account please email us at support@ThailandCommercial.com, we may still retain any and all information associated with your account for any purpose, take actions we deem necessary to protect the integrity of the Site or our users, to enforce our Terms of Service or otherwise permitted by law. In addition, if certain information has already been provided to Third Party Sites, as described in this Privacy Policy, retention of that information will be subject to those Third Party Site policies.

Contacting Thailand Commercial

Please also feel free to contact us if you have any questions about Thailand Commercial’s Privacy Policy or the information practices of the Site. You can reach us at support@ThailandCommercial.com.