

## **Privacy Notice for Corporate Social Responsibility Activities**

**Puratos (Thailand) Company Limited** (hereinafter referred to as the “Company” or “us” or “we”) values your privacy and strives to protect your personal data (“Personal Data”) based on the Personal Data Protection Act B.E. 2562 (“PDPA”) and any revised version that will be amended and promulgated under the said Act. The Company has, therefore, prepared this Privacy Notice to inform you of details about the collection, use and/or disclosure of your Personal Data for Corporate Social Responsibility Activities (CSR).

### **1. Collection of Personal Data**

The Company collects and uses many kinds of Personal Data, depending on the circumstances that are relevant to the processes of corporate social responsibility. The categories of your Personal Data that the Company collects, uses, or discloses (collectively “process” or “processing”), subject to applicable law, includes but is not limited to the following:

1.1 Personal details: such as, first name and surname, gender, date of birth, personal identification number, passport number, photograph as appears in the identification card or passport, occupation, signatures, other photographs, CCTV images/footage.

1.2 Contact details: such as, address, telephone number and email address.

1.3 Program participating details: such as, information stated in your participation document; and

1.4 Sensitive Personal Data: such as, religion; health data (e.g., food allergies, drug allergies, etc.). The Company may also collect some sensitive Personal Data about you for use

in participating in corporate social responsibility activities. However, the Company will not collect, use and/or disclose this type of data without your explicit consent unless the law allows the Company to do so.

#### Sources of data for the collection of Personal Data

- (1) Information obtained directly from you as part of registration or signing up to participate in activities with the Company or through the Company's website or from an identity document such as identity cards, passports, driving licenses, etc.
- (2) Contacting you through participation in activities or by other methods, such as recording pictures and/or audio recording equipment, etc.
- (3) All conversations between you and the Company including recordings of conversations by telephone, letter, email, memos, or any other method.

## 2. Purposes and legal grounds of processing of Personal Data

The Company will collect, use and/or disclose your Personal Data only where there are proper reasons and/or legal grounds to do so. This includes sharing it to third parties under the following main purposes:

2.1 For the Company's legitimate interests in processing your Personal Data while still considering that your fundamental rights does not exceed the benefits of the Company;

- For communicating with you about the Company's activities.
- For capturing and recording your movement and an atmosphere of activities.
- For public relations of the Company's activities.

- For preparing documents and illustrations in order to keep the Company's record which may be publicized or published in a book or through the Company's social media.

2.2 For a specific purpose in accordance with the consent you gave to the Company in processing your Personal Data for the Company's activities and your participation, for instance, the collection for identity verification and keep as a record. In this regard, it may include any documents provided sensitive data, such as, religion, health data, food allergy.

In case that the Company is required to collect your personal data and you refuse to give your personal data, the Company may refuse conducting any related to activities to you.

### **3. Disclosure of Personal Data to third parties**

The Company may disclose or send your Personal Data to third parties in order for these individuals to process your Personal Data in the following ways:

3.1 Subcontractors, brokers or any service providers working for the Company or providing services to the Company such as data processors, reporters/press, photographers and the media including their sub-contractors, service providers, directors and officers;

3.2 Various government agencies involved in organizing activities at that time;

3.3 Financial institutions and payment service providers, insurers and agents or brokers of the insurers, securities companies, advisors and professional service providers;

3.4 A person assigned to manage any of your interests;

3.5 Intermediaries, contact persons and your representatives;

3.6 Any person who orders or manages affairs on your behalf (such as attorneys, lawyers, etc.); and/or

3.7 Any person whom the Company has been ordered by you to disclose your personal information for.

#### **4. Send or Transfer of Personal Data overseas**

The Company may be required to send or transfer your Personal Data overseas for storage and/or processing in the performance of a contract entered into between you and the Company. The Company will not allow unrelated persons to access the Personal Data and the Company will lay out appropriate security measures.

#### **5. Retention of Personal Data**

The Company will collect your Personal Data for as long as it is necessary to carry out the purposes of collecting and processing such Personal Data which related to organizing activities, recording activities, publicize/advertise activities and/or to comply with related applicable laws. The Company will retain your Personal Data for a period of 1 year after the expiration of your participation in corporate social responsibility activities. The Company will destroy, delete, or make Personal Data non-personally identifiable information, unless there is a legal obligation or technical reasons whereby the Company may keep your Personal Data for a longer period of time.

#### **6. Data Subject Right**

You have entitled to your Personal Data in accordance with the PDPA, and the Company will respect your rights and take actions promptly in accordance with any laws, rules or regulations, under certain circumstances, relating to the processing of your Personal Data

You have the following rights regarding your Personal Data:

6.1 Right to Withdraw Consent: In case where the Company processes your Personal Data with your consent, this right enables you to withdraw your consent to the Company processing your Personal Data at any time. The Company may continue to process your Personal Data if the Company has another legal basis to do so.

6.2 Right to Access: This right enables you to receive a copy of the Personal Data the Company holds about you.

6.3 Right to Correct: This right enables you to have any incomplete or inaccurate Personal Data the Company holds about you to become correct, current and complete.

6.4 Right to Erasure: This right enables you to ask the Company to delete, destroy or anonymize your Personal Data where there is no good reason for the Company to continue processing it. You also have the right to ask the Company to delete your Personal Data where you have exercised your right to object to the processing (see below). Nonetheless, exercise of such rights shall not be requested to be erased all personal data and the Company will consider a request to delete carefully, according to the law, regarding the processing of your Personal Data.

6.5 Right to Object: This right enables you to object to the processing of your Personal Data where the Company relies on legitimate interest and there is something about your particular situation which makes you want to object to the processing on this ground. You also have the right to object where the Company processes your Personal Data for direct marketing purposes, recording and analyzing psychological traits and profiling activities.

6.6 Right to Restrict Processing: This right enables you to ask the Company to suspend the processing of your Personal Data, for example, if you want the Company to establish its accuracy or a reason/lawful basis for processing it.

6.7 Right to Portability: In some cases, you have the right to request for a copy of your Personal Data in electronic form to be sent to other data controllers. This right can only be used

for the Personal Data you submitted to the Company and the processing of such Personal Data is done with your consent or where such Personal Data is necessary to be processed in order to fulfill the Company's obligations under a contract.

6.8 Right to Lodge a Complaint: This right enables you to file a complaint with a related government authority, including but not limited to, the Thailand Personal Data Protection Committee, when you see that the Company, the Company's employees or service providers violate or do not comply with the PDPA or other notifications issued under the PDPA.

You may exercise your rights at any time by contacting the Company via the contact channels mentioned in Article 8 below.

The Company may be required to obtain certain information from you in order to verify your identity and certify your right to access Personal Data (or to exercise any other right) in order to comply with security measures that will ensure that your Personal Data will not be disclosed to anyone who has no right to access it.

The Company will make every effort to respond to all legitimate requests within 30 days. In some cases, it may take more than 30 days if your request is complex, or you submit more than one request. In such event, the Company will notify you and will keep you informed of the status of the request.

## **7. Security for your Personal Data**

We have furnished the appropriate security measures covering the administrative safeguards, technical safeguards as well as physical safeguards in the purpose to protect loss of personal data or control the access of personal data to protect from loss, unauthorized access, alteration, modification, or disclosure without authorization in accordance with our Information Security Policy and Practice.

Additionally, with the purpose of retention your personal data as a confidentiality, integrity, and availability, we have also publicly established Privacy Notice in accompany with guidelines for security in the collection, use or disclosure of personal data, which will be reviewed from time to time suitably. In this regard, we will consider upon and abide by the Laws on Personal Data Protection, the Announcement of the Ministry of Digital Economy and Society concerning the Requirements for Personal Data Security Standards B.E. 2563 and the Announcement of the Ministry of Digital Economy and Society concerning the Requirements for Personal Data Security Standards (No.2) B.E. 2564, as well as other announcements or orders of the Office of the Personal Data Protection Commission.

## 8. Contact us

If you need to exercise your personal rights in relation to your personal data or having questions about your personal data under this Privacy Notice, please contact us at

### **PDPA Implementation Working Group**

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