

Privacy Notice for Employee

This Privacy Notice (hereinafter referred to as “Privacy Notice”) is explained about the collection, use, or disclosure of your personal data by with **Puratos (Thailand) Company Limited** (hereinafter referred to as “company” or “we”, “us” or “our”), in the purpose of collection, use and/or disclosure of the personal data of employees.

1. Definition

“Employee” means all employees pursuing to the Company’s rules and regulations.

“Sensitive Data” means personal data classified as inherently private matter of the Data Subject according to the law, where will be collected, used and/or disclosed by the company when obtaining the express consent of the employee, or where is required by law. In some cases, the Company may require collecting, using and/or disclosing sensitive personal data, such as, religious beliefs, health data, disability data, criminal records, biometric data and so on.

“Data Processing” means any processing of employee’s personal data by the Company, including the collection, retention, use, disclosure and deletion of such data.

2. The collection of Personal data

The Company will collect personal data of employees as detailed below. Provided that the employees could not provide such personal data, the company may fail to comply with the terms and conditions of employment contract for applying for a job, labor law and/or any other relevant laws as follows:

2.1 Name-Surname, nickname, address according to house registration, address where can be contacted, birth of date, gender, nationality, religion, ID card number, contact information, such as, phone number, email, LINE ID, Facebook, LinkedIn Profile, marital status.

2.2 Education background, work experiences, including the company name of employer, start and end date of working.

2.3 Resume, copy of completed transcript, copy of ID card, copy of house registration, copy of military certificate, copy of income statement/salary slip, copy of employment certificate, copy of name-surname change notification, copy of examination results/certificates, copy of bank account number.

2.4 Wages, other compensation, bonuses, and employees' welfares.

2.5 Medical certificate, physical examination results before starting work, credit bureau information, a result of bankruptcy checking.

2.6 Health data, data of health check-up, medical history.

2.7 Photos.

2.8 The Company collects personal data of third parties related to employees, including:

(1) Family information (parents, spouses and children) consisting of first name, last name, relationship, occupation, phone number, with the purpose of benefit of the company's provided to employee's family, such as health insurance.

(2) Emergency contact person, consists of name-surname, relationship, occupation, phone number and address.

(3) Reference person, consists of name-surname, relationship, occupation, phone number and address.

2.9 Attendance (working days and hours), different types of leave, reasons for leaving and related documents.

2.10 Disciplinary actions to employees, including penalty, complaint and other related documents.

2.11 Annual performance and related documents.

2.12 Training history and related documents.

2.13 Other personal data that may be retained additionally for the purposes of Human Resources Management and complying with the relevant laws.

The Company may retain personal data of employees in various forms, such as document or electronic.

3. Purpose of Personal Data Collection

3.1 The company will collect, use, or disclose personal data of employees for the purposes of human resource management according to its work instruction abiding by the relevant law and according to the policy of executive.

3.2 The Company will collect, use, or disclose personal data of third parties related to the employees for the benefit of employees' welfares as specified in Article 2.8 or for communication (as a case may be).

3.3 The Company will collect, use, or disclose personal data of applicants for the benefit of recruitment or for an interview at the next opportunity.

4. Use and Disclosure of Personal Data

The Company will use your personal data for all operations in accordance with the company's purposes related to human resource management activities, whereby the Company processes such data for a reason (data processing basis), or any reasons as provided below:

4.1 Contract Basis: For the fulfilment of performance according to the employment contract between the company and the employees or for the employee' request pursuing to the rules and conditions prescribed by the company, with the purpose of providing services under

the contract thereon, for instance, preparing employee salaries, the management of employee welfare, providing an insurance for employees and their family, etc., which the Company may process on its own/or co-process with third parties.

4.2 Legitimate Interests Basis: For the human resources management of the company, for auditing, for preparing a report, for maintaining a safety system and risk management, with the purpose of the legitimate interests of the Company, such as, CCTV recording, handling a complaint, survey of employee engagement with the organization, risk management, etc.

4.3 Legal Obligation Basis: The company may process the personal data of employees in order to carry out any activities related to employees with legal entities, such as, the Revenue Department, Office of Social Securities, Department of Skill Development, etc.

4.4 Consent Basis: The Company will request a consent from employees to process their personal data for the purpose of human resource management within the company, for example, recruitment, selection, assignment of employee, etc.

The Company will only process your personal data in accordance with the stated purpose. In some cases, the company may consider processing your personal data for other relevant purposes and non-contradictory or in addition to the original purpose. Despite the company is necessary to process your personal data for other purposes that are not related to the original purpose, the new consent will be requested from the data subject for the use of such data under a new purpose.

Furthermore, if the employee wishes to withdraw a consent of such processing, the employee can contact the company and notify his/her wishes in accordance with this notice. Please be advised that the withdrawal of consent may affect employees in respect of the employee's benefits regarding the human resources management, recruitment, selection, assignment and/or various services provided by the Company, therefore, it is necessary to study and inquire about the impact before withdrawing the consent.

5. Transferring of Personal Data

The company may transfer your personal data to other parties, where is necessary for data processing according to contractual or legal responsibilities or the consent given by the employees. The company may send or transfer personal data of employees to third parties as follows:

5.1 External agencies to carry out any processing related to employees, such as, salary or tax payment, social security, life-health insurance, by submitting or transferring such data to the Revenue Department, Office of Social Securities, Department of Skill Development, or any financial institutions, which collectively has a cooperation agreement, etc.

5.2 Regulatory agencies or governmental agencies.

5.3 For the establishment of contractual or legal claims of the company or raising the defense of legal claims.

5.4 The Company may transfer the personal data of employees to a foreign country (Cloud), whereby that is considered by the Personal Data Protection Committee whether there is adequate personal data protection or data protection measures.

6. Period of Personal Data Retention

The company will collect the personal data of employees during the time of employment and no later than 10 years from the date of termination of employment, or by the consent, or according to the period of legal claims, whichever it is longer.

7. The Rights of Data Subject

You are entitled to exercise the rights of data subject in accordance with the laws on Personal Data Protection, whereby the Company will respect your rights and proceed complying

with the law, statute or regulation relating to the processing of your personal data under certain circumstances promptly. You have the rights to process your personal data as follows:

7.1 Right to withdraw consent

In the event that the company processes your personal data pursuing to your consent, you have the right to withdraw your consent for processing your personal data to the company at any time. The company may however continue to process your personal data on the ground of another lawful basis.

7.2 Right of access

You have right to request for a copy of your personal data from the company.

7.3 Right to rectification;

You have right to rectify your personal data to be accurate, up-to-date and complete.

7.4 Right to erasure

You have the right to request the company to delete, destroy, or anonymize your personal data in the circumstances that there is no reasonable reason for the company to continue processing your personal data. In addition, you can require the company to delete as well as exercise the right to object where is stipulated in the next Article. Nonetheless, the exercise of right hereof shall not be for the purpose of erasure all personal data, and the company shall carefully consider each request by the laws on processing your personal data.

7.5 Right to object

You have the right to raise an objection to the processing of your personal data in certain circumstances prescribed under the laws on personal data protection. Besides, you have the right to object to the processing of your personal data in the case that the company processes

your personal data for marketing purposes, recording and analyzing the psychological and behavioral characteristics of individuals (Profiling).

7.6 Right to restriction

You have the right to request the company to restrict of processing of your personal data temporarily, for instance, when you wish the company to correct your personal data or when you request the company justifying the lawful basis for processing under the laws on personal data processing.

7.7 Right to data portability

In some cases, you may request the company to transfer or transmit your general personal data to other data processor via electronics. However, this right is particularly in the case of your personal data submitted to the company by consent basis, or where such personal data is required to be processed in order to fulfil the obligation under the contract.

7.8 Right to lodge a complaint

You have the right to lodge a complaint to the governmental agencies as well as the Personal Data Protection Committee in the case of violation of the law by the company or the company's staff.

At any time, you may exercise your rights by contact the company following information provided in Article 10. of this privacy notice.

The Company may request some certain information from you to verify your identity and ensure your right to access personal data (or to exercise any other rights) to observe the security measures ensuring that your personal data will not be disclosed to any person, who is not entitled to access such information

The Company will endeavor responding to all legitimate requests within 30 days. In some cases, the Company may take more than 30 days if your request is complicated, or you are submitting more than a request. Following to such event, the Company will notify and keep you

posted the status of your request at all the times, in addition to comply with legal requirements related to the rights of employees, as a data subjects of personal data. Supposing that the employees request the Company to delete, destroy or dispose the processing of your personal data, to temporarily suspend of use, to de-identify the personal data, or to withdraw your consent, it may cause the restriction on the company in the performance of employment contract or in processing in accordance with the relevant laws. In this regard, the Company reserves the right to charge any necessary expenses for any processing of your personal data upon your request.

8. 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.

9. Review of Privacy Notice

Subject to the Personal Data Protection Act B.E. 2562, this privacy notice will be amended occasionally, and the update version will be displayed on the company's website.

10. 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

Puratos (Thailand) Company Limited

78/3 Moo 1, Bangna-Trad Rd., Homsin, Bangpakong, Chachoengsao 24130 Thailand

phone number +66 63 223 1344

e-mail pdpath@puratos.com