

## Privacy Notice for Internship Program

This Privacy Notice ("Privacy Notice") is prepared to inform you of details about the collection, use and/or disclosure of your Personal Data regarding an internship program with **Puratos (Thailand) Company Limited** (hereinafter referred to as the "Company" or "us" or "we").

### 1. Purposes of collection, use and/or disclosure of Personal Data

The Company collect, use and/or disclose your Personal Data only under the following main purposes:

1.1 For use as an introductory database in the process of recruiting for internship or professional experience program such as applying, taking an exam or test whether in offline or online, and interviewing and publishing a result, whether in offline or online.

1.2 For gathering as a preliminary database to assess and summarize for the internship or professional experience program.

1.3 For use as an introductory database for making a card for internship or professional experience program.

1.4 For use as a preliminary database for accident insurance and other insurance.

1.5 For use as a preliminary database for requesting IT equipment, Notebook, Company Email and others provided by the Company pursuant to the rules or guidelines established.

1.6 For use as a preliminary database to request a card for building approaching and parking ticket for internship student.

1.7 For use as a preliminary database for making an allowance payment.

1.8 For use as a preliminary database for agencies or person related to internship student.

## 2. Collection of Personal Data

### 2.1 Data Collection Channels

The Company collects your Personal Data from a variety of sources, depending on the circumstances that are relevant to the recruitment process and on-boarding process of the Company, such as:

(2.1.1) Information obtained directly from you as part of the internship program, and internship recruitment process (i.e., internship application, identity documents such as identity cards, passports, driving license, etc.;

(2.1.2) Information which the Company receives from recruiter websites, headhunters or from current employees of the Company.

(2.1.3) Data that the Company received during the recruitment process, whether from telephone or video call;

(2.1.4) Data that the Company has or may have received when you used the Company's systems, tools or websites;

(2.1.5) Correspondence with you through interviews, meetings or other devices e.g., CCTV, visual and/or voice recording equipment, etc.

In some cases, the Company may collect your personal information from third parties, such as LinkedIn, Facebook and so on.

### 2.2 Categories of Personal Data collected, used or disclosed

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:

(2.2.1) Personal details: First name and surname, gender, date of birth, marital status, military status, personal identification number, passport number, other identification number issued by the government authorities to be used as an identity verification document, nationality, photograph as it appears on the identification card, passport or driving license, signatures, identity verification information, photograph and CCTV image/footage;

(2.2.2) Contact details: Address, telephone number and e-mail address;

(2.2.3) Educational details: Details of educational background, transcript and educational achievements;

(2.2.4) Family details: Names and contact details of family members, including spouse and children;

(2.2.5) Professional details: your qualifications, skills, experience or training program;

(2.2.6) Sensitive Personal Data: such as religion, race, health data and medical data, and biometric record and so on.

The Company may also collect some sensitive Personal Data about you for use in recruiting and considering who will fit the internship program. 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.

## 2.3 Refusal to give Personal Data to the Company

Under the circumstances where it is necessary for the Company to collect your Personal Data and you refuse to give your Personal Data to the Company, the Company may refuse to take other relevant actions.

### 3. Processing of Personal Data

Pursuant to the purposes, the Company may process your Personal Data in accordance with applicable law and a legal basis. The legal basis on which the Company performs such processing are as follows:

**3.1 Contractual Basis :** the purposes of collection, use and disclosure of Personal Data under contractual basis for performing any action in connection with the internship program for instance, to verify your identity, to assess competence, qualifications and suitability for the position, and to conduct background checks and reference with if it is possible.

**3.2 Legal Obligation Basis :** the purposes of collection, use and disclosure of Personal Data legal obligation basis are for complying with the legal requirements.

**3.3 Consent Basis :** The purposes of collection, use and disclosure of Personal Data under consent basis are for conducting background checks and reference with, if it is possible, to the extent with your consent.

**3.4 Legitimate Interest Basis :** The purposes of collection, use and disclosure of Personal Data under legitimate interest basis are to prevent crimes and manage the security of the Company's premises, the Company may, for example, install a closed circuit television (CCTV) in and around the Company's premises and these may collect your photos, videos or voice recordings.

### 4. Disclosure of Personal Data

In some cases, the Company may disclose your Personal Data by forwarding or sharing it to our affiliated company or to our company group, either in the country or in foreign country, which may have the personal data protection standards not lower than the laws in Thailand and in compliance with the law.

## 5. Retention of Personal Data

The Company determines the period for the recording, retention, and processing of your Personal Data, as stated above, for presenting an internship program or offering an employment opportunity with us for a period not exceeding 10 years.

## 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**

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](mailto:pdpath@puratos.com)