

Privacy Notice for Training & Development

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

1. The Collection of Personal Data

We may collect your personal data directly from you as follows:

1) Contact information for instance, name – surname, address, phone number, mobile phone number, e-mail, social media account information (e.g. Line ID, Facebook account).

2) Personal information for instance, sex, age, occupation, employee ID, job title, date of birth, photograph, signature, identification card number, including information from driver's license, house registration, information on card issued by government/other governmental agencies.

3) Personal data displayed in the system Successfactors Module Learning such as First Name-Last Name, User Name, Password etc.

4) Interest information for instance, information about your interest in training and personnel development.

5) Marketing information and communications, such as your desire to receive marketing information from us and/or our affiliates. and business partners including the desired form of communication.

6) Other information, for instance assessment and attendance information in relation to our training and development, information from CCTV and video, audio-visual data recorded in our area.

2. Purposes and Lawful Basis for Processing

We will collect, use, and disclose your personal data under following purposes:

- 1) To carry out the training activities and personnel development, including other activities with respect of or in connection with training and personnel development.
- 2) To evaluate and monitor the results of training and personnel development and for issuing your training certificate.
- 3) To perform an obligation under the contract between you and the company or to take any necessary actions to initiate or enter such a contract.
- 4) To verify your identity and to process your request.
- 5) For safety and to maintain the security of our business.
- 6) To improve business operations or better our products and services.
- 7) To perform our legal duties and/or cooperate with the court Regulators, government agencies and law enforcement agencies that have delegated powers to us.
- 8) To exercise our rights or protect our legitimate interests as necessary, such as to detect and prevent fraud, crime, infringement of intellectual property rights. or non-compliance with the law.
- 9) For public interest of protecting those who participate in our training.
- 10) To prevent and suppress the harm to life, body, or your health or other, as a case may be.

If you are unable to provide the personal data we request We may not be able to provide you with our services, for example, we may not allow you to participate in our training or human resource development by any other means.

3. The Disclosure of Personal Data to Others

We may disclose your personal data to other companies providing services in training and personnel development, law enforcement agencies, courts, officials, or governmental agencies supervising our training and personnel development.

4. Transferring of Personal Data to a Foreign Country

We may transfer your personnel data to a foreign country, where the destination country may provide the standard of personal data protection higher or lower than Thailand. We however carry out complying with the methods and provisions of relevant laws.

5. Retention Period for Personal Data

The company will retain your Personal Data for the period necessary to fulfil the purposes for which the personal data was Processed, whereby the retention period will vary depending on the Purposes for which such personal data was collected and processed. But all theses, we may retain your personal data longer, where necessary as required by the applicable law, or other contracts between you and the company, or under your consent given to the company.

6. The Right of Personal Data Subject

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 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 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 endeavor to respond to all legitimate requests within 30 days. In some cases, the Company may take more than 30 days if the request is complex, or you submit more than a request. In such event, the Company will notify you and will keep you posted the status of your request.

7. Security for your Personal Data

With the purpose of retention your personal data as a confidentiality, completeness, and availability, we use a various security, covering the preventive measures in management, technical precaution as well as physical protective in regard to restrict or control the access of personal data, to protect your personal data from loss, unauthorized access, alteration, modification, or disclosure misusing or without authority, as stipulated by the applicable law.

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

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