Innovative solutions for bakers, patissiers and chocolatiers



Privacy Notice for Provident Fund

This privacy notice This Privacy Notice ("Privacy Notice") describes how **Puratos** (Thailand) Company Limited (hereinafter referred to as the "Company" or "we") collects, uses and/or discloses personal information. Persons of the Company's employees relating to the operation of the Provident Fund as follows:

1. Collection of Personal Data and Purposes of Collection of Personal Data

The Company may collect your Personal Data under the following main purposes:

2.1 name, surname, date of birth, age, working period, salary, and other information in connection with the employment where is proper for being a member of provident fund for creating a membership.

2.2 Address, phone number, e-mail for contacting with a member.

2.3 Information about savings rate, investment policy for managing of a member's fund account.

2.4 Information about the beneficiary person such as name, surname, relationship and phone number for receiving benefits from the compensation fund. However, Prior to giving information of the beneficiary person, please notify him/her of this privacy.

2.5 Information where is necessary for reporting to regulatory agencies such as the Securities and Exchange Commission (SEC).

2.6 Financial information such as bank accounts also for processing under the taxation law.

2.7 Information on use and access to IT system, computer, system, website, application, network system, electronic device, email to be consistent with Information Technology Policy and applicable laws.



2.8 Information chosen by employee will be shared and disclosed through our system, application, tool, questionnaire, assessment and document.

2.9 Information collected from your engagement with us, such as attending a meeting, participation in any activity, survey response, assessment response, including photograph and video.

2.10 Copy of documents that can be used to identify employees, such as identification card, passport, other documents issued by government agencies, civil registration.

2.11 Other information where is necessary for the fulfillment of our performance under the contract and regulation, as well as in compliance with the laws.

In case that the member refuses to provide Personal Data that is required to comply with the law or contract or to enter into a contract with us, it may impair the performance under contract and the right to access our services providing for you.

In addition, we may need to collect and process our members' sensitive personal data in order to use them for the purposes we have stated in this privacy notice, including member's Biometric Data is regarded as the sensitive Personal Data, namely, fingerprint, face simulation, to identify and verify the member, to prevent crime and to maintain our legitimate interests of us or another person. In case of necessity, we will process members' sensitive Personal Data under the express consent given by the member and pursuant to the purposes stated herein, we will use our best efforts to provide adequate security measures to protect the members' sensitive Personal Data.

3. Retention of Personal Data

3.1 We will retain the member's Personal Data for the period where is necessary to fulfill the purposes of each type of Personal Data unless the law is otherwise permitted for a longer retention period. In case that the retention period of Personal Data cannot be clearly stated, we will retain your Personal Data for a period that may be expected following the standard of collection (for example, 10 years for prescription under general principle of law).



3.2 To comply with our contracts and regulations and for the necessary period, we retain Personal Data of members throughout the duration of our membership but not exceeding 10 years from the date of termination of membership.

3.3 We retain Personal Data of beneficiary person of members for the necessary period to fulfill the purposes of this Privacy Policy.

3.4 In the event that we use the member's Personal Data under his/her consent, we will process your Personal Data until the withdrawal of his/her consent by the member. However, we will continue retaining the Personal Data of member where is necessary for our record. In this regard, we will record that the member has withdrawn his/her consent, so that we can respond to your request in the future.

3.5 We provide an audit system for the deletion or destruction of Personal Data when the retention period has expired or is unrelated to or is unnecessary for the purpose in which such Personal Data was collected.

The Company will only process Personal Data in accordance with the stated purpose herein. In some cases, the Company may consider that your Personal Data can be processed for other relevant and non-contradictory purposes apart from the original purpose; However, provided that the Company is necessary to process your Personal Data for other purposes that are not related to the original purpose, the Company will request a new consent from you.

Furthermore, if the employee wishes to withdraw his/her consent from such data processing, you can contact the Company to do so according to this Privacy Notice. Such withdrawal of consent may nevertheless affect employee in the management of human resource by the Company, for example, a recruitment, a selection, an appointment and/or any various services carrying out for the benefit of our employees. Therefore, please be advised and inquire us about the effects of your withdrawal of consent before.

4. Disclosure of Personal Data to Third Parties

4.1 We disclose and share Personal Data of members with other persons and entities. ("Third Parties") for the purpose of collecting and processing Personal Data as set forth in this



Privacy Notice, for example, disclosing to a company who is designate by us as a fund manager. or to a registrar who maintains and manages all member information, to service provider for IT system, financial institution, government agency and other parties necessary for us carrying out the purposes of collecting and processing personal data under this Privacy Policy.

4.2 We will require the person receiving the Personal Data to take appropriate measures to protect the Personal Data of all member and will process such personal data only where is necessary. In addition to take step for preventing the unauthorized use or disclosure of such Personal Data.

5. 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:

5.1 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.

5.2 Right to Access

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

5.3 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.

5.4 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.

5.5 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.

5.6 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.

5.7 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.

5.8 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 and will also comply with any legal requirement in connection with the rights of employee as a data subject. If employee requests the Company to delete, destroy or dispose your personal data temporarily, as well as to transform your personal data to be unidentified the data subject, or withdraw his/her consent, it may cause the restriction on the company to fulfill the performance under the employment contract or in accordance with any relevant laws. In this regard, the Company reserves the right to charge any necessary expenses for the processing of personal data according to the data subject's request.

6. 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.

7. Modification of the Privacy Notice

To comply with the Personal Data Protection Act B.E. 2562, the Company will review and revise this Privacy Notice regularly in which it may have affect to this Privacy Notice. You can view the latest changes available from the date below in the Privacy Notice through the Company's website.

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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