



## Privacy Notice for Employees and Job Applicants

### Thai Wah Public Company Limited

Thai Wah Public Company Limited and its Group Companies<sup>1</sup> (the “Company”) have prepared and published this privacy notice to clarify the details regarding the collection, use, or disclosure of personal data of job applicants, internship applicants, employees, interns, former employees, as well as their family members and reference persons. This notice also explains the methods for protecting personal data and the appropriate guidelines for managing such data in accordance with the Personal Data Protection Act B.E. 2562 (2019).

#### 1. Collection of Personal Data

The Company collects various types of personal data. The type of personal data we collect depends on the specific situation related to the Company's human resource management.

##### 1.1 Source of Personal Data

The Company may collect your personal data from the following sources, but not limited to:

<b>Personal Data Obtained Directly from You</b>	:	<p>In the Company's personnel recruitment process</p> <ul style="list-style-type: none"><li>• The process of applying for a job or internship with the Company, completing related surveys, or various registrations.</li><li>• The process before entering into a contract, signing a contract, filling out forms, completing surveys, or other related registrations.</li><li>• During or while you are performing work for the Company.</li><li>• When contacting the Company through various channels such as telephone, email, the Company's website, or online media.</li><li>• When participating in the Company's activities, such as still or video recordings.</li><li>• Data collected automatically, for example, when you use the Company's website, IT systems, or applications.</li></ul>
<b>Personal Data Obtained from Other Sources</b>	:	<ul style="list-style-type: none"><li>• Reference persons you specify in your job application form.</li><li>• Job application websites.</li><li>• Hospitals, when you undergo a pre-employment or annual health check-up.</li><li>• The Company's affiliates.</li><li>• Government agencies.</li></ul>
<b>Public Data from Public Sources</b>	:	<ul style="list-style-type: none"><li>• Research from the internet or social media. In such cases, the Company will only collect personal data that you have chosen to make public.</li></ul>

<sup>1</sup> Group Companies means companies in which Thai Wah Public Company Limited holds, whether directly or indirectly, more than 50% of the total number of shares with voting rights.

## 1.2 Personal Data Collected by the Company

The personal data that the Company may collect from you under the relevant laws includes, but is not limited to, the following:

<b>Personal Information</b>	:	Name, surname, date of birth, gender, age, nationality.
<b>Identification Information</b>	:	National ID card number, passport number, photograph, personal information on government-issued documents, licenses, or ID cards for identity verification, signature, and other relevant identity verification data.
<b>Contact Information</b>	:	Address, phone number, email, and social media accounts.
<b>Information from Contact with the Company</b>	:	Communication records between you and the Company, CCTV data, photographs, moving images, and audio.
<b>Financial Information</b>	:	Bank account information, salary information, provident fund information.
<b>Job Application Information</b>	:	Work and education history, job interview information.
<b>Work-related Information</b>	:	Work permit information, performance evaluation data, leave history, sickness records, information on the use of the Company's IT systems, and recordings of images or sound during work performance.
<b>Electronic Information</b>	:	Geographic location data (GPS), computer identification number (IP Address or MAC Address), device ID, mobile network data, activity log, transaction log, data collected via cookies or similar technologies.
<b>Sensitive Personal Data</b>	:	In some cases, the Company may process sensitive data with your explicit consent or as permitted by law, such as religion and blood type information on a copy of a national ID card, racial information from a copy of a passport from certain countries, criminal records, facial recognition data, fingerprint data, health data, and disability data.
<b>Personal Data of Third Parties</b>	:	If you provide the personal data of any third party related to you to the Company (e.g., reference persons and family members), you are responsible for informing those individuals about the details in this notice and obtaining their consent if necessary, or establishing another legal basis to ensure that the Company can collect, use, and disclose the personal data of these third parties.

## 2. Use of Personal Data

### 2.1 Legal Basis for Processing Personal Data

The Company will rely on at least one of the following legal bases to collect, use, and disclose personal data:

<b>Contractual Basis</b>	:	When it is for the performance of an agreement in a contract the Company has with you; that is, when the Company needs your personal data to perform a contract or before the Company enters into a contract with you.
<b>Legal Obligation</b>	:	When the Company needs to collect, use, and disclose your personal data to comply with the law or a legal obligation.
<b>Legitimate Interest</b>	:	When the Company collects, uses, and discloses your data for the benefit of the Company or another person as permitted by law, unless the Company's legitimate interests are less important than your fundamental rights.
<b>Consent</b>	:	When you give consent to the Company to collect, use, and disclose your personal data for one or more specific purposes.
<b>Other Legal Bases</b>	:	In some cases, the Company may need to process your personal data under other legal processing bases of data protection law, such as for preventing or suppressing a danger to a person's life, body, or health; for the preparation of historical documents or archives for public interest, or for research or statistics; for the performance of a task carried out in the public interest by the Company; or for the exercising of official authority vested in the Company. The Company will process your personal data as necessary and in accordance with data protection laws.

### 2.2 Purposes for Collecting, Using, and Disclosing Personal Data

The Company collects, uses, and discloses your personal data for several purposes, depending on the nature of your relationship with the Company, as follows:

### 2.2.1 For Job Applicants and Internship Applicants

Purposes for Collection, Use and Disclosure	Legal Basis Used
<b>Recruitment Process</b>	
<ul style="list-style-type: none"> <li>To carry out any actions related to your job application, such as sending applicant information or interview reports to the relevant departments and decision-makers.</li> <li>To verify your identity and the accuracy of any information you provide to the Company.</li> <li>To assess your abilities, qualifications, and suitability for the position.</li> <li>To conduct background checks and reference checks.</li> <li>To create records of the Company's hiring process.</li> <li>To comply with relevant laws, such as labor protection laws.</li> <li>To verify your right to work in Thailand.</li> <li>To conduct background and qualification checks before employment within the scope of the law, including criminal record checks, health history checks, and checking information from the reference persons you have provided.</li> <li>To offer you other positions that the Company deems suitable for your qualifications in the future.</li> </ul>	<ul style="list-style-type: none"> <li>Contractual Basis</li> <li>Legitimate Interest</li> <li>Legal Obligation</li> </ul>
<b>Security and Risk Management</b>	
<ul style="list-style-type: none"> <li>To maintain security within the Company's buildings and premises, such as exchanging cards before entering such areas and recording images of visitors with CCTV.</li> <li>For the benefit of internal management regarding the employment process.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate Interest</li> </ul>

### 2.2.2 For Employees, Interns, and Former Employees

Purposes for Collection, Use, and Disclosure	Legal Basis Used
<b>Personnel Hiring Process</b>	

<ul style="list-style-type: none"> <li>To carry out the processes and procedures under the employment or internship contract between you and the Company, including other related agreements such as non-disclosure agreements, work policies, and regulations.</li> </ul>	<ul style="list-style-type: none"> <li>Contractual Basis</li> <li>Legitimate Interest</li> </ul>
<b>Personnel and Welfare Management</b>	
<ul style="list-style-type: none"> <li>For human resource management, such as managing compensation, welfare and various benefits, expenses, creating employee cards, monitoring work hours, and managing leave.</li> <li>To perform the employment contract between you and the Company.</li> <li>For the performance of your duties within the scope of the employment contract, including processing procedures related to resignation, termination, payment of severance, post-employment benefits, and reporting to relevant agencies.</li> <li>For performance evaluation.</li> <li>For training and various knowledge certifications.</li> <li>To communicate and invite participation in various Company activities, which may involve recording your image and voice during such activities.</li> <li>To survey employee satisfaction with the Company.</li> <li>To serve as a database for the Company.</li> <li>To analyze and develop various work-related processes and policies and internal operations of the Company.</li> <li>For managing your health and safety, such as arranging annual health check-ups, providing health or other insurance, and processing claims under insurance policies.</li> </ul>	<ul style="list-style-type: none"> <li>Contractual Basis</li> <li>Legal Obligation</li> <li>Legitimate Interest</li> </ul>
<b>Legal Compliance</b>	
<ul style="list-style-type: none"> <li>To perform duties required by law, such as labor protection laws and tax laws.</li> <li>To report or disclose information to government agencies as required by law, or upon receiving a summons or seizure order from the police, government agencies, courts, or other law enforcement agencies.</li> <li>To establish legal claims, exercise legal claims, or defend against legal claims.</li> </ul>	<ul style="list-style-type: none"> <li>Legal Obligation</li> </ul>

Security and Risk Management	
<ul style="list-style-type: none"> <li>• To prevent crime and maintain security within the Company's buildings and premises, such as exchanging cards before entering building areas and recording images with CCTV.</li> <li>• For risk management, audit supervision, and internal organization management, such as to investigate and prevent fraud.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>

The Company will not use your personal data for purposes other than those specified in this privacy notice. If the Company needs to collect, use, or disclose your personal data for additional purposes not mentioned here, we will inform you and request your consent before doing so, unless the law permits us to proceed without your consent.

Where the Company relies on a legitimate interest basis, we will consider whether our interests or those of another person override your fundamental rights.

### 2.3 If You Cannot Provide Personal Data to the Company

In cases where the Company needs to collect your personal data by law or under the terms of a contract between you and the Company, if you do not provide your personal data, the Company may not be able to fulfill its obligations to you or as planned under the contract. However, the Company will inform you of such a case at the time of data collection.

## 3. Disclosure of Personal Data

To carry out the purposes stated in this notice, the Company may disclose your personal data to the following third parties:

- Subsidiaries, group companies, affiliates, and business partners.
- Government agencies, regulatory bodies, or other authorities as required by law, including officials exercising legal powers.
- Agents, contractors/subcontractors, and service providers for any operations, such as transportation providers, document storage and destruction providers, printing houses, marketing activity contractors, advertising media, research companies, recruitment agencies, IT system development and maintenance contractors, accommodation and travel arrangement contractors, payment and payment system providers, auditors, lawyers, legal and tax advisors, and any other consultants.
- Insurance companies.
- Hospitals or legally licensed medical facilities for arranging pre-employment and annual employee health check-ups.
- Third parties with your consent, or as required by contract or law, as the case may be.
- Any transferees of the Company's rights, duties, and interests, including those assigned by such transferees to act on their behalf (e.g., in cases of corporate restructuring, mergers, or acquisitions).

#### 4. Cross-Border Transfer of Personal Data

In some cases, the Company may send or transfer your personal data to a foreign country. If the destination country does not have adequate personal data protection measures equivalent to Thailand, the Company will ensure that appropriate safeguards are in place to make such transfers lawful and compliant with the Personal Data Protection Act B.E. 2562.

#### 5. Retention of Personal Data

##### 5.1 Data Retention Period

The Company will retain your personal data only for as long as necessary for the purposes of collection, use, or disclosure as stated in this privacy notice. However, for the purpose of handling any potential contractual disputes, the Company will retain your personal data for a period of 10 years from the date you are no longer an employee of the Company, unless there are legal, technical, or other reasons according to the Company's internal policies and regulations that require a longer retention period.

##### 5.2 Deletion or Destruction of Personal Data

If the Company no longer needs to retain your data, or when the retention period ends, the Company will delete, destroy, or anonymize the personal data so that it can no longer be linked to you.

#### 6. Exercising Your Rights as a Data Subject

##### 6.1 Your Rights as a Data Subject

You have the following rights under the Personal Data Protection Act:

<b>Right to Withdraw Consent</b>	:	If the Company collects, uses, and discloses your personal data based on your consent, you have the right to withdraw that consent at any time, unless the withdrawal is restricted by law or a contract that benefits you. However, the withdrawal will not affect the lawfulness of processing that was based on consent before its withdrawal.  The Company may continue to process your data if there is another legal basis for doing so.
<b>Right to Access</b>	:	You have the right to request access to and receive a copy of your personal data that is under the Company's responsibility, and to request disclosure of how the data was obtained without your consent. This right must not adversely affect the privacy rights of others.

<b>Right to Rectification</b>	:	You have the right to request that your personal data be corrected to be accurate, current, and complete.
<b>Right to Data Portability</b>	:	Where the Company has made your personal data available in a commonly used and machine-readable electronic format, you have the right to receive your personal data from the Company and to request that the Company transmit or transfer it to another data controller, where such processing is necessary to comply with the law or a contractual obligation.
<b>Right to Erasure</b>	:	<p>If there is no longer a reasonable basis for the Company to collect, use, or disclose your personal data, you have the right to request that the Company delete, destroy, or anonymize it. However, this is not an absolute right to have all data erased. The Company will carefully consider each request in accordance with any legal requirements related to the processing of your personal data.</p> <p>The Company will proceed with the deletion, destruction, or anonymization within 90 days of receiving the request, unless legally exempt or if it is not possible due to essential necessity.</p>
<b>Right to Object</b>	:	You have the right to object to the collection, use, and disclosure of your personal data that the Company processes based on its legitimate interests. You also have the right to object if the Company processes your data for direct marketing and profiling purposes.
<b>Right to Restrict Processing</b>	:	You have the right to request that the Company temporarily suspend the collection, use, and disclosure of your personal data, for example, when you want the Company to correct your data or to clarify the legal basis for its processing.
<b>Right to Lodge a Complaint</b>	:	<p>You have the right to file a complaint with the Personal Data Protection Committee or a relevant government agency if you believe that the Company or its employees have violated or failed to comply with the Personal Data Protection Act B.E. 2562 or other related announcements.</p> <p>You may also contact the Company to complain about how we collect, use, or disclose your personal data. Filing a complaint with the Company does not affect your right to complain to government officials or the Personal Data Protection Committee.</p>



## **6.2 Procedure for Exercising Your Rights**

You may exercise any of your rights at any time by contacting the Company through the channels specified in **Section 10**. The Company may need to request specific information from you to verify your identity and ensure your right to access your personal data or to exercise any other right. This is a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it. The Company may also contact you to ask for further information in relation to your request to speed up our response. We will endeavor to respond to all legitimate requests within 30 days. Occasionally, it may take us longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated on the status of your request.

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

The Company has established appropriate security measures to protect personal data against loss, unauthorized access, use, alteration, correction, or disclosure.

In cases where the Company assigns another person to process personal data on its behalf, the Company will properly supervise that person to ensure that they maintain the security of your personal data in accordance with the Personal Data Protection Act B.E. 2562.

## **8. Your Duties**

You have a duty to ensure that the personal data you provide to the Company, whether by yourself or on your behalf, is accurate and up-to-date, and you must inform the Company as soon as possible if there are any changes.

Once you agree to enter into a contract with the Company, you may have a contractual duty to provide certain personal data, such as contact information and payment details, so that you can receive your legal or contractual rights. Failure to comply with this duty may result in the loss of some of your legal or contractual rights.

## **9. Accessing Other Websites via the Company's Website**

The Company's website may contain links to third-party websites. These third parties may collect certain personal data about the data subject's use of their services. Therefore, if you visit other websites, even through the Company's website, the protection of your personal data will be governed by the privacy notice of that website, which is not related to the Company. The Company cannot be responsible for the security or privacy of any of your information collected by such third-party websites. For this reason, the Company recommends that you exercise caution and review the privacy notices of those third-party websites, products, and services.

## **10. Company's Contact Channels**

If you have any questions or would like more details about personal data protection, the collection, use, or disclosure of your personal data, or exercising your rights, you can contact the Company at:

- **Thai Wah Public Company Limited**

Address: 21/11, 21/13 Thai Wah Tower 1, 6th Floor, South Sathorn Road, Thung Maha Mek, Sathon, Bangkok 10120

Phone: +66 (0) 2285 0040

- **Personal Data Protection Working Group**

Email: Legal@thaiwah.com

#### **11. Amendment of the Privacy Notice**

The Company regularly reviews and revises this privacy notice. Therefore, the Company may amend this notice from time to time to ensure that your personal data is appropriately protected. If this notice is significantly amended, the Company will inform you by publishing the changes through appropriate channels.