

## Notification of Privacy of Staff

HaadThip PCL., and its Subsidiaries (thereafter called “the company”) are aware of and give emphasis upon protection of personal data of candidates and staff, especially the respect of your privacy rights and data protection measures.

This Notification of Privacy of Staff (“notification”) has been prepared to allow you as candidates or staff to learn and understand format, objectives, methods of collection, utilization or disclosure (overall called “assessment”) of private data, as well as your other rights under the Personal Data Protection Act 2012.

In assessing your personal data in accordance with the objectives of this notification, the company operates as the data controller that means the company has an authority to make decision upon the collection, utilization or disclosure of personal data as follows.

### 1. Scope and Enforcement

This notification covers management of directors, current staff, including selected candidates, ex-employees and any other persons such as family members of staff and visitors in case of emergency.

### 2. Definition and Meanings of this Notification

- “Personal Data” means the personal data which can identify one person’s identity either directly or indirectly like first and last name, tel. no., e-mail address, national ID No., photo and work experience. This excludes personal data of deceased.
  - “The company” means HaadThip PCL., and its Subsidiaries
  - “Staff” means employees and officers as per specification in the company’s working regulations.
- “Responsible Person” who looks after and protects personal data of staff is Human Resources Manager and above or an authorizes person of the company.

- 3. “Responsible Person” who looks after and protects personal data of staff is Human Resources Manager and above or an authorizes person of the company.

- 4. **Types of Personal Data** stored by the company are divided into 3 groups as follows.

**4.1 Data of General Persons** includes title, first and last name, nickname, photo, signature, National ID No., Passport No., National Security No., Driving License No., Tax ID No., Bank Account No., Car Registration No., Motorcycle Registration No., Current Home Address, E-

mail address, Tel. No., Date of Birth, Age, Marital Status, Education, working experience, Training History and Skills.

**4.2 Sensitive Data of Persons** includes health data, finger prints, criminal record, photo and blood group.

**4.3 Data of Third Party** includes marital data, family members, contact person in case of emergency, beneficiaries or other data stored as deemed necessary.

## **5. Collection Methods of Your Personal Data**

### **5.1 Direct collection of your personal Data**

The company receives your personal data through collection from recruitment process, including processes like employment contract and others related to employment.

### **5.2 Self-provided personal data and others related to you**

In case that you may have provided data of other persons like intimate of the family for human resources process, namely provision of compensation and benefits, contact details of relatives in case of emergency.

### **5.3 Your personal data collection by other organizations or agencies**

The company may collect your personal data from other organizations or agencies for recruitment and selection process, for example, reference from ex-employer, other histories complied by law according to the position applied as well as application through websites of either public or private agencies.

## **6. Objectives and Evaluation Base**

The company has evaluated your personal data in accordance with the objectives, scope and transparent and fair methods, using the following evaluation base.

**6.1** To comply with the employment contract and working regulations between you and the company as per the employment application and the status of employee.

**6.2** To be required to comply with law and/or achieve objectives of labour protection, social security, health insurance, skill assessment, working capabilities, development of efficiency, knowledge, capabilities as well as psychological development and recreational activities.

**6.3** For the legal benefits of the company that does not infringe the basis of Human Rights and Liberty (Freedom).

7. Your personal data has been collected according to your employment contract, including related documents and other contracts of the previous employment. Your personal data stored by the company depends on the employment status whether you are a successful candidate, current employee or former employee. The company has collected such personal data in accordance with the objectives of data usage and this can be divided into the following types.

#### 7.1) Collection of Personal Data of Successful Candidate

The company evaluates your personal data as deemed necessary so to as assess whether you are suitable for the vacant position and to check correctness of the data provided to the company as follows.

Objectives	Collection Details
1) For Recruitment and Selection of Candidates	<p>1.1 The company uses your personal data to assess that you have the right qualifications for job responsibilities of the position the company is recruiting and to proceed with job interview or other evaluations when you have applied directly with the company or through recruitment agency or third party or to contact you for job evaluation and provide feedback about evaluation and interview results in case the company has selected you.</p> <p>1.2 The company may ask you to carry out a test or answer questions about your personality and/or attend an interview. Details may be obtained from you or the evaluation by the company so as to assess that you are qualified to work in that position.</p> <p>1.3 The company shall adhere to the details you provided in your application. If you provided incorrect or fault information partly or entirely, it shall be considered that you have intention to conceal or cheat.</p>
2) Examination of working experience in appropriate positions	<p>2.1 To check if you used to work with the company and the reason for leaving and to check if you have an interest in other positions in the company.</p> <p>2.2 To assess your working capabilities as permitted by law, for example, professional qualifications, health information, criminal record and reference check provided by you.</p>

Objectives	Collection Details
3) To consider future appropriate positions	<p>3.1 If you are unsuccessful with the evaluation results of the interview for the job you have applied for, the company shall keep your data for 1 year for future contact in case of appropriate positions in the future.</p> <p>3.2 In case you wish to exercise your rights, please directly contact Human Resources Management.</p>

### 7.2) Collection of Personal Data of Staff

The company shall use your personal data for the objective of employment contract between you and the company, legal compliance and/or requirement for legitimate interests of the company, not violating basic rights of your liberty. They are as follows:

Objectives	Collection Details
1) In compliance with the roles and responsibilities of the employer as imposed by law	<p>1.1 To act as per the roles of the employer so as to manage your roles and responsibilities and business activities which the company is also involved.</p> <p>1.2 To act and manage human resources as well as to maintain and carry out general records required for staff management and execution of employment contract or service contract between you and the company. The company shall evaluate results from your fingerprints and photos collected from you.</p> <p>1.3 To perform your job evaluation, promotion, transfer between departments or branches, salary increment, bonus payment and to help you adjust your working format appropriately.</p> <p>1.4 To develop skills, knowledge, capabilities as well as your mental development, for example, activities, recreational activities, training and other knowledge certification, including career path development, succession plan, knowledge management transferred to the organization.</p>

Objectives	Collection Details
<p>2) To carry out Compensation and Benefits</p>	<p>2.1 To assess wages, salary and other benefits the company needs in order to submit your data to payroll officer for your salary assessment as well as other legal compliances, for example, personal income tax, social security, Legal, Student Loan Fund and Legal Execution by submitting your data to Government agencies as imposed by law.</p> <p>2.2 To provide other appropriate compensation and benefits like Annual Physical Exam, health consultation with doctors. The company has stored your health information and may pass your personal data onto third parties who provide the compensation, for example, social security provider, listed companies which manage provident fund, banks which provide mortgages or other agencies/institutions. This is to enable such providers to contact you or you may directly register with them, including providing data on the notified beneficiaries in case of death or other benefits to the concerned 3<sup>rd</sup> parties.</p> <p>2.3 In case you choose to use family welfare, the company is required to collect personal data of your family members and maybe need to pass it on to service provider of such welfare (if any). This is for the protection benefits of yours and your family, for example, marriage, childbirth and death of family member. The company shall be required to request documentary evidence of your family members so as to consider compensation in accordance with the company's regulation.</p>
<p>3) To support working process, communication and other activity organizations</p>	<p>3.1 To support data used to proceed with each step or other internal and external procedures, to assist in HR work and manage in other cases that the company may deliver your data to relevant agencies, using only necessary data and in accordance with the objectives of each procedure.</p> <p>3.2 To specify a right to operate systems and to support devices to facilitate your work.</p>

Objectives	Collection Details
	<p>3.3 To carry out transportation or accommodation related to work as well as disbursement of other expenses related to work.</p> <p>3.4 To test your knowledge, understanding, to carry out test or questionnaire and evaluate results.</p> <p>3.5 To communicate and coordinate as well as to announce or promote internal and external activities. This may use your personal data like name – surname and your photos taken during the activities in order to promote, according to the objectives of each activity.</p> <p>3.6 For training, seminar and both internal and external activities, the company is required to pass on only necessary personal data of you to external service providers in order to prepare flight ticket, coach, food, accommodation and other places for you.</p>
4) To check work – related communication	<p>- In compliance with the related law, the company is required and reserves the rights to check and examine electronic communication sent through account, network and devices provided to you by the company as part of your work and to ensure that recourses, IT equipment of the company correctly function and in accordance with the law and the company’s policy.</p>
5) To check and manage complaints	<p>5.1 To check and manage complaints, management and examination of performance, capabilities, leaves, appeals, violations, complaints, investigation and other processes, including both formal and informal personnel management, decision making upon relevant management and the necessary parts under the employment contract between you and the company.</p> <p>5.2 To manage your possible complaints against the company or issues which you seek help from the company in order to give you an</p>

Objectives	Collection Details
	opportunity to take part in activities and programs you are entitled to as an employee.
6) For labour protection of health and safety at work under occupational health and safety	<p>6.1 To conduct details of leaves or medical information on physical and mental health or disability in relation to compensation or welfare. This is to evaluate working capability, normal work return, management decision on employment or any commitment, including other processes.</p> <p>6.2 To provide assistance in case of your work injuries, illness and health and safety management, to support any necessity and assistance you may require and to contact your referred person in case of emergency if required and no infringement of your rights.</p>
7) To check legal other and regulation compliances	<p>7.1 To check and proceed as per legal requirements, other regulations, including receipts of goods, anti – briberies and corruption report, employee’s ethics and business operation ethics.</p> <p>7.2 To comply with effective law and regulations, for example, working hours, health and safety law, practices of tax, social security, compliance of writ of execution, student loan fund, labour law as well as the company’s current working regulations.</p>
8) To make requests related to Government sectors and other legal claims	To comply with legal claims, to complete effective legal documents, writs, orders, Government Regulations or authorized organizations, including right dispute and management of legal cases. The company shall carry out in highest confidentiality.

### 7.3) Personal Data Storage for former employee or out of state as an employee of the company

After you have terminated the employment or become out of state as an employee, the company may require to further maintain your personal data to proceed with relevant legal obligations.

Objectives	Collection Details
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1) For continual business management	To collect decision making evidences as for your role and keep it with the business as confidential after you have left the company.
2) To evaluate and retain the company's staff	To understand the reasons why you have resigned from the company because they company needs to use details in some cases in order to the company's business operations for maximum benefits.
3) For legal obligations and management of legal rights	To comply with relevant legal obligations, for example, the Revenue Department, Legal Execution Department, as well as to manage complaints and conflicts of yours and others because the company is obliged to provide data or to protect the company from those complaints and conflicts.

**8. Disclosure of Your Personal Data** can be divided into 2 cases as follows:

**8.1 Disclosure of Your Personal Data in the company is deemed as personal data transfer in the company**

Your personal data may be disclosed or submitted to only relevant departments in the company and with necessary roles and responsibilities as per the objectives. This is to comply with the company's processes so as for internal management and communication. Individuals or teams may have access to your personal data as per the following requirements:

- Human Resources or other departments only with related responsibilities of specifying access rights to data as per the roles and responsibilities only.
- The management or your direct superior with responsibilities to manage or make decisions upon you or when it is relevant to processes of Human Resources Management.
- Supporting Departments that serve and develop your working procedure or your work like IT Department.

**8.2 Disclosure of Your Personal Data outside the company**

Your personal data may be passed on to the following external agencies:

- **External Service Providers**, namely organization and its party to the contract, external service provider and/or personal data processors who provide IT services, for example, service providers of managing payroll system, banks, provident fund management



companies and other welfare systems, service providers of health insurance, accident insurance, medical examination, training institutions or other organization managements.

In using services of 3<sup>rd</sup> parties, the company has to ensure that the service providers comply with relevant law and your personal data is protected through technical measures and safety technology.

- **The company’s qualified professional consultants**, namely auditors, law firms and other consultants.
- **The company’s customers**. In case the company may be required to send its customers your personal data (only required). This is for the benefits of managing the work that you are due to perform or authorized to perform on behalf of the company and delivery of good services to them.
- **Government Agencies** The company may send your personal data to Government Agencies like the Revenue Department, Social Security Office, Department of Labour Protection and Welfare, Legal Execution Department, Student Loan Fund, Department of Skill Development, Department of Empowerment of Persons and Disabilities, Securities and Exchange Commission, Ministry of Commerce, Ministry of Labour etc., in order to comply with the law. The company shall submit only your personal data in accordance with the law and legitimate interests of the company.
- **External Organizations or Persons** In some cases, the company may need to confirm your personal data with external organizations or persons who make inquiries for the benefits of investigating your transactions, for example, loan application and other services as well as job application. Thus, you are responsible and consent to disclose in writing. The company shall then confirm and disclose only data on your employment status and others as you are consent to disclose only to the external organizations or persons.

**9. Storage and Duration of Your Personal Data**

Storage of your data	- The company has complied with measures of technics and data management appropriately in order protect your personal data. When the company has to transfer your personal data to a 3 <sup>rd</sup> party
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	<p>service provider, the company has to arrange an appropriate protection system so as to protect your personal data.</p>
Duration of Personal Data Storage	<ul style="list-style-type: none"> <li>- The company shall necessarily store your personal data as per objectives of collection, utilization and disclosure previously notified. In general, the company shall store the data for a period you are contracted with the company, accordingly to the duration legally imposed after the expiration of the contract, for example, 1 year after the receipt of personal data of unsuccessful candidate or throughout the employment period of staff and 10 years after the contract is expired. This is referring evidence used to manage claims and conflicts between you and others because the company legally obliged to provide data or to prevent the company from disputing those claims in the future.</li> <li>- Once the duration is over, the company shall delete and terminate your personal data when usage of such data is no longer necessary. However, in case there is a dispute or a case, regarding job application or your employment contract, the company reserves the rights to further store the data until the verdict reaches its finality.</li> </ul>

**10. Your Rights of Personal Data.** You have the rights to proceed with your personal data as follows:

1. Right to withdraw consent	<ul style="list-style-type: none"> <li>- You have the right to withdraw consent in evaluating your personal data that you have given, throughout the duration during which your personal data is stored with the company, <u>except that</u> such data is in the evaluation base in accordance with the law and contract base. The withdrawal shall not bear any impact upon the evaluation of your personal data you have already given your consent by law.</li> </ul>
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	<ul style="list-style-type: none"> <li>- If the company has other evaluation bases, the company may continue to evaluate your personal data.</li> </ul>
2. Right to access your personal data	<ul style="list-style-type: none"> <li>- You have the right to access your personal data and can request the company to make copies of the personal data for you.</li> <li>- You may request the company to disclose sources of your personal data you did not give your consent to the company but the company may refuse to do so if such access or receipt of copies of personal data may have an effect on liberty and rights of others or the company in accordance with the law or court decree to forbid the disclosure of your personal data.</li> </ul>
3. Right to transfer personal data	<ul style="list-style-type: none"> <li>- You have the right to transfer your personal data given to the company to other Data Protection Officers or yourself for some reasons <u>except</u> cases that are against the law or affect liberty and rights of others.</li> </ul>
4. Right to object data evaluation	<ul style="list-style-type: none"> <li>- You have the right to object evaluation of your personal data for some reasons <u>except</u> lawful cases in which the company is required to store the data or comply with the law, regarding such personal data storage.</li> </ul>
5. Right to request to delete or suppress usage of personal data	<ul style="list-style-type: none"> <li>- You have the right to request the company to delete or suppress usage of personal data for some reasons <u>except</u> in cases that the company complies by law or legally exercises right of claim related to such data storage but the company still further evaluates your personal data.</li> <li>- Thus, you can exercise your rights to request the company to delete your personal data along with the rights to the aforementioned objection. However, the company may refuse such exercise of rights as per the company's legal rules.</li> <li>- In case the company refuse the exercise of rights, the company shall promptly inform you of reasons of refusal.</li> </ul>

6. Right to verify personal data	- You have the right to request the company to verify the incorrect data or add more data for completion by carrying out documents through steps specified by the company.
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You can submit your petition to proceed according to your rights without any expenses. The Human Resources Department shall consider and inform you the result within 30 days from the date of receipt of such petition.

### **11. Maintenance of Stability and Safety of Personal Data**

The company has a measure of appropriately securing stability and safety of your personal data both in technic and management wise in order to prevent losses or access, destruction, usage, alteration or disclosure of personal data without permission. This is in accordance with the company's Information Security Policy.

Furthermore, the company has set to have Privacy Policy notified throughout the organization along with the guideline in order to build stability and safety of collection, usage and disclosure of personal data, maintaining Confidentiality, Integrity, Availability of personal data. This policy and the notice are reviewed at an appropriate time.

### **12. Changes and rectification of this Privacy**

The company may consider improving, amending or changing this notification as deemed appropriate and shall notify you through channels specified by HR, internal and external websites, e-mail or other foreseeable channels, with the latest updated date shown at the end. However, the company would like to advise you to regularly check in order to acknowledge a new notification, especially before you disclose data to any persons.

### **13. Contact Channels**

For further inquiries about Privacy Notice for Staff, you can contact the company through:

- 1) Human Resources Manager, HaadThip PCL.

Hatyai Plant Tel. : 074 210008 ext. 284

Punpin Plant Tel. : 077 357385 ext. 162

E-mail : [personnel@haadthip.com](mailto:personnel@haadthip.com)

**or**

2) Personal Data Protection Working Group, HaadThip PCL.

Tel. : 074 210008 ต่อ 1188

E-mail : [dpo@haadthip.com](mailto:dpo@haadthip.com)

HaadThip and Subsidiaries

## Acknowledgement Form

### Privacy Notice for Staff

I have acknowledged the “Privacy Notice for Staff” and I acknowledge, understand and is consent to adhere to as a working procedure.

First – Last Name	
Employee ID.	
Position	
Department	
Division	
Company	
Signature	
Date	