

## **PRIVACY POLICY FOR EMPLOYEE AND APPLICANT**

This privacy policy is to let you know how the Company collect, use and disclose personal data, as well as to identify the relevant processing purposes and also describe your rights as a data subject while you are an employee or an applicant of the Company.

### **1. WHO ARE WE?**

This privacy policy applies to personal data of all employees and applicants collected by [the Company](#) (individually and collectively, “we”, “our”, “us”, or “the Company”)(Please click here to see a list of the companies that are subject to this privacy policy). When developing and updating our privacy program, we consider global and domestic principles, Laws that have been in effect and frameworks, including The Personal Data Protection Act B.E. 2562 (2019) (PDPA).

If you have any questions or concerns about our privacy practices, we welcome you to contact us via

Headquarters : True Corporation Public Company Limited 18 True Tower, Ratchadaphisek Road, Huay Khwang, Bangkok 10310, Thailand

Contact channel : [HRCareCenter@truecorp.co.th](mailto:HRCareCenter@truecorp.co.th)

In addition, you can contact the Personal Data Protection Officer via email [Dataprivacycenter@truecorp.co.th](mailto:Dataprivacycenter@truecorp.co.th)

Upon receive your questions or concerns, our representative will contact you within a reasonable time to response to your questions or concerns. In some case, we may request for further information to verify your identity.

### **2. WHAT IS PERSONAL DATA?**

“Personal Data” means any information relating to an identified or identifiable natural person, directly or indirectly, but not including the information of the deceased persons in particular.

“Sensitive Data” means some types of personal data that are sensitive and vulnerable to an unfair use or discrimination. Such personal data includes but not limited to biometric data, genetic data, religion, nationality, criminal records and any other data as specified by law.

### **3. WHAT PERSONAL DATA WE WILL COLLECT**

The personal data that we will collect related to our services, whether now or in the future, includes but is not limited to:

3.1. Personally identifiable information, such as name, surname, title, nickname, date of birth, photograph, photo and identification card number, passport number, driver’s license number or other numbers that can be used to verify your identity, location information;

3.2. Personally identifiable information which are sensitive, such as health data, religion, criminal records, biometric data e.g. facial recognition data, iris recognition data, fingerprint recognition data, etc.;

3.3. Contact information, such as address, contact location, telephone number, email address, emergency contact information, beneficiary information in case of demise;

3.4. Education or work information, such as educational degree, educational background;

3.5. Financial information, such as account information and bank account number, wage and compensation information including other benefits;

3.6. Service information necessary for specific groups (e.g., person with visual impairment, and/or hearing impairment, etc.);

3.7. Information about message, email, document, work, product, communication that are created, stored and/or transmitted using the Company's network, application, computer equipment and/or communication equipment;

3.8. Information about employment, such as Employee ID, the date of employment, promoted date, working history with the Company, provident fund, record information about absence, vacation leave, working performance assessment;

3.9. Records of service usage to improve the quality of services and/or to resolve the service issues (e.g., information of recording security cameras, records of photo via electronic media or other medias, etc.);

3.10. Information necessary for managing employment relationship agreements or contracts, granting welfare or other benefits, including any other information necessary for the Company to comply with the law, law enforcement agency's requests and/or court orders.

#### **4. THE SOURCES OF PERSONAL DATA**

The Company may receive your personal data through the channels as follows:

4.1. The Company receives personal data from you directly and will collect your personal data from the process of providing various services, including:

4.1.1. During job application and interview such as application form and/or any other form you fill out including collecting additional information via email and telephone;

4.1.2. Procedures for applying or submitting applications for exercising rights, such as employee registration, registration for applying and/or receiving welfare and benefits;

4.1.3. From your willingness in making a survey or interacting by email or other communication channels between the Company and you;

4.1.4. From the use of the Company's application network, computer equipment and/or communication equipment;

4.1.5. From information about accessing the website of the employee via Browser's cookies;

4.2. The Company receives your personal data from the collection by the Company itself through various employment-related activities throughout the period you work for the Company.

4.3. The Company collects information automatically for tracking and auditing information about using the Company's location, equipment, computer equipment, networks, applications, software, assets and similar resources which collection may result in the collection of personal data about you, this tracking and monitoring may include the use of CCTV installed in company's area.

4.4. The Company receives your personal data from third parties, which have a legitimate right to disclose your personal data, including True Group companies, Ascend Group companies, Thana Telecom Group companies, Charoen Pokphand Group companies, the Company's selected partners, agents and contractors used by the Company to recruit applicants and perform employment contracts for you, such as position transfer information, salary adjustments, training, job assessments, or receives your personal data from the process of providing services in the same way that the Company collects as stated above.

## **5. THE PURPOSES OF PERSONAL DATA PROCESSING**

The Company collects, uses or discloses your personal data for the purpose as follows:

### **5.1. To manage employees' employment relations:**

5.1.1. To consider and evaluate of employment qualifications to ensure that the Company has qualified and competent personnel to perform the job according to the standards set by the Company, including checking reference information in various fields;

5.1.2. To comply with an employment contract, including other relevant purposes;

5.1.3. To consider the payment of medical expenses;

5.1.4. To manage employee's right to take leave;

5.1.5. To consider and assess the qualifications of employment;

5.1.6. To manage the calculation of compensation, salary, benefits, privilege, employment welfare, personal income tax calculation;

5.1.7. To assess work efficiency and operations, position and salary adjustments, giving bonuses;

5.1.8. To set courses or organize training to increase work efficiency;

5.1.9. To carry out other general operations and purposes related to financial and human resource management;

5.1.10. To manage complaints related to employee's work (such as severance pay, claims related to insurance, etc.);

5.1.11. To assess suitable qualifications for a job or specific duty;

5.1.12. To consider your qualifications for offering you to consider transferring work at affiliates and/or the appropriate third party company;

5.1.13. To gather evidence for determining disciplinary action, including termination of employment;

5.1.14. To comply with labor laws or other employment laws;

5.1.15. To compile and create a list of names and addresses;

5.2. To support the operations of the Company:

5.2.1. To communicate with employees;

5.2.2. To inform information, news and offers;

5.2.3. To organize activities, survey opinions, satisfaction, employee participation;

5.2.4. To contact and manage information of emergency contact person and details of beneficiaries and perform related operations;

5.2.5. To improve the Company's financial and human resources management to be efficient;

5.2.6. To restructuring the Company, takeover or merge business and acquisitions;

5.3. For the safety and protection of the Company, employees and related parties:

5.3.1. For the safety or suppression of danger to life, body or health of the person;

5.3.2. To authenticate for entering buildings and premises;

5.3.3. For the benefit of epidemic prevention and control;

5.3.4. To protect and maintain the safety of the Company's employees, properties, assets, information, service networks, including monitoring or auditing the system and user activities that are harmful to you, others and the Company, such as facial recognition data, iris recognition data or fingerprint recognition data for entry to the Company's places where have the modern technology and are necessary to install high-security systems;

5.3.5. To detect, prevent and respond to misconduct, illegal activity, possible prohibited activities and fraud, including enforcing the terms, conditions, the Company's policies and/or related laws;

5.4. For commercial purposes:

5.4.1. To research, develop, improve products and plan marketing strategies of the Company, True Group companies, Ascend Group companies, Thana Telecom Group companies, Charoen Pokphand Group companies or the Company's selected partners;

5.4.2. To offer products and services, privileges, promotions and other offers of the Company, True Group companies, Ascend Group companies, Thana Telecom Group companies,

Charoen Pokphand Group companies or the Company's selected partners which are analyzed and personalized to you;

5.4.3. To inform details of charges of goods and services, notice for payment of goods and services, prepare receipts and tax invoices, pursue debt collection and exercise rights of claim;

5.5. For preventive purposes to meet the standards set by the Company, True Group companies, Ascend Group companies, Thana Telecom Group companies or Charoen Pokphand Group companies or to meet the operational standards of organizations that the Company, True Group companies, Ascend Group companies, Thana Telecom Group companies or Charoen Pokphand Group companies have joined as a member:

5.5.1. For substantial public interest, such as appropriate welfare rights arrangement;

5.5.2. To request for criminal records check;

5.5.3. To request for credit account information and all types of credit history (National Credit Bureau) for considering your qualification;

5.6. To comply with the law and/or have any other necessities for the Company's legitimate interests:

5.6.1. To terminate the contract and keep history of termination, including the history of disciplinary action;

5.6.2. To comply with relevant laws, such as labor law, personal data protection law, cyber security law, computer-related crime law, law about promoting and improving the quality of disabled's life etc.;

5.6.3. For other purposes as permitted by law to collect, use or disclose without consent of the data subject;

5.6.4. For other purposes as permitted by law to collect, use or disclose personal data without the consent of the owner of the personal data.

## **6. HOW WE PROCESS YOUR PERSONAL DATA**

After receiving personal data from various data sources, the Company will collect, use or disclose your personal data for the purposes specified in the previous session and will process your personal data only to the extent permitted by law. That is, it is based on a lawful basis for processing the data.

The company may disclose personal data and any information about your employment or any other information that the Company collected as described in section 3 above to the Company, True Group companies, Ascend Group companies, Thana Telecom Group companies, Charoen Pokphand Group companies, the Company's selected partners, legal government agencies, Information technology service providers, banks, payment and transaction service providers, customer support service providers, service providers, marketing and advertising management service provider, business consultants including any juristic persons or any other person in which the Company and/or you are a party or having legal relations.

In addition, the Company may have to send your personal data to the regulatory authorities for investigation and may use the results of such data audits to prevent fraud. In addition, the Company may disclose your information to individuals or juristic person outside of True Group companies, Ascend Group companies, Thana Telecom Group companies or Charoen Pokphand Group companies which the Company may sell or transfer some of its business or assets, or vice versa. There may be plan to acquire or merge with external persons or entities. If there is a change in the Company's business in parts that are sold, acquired or merged with other companies (As the case may be) your information may be used in the same way as described in this Privacy Policy.

In the event that the Company employs other persons to act as a personal data processor, the Company will investigate personal data protection measures and arrange to sign an agreement to control and protect personal data appropriately and in accordance with the rules prescribed by required law.

In some circumstances, we may need to transfer your personal data to another person, foreign branch offices, or international organizations in some countries that may not have appropriate safeguards. In such case, the Companies will make sure that transferring of such information is lawful as specified by the Personal Data Protection Committee, for example your personal data may be disclosed to other companies within True Group companies in accordance with the Binding Corporate Rules (BCRs) or other information transfer agreements.

We conduct internal and external inspection for customer data protection on a regular basis.

## **7. HOW AND HOW LONG WE KEEP YOUR PERSONAL DATA**

The Company has information security measure to maintain and the period of retention of your personal data as follows:

7.1. Collection characteristics: We keep your personal data either in printed paper (hard copy) or in electronic document system (soft copy) with appropriately secured measures to prevent the loss, unauthorized access, change, and disclose of your personal data.

7.2. We manage to put in place procedures to deal with any suspected personal data breaches. In case of substantiated complaints concerning breaches of customer privacy and losses of customer data, our security team will immediately investigate to solve the case.

7.3. Retention period: We will not keep your personal data for any longer than we seem necessary for the purposes for which we collect and process it, or within the effective period of contract, or within the period of the exercise, or defense of legal claims.

7.4. When your personal data for which we collect, use and process it, is no longer required for the purposes and by applicable laws, we will erase or destroy or aggregate and/or anonymize your personal data to an extent that it no longer identifies you within a reasonable time.

## **8. YOUR RIGHTS AS A DATA SUBJECT**

When the provision on the rights of the personal data subject under the Personal Data Protection Act B.E. 2562 comes into effect, you, as the data subject, have the following rights in relation to personal data:

8.1 When you give us your consent for the specific purposes, you have the right to withdraw the consent for your specific purposes at any time, unless there are restrictions on legal rights or in connection with the contract that benefits to you.

- o You have the right to withdraw the consent about processing your personal data at any time that your personal data is with the Company.

- o If exercise the right to withdraw consent prevents the Company from delivering products or providing some services to you, the Company will inform you about the effect of withdrawing the consent.

#### 8.2. Right to access (or “Rights to be informed”)

- o You have the right to request access to and obtain copy of your personal data to and obtain which is being processed by us.

#### 8.3. Right to data portability

- o You are entitled to request us to send or transfer your personal data to other data controllers or directly receive your personal data for some reasons. However, the right to data portability applies only to the personal data that you submit to the Company and the collection, use and/or disclose of such personal data is done with your consent or where such personal data is necessary to be collected, used and/or disclosed in order to fulfill its obligations under a contract.

#### 8.4. Right to object

- o You have the right to object to the processing of your personal data for some reasons.

#### 8.5. Right to erasure

- o You have the right, in certain circumstances, to request the erasure of your personal data which is being processed by the Company.

#### 8.6. Right to restriction of processing

- o You are entitled to have the right, in certain circumstances, to restrict the processing of your personal data by our Company.

#### 8.7. Right to rectification

- o You have the right to ask for any inaccurate personal data held or processed by us to be corrected, and any incomplete data to be completed. For those inaccurate personal data or incomplete personal data, we will investigate and correct them.

- o Where a request to rectify inaccurate personal data is received, we may, in some circumstances, request you to provide proof of your identity or to provide additional documents and/or required information.

You may contact the staff of the Company to file a request to proceed with the above rights, as detailed in section 1, or contact designated channels specified by the Company. However, you do not have to pay a fee to use your rights. However, a fee may be charged accordingly if your

request is found to be unfounded, repetitive or excessive.

The Company has the right to refuse that is a dishonest exercise of the right, unreasonable requests, requests that are not provided by law and/or requests that cannot be fulfilled. In addition, the Company has the right to reject your request in accordance with the rules stipulated by the law.

## **9. IF YOU REFUSE TO GIVE US YOUR PERSONAL DATA**

The Company is legally obligated to collect personal data or in order to make a contract between you and the Company. If you choose not to provide personal data, the Company may not be able to make an employment contract with you and/or the Company may not be able to provide services to you.

Besides the case that the Company processes personal data for performing of the contract and complying with the laws, in case that you do not give consent to process personal data, you may be still able to use the Company's services. However, you may get less convenience from using service, because the Company doesn't obtain consent to process personal data for providing the service effectively.

## **10. MARKETING ACTIVITIES AND CAMPAIGNS**

During the period you are employed, the Company will send you information about marketing activities and campaigns about products and services of the Company, True Group companies, Ascend Group companies, Thana Telecom Group companies, Charoen Pokphand Group companies or the Company's selected partners which you will be interested in. If you want to withdraw the consent for being informed marketing communications, please contact our designated channels described in section 1 or specified by the Company.

## **11. COOKIE POLICY**

During any use of the Company's website Information relating to your access to this website will be saved in the form of a cookie. This cookie policy describes the meaning of functional cookies, their purposes. And how to delete cookies for your privacy by accessing our website, you consent to our use of cookies in accordance with the cookie policy detailed below.

- What are cookies?

Cookies are text files which are stored on a user's computer and/or communication devices that you use, such as tablets and smartphones, via a web browser while you enter the Company's website. Cookies will not cause harm to your computer equipment and/or communication devices. They used to store detailed log data, internet usage or your website visit behavior. You can learn more about cookies from <https://www.allaboutcookies.org/>

- How the Company uses cookies?

The Company will collect website information from all visitors through cookies or similar technologies and will use cookies for the purpose of improving the efficiency of accessing and using the Company's internet services. The company collects cookies for the following purposes

- o To study the behavior of your website usage and to develop company websites to be able to use easily, quickly and more efficient



- o To enable you to sign in to your account on the Company's website
- o To protect you from fraud and improve security
- o To analyze products and services, and offers of the Company products that may be relevant to you
- o To improve the marketing that you see on social media, applications and other websites

You can refuse the collection of information via cookies through your browser settings, which may reduce the optimum performance of the website and application.

## **12. PERSONAL DATA OF MINORS**

With the nature of the services including the products of the Company, the Company may collect, use or disclose personal data about individuals under 20 years of age. The Company will comply with the Personal Data Protection Law in connection with the processing of minors' personal data. This includes requesting consent from legal representatives or a person using parental power as prescribed in accordance with the Personal Data Protection Act B.E. 2562.

## **13. COLLECTION AND USE OF PERSONAL DATA FOR THE ORIGINAL PURPOSE**

The Company will process the personal data under the law applicable at present and the Company is entitled to continue to collect and use the personal data which has been collected prior to the effective date of provisions relating to collection, use and disclosure of personal data of the PDPA for the existing purposes. If you no longer want the Company to collect and use such personal data after the PDPA is fully effective, you may withdraw your consent through the channels to be further publicized by the Company.

## **14. PRIVACY POLICY OF OTHER WEBSITES**

This privacy policy is only applied to our products, services, and our websites. However, it may contain links to third party websites and services. We have no control over how third party websites and services process your personal data, and we are not responsible for such third party websites and services or their privacy practices.

Please read the privacy policies of any third party websites or services that you access from our websites or services.

## **15. YOUR DUTIES AND RESPONSIBILITIES**

While you are an employee of the Company and in case that your personal data has been changed, you are obliged to update your personal data to be completed and correct to the Human Resources Department. If you do not do so, you will not receive useful information, payroll, expenses or benefits.

If you encounter any behavior that impacts the security of personal information that poses the risk of accident, destruction, loss, alteration, disclosure, transfer, storage of personal information unlawfully, you will notify the company immediately.

## **16. LANGUAGE**

Translation of this privacy policy to any languages is for your convenience only. It is not intended to be considered a change to this privacy policy. In case that there is a conflict between the Thai version and other non-Thai versions, the Thai version shall prevail.

## **17. CHANGES TO PRIVACY POLICY**

The Company will update and alter this Privacy Policy from time to time to be compatible with the changing laws, regulations or operational requirements. In this regard, the Company reserves the right to change this policy on the website or any channels without prior notice.