

## **Privacy Policy**

### **Phuttharaksa Mungkong Company Limited and Affiliates**

Phuttharaksa Mungkong Company Limited and Affiliates (the “Company”) has established and disclose this Privacy Policy (“Policy”) as its approach to explain how we collect, use or disclose personal information of our job applicants, trainee applicants, employees, trainees, ex-employees, and their family members and reference persons and how we protect personal information and properly handle such information according to the Personal Data Protection Act B.E. 2562 (“PDPA”).

We regularly review and, if appropriate, update this Policy from time to time to ensure that your personal information is properly protected. In case of any significant update to this Policy, we will inform you through the appropriate channel(s).

#### **1. Personal information we collect**

##### **1.1 What is personal information?**

Personal information means any information relating to an individual, which enables the identification of such individual, whether directly or indirectly, but not including the information of the deceased persons in particular.

##### **1.2 Personal information we collect**

We collect several types of personal information, including:

- Identity Data (for example, name, surname, identification card number, passport number, birthdate, gender, age, nationality, marital status, photos, and in some cases we may process sensitive data such as religion, race, criminal records, fingerprint recognition, health data, disability data only with your explicit consent or when permitted by law)
- Contact Data (for example, address, telephone number, e-mail)
- Financial Data (for example, bank account number and salary)
- Information relevant to your work (for example, working information, work permit information, work performance evaluation, leave records, medical records, information from your uses of our information system)
- Other relevant personal data (for example, work experience and educational background, information of reference persons and family members, and in some cases the Company may process family members’ sensitive personal data such as medical records only with their consent)
- Images or voice recordings during work performance (for example, recording via CCTV)
- Information on participating in activities held by us (for example, static images or videos)

### **1.3 Sources of information**

We may collect your personal information from various sources as follows:

(a) Collect information directly from you, for example:

- Procedures for job or trainee applications, form filling and contract signing, attached documents for selection, questionnaires, or any relevant registrations
- Procedures for taking steps as per request before entering into contract, contract signing, contract form filling, documents attached to contract, questionnaires, registrations or submission of claims or requests for exercising your rights
- Your communication with us via our contact channels, for example, telephone and e-mail, etc.
- Information on participating in activities held by us, for example, static images or videos
- Automatic data storage system, for example, when you use our website or our information technology system or our application, etc.

(b) Collect information from other sources, for example:

- Reference persons specified in our job applications
- Job recruitment websites
- Hospitals providing your pre-employment health check-up and annual health check-up
- Government authorities or other publicly available sources such as company website, information made available on the internet or social media platforms, for example, Facebook, etc.

## **2. Purposes of Collection, Use or Disclosure of Personal Information**

We collect, use or disclose your personal information for various purposes depending on relationship between you and the Company as follows:

### **2.1 For Job Applicants, Trainee Applicants, their Family Members and Reference Persons**

2.1.1 To proceed as necessary with considering and selecting job or trainee applicants and other relevant procedures, e.g. your application via our website, other job recruitment websites or directly with the Company, interview procedures, assessment and selection procedures, and/or job offering procedures

2.1.2 To check your backgrounds and qualifications before an employment under applicable laws, including checking your criminal records, health records and information from your specified reference persons

2.1.3 To be benefit for internal human resource management for recruitment process, e.g. disclosing your information or reporting your interview information to relevant divisions and authorized persons for decision making including employment contract preparation and other human resource management procedures

2.1.4 To offer other positions in the Company that may be suitable for your qualifications in the case where you are not recruited to [work/train] with the Company

2.1.5 To monitor security in our buildings or premises including I.D. card deposit before accessing such areas and to record images within our buildings and premises via Closed-Circuit Television (CCTV)

## **2.2 For Employees, Trainees, ex-Employee, and their Family Members and Reference Persons**

2.2.1 To proceed with an employment or trainee agreement between you and the Company as well as other agreements in relation to the employment such as a non-disclosure agreement, policy and work rules, etc. including amendments or additions to such agreements

2.2.2 To communicate with employees and trainees, evaluate your work performance, provide trainings, certifications, and activity invitation for employees including any proceeding and communicating about

such activity which will record your images and voices while participating such activities, and to survey the employees' satisfaction towards the Company in order to analyze and develop the Company's working policies and internal procedures

2.2.3 To perform human resource management including managing and complying with an employment contract between you and the Company such as administering remunerations, welfares and benefits, expense managing, issuing employee card, examining work attendance, and administering leaves, etc., and to perform your obligations under the employment contract between you and the Company, and to undertake any procedures relating to resignation, employment termination, severance pay, post-employment benefits, and reporting to relevant authorities

2.2.4 To manage your health and safety such as providing annual health check-up, providing health insurance or other insurance, and claiming the compensation under insurance policy, etc.

2.2.5 To monitor your work performance via Closed-Circuit Television (CCTV) for surveillance and security purposes during the work performance

2.2.6 To conduct business planning, reporting, and forecasting

2.2.7 To manage risks and undertake internal prevention, audit and administration such as investigation of fraud, employees' disciplinary offences or any other illegal actions, examination of qualifications and professional licenses for

certain positions, conflict of interest assessment for certain managing positions, examination proceeding by supervisory authorities or any other legal proceeding

2.2.8 To undertake detection and investigation under legal procedures and other regulations, to comply with laws, and to report information to government authorities as required by laws or upon receiving an order or a writ of attachment from police officers, government authorities, courts, or other competent authorities, including to establish, comply or exercise the rights to legal claims or defend against the rights to legal claims

2.2.9 To monitor security in our buildings and premises and to record images within our buildings and premises via Closed-Circuit Television (CCTV)

2.2.10 To assign rights, obligations and any benefits under the contract between you and the Company which have been done legally, for example, merger or employment transfer

### **3. Data Retention Period**

We retain your personal information for as long as is considered necessary for the purpose for which it was collected, used or disclosed as set out in this Policy. The criteria used to determine our retention periods include: we retain the personal information for the duration we have an ongoing relationship with you; and we may retain the personal information for a longer period as necessary to comply with applicable laws, or to be in accordance with legal prescription, or to establish, comply with or exercise the rights to legal claims or defend against the rights to legal claims, or to comply with, for any other cause, our internal policies and regulations.

### **4. Data Disclosure**

We may disclose your personal information in certain circumstances, for the purposes set out in this Policy, to:

4.1 Subsidiaries, affiliates and any related companies for business purposes, internal management including undertaking any other activity as set out in this Policy.

4.2 Government authorities, supervisory authorities or other authorities as stipulated by laws, including competent officials, e.g. courts, police officers, the Revenue Department, the Social Security Office, the Department of Labour Protection and Welfare, etc..

4.3 Agencies, service providers and/or sub-contractors for their implementation and procedures, for example, carriers, document storage and destruction service providers, printing house, marketing agency, IT development and maintenance service providers, travel and accommodation service providers, payment and payment system service providers, payroll service providers, auditors, lawyers, tax and legal advisors, and any consultants.

4.4 Insurance company.

4.5 Hospitals for providing pre-employment health check-up and annual health check-up.

4.6 Our business partners, customers, vendors, or other third parties as per your consent or contractual requirements or legal requirements, as the case may be.

4.7 The assignee of the rights, duties, and any benefits from the Company, including any persons who are assigned by the aforesaid assignee to act on its behalf, for example, in the case of organizational restructuring, merger or acquisition, transfer of employees, etc.

## **5. International Transfer of Personal Data**

In some cases, we may transmit or transfer your personal information to the Company databases which are operated and managed on Cloud Servers in foreign countries. In such case, the Company shall provide appropriate protection and security measures and comply with the PDPA.

## **6. Lawful Basis for Processing of Personal Data**

The Company only processes your personal information as it is necessary for the scope set out in this Policy, as follows:

- Where we obtain your consent (as required by law)
- To take steps at your request prior to entering into a contract and to perform contractual obligations between you and the Company;
- Where it is necessary for legitimate interests of the Company or any other persons or juristic persons, except where such interests are overridden by fundamental rights of your personal information;
- To comply with laws to which the Company is subjected;
- Where it is necessary for preventing or suppressing a danger to a person's life, body or health;
- To perform the Company's duties for a task carried out in public interest or to perform duties for exercising of official authority vested in the Company (if any).

In the case where the Company processes your sensitive personal information, the Company shall duly obtain your explicit consent, unless the explicit consent is not required by law.

In the case where the personal information collected by the Company as stated above is necessary for the Company's compliance with applicable laws or performance of contract. If you do not provide us with such necessary personal information, the Company may be subject to legal liabilities; and/or may not be able to manage or administer the contract or give any convenience for you.

## **7. Your Rights as a Data Subject**

According to the PDPA, you have certain rights relating to your personal information as follows:

### **7.1 Right to Withdraw Consent**

You have the right to withdraw consent given to us for collecting, using or disclosing your personal information at any time, unless there is a restriction of the withdrawal of consent by law or the contract which gives benefits to you.

However, the withdrawal of consent shall not affect the processing of personal information you have already given consent to the Company legally.

### **7.2 Right to Access**

You have the right to request access to and obtain copy of your personal information, which is under our responsibility, including to request the disclosure of the acquisition of the personal information obtained without your consent.

### **7.3 Right to Data Portability**

Where the Company arranges your personal information to be in the format which is readable or commonly used by ways of automatic tools or equipment, and can be used or disclosed by automated means, you have the right to receive your personal information and are also entitled to send or transfer your personal information in such formats to other data controllers stipulated by law.

### **7.4 Right to Object**

You have the right to object to the collection, use or disclosure of your personal information on grounds stipulated by law.

### **7.5 Right to Erasure**

You have the right to request the Company to erase, destroy or make your personal information become unidentifiable data on grounds stipulated by law.

### **7.6 Right to Restriction of Processing**

You have the right to request the Company to restrict the use of your personal information on grounds stipulated by law.

### **7.7 Right to Rectification**

You have the right to request the Company to modify your personal information to be accurate, up-to-date, complete, and not misleading.

### **7.8 Right to File a Complaint**

You have the right to file a complaint to a competent official under the PDPA anytime the Company violates or does not comply with the PDPA.

### **8. Personal Data Protection Security Measures**

The Company implements appropriate and strict security measures for preventing unauthorized or unlawful loss, access to, use, alteration, correction or disclosure of personal information.

In case where the Company assigns any third party to process your personal information pursuant to the instructions given by or on behalf of the Company, the Company shall appropriately supervise such third party to ensure your personal information protection in accordance with the PDPA.

### **9. Contact information**

If you have any questions or inquiries about the protection of your personal information, collection, use or disclosure of your personal information, or exercise of your rights, or have any claims, please contact us at:

Phuttharaksa Mungkong Company Limited

Address: 14, 16 Soi Rama 2, Soi 10, Chomthong, Chom Thong, Bangkok 10150 Thailand

Tel: (6634)110-555

E-mail: [int\\_sale@preservefood.net](mailto:int_sale@preservefood.net)

### **10. Link to Third Party Websites via our Website**

This Policy applies to the use of our Website only. When you link to third party websites via our Website, the personal information protection shall be in accordance with the Privacy Policy of such third party websites which are not related to the Company.