# **Personal Data Protection Policy**

In order to be consistent with the Personal Data Act, B.E. 2562 (2019), Seafco Public Company Limited, therefore, determined the policy and regulations to communicate for all involved parties to have understanding relating with collecting, using, or disclosing personal data and to use in practicing concretely, the company determines the policy as follows:

All provisions, or regulations which are in conflict with this policy cannot be enforced since this policy is valid. In case there must be interpreting, or new practices must be created, the Personnel Department and Data Department will be the persons who process the data.

#### 1. Definition

- 1.1 The company means Seafco Public Company Limited and it means to include affiliated companies, both the companies existing at the time this policy is in effect, or after this policy is valid.
- 1.2 Personal data means data about an individual from which that individual can be identified, directly or indirectly, but does not specifically include data about the deceased.
- 1.3 Personal data controller means a juristic person having authority and duty to make decisions regarding the collection, use, or disclosure of personal data.
- 1.4 Personal data processor means a person or person who carries out the collection, use or disclosure of personal data in accordance with the order or in the name of the personal data controller. The person or juristic person who performs such action is not the controller of personal data.
- 1.5 Person means employees or workers of the company, including natural persons who conduct transactions with the company.

#### 2. Purpose

This policy is used for collecting, using, or disclosing personal data of employees, contractors, or natural persons who conduct transactions with the Company, to provide data related to the use of personal data by the company or in the name of the Company, or its affiliated companies, or those assigned by the Company, to ensure that personal data will:

- 2.1 Be collected, used, and disclosed fairly and lawfully.
- 2.2 Be collected, used, and disclosed for specific purposes only.
- 2.3 Personal data is kept safe, correct, appropriate, up-to-date, and truthful.
- 2.4 Data is collected over a reasonable period of time as necessary.
- 2.5 Access to the data is secure, not used contrary to the rights of the data owner.

# 3. Utilization of personal data, the company will use the personal data in the following cases:

3.1 Human resource management, consisting of Recruitment, general management of employees, data for payroll, employment, wage management, compensation, benefits, welfare,

health examinations, performance evaluations, investigations disciplinary matters, criminal history checks, including any actions that are a violation of job performance, manpower analysis, organizational management structure changes, career advancement planning, personnel training and development, Mergers and acquisitions, organizing activities of the company, and including terminating employment contracts of the company or its affiliated companies.

- 3.2 Asset management, facilitation, and business development of the company and its affiliates.
- 3.3 Compliance with the provisions of laws that are mandatory for employers to use employees' personal data, such as the Compensation Fund Law, Social Security Fund, Provident Fund, Revenue Law, etc., including regulations, requirements according to laws or agencies. Government regulations both before and during or after this announcement comes into effect.
- 3.4 Protecting and maintaining the rights and interests of the Company and its affiliated companies related to administrative proceedings, the justice settlement process, and including mediation and reconciliation of all disputes.
- 3.5 Support in implementing information technology systems and use of data, and development of systems, and information technology applications, inspection of systems.
- 3.6 Providing data to government agencies regarding lawsuits in response to law enforcement requests or disclosure processes, or in cases where it is necessary or entitled to do so in accordance with applicable laws, court orders, Government regulations.
- 3.7 Managing human resource management programs, accounting programs, and other programs related to the company's operations so that they can be used efficiently.

# 4. Types of Personal Data

#### **Contains general personal data:**

- 1. First name last name, information on changing name surname.
- 2. National ID card number, passport number, driver's license number, work permit number, Visa professional license identification number, vehicle registration number.
  - 3. Day, month, year, place of birth, age, weight, height, nationality, gender.
  - 4. Data of contact includes address, telephone number, email, Line ID.
- 5. Data about marital status, information about spouse, children, father, mother, brother and sister.
  - 6. Data about past until present education necessary for work-related development.
  - 7. Data about training, testing of skills related to work.
- 8. Data on entry date and resignation date, job title, compensation, benefits, employee ID.
  - 9. Credit bureau data.
- 10. Data about performance records since starting work with the company or its affiliated companies.
- 11. Data about the person the company can contact in the event of an emergency involving the employee.
- 12. Data on work history, leave application, absence from work, and disciplinary punishment.

- 13. Pictures or any other data that employees have provided to the company while writing applications, background reports upon employment.
- 14. Date and reason for termination of employment contract and information of contact person after resigning from employment.
  - 15. Bank deposit account number.
- 16. Data about recording images and videos used in electronic systems, CCTV, or visiting websites.

# Sensitive personal data

- 1. Data about health, history of receiving medical treatment, health insurance agreements, life insurance, history of accidents or dangers. or symptoms of illness, disease resulting from work
- 2. Religion
- 3. Race
- 4. Blood group
- 5. Criminal history
- 6. Fingerprint simulation data
- 7. Face scanning data

#### 5. Period of storing personal data

The company collects personal data as follows:

- 5.1 Document format, document storage period
  - Documents related to job applications for 5 years from the date of job termination
  - Accounting documents for 10 years and/or from the end of the legal results of each project.
- 5.2 Data formats in electronic systems, preserved throughout the life of the company for the benefit of the company, such as payroll systems, human resource management operating systems, financial accounting systems.

#### 6. Sending data outside the Kingdom

The Company will apply the stipulations regarding: agreements as well as the collection, use, or disclosure of personal data of the data controller in the Kingdom, mutatis mutandis.

#### 7. Personal data security standards

The Company will take reasonable care of all physical, technical, and organizational aspects, including monitoring the system to prevent external attacks, to protect personal data from espionage, loss, accidental loss, alteration, Unauthorized entry, use, use, disclosure, copying, and unlawful operation, in accordance with current applicable laws.

In this regard, the company has a policy for those involved in collecting, using, and disclosing personal data to have a memorandum of understanding to maintain confidentiality and use it only as specified by the company.

# 8. Rights of the personal data owner

- 8.1 Request to withdraw consent
- 8.2 Request to access or receive a copy of personal data
- 8.3 Request to correct personal data
- 8.4 Request for deletion of personal data
- 8.5 Objections to processing of personal data
- 8.6 Request to transfer personal data
- 8.7 Request to object to the disclosure of personal data.
- 8.8 Request to exercise the right to complain

# 9. Company contact channels

Dr. Nutthapan Thasnanipan, Data Protection Officer.

Seafco Public Company Limited

144 Prayasuren Rd., Bangchan, Khlong Sam Wah, Bangkok 10510

Tel: 0-29190090 - 3

Email: NUTHAPAN@SEAFCO.CO.TH