

## HR Privacy Policy

**TCC Assets (Thailand) Co., Ltd. and TCCA Group** (collectively, the “Company”, “we”, “us”, or “our”) are committed to ensuring the protection of rights regarding information relating to any identified or identifiable natural person (“**Personal Data**”) from you. We understand that you, as a natural person, would like to receive the protection for how information about you is collected, used, disclosed, and/or transferred to others, including any transfer outside of Thailand. The information you share with us is necessary, in order for us to enter into a contract of employment/work relationship with you and to continue to perform crucial aspects of your contract of employment/work relationship, including but not limited to paying you or providing you with benefits.

This HR Privacy Policy (“**Privacy Policy**”) applies to Personal Data of our job applicants, current and/or retired employees, and non-employed workers. You, as our job applicant or employee or non-employed worker as the case maybe, are responsible for familiarizing yourself with this Privacy Policy (including all changes and updates), and to comply with this Privacy Policy. However, this Privacy Policy does not form a part of your employment contract/work relationship.

This Privacy Policy will be updated from time to time to reflect changes in data protection laws, as well as changes in the way we operate and process personal data. We suggest you to read this Privacy Policy periodically. We will also provide additional notice of significant updates to this policy to you accordingly.

### 1. What Personal Data we collect

We may collect, maintain, and use the following types of information which may include your Personal Data, directly or indirectly, from you, other sources, or through our affiliates, subsidiaries, other companies, business partners, or communications between us. The specific type of data collected will depend on the communication and interaction between you and us, your field of work or benefits received from us and within TCCA Group (as defined below), including but not limited to:

- 1) **Personal details**, such as title, full name, nick name, gender, age, citizenship/nationality, details of birth (e.g. date), weight and height, educational/training background, education certificate, curriculum vitae (CV), language proficiency, computer and other skills, activities (e.g., hobbies, sports), employment history, information on government-issued cards (e.g. national identification card, passport), house registration, licenses/certificates or other similar identifiers), military enrollment document and status, marital status, photograph, image, videos and CCTV records, vehicle details (e.g. type of your own vehicle, copy of vehicle registration book, license plate number), personal background check information (e.g., litigation check), performance and disciplinary information, and position in any associate or professional organization;
- 2) **Contact details**, such as your present address, registered address, email address, and telephone number;
- 3) **Employment-related details**, such as your job/employment application form, type of employment, employment terms and condition, period of contract, position, title, department, origin company, workplace, nature of business, job description, working hours, time attendance record, commencement date, current employment record, leave related information and records, reasons for termination and/or resignation of employment contract, career achievement and performance evaluations, and transportation/gasoline expense;
- 4) **Salary and benefit details**, such as your salary, wages and allowances, incentive, bonus, benefits on transportation, gasoline and phone fee, life and PA insurance related information, social security related information, provident fund related information, bank account information (e.g. account number, name of bank, branch office, and type of account), tax payer ID number, and tax reduction information;

- 5) **Other personal information**, such as your supervisor, references, relatives or friends who have been working with us, family information (e.g., your parents, spouse, brothers/sisters, and children), and emergency contact person information. Their Personal Data collected may include, but not limited to title, full name, age, occupation/position, company they work for, telephone number, and relationship with the employee.

We will only collect, use, disclose and/or transfer (domestically or cross border) the following Personal Data classified by law as sensitive data (“**Sensitive Data**”) of yours, if we have received your explicit consent or as permitted by law:

- 1) racial/ethnic origin;
- 2) sensitive data as shown in the identification document (e.g. race);
- 3) health data (e.g., contagious disease);
- 4) biometric data (e.g. finger prints);
- 5) disability; and
- 6) criminal records.

If you have provided Personal Data of any third party to us, (e.g. their full name, telephone number, your relationship with them, etc.), please provide this Privacy Policy for their acknowledgement and/or obtain consents for us.

We will only collect, use, disclose and/or transfer (domestically or cross border) sensitive data on the basis of your explicit consent or where permitted by law.

Our activities, as specified in this Privacy Policy, are not aimed at minors, and we do not knowingly collect Personal Data of minors, quasi-incompetent persons and incompetent persons. If you are minor, quasi-incompetent or incompetent person wishing to engage employment relationship/work relationship with us, you must obtain consent from your parent or guardian prior to contacting us or give us with your Personal Data. In the event we learn that we have unintentionally collected Personal Data from anyone under the age of 20 without parental consent when it is required, or from quasi-incompetent and/or incompetent person without a consent from their legal guardians, we will delete it immediately or process only if we can rely on other legal bases apart from consent.

## 2. Why we collect, use, disclose and/or transfer your Personal Data

### 2.1 The purpose of which you have given your consent:

We may use your sensitive data for the following purposes:

- 1) **Racial/ethnic origin:** for recruitment and employment process.
- 2) **Sensitive data as shown in the identification document:** for verification and authentication purpose.
- 3) **Health data:** for recruitment and employment process, provision of health care in case of emergency illness and provision of annual health check plan.
- 4) **Biometric data:** for granting access to restricted area, time attendance management and employment record, and for security purpose.
- 5) **Disability:** for recruitment and employment process, background check and for security purpose.
- 6) **Criminal records:** for employment/work relationship decision making, background check and for security purpose.

## 2.2 The purpose we may rely on and other legal grounds for processing your Personal Data

We may rely on (1) contractual basis, for our initiation of fulfilment of our employment contract/work relationship with you; (2) legal obligation, for the fulfilment of our legal obligation; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties; (4) vital interest, for preventing or suppressing a danger to a person's life, body or health; and/or (5) public interest, for the performance of a task carried out in the public interest or for the exercising of official authorities.

If you are ***a job applicant***, we rely on the legal grounds above for the following purposes of collection, use, disclosure and/or transfer (domestically or cross border) your Personal Data:

- for consideration on recruitment and coordinate on screening;
- for processing of your application for an internship, part-time job, or employment;
- for authentication and verification on your identity;
- for applicant evaluation and scoring so as to make a hiring decision;
- for evaluation for job suitability;
- for execution of employment agreement and preparation on orientation process;
- for salary or compensation payment and the offer of reimbursements;
- for background and reference checks if you are offered a position with us; and
- for communication with you and/or your designated contacts in case of an emergency.

If you are ***our employee or non-employed worker***, we rely on the legal grounds above for the following purposes of collection, use, disclosure and/or transfer (domestically or cross border) of your Personal Data:

- for recruitment process and consideration for other job position(s) (e.g. screening, hiring decision making, selection of candidates, and/or change of type of employment contract);
- for entering into contract and manage our employment/work relationship with you;
- for verification, identification and authentication about you or your identity;
- for communication with you on business/work related news and update, employment status confirmation, internal meeting and emergency contact;
- for provision of salary and wage payment, rewards, bonus, merits, tax reduction, provident fund, social security, dividend payment, pension, expenses reimbursement, medical and medication expenses reimbursement, life and PA insurance, severance payment, welfare and other employee's benefit;
- for support the operational purposes, such as human resources and human development, including workforce management, employee's disciplinary monitoring, internal investigation and interrogation in case of complaint, and impose disciplinary sanction where necessary.
- for provision of facilities, such as car park, space management, IT system and support, authorized access to certain restricted area, meeting room booking, Wi-Fi service, tools and/or equipment in order to carry on employed tasks;
- for provision of employee relationship, training and seminar, monitor your work performance and conduct a job performance evaluation;
- for maintenance of employee disciplinary, work attendance and leave records (e.g. sick leave, business leave or maternity leave);
- for prevention or suppression of a danger to a person's life, body, or health;
- for compliance with legal obligations, legal proceedings, or government authorities' orders;

- for fraud prevention, such as to provide office security access control, to detect and prevent misconduct within our premises which includes our use of CCTV; and
- for other purposes as are reasonably required by us in connection with your employment (such as to proceed with the activities or operation for us or on behalf of us) and as set out in your employment agreement, the work rules, or any documents related to HR management and development.

Failure to provide certain Personal Data may result in us, not being able to perform certain processing activities describes in this Privacy Policy, and as consequences, we may not be able to comply with your contract of employment/work relationship, and in some instances, we may not be able to accept your employment/work relationship or continue your employment/work relationship with us. We provide data protection which includes protecting your Personal Data from being used without your permission beforehand.

### **3. To whom we may disclose or transfer your Personal Data**

We may disclose or transfer your Personal Data to the following third parties who collect, use and disclosure Personal Data in accordance with the purposes under this Policy. These third parties may be located in Thailand and areas outside of Thailand. You can visit their privacy policy to learn more on how they collect, use, and disclose your Personal Data as you are also subject to their privacy policies.

#### **3.1 TCCA Group's data ecosystem**

We, TCC Assets (Thailand) Co., Ltd. and TCCA Group, will be able to access and/or share your information among ourselves. We also may need to allow access by other companies within Frasers Property Group ([www.frasersproperty.co.th](http://www.frasersproperty.co.th)), One Bangkok Group ([www.onebangkok.com](http://www.onebangkok.com)), including the intra-group companies in accordance with the Binding Corporate Rules (BCR) for the purpose set out in this Privacy Policy, by relying on consent obtained from you by TCC Assets (Thailand) Co., Ltd. and TCCA Group.

#### **3.2 Other third parties**

We may use other companies, agents or outsourcing service provider to perform on behalf or to assist with our business operations. We may share your Personal Data to our customers, service providers, outsourcers or third-party suppliers including, but not limited to: (1) bank and financial institution; (2) payroll service provider; (3) outsourced HR service providers; (4) outsourced administrative service providers; (5) data storage and cloud service providers; (6) insurance company; (7) provident fund agency; (8) IT system service provider, and IT supporting company; (9) hospital; (10) training/learning service provider; and (11) document outsourcing service provider.

In the course of providing such services, the service providers may have access to your Personal Data. However, we will only provide our service providers with the information that is necessary for them to perform the services, and we ask them not to collect, use, disclose, or transfer (domestically or cross border) your information for any other purposes. We will ensure that the service providers we work with will keep your Personal Data secure as required under the laws.

#### **3.3 Government agencies**

In certain circumstances, we may be required to disclose or share your Personal Data in order to comply with legal or regulatory obligations. This includes any law enforcement agency, court, regulator, government authority or other third party where we believe it is necessary to comply with a legal or regulatory obligation; or otherwise to protect our rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise address fraud, security, or safety issues.

### **3.4 Professional advisors**

The professional advisors include but not limit to (i) legal consultants who assist in running our business and provide litigation services for the defending or bringing of any legal claims, (ii) auditor who provide accounting and audit service to us.

### **3.5 Assignee of rights and/or obligations**

Third parties as our assignee, in the event of any reorganization, merger, business transfer, whether in whole or in part or joint venture, will comply with this Privacy Policy to respect your Personal Data.

## **4. International transfers of your Personal Data**

We may disclose or transfer your Personal Data to third parties, our parent, foreign affiliates/subsidiary or data servers located overseas (if any), which the destination countries may or may not have the same data protection standards. We take steps and measures to ensure that your Personal Data is securely transferred and that the receiving parties have in place suitable data protection standards or other derogations as allowed by laws. We will request your consent where consent to cross-border transfer is required by law.

## **5. Accuracy of Personal Data**

We may validate data provided using generally accepted practices and guidelines. This includes the requirement of your original documentation before we may use the Personal Data such as with personal identifiers and/or proof of address. You shall assist us in ensuring the accuracy of your Personal Data in the possession of us and please inform us of any updates of any parts of your Personal Data where applicable.

## **6. How long we do keep your Personal Data**

We will retain your Personal Data for as long as is reasonably necessary to fulfil the purpose for which we obtained it, and to comply with our legal and regulatory obligations. However, we may have to retain your Personal Data for a longer duration, as required by applicable law.

## **7. Your rights as a data subject**

Subject to applicable laws and exceptions thereof, you may have the following rights to:

- 1) **Access:** You may have the right to access or request a copy of the Personal Data we are collecting, using, and disclosing about you. For your own privacy and security, we may require you to prove your identity before providing the requested information to you.
- 2) **Rectification:** You may have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data that we collect, use, disclose and/or transfer (domestically or cross border) about you rectified.
- 3) **Data Portability:** You may have the right to obtain Personal Data we hold about you, in a structured, electronic format, and to send or transfer such data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) if we are processing such data on the basis of your consent or to perform our contract with you.
- 4) **Objection:** You may have the right to object to certain collection, use, and disclosure of your Personal Data, such as objecting to direct marketing.
- 5) **Restriction:** You may have the right to restrict the use of your Personal Data in certain circumstances.

- 6) **Withdraw Consent:** For the purposes you have consented to our collecting, using, and disclosing of your Personal Data, you have the right to withdraw your consent at any time.
- 7) **Deletion:** You may have the right to request that we delete or de-identity Personal Data that we collect, use, disclose and/or transfer (domestically or cross border) about you. However, we are not obliged to do so if we need to retain such data in order to comply with legal obligations or to establish, exercise, or defend legal claims.
- 8) **Lodge a complaint:** You may have the right to lodge a complaint to the competent authority where you believe our collection, use, and disclosure of your Personal Data is unlawful or noncompliant with applicable data protection law.

## 8. Our Contact Details

If you wish to contact us to exercise your rights relating to your Personal Data or if you have any queries about your Personal Data under this Privacy Policy, please contact us at:

**TCC Assets (Thailand) Co., Ltd.**

No. 57 Park Ventures Ecoplex, Unit 2105-2107, 21<sup>st</sup> Floor,

Witthayu Road, Lumpini, Pathum Wan, Bangkok 10330

Telephone No.: +66 2 643 7380

E-mail Address: [enquiry.pdpa@tccassets.com](mailto:enquiry.pdpa@tccassets.com)