

**Announcement of  
TEAM Consulting Engineering and Management Public Company Limited  
Re: Personal Data Protection Policy for Customers**

TEAM Consulting Engineering and Management Public Company Limited (the “Company”) and its subsidiaries realize the importance of personal data protection and have therefore announced the Personal Data Protection Policy for Customers so as to inform the customers of the rights and conditions in relation to the collection, use and disclosure of personal data related to customers as follows:

**1. Persons from Whom the Company Collects Personal Data**

“Customers” means:

- 1.1 Employers, persons who use services and/or purchase products from the Company and/or those who may use services and/or purchase products from the Company, persons to whom the Company submits a proposal or whom the Company contacts to submit a proposal or any other persons having similar characteristics such as seminar participants, activity participants, website users, persons who make contact to request to receive information or services from the Company, respondents to questionnaire surveys concerning services or products of the Company, commenters, persons who evaluate their satisfaction with the Company’s services, etc.
- 1.2 Persons related to customers which means natural persons who are related to or are representatives of customers such as directors, executives, employees, representatives, advisors or any personnel of customers who are juristic persons, persons whose Personal Data appears in relevant documents in connection with related processes such as service recipients, purchasers, and cheque payers, etc., including persons assigned by customers to visit or enter the Company’s premises.

**2. Personal Data that the Company Collects**

The Company will collect the following Personal Data.

- 2.1 Personal identifiable information such as name, surname, nickname, date of birth, age, occupation, sex, national identification number, passport number, photographs, videos, signature, address on the national identification card, address on the house registration, telephone number, fax number, email address, Line ID, information on name card, and contact persons, etc.
- 2.2 Information regarding service or sale and purchase transactions such as details of services or products to be sold and purchased, service or product delivery documents, etc.

- 2.3 Information about payment such as monetary amount, credit limit, payment terms, bank account number, Personal Data which appears in invoice, tax invoice, receipt, receipt voucher, and debit application form, etc.
- 2.4 Information or document that is used as supporting evidence for signing documents in order to be the Company's customers or execution of transactions such as Personal Data which appears in a copy of national identification card, copy of passport, copy of house registration, copy of name/surname change certificate, copy of business license, power of attorney, copy of company affidavit, copy of Phor Phor. 09/20, map, security documents (such as bank guarantee, and personal guarantee), employment contract, sale and purchase agreement, joint venture agreement or any other agreements related to transactions, etc.
- 2.5 Technical information such as log files, IP Address, website login/logout records, and information that the Company collects through the use of Cookies or other technologies, etc.
- 2.6 Other information such as audio recording of conversations, photographs, video conference recording and video recording by means of CCTV, etc.

### **3. Sources of Personal Data**

- 3.1 The Company will collect data of customers through the following channels.
  - 3.1.1 Personal Data which the customers directly provide to the Company, for example, when customers communicate with the Company, enter into a contract with the Company, visit or enter the Company's premises or deliver documents or copy of documents which contain Personal Data to the Company; when customers make enquiries, provide comments or feedbacks or send complaints to the Company, regardless of whether in written or oral communications by phone, e-mail, fax, mail, website, joint meetings or other applications or by any other similar means
  - 3.1.2 Personal Data which is automatically collected by the Company from customers by automated means such as the use of Cookies or other similar technologies.
  - 3.1.3 Personal Data which the Company receives from third parties such as collection of Personal Data from public data sources, data sources in relation to the customers' business or other data sources, etc.
- 3.2 In collecting the Personal Data of customers, the customers will be informed of the details as set out in this Personal Data Protection Policy, including the purposes and legal basis for the collection, use, disclosure and/or processing of Personal Data, or where the Personal Data Protection Laws require consent of customers for any processing of Personal Data, the Company will request their explicit consent.
- 3.3 In the event that the Company has collected the Personal Data of customers prior to the effective date of the Personal Data Protection Laws with regard to the collection, use or disclosure of Personal Data, the Company will continue to collect

and use the Personal Data of customers pursuant to the original purposes which the Company has already informed the customers in the collection of Personal Data. The customers have the right to withdraw their consent by contacting the Company using the contact details set out in Clause 10 of this Personal Data Protection Policy. In this regard, the Company reserves the right to consider their request for withdrawal of consent and proceed in accordance with the Personal Data Protection Laws.

#### **4. Purposes of Personal Data Processing**

The Company processes the Personal Data of customers for the following purposes.

##### **4.1 Processing on Contractual Basis**

- 4.1.1 Customer registration as well as proceeding with the requests which is necessary for taking steps at the request of Data Subjects prior to entering into a contract
- 4.1.2 Procurement and selection of customers
- 4.1.3 Preparation and other processes in relation to entry into a contract such as examination of supporting evidence for entering into a contract, management of the contract between the Company and the customers and/or any contracting party including performance of a contract, etc.
- 4.1.4 Preparation of transactions or undertaking any other related activities such as preparation of invoice, receipt, tax invoice, recording of accounting transactions, preparation of withholding tax deduction certificate, preparation of power of attorney, use of banks' transaction services, etc.

##### **4.2 Processing on Legitimate Interest Basis in the Business Operations of the Company and Third Parties**

- 4.2.1 Examination of the customers' qualifications such as verification of the identity and qualifications of a contracting party, etc.
- 4.2.2 Business communication with customers
- 4.2.3 Receipt of customers' complaints so as to provide convenience to customers and develop the service quality of the Company
- 4.2.4 Management of relationship between the Company and customers such as evaluation of customer satisfaction to develop the service provision and/or control the service quality, etc.
- 4.2.5 Compliance or exercise of legal claims or defense of legal claims of the Company in various stages according to the laws such as investigation and/or inquiry by government officials, prosecution and/or defence of lawsuits in court, etc.

- 4.2.6 Monitoring, protecting and ensuring the security of premises such as CCTV footages, visitor badges or taking photographs for protection of a person's health and safety; prevention of damage to buildings, premises and properties; support for investigation or consideration process, dispute settlements or any legal proceedings, etc.
- 4.2.7 Any marketing activities such as sending marketing messages to customers, request for taking photographs or recording videos of customers so as to publicize marketing activities through various channels or photographing or audio recording with regard to meetings, training, seminars, recreation or marketing promotion activities or past achievement reference, etc.
- 4.2.8 Any activity necessary and related to the purposes set out in this Personal Data Protection Policy in the event where the Personal Data Protection Laws require the consent of customers for any processing of Personal Data, the Company will request explicit consent of the customers.

#### **4.3 Processing on Compliance with Laws Basis**

- 4.3.1 Compliance with laws or exemptions in accordance with the laws
- 4.3.2 Compliance with regulations and/or orders of the competent authorities such as court orders, orders of government agencies or empowered competent officials, etc.

#### **4.4 Processing on Consent Basis**

In the event that the Company collects and processes the Personal Data of customers where the Personal Data Protection Laws require the consent of customers, the Company will request prior consent of the customers.

In the event where the customers' refusal to give their Personal Data may have an impact and make the Company unable to enter into a contract with the customers or to perform its duties under the contract with the customers or may have legal consequences, the Company may have to refuse to enter into a contract with the customers or may have to cancel its provision of relevant services, either wholly or partially, to the customers.

The Company will notify the customers when there is any addition and/or change to the purposes set forth. In the event where the Personal Data Protection Laws require the consent of customers for any processing of Personal Data, the Company will request explicit consent of the customers.

#### **4.5 Processing on Prevention or Suppression of Danger to Life, Body or Health Basis**

It is necessary for monitoring, prevention or suppression of any incident which may be dangerous to a person's life, body or health including monitoring, protecting and ensuring the security of persons and properties of the Company.

## **5. Disclosure of Personal Data**

The Company may disclose the Personal Data of customers in accordance with the specified purposes and the rules prescribed by law to the following persons and entities.

- 5.1 The subsidiaries and associated firms of the Company, business partners and/or any other persons with whom the Company has juristic relations including executives, directors, staff, employees and/or relevant in-house personnel of the said entities and as necessary for the processing of the customers' Personal Data.
- 5.2 Suppliers, service providers, vendors, and Data Processors assigned or engaged by the Company to manage/process the Personal Data for the Company in the provision of services such as information technology services, data recording services, payment services, mailing services, delivery services, printing services, insurance services, training services, data analysis services, research services, marketing services or any other services which may be beneficial to the customers or in connection with the Company's business operations such as banks, insurance companies, etc.
- 5.3 Advisors of the Company such as legal advisors, lawyers, auditors or any other internal and external experts of the Company, etc.
- 5.4 Government agencies which have supervisory duties under the laws or which have requested the disclosure of Personal Data pursuant to their lawful powers or related to the legal process or which are permitted by applicable laws such as Revenue Department, Ministry of Commerce, Office of the Personal Data Protection Committee, Royal Thai Police, Office of Attorney General or courts, etc.
- 5.5 Regulatory agencies overseeing the Company such as Office of the Securities and Exchange Commission, Stock Exchange of Thailand, etc.
- 5.6 Any persons or agencies that the customers have given consent to disclose their Personal Data to such persons or agencies.

In the event of the disclosure of the customers' Personal Data to third parties, the Company will put in place appropriate safeguards to protect the disclosed Personal Data and to comply with the standards and duties regarding the protection of Personal Data as prescribed by the Personal Data Protection Laws.

## **6. Retention Period**

The Company will collect the Personal Data of customers for the period necessary for fulfilling the specified purposes of the Personal Data processing. The retention period may vary, depending on the purposes specified for the processing of such Personal Data. Moreover, the Company will retain the Personal Data for the period prescribed under the applicable laws (if any) by considering the prescriptions under the law for any legal proceedings that may arise from or in relation to the documents or each category of Personal Data collected by the Company and with particular consideration given to business practices of the Company and relevant business sectors related to each category of Personal Data.

The Company will retain the Personal Data of customers for a period of not exceeding 10 years from the termination date of juristic relations or commitments between the customers and the Company. However, the Company may retain the Personal Data of the customers for a longer period if the laws permit or such retention of Personal Data is necessary for establishment of legal claims of the Company.

After the expiration of the aforementioned period, the Company will erase or destroy the Personal Data of customers from the storage or system of the Company and other persons providing services to the Company (if any) or anonymize the Personal Data of customers, unless in the event that the Company can continue to retain such Personal Data as stipulated by the Personal Data Protection Laws or other applicable laws.

## **7. Cross-Border Transfer of Personal Data**

In the case where it is necessary for the Company to transfer the Personal Data of customers to foreign countries and such destination countries have lower standards of Personal Data protection than the requirements stipulated by law, the Company will take steps to ensure that adequate protection of the transferred Personal Data is provided and the Personal Data is protected under the Personal Data Protection Standards equivalent to the level afforded in Thailand.

## **8. Rights of Data Subjects**

The customers have the rights to take the following actions.

- 8.1 **Right to Withdraw Consent:** In the event that the Company processes the data of customers on the consent basis, the customers have the right to withdraw consent given to the Company for processing their Personal Data at any time as long as their Personal Data is with the Company.
- 8.2 **Right of Access:** The customers have the right to access their Personal Data and request that the Company provides them with a copy of such Personal Data as well as to request the Company to disclose the acquisition of the Personal Data obtained without their consent.
- 8.3 **Right to Data Portability:** The customers have the right to transfer their Personal Data to other data controllers or to themselves except where it is technically unfeasible.
- 8.4 **Right to Object:** The customers have the right to object to the processing of their Personal Data.
- 8.5 **Right to Erasure:** The customers have the right to request the Company to erase, destroy or anonymize their Personal Data.
- 8.6 **Right to Restriction:** The customers have the right to restrict the use of their Personal Data.
- 8.7 **Right to Rectification:** The customers have the right to request the Company to rectify or update their Personal Data which is inaccurate or incomplete.

The customers may contact the Data Protection Officer of the Company to submit a request for exercising the above rights using the contact information specified in Clause 10 of this Personal Data Protection Policy.

The customers will not have to pay any fees for any proceedings of the above rights. The Company reserves the right to consider the customers' request to exercise their rights and proceed in accordance with the Personal Data Protection Laws.

## **9. Changes to Personal Data Protection Policy**

The Company may amend this Personal Data Protection Policy to reflect any changes to the Company's operations, recommendations and comments from the customers. The Company will expressly announce the changes prior to implementation or may send a notification to directly inform the customers.

## **10. Contact Channels**

Details of Data Controller

TEAM Consulting Engineering and Management Public Company Limited

Contact Address: 151 Nuan Chan Road, Nuan Chan, Bueng Kum, Bangkok  
10230

Contact Channel: Corporate Planning & Communication

Data Protection Officer (DPO)

Contact Address: Office of Data Protection Officer

Contact Channel: Tel. No. 02-5099000 ext. 2017

Email: [Teamgroup@team.co.th](mailto:Teamgroup@team.co.th)

This Personal Data Protection Policy shall be effective from 1 June 2022.