

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

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 Personnel so as to inform job applicants or employees or persons related to the job applicants or employees of the rights and conditions in relation to the collection, use and disclosure of personal data related to job applicants or employees or persons related to the job applicants and employees as follows:

1. Persons from Whom the Company Collects Personal Data

- 1.1 **“Job applicants”** means persons who may be selected to be employees of the Company, whereby the Company may directly collect the Personal Data of job applicants or obtain their Personal Data from third parties;
- 1.2 **“Employees”** means personnel or persons or consultants who work or perform any duties for the Company and receive wages, welfare or any other compensation from the Company for their work such as directors, executives, managers, employees, personnel, trainees or any persons having similar characteristics, etc., but excluding contractors or service providers who are suppliers of the Company;
- 1.3 **“Persons related to the job applicants or employees”** means persons related to the job applicants or employees of the Company, including persons whose Personal Data appears in the documents pertinent to relevant processes such as family members (e.g. father, mother, spouse, and children, etc.), emergency contact persons, reference persons, beneficiaries, and guarantors of the performance of employment contract, etc.

2. Personal Data that the Company Collects

The Company will collect the following Personal Data.

- 2.1 Personal identifiable information such as Personal Data of job applicants or employees or persons related to the job applicants or employees which is received by the Company such as name, surname, age, sex, national identification number, passport number, nationality, date of birth, marital status, military status, signature, photographs, videos, etc.
- 2.2 Contact information such as address, contact address, telephone number, email address, Line ID, reference persons and/or emergency contact persons, etc.
- 2.3 Educational information or training background such as educational and training background (e.g. name of institution, faculty, program, year of graduation, etc.), academic certificate, transcript, language skills, computer skills, other training

and test details, activities participated during the time of study, professional licenses, etc.

- 2.4 Information on job application such as work experience, personal profile or details in resume/CV, position applied, expected salary, interview details, copy of passport, copy of name/surname change certificate, copy of house registration, copy of work permit, evidence or reference documents or details which appear in the interview assessment form (such as assessment results regarding knowledge, competency and experience, team work or potential, etc.), etc.
- 2.5 Information that is used as supporting evidence in the job application or execution of juristic acts such as Personal Data which appears in a copy of national identification card, copy of passport, copy of name/surname change certificate, copy of house registration, copy of military service certificate, copy of bank account book, copy of marriage certificate, social security application form, employment contract, letter of guarantee for performance of employment contract and relevant documents (e.g. certificate of position, copy of civil servant card, salary certificate, copy of business registration or company incorporation documents containing the name of guarantor for performance of employment contract as the owner or partner, etc.), power of attorney, etc.
- 2.6 Information on work and assessment such as staff identification number, position, department, affiliation, section, line of work, chain of command, performance assessment, achievement or award received, training information, disciplinary action information, details which appear in the intercompany employee transfer documents, secondment agreement, letter of resignation and reason for resignation, etc.
- 2.7 Information relating to registration statistics such as commencement date of employment, probation end date, working date and time, hours of work, overtime hours, annual leaves, leave dates, leave request forms, leave details including reasons for such leave, time attendance records, and usage record of the Company's systems, etc.
- 2.8 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.
- 2.9 Other information such as audio recording of conversations, photographs, video conference recording, video recording by means of CCTV, etc.
- 2.10 Sensitive Personal Data such as race, religion, criminal records, health information, disability, biometric data or any other similar data as required by law, etc.

3. Sources of Personal Data

- 3.1 The Company will collect data of job applicants or employees or persons related to the job applicants or employees through the following channels.

- 3.1.1 Personal Data which is directly provided by job applicants or employees or persons related to the job applicants or employees, for example, when job applicants or employees or persons related to the job applicants or employees submit job application forms and supporting documents for job application to the Company whether by walk-in at the Company's office or by mail or fax or via the Company's website including in the event that the job applicants or employees or persons related to the job applicants or employees attend a job interview, enter into an employment contract with the Company including submission of documents containing their Personal Data to the Company, etc.
 - 3.1.2 Personal Data which is automatically collected by the Company from job applicants or employees or persons related to the job applicants or employees by automated means such as the use of Cookies or other similar technologies, etc.
 - 3.1.3 Personal Data which the Company collects from third parties such as recruitment websites of third parties, recruitment agencies, reference persons of the job applicants or employees or persons related to the job applicants or employees, government agencies, educational institutions, social media sources, or job application forms or documents of persons related to the job applicants or employees or those related to the job applicants or employees as the job applicants or employees or persons related to the job applicants or employees are family members, emergency contact persons, beneficiaries or guarantors, etc.
 - 3.2 In collecting the Personal Data of job applicants or employees or persons related to the job applicants or employees, the job applicants or employees or persons related to the job applicants or employees 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 or processing of Personal Data, or where the Personal Data Protection Laws require consent of job applicants or employees or persons related to the job applicants or employees 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 the job applicants or employees or persons related to the job applicants or employees prior to the effective date of the Personal Data Protection Laws with regard to collection, use or disclosure of Personal Data, the Company will continue to collect and use the Personal Data of the job applicants or employees or persons related to the job applicants or employees pursuant to the original purposes which the Company has already informed them in the collection of Personal Data. The job applicants or employees or persons related to the job applicants or employees 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 job applicants or employees or persons related to the job applicants or employees for the following purposes.

4.1 Processing on Contractual Basis

- 4.1.1 Consideration of the requests of job applicants who express an intention to apply for a job and enter into the Company's recruitment process, interviews and any process pertaining to job application
- 4.1.2 Consideration of the requests of job applicants who have passed the interview process and entered into the approval process of employees' salary, benefits or welfare before entering into an employment contract or any other contracts so as to be placed as an employee of the Company
- 4.1.3 Entry into an employment contract and other relevant contracts as well as carrying out any necessary pre-contract activities. In case of a guarantor for the performance of employment contract, the processing of the guarantor's Personal Data is necessary for entering into a guarantee contract to which the guarantor is a contracting party.
- 4.1.4 Performance of the Contract: The performance of duty or work in accordance with the scope of work specified in the employment contract, employment agreement, appointment contract or any other contracts which the employees have entered into with the Company such as the use and disclosure of name, surname and Personal Data which appears in the employee's national identification card for verification of identity as an authorized person of the Company in signing contracts, documents or performing any juristic acts on behalf of the Company, including the use and disclosure of employees' names in notifications, approval letters, forms or other documents of the Company according to the scope of power and duties or the work for which such employees are responsible, etc.
- 4.1.5 Payment of wages, salary, bonus, remuneration and/or any benefits according to the employment contracts and other contracts to which the employees are contracting parties
- 4.1.6 Human resources management such as termination of employment in case of employees' resignation or retirement or disciplinary action records of the employees who violate working rules or regulations, etc.

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

- 4.2.1 Recruitment process or post-recruitment process such as selection of job applicants or verification of job applicants' qualifications, etc.
- 4.2.2 Consideration and approval of salary, benefits or welfare for the Company's employees

- 4.2.3 Human resources management of the Company such as verification and consideration of employee qualifications for appropriate placements, allocation of welfare or benefits for employees, employee transfer or secondment, disciplinary actions, disciplinary action records, and termination of employment, etc.
- 4.2.4 The Company's business operations and compliance with applicable laws
- 4.2.5 Employee performance appraisal for human resources management or any other benefits in the business operations of the Company
- 4.2.6 Training arrangement and management such as registration in training programs, preparation of an action plan or training plan, allocation of appropriate facilities for training or skill or knowledge development, etc.
- 4.2.7 Communication with job applicants, employees or any persons related to the job applicants or employees
- 4.2.8 Establishment of legal claims, compliance or exercise of legal claims, or defense of legal claims of the Company such as investigation or inquiry by government officials, prosecution or defence of lawsuits in court, etc.
- 4.2.9 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.
- 4.2.10 Any action necessary for the Company or beneficial to the job applicants or employees or persons related to the job applicants or employees or directly related to the purposes set out above.

In the event that the Personal Data Protection Laws require the consent of job applicants or employees or persons related to the job applicants or employees for any processing of Personal Data, the Company will request their explicit consent.

4.3 Processing on Compliance with Laws Basis

- 4.3.1 In case of the Company's directors and executives as well as relevant persons, the disclosure of Personal Data of the Company's directors and executives is necessary for compliance with the Securities and Exchange Act B.E. 2535 (1992) such as preparation of forms and documents for submission to any relevant agencies, etc.
- 4.3.2 The Company's compliance with laws including but not limited to labour law, social security law, taxation law, provident fund law, securities and exchange law, personal data protection law such as submission of annual registration statement to the Securities and Exchange Commission, submission of Personal Data of employees to relevant government agencies such as Revenue Department, Social Security Office or Department of Skill Development, Department of Employment, Immigration Bureau, etc.

4.4 Processing on Consent Basis

- 4.4.1 In the event that the Company collects Personal Data of prospective employees by the Company's own initiative or from other sources such as websites, whereby the prospective employees have not expressed their intention to apply for a job with the Company, etc.
- 4.4.2 The processing of Personal Data of job applicants or employees or persons related to the job applicants or employees as family members or reference persons of the job applicants will be based on the consent obtained from the job applicants or employees or persons related to the job applicants or employees.
- 4.4.3 The processing of Sensitive Personal Data of job applicants or employees or persons related to the job applicants or employees such as religious or doctrinal beliefs, race, nationality, labour union data, biometric data, health data for provision of appropriate facilities, activities and welfare for the job applicants or employees or persons related to the job applicants or employees including for management of group insurance or other welfare benefits for the job applicants or employees or persons related to the job applicants or employees in an equal and fair manner according to the human rights principles, criminal records for considering the suitability for job performance and protection of legitimate interests, etc.

The Company will collect, use and disclose the Sensitive Personal Data as well as send or transfer the Sensitive Personal Data of the job applicants or employees or persons related to the job applicants or employees only when the Company obtains their explicit consent or where it is necessary for the Company as permitted by law.

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 job applicants or employees or persons related to the job applicants or employees 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, including executives, directors, staff, employees or relevant in-house staff of the said entities and as necessary for the processing of Personal Data of the job applicants or employees or persons related to the job applicants or employees
- 5.2 Suppliers, service providers, vendors, customers of the Company, and/or prospective customers 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, health services, insurance services, training services, data analysis services, research services, marketing or any other services which may be beneficial to the job applicants or employees or persons related to the job applicants or employees or in connection with the Company's business operations such as banks, insurance companies, hospitals, etc.

- 5.3 Advisors of the Company such as legal advisors, lawyers, auditors or 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 relevant to the legal process or which are permitted pursuant to applicable laws, such as Department of Labour Protection and Welfare, Department of Skill Development, Social Security Office, Department of Provincial Administration, Department of Intellectual Property, Revenue Department, Ministry of Commerce, Office of the Personal Data Protection Committee, Department of Employment, Immigration Bureau, Royal Thai Police, Office of Attorney General, courts or Legal Execution Department, etc.
- 5.5 Customers, suppliers and contracting parties of the Company who are contacted by the employees or are relevant to the duty or position of the employees
- 5.6 Regulatory agencies overseeing the Company such as Office of the Securities and Exchange Commission, Stock Exchange of Thailand, etc.
- 5.7 Any persons or agencies that the job applicants or employees or persons related to the job applicants or employees have given consent to disclose their Personal Data to such persons or agencies.

In the event of the disclosure of the Personal Data of job applicants or employees or persons related to the job applicants or employees 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 stipulated by the Personal Data Protection Laws.

6. Retention Period

The Company will collect the Personal Data of job applicants or employees or persons related to the job applicants or employees 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 prescription 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 job applicants or employees or persons related to the job applicants or employees for a period of not exceeding 10 years from the termination date of juristic relations or commitments between the job applicants or employees or persons related to the job applicants or employees and the Company. However, the Company

may retain the Personal Data of the job applicants or employees or persons related to the job applicants or employees 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 job applicants or employees or persons related to the job applicants or employees from the storage or system of the Company and other persons providing services to the Company (if any) or anonymize the Personal Data of job applicants or employees or persons related to the job applicants or employees, 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 job applicants or employees or persons related to the job applicants or employees 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 job applicants or employees or persons related to the job applicants or employees have the rights to take the following actions.

- 8.1 **Right to Withdraw Consent:** In the event that the Company processes the data of job applicants or employees or persons related to the job applicants or employees on the consent basis, the job applicants or employees or persons related to the job applicants or employees 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 job applicants or employees or persons related to the job applicants or employees have the right to access their Personal Data and may 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 job applicants or employees or persons related to the job applicants or employees have the right to transfer their Personal Data which they have given to the Company to other data controllers or to themselves except where it is technically unfeasible.
- 8.4 **Right to Object:** The job applicants or employees or persons related to the job applicants or employees have the right to object to the processing of their Personal Data as stipulated by the Personal Data Protection Laws.
- 8.5 **Right to Erasure:** The job applicants or employees or persons related to the job applicants or employees have the right to request the Company to erase, destroy or anonymize their Personal Data as stipulated by the Personal Data Protection Laws.

- 8.6 **Right to Restriction:** The job applicants or employees or persons related to the job applicants or employees have the right to restrict the use of their Personal Data as stipulated by the Personal Data Protection Laws.
- 8.7 **Right to Rectification:** The job applicants or employees or persons related to the job applicants or employees have the right to request the Company to rectify or update their Personal Data which is inaccurate or incomplete.

The job applicants or employees or persons related to the job applicants or employees 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 job applicants or employees or persons related to the job applicants or employees will not have to pay any fees for any proceedings of the aforementioned rights. The Company reserves the right to consider the request for exercising the rights of the job applicants or employees or persons related to the job applicants or employees and act 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 job applicants or employees or persons related to the job applicants or employees. The Company will expressly announce the changes prior to implementation or may send a notification to directly inform the job applicants or employees or persons related to the job applicants or employees.

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: Human Resources

Data Protection Officer (DPO)

Contact Address: Office of Data Protection Officer

Contact Channel: Tel. No. 02-5099000 ext. 1238

Email: hr_pdpa@team.co.th

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