

## **Notice of Personal Data Protection Policy for Employees**

Matching Maximize Solutions Public Co. Ltd. and group of companies, (collectively the “Group of Companies”) is committed to protecting the personal data of employees (“you”) in accordance with the Personal Data Protection Act 2019.

Further to this policy notice, the Group of Companies is designated “data controller” in accordance with the Personal Data Protection Act 2019 which collects, uses or discloses your personal information.

In compliance with the legal requirement to inform the personal data subject of the purpose of collecting personal data, the collection period of personal data, disclosure of personal data, information about the data controller, and the rights of the personal data subject, under Section 23 of the Personal Data Protection Act 2019, the Group of Companies has issued this notice of the policy for the protection of personal data of employees, to inform the nature of, and reasons for, collecting, using and disclosing your personal information.

This notice of the policy for the protection of personal data is in accordance with Section 23 of the Personal Data Protection Act 2019 and is announced by Matching Maximize Solutions Public Co. Ltd. and the companies whose names are included in the attached list, excepting any companies who have issued their own notification of their policy for the protection of personal data in accordance with Section 23 of the Personal Data Protection Act 2019.

The Group of Companies may make amendments to this document as deemed appropriate and will notify you of any such changes. This notice of the protection of personal data is effective immediately on the date of the publishing of this announcement.

## **1. Personal data that the Group of Companies will collect**

Personal data means information about an individual that enables that individual to be identified, either directly or indirectly, but does not include information about deceased persons. The Group of Companies may collect the following personal data:

### **1.1 Personal data includes:**

- (1) Information about the employee or personal information such as name, surname, date of birth, age, sex, marital status, interests, and personal opinions.
- (2) Contact information such as address, telephone number, email address, social media contacts, and emergency contacts.
- (3) Information and documentation relevant to the recruitment process, such as curriculum vitae (CV), letter of application, application form, and comments of the recruitment staff.
- (4) Information about the employee's education, skills or potential, including qualifications, such as education level, education background, educational institution, education record and training history, educational and test results, professional qualifications and legal licence to work, languages spoken and other abilities, and information from referees that the employee has supplied to the Group of Companies.
- (5) Information about work experience and previous employment such as job title and responsibilities, salary and other compensation.
- (6) Photographs, video, and voice recordings.
- (7) Information about family members or dependents of the employee who are eligible to receive welfare benefits in accordance with the company's rules and personnel management regulations, such as information about spouses, children, parents or other beneficiaries. Before providing such information to the Group of Companies, the employee must inform all such persons of the Group of Companies' Personal Data Protection Policy.
- (8) Information about the location where the employee can work.
- (9) Information about military commitments.
- (10) Information about the employee's characteristics, such as habits, behaviour, attitudes, aptitudes, skills, leadership abilities, ability to work with others, emotional intelligence, and commitment to the company. This information may be gleaned by the Group of

Companies, or employees of the Group of Companies, from observation and analysis of the employee's work performance or in participating in activities within the Group of Companies.

- (11) Financial information such as salary, wages, compensation, taxes, provident funds, bank accounts, loans, and tax exemptions or deductions.
- (12) Information about social security benefits, labour protection benefits, welfare and benefits that the employee is entitled to receive in accordance with the company's rules and personnel management regulations.
- (13) Other information necessary for the performance of duties according to the employment contract; welfare benefits; analysis and management of the Group of Companies; post-retirement care; and to comply with relevant laws.
- (14) Recording of log-in/log-out of work, work duration, overtime, absenteeism and leave.
- (15) Information about work history, job position, meeting attendance, voting, offering of opinions, being a signatory.
- (16) Information relating to the performance of duties as a company director and shareholder such as work history, copies of identification documents, job position, meeting attendance and opinions, directorship history, directorship registration, registration with related agencies, share transfers, records of share registration, issuing of share certificates, payment and receipt of dividends including any acts as a juristic person related to the performance of duties as a company director or shareholder.
- (17) Information on the use of, and access to, information systems, computers, work systems, websites, applications, networks, electronic systems and email systems to comply with the Group of Company's information technology policies and relevant laws.
- (18) Information from participation in Group of Companies events such as responses to surveys and assessments.
- (19) Information that employees choose to disclose and share via mobile applications, questionnaires, assessment forms and services of the Group of Companies.
- (20) Information required to be reported to regulatory bodies such as the Ministry of Labour, Ministry of Industry, and Ministry of Commerce.

- (21) Copies of documents that can be used to identify the employee such as identification card, passport, driver's licence, civil registration, house registration or other documents issued by a government agency.
- (22) Information about the employee's ability to drive a motor vehicle, and in the case that the employee drives a vehicle provided by the Group of Companies, information about the employee's driving behaviour, copy of vehicle registration and copy of vehicle insurance.
- (23) Other information required to investigate conflicts of interest, such as shareholding information and relationships with business partners, information on memberships of associations or organisations established under the law.
- (24) Information about accidents whether occurring during work hours or performing their work duties, or other.
- (25) Information about complaints, whistleblowing, investigations or disciplinary action.

#### 1.2 Sensitive Data includes:

- (1) The Group of Companies may have cause to collect and process the employee's sensitive data to use for the purposes stated in this notice
- (2) The Group of Companies may be required to process the employee's sensitive personal data in the following cases:
  - (a) Information about the employee's health, such as weight, height, congenital diseases, colour blindness, results of physical examinations, pregnancy, food allergies, medicinal allergies, blood type, medical certificates, medical history, medicinal history, and medical expense receipts for the protection of, and the provision of welfare related to medical care of, employees; employee competency assessments including complying with relevant laws to evaluate and analyse employee health data for appropriate management purposes.
  - (b) Biometric data, such as fingerprints to be used for the purpose of identifying and verifying the employee's identity, crime prevention and to protect the legal interests of the Group of Companies or other individuals.
  - (c) Information about criminal records to consider the suitability to work and protect the legal interests of the Group of Companies or other individuals.

- (d) Religious beliefs, philosophical beliefs, race, nationality, disability, labour union affiliation, genetic and biological information, in order to provide appropriate facilities, activities and welfare for employees, including for use in managing employees' care equally and fairly according to human rights principles.
  - (e) Sensitive personal data that is included on an identification card, passport or other document issued by government agencies, such as religious beliefs, race, nationality, blood group, in case such information is required for legal compliance or to verify an employee's identity.
  - (f) Other sensitive personal data for legitimate purposes, such as to prevent or suppress danger to a person's life, body or health; in the event that the employee is unable to give consent; or information made public with the employee's consent to exercise a legal claim, to achieve objectives in accordance with labour protection, social security and employee welfare.
- (3) Where necessary, the Group of Companies will process the employee's sensitive personal data with the employee's express consent, or in other cases will use its best efforts to provide adequate safety measures to protect the employee's sensitive personal information.
- (4) Information about criminal records will be collected directly from the employee or from the relevant legal authority with the consent of the employee. The Group of Companies will provide security measures to protect such information as required by law.

If the employee refuses to provide personal information that is required to comply with the law or contract, or to enter into a contract, the Group of Companies may be unable to fully implement, or provide, the right to access welfare services as agreed in the contract.

## **2. Purpose of processing sensitive personal data**

2.1 For the purpose of processing employee requests before entering into a contract, or to execute a contract between the employee and the Group of Companies, such as employment contracts, agreements, performance checklists under contracts, compliance with the company's rules and personnel management regulations, codes of conduct, assignment contracts, secondments,

training, performance assessments, consideration of positions and compensation, administration and supervision of employee health and safety.

- 2.2 For the purpose of complying with the law, regulations and orders of relevant legal authorities, such as labour protection laws, labour relations laws, social security laws, occupational health, safety and environment laws, occupational and environmental disease control laws, communicable disease control laws, and company law.
- 2.3 For the legal interests of the Group of Companies or others, such as human resource management, analysis and allocation of manpower, employee development, provision of medical welfare, provision of welfare insurance and other employee benefits such as hospitals, cafeterias, sports centres, exercise facilities, employee activities, financial management and budgets, internal correspondence, contact with outsiders, and various operational activities through registrations, authorisations, preparation of certificates, publication of documents, report preparation, submission of information to government agencies or regulatory bodies, verification of identity and information received from employees, analysis and maintenance of database of work history, issuing news and public relations statements, improving the work environment, provision of operational facilities, managing information security, creating account identification for accessing information systems, security systems, preventing workplace accidents and crime, investigating and handling complaints and corruption, litigation and disputes, and taking care of employees post-retirement.
- 2.4 To prevent and minimize the danger to the life, body and health of employees or others, for example emergency contacts, and the control and prevention of communicable diseases.
- 2.5 For the performance of duties for public benefit or the Group of Companies or undertaking duties in exercising powers granted by the state.
- 2.6 To achieve the objectives in accordance with the consent given by the employee as the case may be.

### **3. Changing the Purpose of the Use of Personal Data**

The Group of Companies will use your personal data only for the purposes for which it was collected. In the event that the Group of Companies needs to use the information for other purposes, the Group of Companies will notify you as soon as possible.

#### **4. Requesting Consent and the Possible Effects of Withdrawing Consent**

4.1 In the event that the Group of Companies collects and processes personal data with the consent of the employee, the employee has the right to withdraw that consent at any time. This withdrawal of consent does not affect the collection, use, disclosure or processing of personal data which was acquired before consent was withdrawn.

4.2 If an employee withdraws consent that was previously given to the Group of Companies, or refuses to provide certain information, this may result in the Group of Companies' inability to adhere to some or all of the objectives listed in the notice.

#### **5. How your Personal Data is collected**

The Group of Companies collects your personal data directly via the recruitment system and employment process. The Group of Companies may also obtain your personal data from other sources such as employment service provider, previous employers or government agencies. With this policy notice, the Group of Companies is informing employees about the collection of personal data.

Additionally, the Group of Companies will collect your personal data through employment-related activities throughout your period of employment with the Group of Companies, and information about websites visited by using cookies (please refer to the Cookies Policy of the websites visited).

#### **6. Disclosure of your Personal Data to others**

6.1 The Group of Companies may disclose and share personal data of employees with:

- (1) Companies in the Group as per the attachment, and
- (2) Other persons or juristic persons not a part of the Group of Companies ("Other Persons") for the purpose of collecting and processing personal data as described in this policy notice, such as service providers involved in the recruitment and employment process, background checks, qualifications and ability checks; service providers involved with health benefits or insurance; financial institutions; business partners; security service providers; information system developers or service providers for government information systems

agencies; and other persons necessary for the Group of Companies to be able to conduct its business and provide services to employees including any actions conducted for the purpose of collecting and processing personal data as described in this policy notice.

6.2 The Group of Companies requires that all data recipients take appropriate measures to safeguard the employees' personal data, only process such personal data as is necessary, and ensure that the personal data is not used or disclosed for any other purposes other than that for which it was intended.

## **7. Transfer of Personal Data overseas**

7.1 The Group of Companies may send or transfer employee personal data to its affiliates or companies within the business group located in foreign countries, whose names appear in the list of companies in the attachment to this notice. In the event that it is necessary for the performance of a contract within the Group of Companies to which the employee is a party, or the performance of a contract between the Group of Companies and an individual, or a juristic person for the benefit of the employee; or to meet an employee's request prior to entering into a contract; or to prevent or minimize danger to life, body or health of employees or other persons; to comply with the law; or as is necessary for the public well-being.

7.2 The Group of Companies may store employee information on a computer server or cloud provided by third parties, and may use third-party programmes or applications in the form of software, or in the form of ready-made platforms to process employees' personal data. However, the Group of Companies will not permit unrelated persons to access personal data, and will ensure that any persons accessing the information must employ appropriate security protection measures.

7.3 To protect your personal data sent overseas, the Group of Companies has established a Personal Data Protection Policy for the transmission or transfer of personal data to a Personal Data Controller or Personal Data Processor of the affiliates or companies within the group located overseas.



## **8. Personal Data Security**

- 8.1 The Group of Companies has technical security measures in place to protect your personal data, and prevent any collected data from accidental loss, or of being accessed, disclosed or altered unlawfully or without authorization.
- 8.2 The Group of Companies has implemented appropriate security measures with respect to access to your personal data by staff, contractors or third parties. The Group of Companies will limit access to only individuals who need to access such personal data to perform their duties. If there are cases where a third party is required to process your personal data, it will be processed in accordance with the instructions of the Group of Companies, and the Group of Companies will prescribe that such third parties shall protect your personal data and comply with applicable personal data protection laws.

## **9. Period of Personal Data collection**

- 9.1 The Group of Companies will retain the employee's personal data for such period as necessary to achieve the purpose of the collection of said relevant personal data, unless a longer period is permissible by law. In the event that the retention period is not clearly fixed, the Group of Companies will retain the information for a period of time as may be reasonably expected in accordance with standard practices, (eg. the generally accepted legal period of up to 10 years.)
- 9.2 The Group of Companies retains personal data of family members or dependents of employees of the Group of Companies for the period necessary to meet the purposes of this Privacy Policy, especially with respect to the employee's right to receive benefits in accordance with the company's personnel management regulations.
- 9.3 In the event that the Group of Companies uses employees' personal data having requested consent from the employee, the Group of Companies will continue to process said employee's personal data until such time as the employee withdraws consent and the Group of Companies has completed the employee's request. However, the Group of Companies will continue to keep the employee's personal data as necessary for a historical record that the employee withdrew their consent, so that the Group of Companies may respond to future requests from the employee.

9.4 The Group of Companies provides an auditing system to delete or destroy personal data after the retention period has expired, or the reason for collecting such data is no longer relevant.

## **10. Rights of the Personal Data subject**

10.1 In accordance with the conditions prescribed in the Personal Data Protection Act 2019, you have the following rights:

- (1) The right to request to withdraw consent given to the Group of Companies to process your personal data.
- (2) The right to request access to, and obtain copies of, your personal data, or to have the acquisition of your personal data disclosed to you. The responsibility to meet this request rests with the Personal Data Controller
- (3) The right to send or transfer personal data in electronic form to other parties, as prescribed by the Personal Data Protection Act.
- (4) The right to object to the collection, use or disclosure of your personal data.
- (5) The right to request that the Personal Data Controller delete or destroy or make your personal data non-identifiable.
- (6) The right to request that the Personal Data Controller suspend the use of your personal data.
- (7) The right to request that the Personal Data Controller ensure that your personal data is correct, current, complete and does not cause misunderstandings.
- (8) In accordance with the Personal Data Protection Act and relevant laws, the right to complain to the Personal Data Protection Committee in the event that the Group of Companies or the processor of the personal data, including employees or contractors of the Group of Companies or the Personal Data Processor, violates or fails to comply with personal data protection laws. The Group of Companies will consider the request to exercise such right and inform the result of their consideration within 30 days of receipt of the request.

10.2 You can exercise your legal right by filling in the information in the request to exercise such right, or the request to withdraw consent, on the Group of Companies' website. You can begin the process of exercising this right when the section of the personal data protection laws apply to the Personal Data Controller.

## **11. Information about the Data Controller or the Personal Data Protection Officer**

In the event that you have questions about the collection, use, or disclosure of your personal data, you can contact the Personal Data Controller or Data Protection Officer (DPO) through the following channels:

11.1 Personal Data Controller, Matching Maximize Solutions Public Co. Ltd.

Contact address: 305/12 Soi Sukhothai 6, Sukhothai Rd., Dusit sub-district, Dusit district, Bangkok. Tel: 02 669 4200; Email: [dpo@mmsbangkok.com](mailto:dpo@mmsbangkok.com)

11.2 The Personal Data Controllers of the companies within the Group are separated according to company as listed in the attachment to this notice.

Announced on 1 August 2021

## Attachment

### Companies in the Group and Data Controllers

Company and Personal Data Controllers	Contact details for Data Controllers and personal data protection officers
Matching Maximize Solutions Public Co. Ltd.	305/12 Soi Sukhothai 6, Sukhothai Rd., Dusit sub-district, Dusit district, Bangkok. Tel: 02 669 4200
Gearhead Co. Ltd.  -Branch Office	999 Moo 2, Bangbo sub-district, Bangbo district, Samut Prakan Tel: 02 940 0787-90 779/34 5 Pracha Uthit Rd., Samsen Nok sub-district, Huay Kwang district, Bangkok Tel: 02 691 6394-97
The Studio Park (Thailand) Ltd.  - Branch Office	305/12 Soi Sukhothai 6, Sukhothai Rd., Dusit sub-district, Dusit district, Bangkok Tel: 02 669 4200 999 Moo 2, Bangbo sub-district, Samut Prakan Tel: 02 034 5999