

**Announcement of**  
**TEAM Consulting Engineering and Management Public Company Limited**  
**No. 28/2022**  
**Re: Personal Data Protection Policy**

TEAM Consulting Engineering and Management Public Company Limited (the “Company”) and its subsidiaries recognize the importance of personal data protection. At the Board of Directors' Meeting No. 2/2022 held on May 10, 2022, the Company announced its Personal Data Protection Policy to inform shareholders, personnel, business partners, and customers of their rights and the conditions relating to the collection, use, and disclosure of personal data, as detailed in the personal data protection policies below.

1. Personal Data Protection Policy for Shareholders
2. Personal Data Protection Policy for Personnel
3. Personal Data Protection Policy for Business Partners
4. Personal Data Protection Policy for Customers

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

Announced on 31 May 2022

Mr. Sanit Rangnoi

Chairman of the Board

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

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 Shareholders so as to inform the shareholders of the rights and conditions in relation to the collection, use and disclosure of personal data related to the shareholders as follows:

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

“Shareholder” means a person who legally holds shares with his/her name appearing as a shareholder in the share registration of the Company including a proxy holder or a person authorized to act on behalf of a shareholder who is a juristic person.

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

The Company will collect the following Personal Data.

- 2.1 Personal Data of shareholders including authorized persons or proxy holders by collecting the Personal Data directly from the shareholders including through a securities broker or registrar such as name, surname, address, telephone number, email address, contact channels, nationality, occupation, date of birth, national identification number, passport number, bank account, number of shares, etc.
- 2.2 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.
- 2.3 Other information such as audio recording of conversations, photograph, video conference recording and video recording by means of CCTV, etc.
- 2.4 Sensitive Personal Data such as religion, health information or any other similar data as required by law, etc.

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

- 3.1 The Company will collect data of the shareholders through the following channels.
  - 3.1.1 Personal Data which the shareholders directly provide to the Company, for example, when the shareholders subscribe for shares or register to attend shareholders’ meetings, etc.

- 3.1.2 Personal Data which is automatically collected by the Company from the shareholders 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 a securities broker or registrar, etc.
- 3.2 In collecting the Personal Data of shareholders, the shareholders 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 shareholders for any processing of Personal Data, the Company will request explicit consent of the shareholders.
- 3.3 In the event that the Company has collected the Personal Data of shareholders 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 shareholders pursuant to the original purposes which the Company has already informed the shareholders in the collection of Personal Data. The shareholders 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 shareholders for the following purposes.

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

- 4.1.1 Examination, verification of identity and proceeding with the request of shareholders, organization of shareholders' meetings, and undertaking activities with regard to voting and vote counting in the shareholders' meetings
- 4.1.2 The Company's management, video or audio recording of meetings, ensuring security, organization of activities, public relations or delivery of information or any proposal for the shareholders' benefit, any action necessary for the Company or beneficial to the shareholders or directly related to the purposes set forth.
- 4.1.3 Monitoring, protecting and ensuring the security of premises such as CCTV footages, visitor badges or taking photos 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.

- 4.1.4 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.

In the event that the Personal Data Protection Laws require consent of shareholders for any processing of Personal Data, the Company will request their explicit consent.

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

Management of the Company such as capital increase, capital decrease, business restructuring, changes to registered transactions, shareholders' meetings, management in relation to shareholders' rights and duties, dividend payment, accounting and reporting, auditing, legal documents, delivery of documents or letters including legal duties of public limited companies and companies listed on the Stock Exchange of Thailand.

#### **4.3 Processing on Consent Basis**

The Sensitive Personal Data of shareholders such as nationality and health data is processed for provision of appropriate facilities for screening and controlling communicable diseases or epidemic diseases, etc.

The Company will collect, use and disclose the Sensitive Personal Data as well as send or transfer the Sensitive Personal Data of shareholders only when the Company obtains explicit consent from the shareholders or where it is necessary for the Company as permitted by law.

#### **4.4 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 shareholders 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 shareholders
- 5.2 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, data analysis services or any other services which may be beneficial to the shareholders
- 5.3 Advisors of the Company such as legal advisors, lawyers, auditors, experts or other internal and external service providers 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 by applicable laws such as Ministry of Commerce, Revenue Department, Office of the Personal Data Protection Committee, Royal Thai Police, Office of Attorney General, courts or Legal Execution Department, 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 shareholders have given consent to disclose their Personal Data to such persons or agencies.

In the event of the disclosure of the shareholders' 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 shareholders 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 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 shareholders for a period of not exceeding 10 years from the termination date of juristic relations or commitments between the shareholders and the Company. However, the Company may retain the Personal Data of shareholders 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 shareholders from the storage or system of the Company and other persons providing services to the Company (if any) or anonymize the Personal Data of shareholders, unless in the event that the Company can continue to retain such Personal Data as prescribed 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 shareholders 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 shareholders have the rights to take the following actions.

- 8.1 Right to Withdraw Consent: In the event that the Company processes the data of shareholders on the consent basis, the Shareholders 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 shareholders 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 shareholders 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 shareholders have the right to object to the processing of their Personal Data.
- 8.5 Right to Erasure: The shareholders have the right to request the Company to erase, destroy or anonymize their Personal Data.
- 8.6 Right to Restriction: The shareholders have the right to restrict the use of their Personal Data.
- 8.7 Right to Rectification: The shareholders have the right to request the Company to rectify or update their Personal Data which is inaccurate or incomplete.

The shareholders 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 shareholders will not have to pay any fees for any proceedings of such rights. The Company reserves the right to consider the shareholders' request for exercising their rights 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 shareholders. The Company will expressly announce the changes prior to implementation or may send a notification to directly inform the shareholders.

## **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.

# **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](mailto:hr_pdpa@team.co.th)

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

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

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 Suppliers so as to inform the suppliers of the rights and conditions in relation to the collection, use and disclosure of personal data related to suppliers as follows:

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

“Suppliers” means:

- 1.1 Persons who submit quotations for product sales and/or service provision to the Company or have signed documents with the Company so as to be suppliers or have trade relations, entering into a contract, whether as service providers, vendors, advisors, experts, academics, contractors, subcontractors, participants in a business project, joint venture partners, consortium partners, securities companies, insurance companies, commercial banks or any other persons having similar characteristics, including prospective suppliers of the Company, both in the case where such persons have expressed intention to enter into a contract and where the Company collects Personal Data on its own initiative;
- 1.2 Persons related to suppliers which means natural persons who are related to or are representatives of suppliers such as directors, executives, employees, representatives, advisors or any personnel of suppliers who are juristic persons, persons whose Personal Data appears in relevant documents in connection with related processes such as service recipients, purchasers, cheque payers, etc., including persons assigned by suppliers 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, 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 on entry into contract or any transactions such as vendor code, details of products or services, 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 with the Company so as to be suppliers 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), copy of license for engineering professional practice, copy of attorney-at-law license, copy of professional practices or business operations, 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 suppliers through the following channels.
  - 3.1.1 Personal Data which the suppliers directly provide to the Company, for example, when suppliers 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 suppliers 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 suppliers by automated means such as the use of Cookies or other similar technologies, etc.
  - 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 suppliers' business or other data sources, etc.
- 3.2 In collecting the Personal Data of suppliers, the suppliers 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 suppliers 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 suppliers 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 suppliers pursuant to the original purposes which the Company has already informed the suppliers in the collection of Personal Data. The suppliers 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 suppliers for the following purposes.

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

- 4.1.1 Registration of suppliers or prospective suppliers 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 suppliers
- 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 suppliers 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 suppliers' qualifications such as verification of the identity and qualifications of a contracting party, etc.
- 4.2.2 Business communication with suppliers
- 4.2.3 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.
- 4.2.4 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.

4.2.5 Any marketing activities such as sending marketing messages to suppliers, request for taking photographs or recording videos of suppliers in order to publicize marketing activities through various channels or photographing or audio recording in relation to meetings, training, seminars, recreation or marketing promotion activities or past achievement reference, etc.

4.2.6 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 suppliers for any processing of Personal Data, the Company will request explicit consent of the suppliers.

#### **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 competent officials, etc.

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

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

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

The Company will notify the suppliers 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 suppliers for any processing of Personal Data, the Company will request explicit consent of the suppliers.

#### **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 suppliers 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 suppliers' Personal Data.
- 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 services or any other services which may be beneficial to the suppliers 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 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 relevant 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 suppliers have given consent to disclose their Personal Data to such persons or agencies.

In the event of the disclosure of the suppliers' 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 suppliers 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 suppliers for a period of not exceeding 10 years from the termination date of juristic relations or commitments between the suppliers and the Company. However, the Company may retain the Personal Data of the suppliers 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 suppliers from the storage or system of the Company and other persons providing services to the Company (if any) or anonymize the Personal Data of suppliers, unless in the event that the Company can continue to retain such Personal Data as prescribed 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 suppliers 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 suppliers have the rights to take the following actions.

- 8.1 Right to Withdraw Consent: In the event that the Company processes the data of suppliers on the consent basis, the suppliers 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 suppliers 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 suppliers 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 suppliers have the right to object to the processing of their Personal Data.
- 8.5 Right to Erasure: The suppliers have the right to request the Company to erase, destroy or anonymize their Personal Data.
- 8.6 Right to Restriction: The suppliers have the right to restrict the use of their Personal Data.
- 8.7 Right to Rectification: The suppliers have the right to request the Company to rectify or update their Personal Data which is inaccurate or incomplete.

The suppliers 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 suppliers will not have to pay any fees for any proceedings of the above rights. The Company reserves the right to consider the suppliers' 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 suppliers. The Company will expressly announce the changes prior to implementation or may send a notification to directly inform the suppliers.

## **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.



# **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.

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TEAM Consulting Engineering and Management Public Company Limited

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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.