



บริษัท ไทยทากาซากโก จำกัด

THAI TAKASAGO CO., LTD.

Privacy Notice for Workmen on Construction Projects

Under the Personal Data Protection Act B.E. 2562 (2019), the announcements of the Personal Data Protection Committee, relevant laws, and the personal data protection policy of Thai Takasago Co., Ltd. "**the Company**", this Privacy Notice has been published to inform workmen on construction projects about the collect, use, and disclose of their personal data as follows:

1. Scope of Privacy Notice for Workmen on Construction Projects

This Privacy Notice applies to the personal data of data subject who have a relationship with the Company with following:

- 1) Workmen on construction projects
- 2) Other persons whose personal data is collected by the Company, such as emergency contacts person. It is deemed that such persons have given consent for the disclosure of the personal data of the Workmen on the construction project to the Company.

2. Definitions

"Privacy Notice"

means

means the Company's announcement or statement, whether in document form or published on the Company's website:

<https://www.thaitakasago.co.th/privacy>

"Thai Takasago Co., Ltd." or "the Company"

means

Thai Takasago Co., Ltd., Thai Takasago Holdings Co., Ltd., and its affiliated companies, which act as the data controller with the authority to make decisions regarding the collection, use, or disclosure of personal data in accordance with this Privacy Notice.

"Data Subject"

means

any individual who owns the personal data collected, used, or disclosed by the Company under this Privacy Notice.

"Personal Data"

means

any information relating to an identifiable individual, either directly or indirectly, but excluding information of deceased persons specifically.

"Sensitive Data"

means

Refers to personal data as prescribed under Section 26 of the Personal Data Protection Act B.E. 2562 (2019), which includes data concerning race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health information, disability, labor union membership, genetic data, biometric data, or any other data that may similarly affect the data subject as determined by the Personal Data Protection Committee under the authority of the Personal Data Protection Act B.E. 2562 (2019).

3. Collection of Personal Data

The Company may collect your personal data "**you**" through various means, or through authorized representatives.

The Company may also collect your personal data from other sources.

3.1 Personal Data Collected Directly from Data subject

- 1) When you commence work on the Company's construction projects.

- 2) When you visit the Company's website or use its online services.
- 3) When you voluntarily provide personal data to the Company for other purposes.
- 4) If you provide any personal data relating to other individuals to the Company (e.g., spouse, children, parents), you represent and warrant that you have obtained consent from those individuals to disclose their personal data to the Company.

3.2 Personal Data Collected from Other Sources.

- 3.2.1 The Company may collect your personal data from publicly available sources and from individuals or entities involved in business activities related to the Company.
- 3.2.2 The Company may receive information about you from other construction projects or business operations of the Company.
- 3.2.3 The Company may collect data from social media platforms or online media, including information about your interactions, such as content you view or engage with. For example, when you use the Company's website, the Company may collect data such as your browser software and the pages you visit.

4. Purposes of Collecting, Using, or Disclosing Personal Data

The Company collects, uses, or discloses your personal data for various purposes, within the following scope:

- 1) To maintain and update your personal data and related documentation.
- 2) To analyze data including resolve issues related to the Company's operations.
- 3) To investigate disputes, prevent, detect, avoid, and monitor fraud, security breaches, prohibited acts, or illegal activities that may cause harm to both the Company and you.
- 4) To verify and authenticate your identity and to validate your legal rights in relation to the Company.
- 5) To assess and manage risks.
- 6) To communicate and provide information to you.
- 7) To comply with applicable laws, regulations, orders, legal proceedings, or court orders, including exercising legal rights related to your data.
- 8) To maintain public order, ensure safety, and prevent or mitigate harm to life, body, health, or property.
- 9) To provide information to government agencies as required by law or upon official request.
- 10) For internal management purposes, such as creating organizational charts, maintaining employee records for construction projects, analyzing facts, managing and making decisions regarding safety or vulnerabilities.
- 11) For any other purposes reasonably related to the aforementioned objectives.

The Company may process your personal data for administrative and business operations, and in accordance with its internal policies and procedures, based on legitimate interests.

5. Sources of Personal Data Collected by the Company

The Company collects or obtains your personal data from various sources as follows:

- 1) Directly from you, such as through the construction project registration form
- 2) From sources other than yourself, which sources have legal authority, legitimate reasons, or have obtained your consent to disclose personal data to the Company, such as your employer.

6. Types and Categories of Personal Data Collected by the Company

In general, the Company collects or obtains the following types of personal data with following:

Please note that if you refuse to provide necessary personal data in each case, it may result in the Company being unable to comply with legal obligations, fulfill contractual duties, or enter into a contract with you, either in whole or in part.

Category of Personal Data	Details and Examples
Identifiable Personal Data	Information that identifies you or is derived from official documents, such as title, first name, last name, middle name, nickname, signature, ID number, nationality,

Category of Personal Data	Details and Examples
	marital status, driver's license number, passport number, house registration, professional license, social security status, etc.
Personal Characteristics	Details such as date of birth, gender, height, weight, age, photographs, still and motion images, spoken language, behavioral data, etc.
Contact Information	Data used to contact you, such as home phone number, mobile number, fax number, email address, physical address, social media usernames (e.g., Line ID, MS Teams), residence map, etc.
Employment Information	Details of your work history in construction projects, such as position, responsibilities, employee or contractor ID, department, reporting line, performance evaluations, work behavior, achievements, training records, disciplinary actions, resignation documents, etc.
Online Media and Electronic Traffic Data	Evidence related to electronic meetings via platforms such as Zoom, Line Meeting, Microsoft Teams, Google Meet, including audio or audiovisual recordings of all participants throughout the meeting duration, in accordance with the Ministry of Digital Economy and Society's Notification on Security Standards for Electronic Meetings B.E. 2563 (2020), issued under the Emergency Decree on Electronic Meetings B.E. 2563 (2020)
Financial and Insurance Information	Accident insurance policy details
Sensitive Personal Data	Sensitive personal data such as criminal records, biometric data, and data derived from techniques or technologies used to identify individuals based on physical or behavioral characteristics (e.g., facial recognition data, fingerprint data), health information including blood type and underlying conditions, medical certificates, pre-employment health screening results, etc.
Other Data	Necessary information about your employer or supervisor, emergency contact persons, and other personal data collected for purposes related to the Company's operations and activities

7. Legal and Contractual Basis for Collecting Personal Data

The Company relies on one or more of the following legal bases to collect personal data, depending on the context

and appropriateness of each case:

- 1) Compliance with legal obligations.
- 2) Legitimate interests.
- 3) Necessity to prevent or mitigate harm to life, body, or health of individuals.
- 4) Performance of a contract.
- 5) Your consent.

8. Disclosure of Personal Data

Under the provisions of the Personal Data Protection Act, the Company shall not disclose the personal data of the data subject to any third party without consent. The Company may disclose personal data collected for the purposes stated or for which consent has been obtained, or as permitted by law. Such personal data may be used and disclosed to the following persons or entities:

- 1) Government agencies such as courts, the Royal Thai Police, Ministry of Labor, Department of Provincial Administration, Revenue Department, and other private entities that issue documents containing personal data.

- 2) Contractual parties, business partners, or service providers of the Company who are involved in activities related to you, such as banks, financial institutions, hospitals, insurance companies, software providers, electronic media providers, contractors or subcontractors, and the Company's clients.
- 3) Publications, websites, applications, or social media platforms of the Company
- 4) Affiliates or entities within the same business group for joint business operations
- 5) Any other persons to whom you have given consent to the Company

9. Transfer of Personal Data to Foreign Countries

In the normal course of business operations, the Company may need to use and disclose personal data by transferring it to individuals or organizations located in foreign countries or international organizations. This includes contractual parties, business partners, or service providers of the Company, as well as affiliates or entities within the same business group located abroad. Personal data may also be used and disclosed through information and communication technologies such as email, office programs, cloud storage, web storage, and applications, where service providers often host servers in foreign countries. Please note that the destination country or international organization receiving the personal data may have data protection standards that are inadequate or inconsistent with the Personal Data Protection Act B.E. 2562, depending on the applicable laws of each jurisdiction.

10. Retention Period of Personal Data

The Company will retain personal data for as long as necessary to fulfill the purposes stated in this Privacy Notice, or for the duration of the construction project and any extended construction period, until the contractual period of the project is completed.

However, once the legal relationship between you and the Company ends, or upon completion of a transaction with the Company, or if you request to cancel services, the Company will retain your personal data for a period deemed appropriate and necessary for each type of personal data and its purpose, as prescribed by the Personal Data Protection Act. The Company will also retain personal data in accordance with the statute of limitations or the period required by applicable laws (e.g., accounting laws, tax laws, labor laws, and other laws applicable in Thailand and abroad). Additionally, the Company may need to retain CCTV footage to prevent fraud, ensure security, and investigate suspicious transactions involving you or related persons. After the retention period, the Company may destroy the personal data without prior notice.

11. Rights of the Data Subject

The Company strictly respects and upholds your rights under the Personal Data Protection Act B.E. 2562, which include:

- 1) Right to access and obtain a copy of personal data.
- 2) Right to request to receive, send and portability.
- 3) Right to object to the collection, use, or disclosure of personal data.
- 4) Right to request deletion, destruction, or anonymization of personal data.
- 5) Right to restrict the processing of personal data.
- 6) Right to request rectification of personal data.
- 7) Right to withdraw consent previously given.
- 8) Right to file a complaint with the supervisory authority in case the Company violates or fails to comply with the Personal Data Protection Act B.E. 2562.

12. Measures for Personal Data Security

The Company has implemented appropriate and legally compliant security measures and regularly reviews such measures as necessary or when technology changes, to ensure effective and consistent data protection. Including:

- 1) Technical, physical, and administrative measures to prevent unauthorized or unlawful loss, access, use, alteration, modification, or disclosure of personal data.
- 2) Access control and identity management technologies to regulate access to systems that process and store personal data.

- 3) Physical, electronic, and procedural safeguards in accordance with industry standards.
- 4) Mandatory training for all employees on data security.
- 5) Regular audits and reviews of practices in accordance with the Company's policies and industry best practices.

13. Amendments to the Privacy Notice

The Company may amend this Privacy Notice from time to time to reflect any changes related to the processing of your personal data and as required by the Personal Data Protection Act or other applicable laws. The Company will publish the updated Privacy Notice on its website as specified in this Privacy Notice. You are encouraged to periodically review the Privacy Notice for any updates.

14. Company Information, Contact Location, and Communication Channels

To: Legal Department
Email: ttc_legal@tte-net.com
Company: Thai Takasago Co., Ltd.
Address: Bangna Tower C, 16th Floor 40/14 Moo 12, Bangna-Trad Road, Km.6.5
Bang Kaeo Subdistrict, Bang Phli District
Samutprakarn Province
10540
Tel: (+66) 2751-9695 to 9
Website: <https://www.thaitakasago.co.th>

This Privacy Notice of Thai Takasago Co., Ltd. is publicly posted at the Company's headquarters (Bangna Tower C, 16th Floor, 40/14 Moo 12, Bangna-Trad Road, Km.6.5, Bang Kaeo Subdistrict, Bang Phli District, Samutprakarn Province 10540 and/or on the website specified in this Privacy Notice. It has also been directly communicated to you. The Notice may be reviewed, revoked, or amended in the future, and any such changes will be notified or announced accordingly.