

## Privacy Policy Notice

### Team Precision Public Company Limited

Team Precision Public Company Limited (“**the Company**”) respects the privacy rights of our customers, shareholders, employees and individuals associated with the Company (“**you**”) and to ensure the complete protection of rights under the Personal Data Protection Act B.E. 2562 (“**the PDPA**”) Therefore, the Company has established a privacy policy in order for the Company to have rules, mechanisms, regulatory measures, and clearly and appropriately personal data management.

#### **1. Scope of application**

This Privacy Policy applies to individuals including but not limited to the following:

1. Directors, customers, employees, shareholders, contact person or business stakeholders of the Company.
2. Non-stakeholders which are other persons whom the Company may need to collect, use or disclose personal data such as persons visiting the Company's website or persons visiting the Company.

#### **2. Source of your personal data**

Generally, the Company collects personal data directly from you but in some cases, the company may obtain your personal data from other sources. The Company will proceed in accordance with the PDPA. However, the personal data the Company collects from other sources may include but is not limited to the following information:

1. Data that the Company receives from its affiliates, business partners, and/or any other person with whom the Company has a legal relationship
2. Data that the Company receives from people related to you (such as your family, friends, referrals).
3. Data that the Company receives from customers or contact
4. Data that the company receives from government agencies financial institutions, credit information companies, and/or external service provider
5. Data that the Company receives from the insurance company and/or any other person in connection with the insurance policy or claim; and/or
6. Other sources such as LinkedIn or JobsDB

#### **3. Purpose for collecting, using, or disclosing personal data of the Company**

The Company will collect, use, or disclose personal data for the purpose of its legal obligations, perform based on contractual obligation with the Company, for the benefit of operating the lawful business, perform based on your consent and/or for the purpose of other legal and public interest.

##### **1. Legal Obligations**

The Company is required to collect, use, or disclose personal data for various purposes in accordance with the laws and regulations of governmental and/or corporate governance including, without limitation, the following purposes:

- 1.1 To comply with the Personal Data Protection Act and its amendment
- 1.2 To comply with regulations and/or orders of competent authorities (such as court orders, governmental orders, company regulatory bodies or competent officials)
- 1.3 To comply with the laws of Data controllers such as labor laws, the Factory Act, the Revenue Department, social security, AMLO, ONCB, the Communicable Disease Act, etc.

## **2. Contract with the Company**

The Company will collect, use, or disclose personal data in accordance with requests and/or agreements entered into with the Company including but not limited to the following purposes:

- 2.1 For any operations of the Company
- 2.2 Execute orders (e.g., request for issuance of a letter of guarantee, evidence of letter of financial)
- 2.3 Prepare various reports and analyzes (for example, internal reports of the company).
- 2.4 Take any action in connection with your insurance policy or claim (such as pursuing or pursuing claims under your insurance policy, exercising claims against third parties).

## **3. Legitimate business benefits**

The Company will collect, use, or disclose personal data for the purpose of conducting a lawful business, taking into account the interests of the Company or others with the fundamental rights of your personal data, including but not limited to the following

- 3.1 Manage the affairs of the Company and its affiliates (such as monitoring, risk management, surveillance, prevention and investigation of fraud, money laundering, terrorism, misconduct or other organized crime which includes but not limited to verifying the credibility of any person in connection with the Company's business)
- 3.2 Relationship management (e.g., handling of complaints)
- 3.3 Security (e.g., CCTV recording, registration, card exchange and/or contact recording before entering the company building)
- 3.4 Develop and improve the Company's various internal systems to raise the standards of the Company, including research and analysis of data by taking into account the fundamental rights of your personal data.
- 3.5 Record images and/or audio related to meetings, trainings, seminars, recreation activities.
- 3.6 Collection, use, and disclosure of personal data of directors who are authorized to act on their behalf or their representatives

## **4. Your Consent**

In some instances, the Company may require your consent for the collection, use, or disclosure of your personal data, including but not limited to the following purposes:

- 4.1 It is necessary to collect and use sensitive personal data to verify and confirm your identity, for example using facial recognition as sensitive data or a photo of your identification card, which will contain sensitive personal data, including your religion and/or blood type.
- 4.2 Sending or transferring your personal data to foreign countries where there may be insufficient standards for personal data protection (unless the Personal Data Protection Act stipulates that it can be done without obtaining consent) and/or
- 4.3 Disclosure your personal data and any data to affiliates for the purposes of lawful business operations.

## **5. Other Legal Benefits**

In addition to the above legal bases, the Company may collect, use, or disclose your personal data under other legal bases as follows,

- 5.1 To achieve the objectives relating to the preparation of historical documents or archives for the public benefit or related to research or statistics.
- 5.2 Prevent or suppress life hazards a person's body or health
- 5.3 It is necessary for the performance of duties in the performance of duties in the public interest or for the exercise of competent authority.

If the personal data we collect from you is necessary for compliance with company law or for entering a contract with you, the Company may not be able to process partial or at all if you do not provide personal data to the Company we requested.

#### **4. Information and types of personal data that the Company collects, uses, or discloses**

Types of personal data the Company will collect, use, or disclose are as follows,

1. **General Personal data.** General data about a person that makes it possible to identify that person directly or indirectly including but not limited to the following:
  - 1.1 Personal details such as name, surname, alias, date of birth, gender, age, education, marital status, nationality, personality type
  - 1.2 Contact details such as mailing address, e-mail address, telephone number, social media accounts and/or details of close contacts to contact in case of need or emergency.
  - 1.3 Details used to identify or verify one's identity or security, for example photo of ID card, national identification number, passport data, driving license, signature, photograph, motion pictures through closed-circuit television cameras, and/or video recording.
  - 1.4 Work details such as occupation, position, salary, compensation, details about employers
  - 1.5 Financial details such as bank account data
  - 1.6 Geographic details and data about the device and software such as GPS location, IP address, technical specifications, and personally identifiable data.  
Information for audit purposes, such as data for audits and risk management, money laundering and counter terrorism monitoring
2. **Sensitive Personal Data.** Sensitive Personal data includes but is not limited to the following data,
  - 2.1 Religion
  - 2.2 Blood type
  - 2.3 Biometric data such as face recognition, fingerprint, voice recognition and retina recognition
  - 2.4 Health data
  - 2.5 Criminal charge and records
3. **Other Data**
  - 3.1 Record interactions and communications with other employees or third parties through the Company's communication channels or using the Company's communication equipment in any form or means, including but not limited to: Phone calls, emails, text messages, and social media communications
  - 3.2 Insurance policy data and claims (e.g. insurance policy coverage data, medical treatment data, claim history data)
  - 3.3 Data provided to the Company through any other channels

#### **5. Use of Cookies**

The Company may collect and use cookies and similar technologies when you access the Company's website or other electronic channels such as social media. This Privacy Policy applies only to the Company's services and usage. If you click on a link in the Company's website which lead to another website, this Privacy Policy will not be binding in website. You are required to study and comply with the privacy policy displayed on the said website. The company is not responsible for the content or operations of such website because the Company is not a service provider of such websites.

#### **6. Disclosure of your personal data**

The Company may disclose your personal data to the following persons or organizations under the rules of the Personal Data Protection Act.

1. Companies within the Company's business group, business partners and/or any other person with whom the Company has a legal relationship, including directors, executives, employees, employees, contractors, agents, consultants of the Company.
2. Government agencies and/or regulatory agencies (e.g., Bank of Thailand, Securities and Exchange Commission, Office of Personal Data Protection)
3. Partners, agents, or other organizations that the Company has contact with (such as professional associations of which the Company is a member, independent auditors, securities depository centers, foreign financial institutions).
4. Third parties who provide services to Companies or subcontractors acting on their behalf (such as collateral providers, companies that print and deliver business cards, analytics, and marketing comparisons, including but not limited to correspondent agent/company)
5. Social media service providers or third-party advertising companies and any other person in connection with the promotion of the Company's products and/or services.
6. Debt collection agents, lawyers, credit information companies, anti-corruption agencies, courts, agencies, or any person for whom the Company is designated or authorized to disclose personal data in accordance with laws, regulations, or orders.
7. Persons involved in the sale of claims and/or assets, corporate restructuring, or mergers and acquisitions of the Company in which the Company may have to transfer rights to such entities, including those to whom the Company is required to share information for the sale of claims and/or assets, corporate restructuring, business transfer, financial agreement, asset disposal or any other transactions related to the business and/or assets used in the Company's operations
8. Your attorney, sub-appointee, agent, or legal representative with legal powers

## **7. Sending or transferring your personal data abroad**

As the Company conducts business and have contacts around the world, from time to time, it is necessary for the Company to transmit or transfer your personal data abroad, including but not limited to the following purposes:

1. Comply to legal practice
2. Perform the contract you entered with the Company or at your request before entering the contract.
3. Comply with the contract between the company and other person or juristic.
4. Prevent or suppress harm to life, body, or health to you or others. when you are unable to give consent at that time; or
5. Carrying out missions for important public interest.

## **8. Duration of retention of personal data**

The Company will keep your personal data from the day you engage with the Company and until you terminate your relationship with the Company. The Company will collect your personal data for a reasonable period as necessary based on each type of personal data and its purposes specified by the Personal Data Protection Act.

The Company will retain your personal data for the period or period specified by relevant laws (such as securities and exchange laws, accounting laws, tax laws, labor laws, etc.)

## **9. Security**

The Company has implemented strict internal security measures and enforced policies to keep your personal data safe. The Company requires its personnel and external contractors to comply with privacy standards and policies as

appropriate, including to provide data protection plan and to have appropriate measures for the use or transmission or transfer of your personal data.

The Company has established a personal data governance structure to define appropriate methods and measures to comply with the law as follows:

1. Establish a Data Protection Committee structure to create mechanisms for oversight, control, responsibility, implementation, enforcement, and monitoring of personal data protection measures in accordance with the law and the Company's privacy policy.
2. Appoint a Data Protection Officer (DPO) with roles and duties in accordance with the law and set out in the Company's privacy policy.
3. Establish policy, procedures and other documents related to the personal data protection in accordance with the law and the Company's privacy policy.
4. To conduct regular training for the Company's employees to make employees aware of the importance of personal data protection and ensuring that all relevant employees are trained and have knowledge and understanding of personal data protection and comply with the Company's privacy policy.
5. Personal data will be process in accordance with the law, fair, transparent manner and consider the accuracy of personal data and store personal data for a reasonable period in accordance with the law and business objectives. It will also maintain confidentiality, completeness, and adequate security.
6. There will be processes and controls to manage personal data at every step in accordance with the law and the Company's privacy policy
7. To establish and maintain Records of Processing Activities (RoPA) for recording activities related to personal data in accordance with the law and will update the records of ROPA when there is a change in transactions or related activities.
8. Clearly notice the purposes of personal data collection and processing to get the consent in accordance with the law, including monitoring and review on such matters.
9. There will be a mechanism to verify the accuracy of personal data and correct the personal data.
10. In case that the Company sends, transfers or allows other persons to use personal data, the Company will enter into an agreement with those who receive or use that personal data to determine their rights and obligations in accordance with the law and the Company's privacy policy.
11. In case that the Company sends or transfers personal data abroad, the Company will comply with the law.
12. To destroy personal data after the retention period by comply with the law and the Company's objectives.
13. To assess the risks and develop measures to mitigate the risks and reduce the impact that will occur with the personal data processing.
14. To provide measures, channels, and methods for the Data subject to exercise their rights in accordance with the law as well as to record and evaluating responses to an exercise the rights of data subjects.
15. To provide adequate data security including the prevention of personal data leakage and unauthorized use of personal data.
16. Must have aa privacy incident management and incident response guidelines in order to identify and manage an unusual incident related to personal data in a timely manner.
17. Must notify the Data subject, Government officials, Data controller (In the event that the Company is a Data processor or being a joint Data controller) and other parties in accordance with the law.
18. There will be a follow-up process in case the law changes, and constantly update personal data protection measures to be in line with the law.
19. Regularly review and update the Company's Privacy Policy, procedures and other relates document in accordance with the law and circumstances of each period.

## 10. Your personal data rights

You can start exercising your rights under the Personal Data Protection Act, which are detailed below.

1. Right to access and obtain a copy of your personal data  
You have the right to access and obtain a copy of your personal data held by the Company unless the Company has the right to refuse your request by law or court order or where your request may have violated the rights and freedoms of the others.
2. Right to request correction of your personal data  
You have the right to ask the company to correct or update your personal data that is inaccurate or incomplete
3. The right to request the erasure of your personal data  
You have the right to request that the Company delete or destroy your data. or make your data non-personally identifiable unless the Company has legitimate grounds to decline your request.
4. The right to request the suspension of the use of your personal data  
You have the right to request that the Company suspend the use of your personal data in certain circumstances (for example, the Company is in the process of reviewing the request to exercise the right to correct personal data or object to the collection, use, or disclosure of your personal data).
5. Right to object to the collection, use, or disclosure of your personal data  
You have the right to object to the collection, use, or disclosure of your personal data, for example, where the Company operates for purpose of direct marketing or scientific, historical, or statistical research studies unless the Company has lawful grounds for rejecting your request
6. The right to obtain or request the transmission or transfer of your personal data  
You have the right to receive or send your personal data to a third party or to receive personal data that the company has sent or transferred to a third party through the channels, methods, or communication devices that the company has used on a regular basis. Unless the Company is unable to do so due to technical aspect or the Company has lawful grounds for rejecting your request.
7. Right to withdraw consent  
You have the right to withdraw the consent you have given to the Company at any time in accordance with the procedures and methods prescribed by the Company, provided that your withdrawal of consent will not affect the collection, use or disclosure of your personal data that have already given consent before your withdrawal of such consent
8. Right to complain  
You have the right to complain to the Personal Data Protection Committee or the Office of the Personal Data Protection Committee if the Company acts in violation of the Personal Data Protection Act.

## 11. Roles, duties, and responsibilities

1. The Board of Directors has roles, duties and responsibilities as follows:
  - Regulate the creation of a personal data governance structure and related internal controls of the Company to comply with the law and the Company's privacy policy.
  - Supervise and support the Company to carry out effective protection of personal data and in accordance with the law.
  - Appoint the Company's Personal Data Protection Officer (DPO).
2. The Privacy Committee has the following roles, duties and responsibilities:
  - Provide a personal data governance structure and relevant internal controls, includes the Privacy Incident Management and Incident Response to be able to identify and manage an unusual incident related to personal data in a timely manner.

- Evaluate the effectiveness of the Company's compliance with the Privacy Policy as well as supervising to ensure that various risks related to personal data are managed and appropriate risk management are in place.
  - Establish and review guidelines to ensure that the Company's operations are in accordance with the law and the Company's privacy policy.
3. Executives have roles, duties and responsibilities in monitoring and controlling departments in compliance with the Company's privacy policy and promote awareness raising among the company's employees.
  4. The Company's Personal Data Protection Officer (DPO) has the roles, duties and responsibilities required by law, includes the following duties:
    - Regularly report personal data protection status to the Company's Risk Management Committee and make recommendations to improve the protection of personal data of the Company to be up-to-date consistent with the law.
    - Advising the employees on legal compliance and the Company's privacy policy.
    - Audit the operation within the company to be in accordance with the law and the Company's privacy policy.
  5. The Company's employees have roles, duties and responsibilities as follows:
    - Comply with the Company's privacy policy, procedures and other documents related to the protection of personal data.
    - Report unusual incidents related to personal data protection. and non-compliance with the law and the Company's privacy policy to supervisors.

## **12. Penalties for non-compliance with the Privacy Policy.**

Failure to comply with the Company's privacy policy may result in an offense and subject to disciplinary action as well as may be punished as prescribed by law.

## **13. Changes to the Privacy Policy Notice**

The Company may change or amend this Privacy Notice from time to time. The Company will announce the current privacy policy on the website. [www.teampcba.com](http://www.teampcba.com)

## **14. Contact Channel**

If you have inquiries or request additional information about the Company's Privacy Policy Notice or would like to exercise your rights, please contact the Company at 02-577-2350. In addition, you can contact the Personal Data Protection Officer as following detail,

### **Data Protection Officer**

#### **Team Precision Public Company Limited**

Address : 152/8 Moo 3 Rangsit, Thanyaburi, Pathumthani 12110

Email : Email at [dpo@teampcba.com](mailto:dpo@teampcba.com) or

Telephone : +66 (0) 2577-2350

Revision: June 2022