



### Announcement HO-01-013/2565 Re: Employee's Privacy Policy

Sabina Public Company Limited and Sabina Fareast Company Limited as the employer (the "Company") issued this Announcement on Employee's Privacy Policy in order to inform the director, management and employee (collectively referred to as the "Employee") regarding their rights and the conditions for the collection, storage, use, process and disclosure of the their personal identifiable information as follows

Clause 1 This Announcement is called "Announcement Re. Employee's Privacy Policy" and shall become effective from the announcement date onwards.

Clause 2 All the announcement, regulation, instruction, operational manual and/or other guidelines that the Company has issued before this Announcement shall remain binding, except in the circumstance that there is any discrepancy between the provisions under this Announcement and those existing documentation where the provisions under this Announcement shall prevail; provided that this Announcement shall not affect the prior transaction or actions already executed.

Clause 3 The process of the Employee's personal identifiable information (PII) under this Announcement is undertaken based on the Company's necessity to perform their obligations as the employer in the following manners: (a) the contractual performance under the employment agreement entered into with the Employee; (b) the employee's legal obligation to provide the labor protection and social welfare services to the Employee; and (c) other legal obligations that the Company would be subject to under the applicable laws, including without limitation the tax obligations. Based on these defined necessities, as long as the Employee remains the Company's employee, the Company reserves the rights to collect, store, use, process and disclose the Employee's PII in accordance with the terms and conditions defined hereunder.

Clause 4 The Company may adjust or amend this Announcement from time to time in order to assure the compliance with the applicable laws and the application of the Announcement with the change in employment types or benefits as agreed between the Company and the Employee; provided that the Company shall post the amended Announcement at the Company's office and the amended Announcement shall become effective once post.

Clause 5 The Company may obtain the Employee's PII from these following sources: (a) directly from the Employee; (b) indirectly from the reliable source, including the previous employer of the Employee, headhunters or other relevant service providers; and (c) through the collection and analysis undertaken at the Company's discretion during the employment pursuant to the terms and conditions defined. For the avoidance of doubt, the Employee's PII being processed by the Company would include the following:



- 1 Directly identifiable information, such as name, identification card number and copy, age, date of birth, nationality;
- 2 Contact PII, such as post address, telephone number and email;
- 3 Qualification PII, such as education background, work background, capacity, criminal records and health records;
- 4 Payment PII, such as bank account number, the financial transaction information of the relevant Employee, social security number as well as other PII relating to employment insurance and provident fund (if any);
- 5 Work Record PII, such as the log-in time recorded through the system and the performance assessment undertaken by the Company's supervisor and leave records.
- 6 Other information, such as sound, image, animated image, CCTV

Clause 6 The Company is processing the Employee's PII as defined under Clause 5 under the key framework defined under Clause 3 with the following objectives:

- 1 The Company would need to collect, store, use and process the Direct PII and Qualification PII in order to (a) assess the qualification and suitability of the Employee's qualification before being employed; and (b) to re-assess the performance during the employment terms; provided that for this specific purpose, the Company shall also be entitled to adjust and update those relevant PII as appropriate throughout the employment terms;
- 2 The Company would need to collect, store, use and process the Contact PII in order to contact and coordinate with the relevant Employee;
- 3 The Company would need to collect, store, use and process the Payment PII in order to perform the Company's contractual performance in providing the payroll and other fringe benefit to the Employee as defined under the employment agreement; and to perform the Company's legal obligations relating to tax and other social security or welfare as prescribed under the applicable laws.
- 4 The Company would need to collect, store, use and process the Work Record PII in order to assess the performance and capacity of the relevant Employee; or to consider imposing the applicable sanction on the non-compliant Employee as defined under the employment agreement and as the Company's legitimate interests.
- 5 The Company would need to collect, store, use and process moving image data, photographs, in order to maintain security for employees, service users and other persons entering and surrounding the Company. or used as evidence in the event of a crime or accidents that occur within or around the building and place

Clause 7 The Company intends to store the Employee's PII throughout the employment terms and at least 3 years after the termination; provided that the PII being processed after the employment termination shall be limited only to protect the Company's legitimate interests.



Clause 8 In order to assure the Employee's benefits and rights as defined under the employment agreement, the Company may need to disclose the Employee's PII to the following persons under the defined conditions as follows:

- 1 To disclose the Employee's PII to the Company's third party service provider that has been engaged in providing supports to the Company in their performance as the employer, including without limitation the insurance agency, human resource management service provider, human resource development service providers and other supporting contractor; provided that the PII shall be shared only on the need-to-know basis;
- 2 The Company may disclose the Employee's PII in the usage of the storage service on Computer On-premise
- 3 The Company may be obliged under the applicable laws to disclose the Employee's PII to the relevant government authorities (i.e. Revenue Department or Social Security Office); or may be obliged under the applicable laws, court judgment or administrative order to disclose any PII of any particular Employee and the Company would need to do so; provided that the Employee shall do so only on the necessary basis.

Clause 9 The Company undertakes that the Company shall use the most appropriate security measures to prevent the unauthorized access, amendment or disclosure of the PII in any form or in any circumstance by either internal or external persons and the Company commits to review those measures on the regular basis with the strong commitment to be in strict compliance with the applicable laws.

Clause 10 The Company respects the following rights relating to the PII of the Employee as defined under the applicable laws:

- 1 Right to access; to request for the copy; and to rectify or update their own PII
- 2 Right to request for data portability of the PII that the Company has processed in the readable forms by the tools or automatic mechanics to other data controller;
- 3 Right to object to the PII process being undertaken;
- 4 Right to request for the erasure or de-identification of any PII that does not have any necessary basis to process, i.e. after the consent withdrawal;
- 5 Right to request for the suspension of PII process in case that request for erasure is being exercised or when it is unnecessary to process such PII;
- 6 Right to withdraw consent that has been given.

The Employee can contact the Company in order to make the request to exercise any defined rights through the defined channel without any charge and the Company will consider and notify the Employee of the Company's determination within 30 days after the receipt of the User's valid request.



บริษัท ซาบีน่า จำกัด (มหาชน)  
Sabina Public Company Limited

### Contact Information

Sabina Fareast Company Limited is authorized to be the coordinator regarding the protection of personal information of the Company. In case you have any questions or would like to exercise your rights as defined on this announcement, please contact us:

### Data Protection Officer

12 Arun-Amarin Rd., Arun-Amarin, Bangkok Noi, Bangkok, 10700

[pdpa@sabina.co.th](mailto:pdpa@sabina.co.th)

02-422-9430

Announced On 13 May 2022

Duangdao Mahanavanont

Chief Executive Officer