

Personal Data Protection Policy

Team Excellence Consulting Co., Ltd. (the "Company") recognizes the importance of personal data protection, therefore announced this Personal Data Protection Policy (the "Policy") which describes how the Company will handle Personal Data (i.e., collection, storage, usage and disclosure of Personal data), and the Data Subject's rights under the law. Details of the Policy are, as follows:

1. Definitions

- "Personal Data" means any information that enables the identification of a person, whether directly or indirectly, but not including the deceased person's information in particular.
- "Sensitive Data" means any Personal Data that is sensitive and may lead to a risk of the Data Subject being unfairly discriminated, e.g. nationality, race, political opinion, faith/religion/philosophy, sexual behaviour, criminal record, health information, disability, labour union information, genetic information, biological information or any other information which affects the Data Subject in a similar way.
- "Data Subject" means any individual person who could be identified by the Personal Data.
- "Data Controller" means any individual person or juristic person who has the authority to decide on processing of Personal Data, including collecting, using, and disclosing of Personal data.
- "Data Processor" means any individual person or juristic person who processes the Personal Data according to the Data Controller's order or on behalf of the Data Controller.
- "Data Processing" means
1. Collecting of Personal Data from the Data Subject;
 2. Using of Personal Data whether by the Company, by the Company's staff or by the Data Processor;

3. Disclosing, Transferring or Passing of Personal Data to the third party.

2. Personal Data Collection

The Company will collect Personal Data with lawful and fair purposes, scopes and methods. The collection will be limited only to the necessity of the regular business operation. The Company will notify the Data Subject details of Data Processing or request consent from the Data Subject (as the case may be) before collecting Personal Data, pursuant to the Personal Data Protection Act B.E. 2562 (2019) or other applicable laws.

Personal Data Collection Channel

The Company may collect Personal Data, whether directly or indirectly, through the following channels:

- Collected directly from the Data Subject both in hard copy and electronic forms, such as Personal Data collected from jobs application form or contact information form;
- Lawfully collected from the Company's subsidiaries, affiliates or business partners;
- Collected from any other reliable sources, such as government agencies and banks; and
- Collected from the general public in a lawful manner.

Personal Data to be collected by the Company

- General data, e.g. name and surname, telephone number, email address, residential address, identification number of an individual person (e.g. ID card, passport, driver's license and tax identification number), date of birth, nationality, citizenship, weight, height, and photo;
- Data on career, education, employment history, employment performance evaluation, criminal record, medical history, family history, employee ID, salary record, and job title;
- Historical data on any transaction(s) or contract(s) entered into with the Company;
- Bank account number, salary, financial status, tax payment history, credit card number, and vehicle license plate number;
- Data on the Data Subject's use of computer device and computer program, including IP address, type of browser, language, operating systems, applications, website usage history, and cookies; and
- Recorded CCTV footage.

3. Purpose of using and disclosing the Personal Data

Purpose of using and disclosing the Personal Data

The Company will use and disclose the Personal Data to carry out the Company's ordinary course of business operation, which includes:

- For entering into a contract or performing duties under an agreement between the Company and the Data Subject;
- For business operation necessary for the legitimate interest of the Company or other persons by taking into account the basic rights of the Data Subject;
- To offer information about products and services as well as to improve, develop and to maintain the quality of products and services that the Data Subject is partnering with the Company;
- For communications such as notification and responding services;
- To offer new products and services. In the event that the Data Subject does not wish to be notified of the marketing or sales activities, the Data Subject can notify his/her intention to the Company through the channels specified by the Company;
- For the purpose of recruitment and selection of human resources;
- To identify persons who come into contact with the Company and for security purposes; and
- To perform various duties of the Company under relevant laws.

Person in which Personal Data might be disclosed to

The Company may disclose Personal Data of the Data Subject on a lawful basis to government agencies or third party, which includes:

- Company's subsidiaries and affiliates;
- Third-party service providers, such as service providers who collect and analyze data or human resources service providers;
- Government agencies relevant to the Company's business operations;
- Advisors, such as financial advisors or legal advisors; and
- Other data controller that the Data Subject requests the Company to send or transfer Personal Data to.

The Company will carry out necessary procedures to ensure the protection and prevention of the loss of data, unauthorized access to, and unlawful use, modification, or disclosure of Personal Data by the person mentioned above.

If the Company must disclose the Personal Data to the receiver in a foreign country, the Company must disclose the Personal Data only to the extent permitted by the Personal Data Protection Act and other related laws.

4. Personal Data retention period

The Company will collect and retain the Personal Data only for a period necessary for processing such Personal Data within the scope and purposes related to the Company's business operations. After such period has ended, the Company will destroy such Personal data pursuant to the standard method and procedure; unless the Company has the legal obligation to retain such data continuously or for the protection of the rights of the Company as specified by the law.

5. Guideline for personal data protection

The Company will define any measures, including security protection measures, to conform with the laws, regulations, rules and practices for the employee and other related parties as well as support and encourage the employee to be knowledgeable and have an awareness of their duties and responsibilities in collecting, storing, using, and disclosing the Data Subject's Personal Data. In order to effectively exercises as prescribed, the employee would be required to strictly comply with this Policy and Personal Data Protection Act.

6. Rights of Data Subject

The rights of the Data Subject are as follows:

- (1) Rights to withdraw any given consent and rights to receive a notification when the Company collects their Personal Data;
- (2) Rights to access their own Personal Data, request for copies of their Personal Data, request the Company to disclose the source of Personal Data collected without consent;
- (3) Rights to request the Company to ensure that their Personal Data are accurate, up-to-date, complete, and not misleading;
- (4) Rights to request the Company to erase or destroy or anonymize the Personal Data;
- (5) Rights to request the Company to cease the use of their Personal Data;
- (6) Rights to receive or request the Company to send or transfer Personal Data to another data controller if it can be done by automatic means; and
- (7) Rights to object to the collection, use, or disclosure of their Personal Data.

The Data Subject can exercise their rights mentioned above by submitting the request form in writing or via email to the Company through the "Communication" channel specified below; the Company will consider and return to the Data Subject within 30 days from the submission date or after fully receive the necessary information. The Company may deny such request under its lawful right.

7. Policy review and update

The Company will regularly review and update this Policy in order for the Policy to be complied with the laws, practice of the Company and any suggestion from government agencies. The Company will announce the change before exercising it.

This Policy has been recently reviewed on 1 May 2022.

8. Data protection

The Company has deployed standard data security systems to protect Personal Data from the loss, and any unauthorized or unlawful access, use, modification, revision or disclosure.

In case the Company contracts any agencies or third party to collect, use, or disclose the Data Subject's Personal Data, the Company will carry out the necessary procedure to ensure that the Personal Data will be kept confidential as well as to protect and prevent any unlawful processing of Personal Data outside the scope of work.

9. Communication

Details of the Company's Data Protection Officer (DPO)

Team Excellence Consulting Co.,Ltd.

DPO officer:	Mr. Piya Saengtubtim / Mr. Thanawit Suttarattanakul
Address:	No. 540 Mercury Tower Floor 9 Room 902, Phloen Chit Road, Lumphini Sub-District, Pathum Wan District, Bangkok 10330
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