Privacy Policy

Project Planning Service Public Company Limited and its affiliates

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1. Introduction

Project Planning Service Public Company Limited and its affiliates (hereinafter referred to as "PPS") recognize the importance of personal data and other related information concerning you (collectively referred to as the "Data"). This Policy is established to ensure that you can trust PPS in its transparency and accountability in collecting, using, or disclosing your Data in accordance with the Personal Data Protection Act B.E. 2562 (2019) (the "PDPA") and other applicable laws. This Privacy Policy ("Policy") is intended to inform you of the details regarding the collection, use, or disclosure (collectively referred to as "Processing") of your personal data conducted by PPS, including its personnel and any individuals or entities acting on behalf of or under the direction of PPS. The contents of this Policy are as follows:

2. Scope of Policy

This Policy applies to the personal data of individuals who currently have, or may have in the future, a relationship with PPS and whose personal data is processed by PPS, its personnel, contractual employees, business units, or other entities operated by PPS. It also applies to contractual parties or third parties who process personal data on behalf of or in the name of PPS (referred to as "Data Processors"). This Policy covers all products and services under the supervision of PPS, including but not limited to websites, systems, applications, documents, or any other form of services (collectively referred to as the "Services").

Individuals who have a relationship with PPS as mentioned in the preceding paragraph include:

1) Individual customers.
2) Officers, employees, or workers.
3) Partners and service providers who are natural people.
4) Directors, authorized persons, representatives, agents, shareholders, employees, or other individuals in similar capacities of juristic persons having a relationship with PPS.
5) Users of PPS's products or services;

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6) Visitors or users of the website www.pps.co.th, including systems, applications, devices, or other communication channels under PPS's supervision.
7) Other individuals whose personal data is collected by PPS, such as job applicants, family members of personnel, guarantors, or insurance beneficiaries.
8) Items 1) through 6) are collectively referred to as "you."

In addition to this Policy, PPS may establish separate Privacy Notices ("Notices") for specific products or services, to inform data subjects who are users of such services about the personal data being processed, the purposes and lawful bases for processing, the retention period of personal data, as well as the rights of data subjects in relation to such products or services.

In the event of any material inconsistency between the contents of a Privacy Notice and this Policy, the provisions set forth in the relevant Privacy Notice shall prevail.

3. Purposes of Personal Data Collection

PPS collects your personal data for various purposes, depending on the type of products, services, or activities you engage with, as well as the nature of your relationship with PPS or the specific context under consideration. The purposes outlined below represent the general framework for PPS's use of personal data. Only those purposes relevant to the products or services you use or are connected with will be applicable to your personal data.

1) To carry out activities necessary for performing tasks in the public interest assigned to PPS or to exercise official authority vested in PPS in accordance with its missions as stipulated under the Royal Decree Establishing the Digital Government Development Agency (Public Organization), B.E. 2561, as well as relevant laws, regulations, and orders.
2) To provide and manage PPS services, whether under contracts entered into with you or pursuant to PPS's organizational mission.
3) To conduct transactions related to PPS operations.
4) To supervise, operate, monitor, audit, and manage services in a manner that facilitates and aligns with your needs.
5) To retain and update your information, including documents that reference you.
6) To maintain records of personal data processing activities as required by law.
7) To analyze data and resolve service-related issues of PPS.

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8) To perform necessary internal organizational management, including recruitment, selection of directors or other position holders, and qualification assessments.
9) To prevent, detect, avoid, and investigate fraud, security breaches, prohibited acts, or unlawful conduct that may cause damage to PPS or data subjects.
10) To verify your identity and validate information when applying for PPS services, contacting PPS, or exercising your legal rights.
11) To improve and modernize the quality of PPS products and services.
12) To assess and manage risks.
13) To send notifications, confirmations, communications, and updates to you.
14) To prepare and deliver relevant and necessary documents or information.
15) To verify identity and prevent spam, unauthorized acts, or illegal activities.
16) To monitor how data subjects access and use PPS services—both in aggregate and individually—for research and analytical purposes.
17) To fulfill legal obligations that PPS has with regulatory authorities, tax authorities, law enforcement agencies, or as otherwise required by law.
18) To carry out actions necessary for the legitimate interests of PPS or other persons.
19) To prevent or mitigate harm to the life, body, or health of individuals, including public health surveillance.
20) To comply with applicable laws, announcements, enforceable orders, legal proceedings, or court orders, and to exercise legal rights concerning your personal data.

4. Definitions

1) **PPS** refers to Project Planning Service Public Company Limited and any company in which Project Planning Service Public Company Limited holds, directly or indirectly, no less than fifty percent (50%) of the registered capital.
2) **Employee**s refer to personnel at levels below executive level of Project Planning Service Public Company Limited and its affiliated companies.
3) **Personal Data** refers to any information relating to an identified or identifiable natural person, either directly or indirectly, but excludes data of deceased persons.

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4) **Sensitive Personal Data** refers to personal data as stipulated in Section 26 of the Personal Data Protection Act B.E. 2562, including data relating to race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, labor union information, genetic data, biometric data, or any other data which may similarly affect the data subject, as prescribed by the Personal Data Protection Committee.

5) **Personal Data Processing** refers to any operation or set of operations performed on personal data, such as collection, recording, copying, organization, storage, updating, modification, use, retrieval, disclosure, transfer, dissemination, combination, erasure, or destruction, etc.

6) **Data Subject** refers to a natural person who is the owner of the personal data that PPS collects, uses, or discloses.

7) **Legally Competent Data Subject** refers to a data subject who meets any of the following criteria:

   - **A person aged 20 years or older, or**
   - **A person who is legally married from the age of 17 or older, or**
   - **A person legally married before the age of 17 with court permission, or**
   - A minor whose legal representative consents to engage in commercial activities or employment-related contracts, thereby granting the minor legal status equivalent to a legally competent person.

   A legally competent data subject can provide consent independently.

8) **Minor Data Subject** refers to a data subject under the age of 10 and who does not qualify as a legally competent data subject.

Consent must be obtained from the legal guardian who has authority to act on behalf of the minor.

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9) **Quasi-Incompetent Data Subject** refers to a data subject declared by the court as quasi-incompetent due to physical disability, mental incapacity, habitual intoxication, or any similar condition that renders the individual incapable of managing their affairs or may impair their financial well-being or that of their family.

Consent must be given by the guardian authorized to act on behalf of the quasi-incompetent person.

10) **Incompetent Data Subject** refers to a data subject declared by the court as legally incompetent due to mental disability.

Consent must be given by the custodian authorized to act on behalf of the incompetent person.

Any consent obtained in violation of the Personal Data Protection Act B.E. 2562 shall not be binding on the data subject, and the use of such data may constitute a violation of their privacy.

11) **Personal Data Controller** refers to a person or legal entity who has the authority and duty to make decisions regarding the collection, use, or disclosure of personal data.

12) **Personal Data Processor** refers to a person or legal entity who processes personal data on behalf of or under the instructions of the personal data controller. Such person or entity is not considered a personal data controller.

13) **Third Party or External Party** refers to any person or legal entity other than the data subject, personal data controller, or data processor engaged by Project Planning Service Public Company Limited and its affiliates.

14) **Data Protection Officer (DPO)** refers to a person appointed to provide advice and monitor compliance of the personal data controller or processor with the Personal Data Protection Law.

15) **Privacy Notice** refers to the communication that informs the data subject of the purpose, method of collection, processing, and storage of personal data by the company.

16) **Cookie** refer to unique files created by websites and stored on a user's computer or communication device, which store personal data, usage patterns, and user preferences to enhance the website experience.

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5. Principles of Consent

1) Personal Data Control Project Planning Service Public Company Limited (PPS) and its affiliates, as data controllers, must adhere to the principles of personal data protection as outlined below. To ensure the proper use of personal data, PPS and its affiliates are required to implement the following measures:

1. To inform data subjects of the purposes, conditions, and, where applicable, obtain consent prior to the collection, use, or disclosure of personal data.
2. To collect, use, and disclose only personal data necessary for the purposes notified to the data subjects.
3. To prevent unauthorized use or disclosure of personal data.
4. To implement appropriate security measures for the storage, use, or disclosure of personal data, including the transmission or transfer of such data to third parties, and to regularly review and update these measures in line with changes.
5. To correct, modify, delete, or destroy personal data upon the request of the data subject.
6. To ensure that the deletion or destruction of personal data is monitored and verified in the following circumstances:

- When the data retention period has expired,
- When the data is no longer relevant or necessary for the specified purposes,
- When the data subject requests it or withdraws consent.

7. To establish rights and restrictions regarding access to personal data.
8. To maintain personal data records that allow data subjects to access and verify their personal data.
9. To promptly report any personal data breach to the Data Protection Officer and the data subject upon discovery.

2) Personal Data Processing In processing personal data, Project Planning Service Public Company Limited and its affiliates shall implement appropriate measures to prevent the unlawful use or unauthorized disclosure of personal data without consent. The data processors acting on behalf of Project Planning Service Public Company Limited and its affiliates—including internal personnel, external individuals, and external legal entities, shall carry out the following actions:

1. Collect, use, or disclose personal data only as instructed by the data controller.

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2. Implement security measures to prevent loss, access, use, alteration, modification, or disclosure of personal data.
3. Record and maintain logs of personal data processing activities.
4. Immediately notify the data controller upon detecting any personal data breach.

6. Legal Basis for the Collection of Personal Data

PPS determines the legal basis for collecting your personal data appropriately and in accordance with the context of the services provided. The legal bases for collecting personal data used by PPS include the following:

Legal Basis for Data Collection	Details
For the performance of legal obligations	To enable PPS to comply with applicable laws and regulations governing PPS, such as: - Computer Crime Act B.E. 2560 (2017) regarding the collection of computer data - Tax laws and regulations Compliance with court orders, enforcement by the Department of Legal Execution, and other relevant legal obligations
For the performance of contractual obligations	To enable PPS to perform its contractual obligations or to undertake necessary actions related to contracts to which you are a party with PPS, such as employment contracts, service contracts, memoranda of understanding, or other forms of agreements.
It is necessary for the legitimate interests of PPS.	For the legitimate interests of PPS and other parties, provided that such interests are not less significant than the fundamental rights and freedoms of the personal data owners. Examples include, but are not limited to, ensuring the security of PPS's premises or processing personal data for internal business operations of PPS.
It is necessary for the prevention or mitigation of harm to the life, body, or health of an individual.	To prevent or mitigate harm to a person's life, body, or health, such as providing applications for epidemic surveillance in accordance with government policies, etc.

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Legal Basis for Data Collection	Details
For the purpose of preparing important historical, research, or statistical documents.	To enable PPS to prepare or support the preparation of historical documents, research, or statistics as may be assigned to PPS.
Your Consent	For the collection, use, or disclosure of personal data in cases where PPS is required to obtain your consent, having previously informed you of the purpose of such collection, use, or disclosure. Examples include collecting sensitive personal data for purposes not falling under the exceptions specified in Sections 24 or 26 of the Personal Data Protection Act B.E. 2562 (2019), or for presenting and promoting products and services of contractual partners or business affiliates to you.

In the event that PPS needs to collect your personal data for the purpose of performing a contract, complying with legal obligations, or for the necessity of entering into a contract, if you refuse to provide personal data or object to the processing activities for these purposes, it may result in PPS being unable to perform or provide the requested services in whole or in part.

7. Types of Personal Data Collected by PPS

PPS may collect or obtain the following types of data, which may include your personal data. The specific data collected depends on the services you use or your relationship with PPS, as well as other considerations affecting the collection of personal data. The types of data listed below serve as a general framework for PPS's data collection. Only data related to the products or services you use or are connected with will be applicable.

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Types of Personal Data	Details and Examples
Personal Identifiable Information	Information that identifies you by name or information derived from official documents that specify your personal details, such as: Name prefix, First name, Last name, Middle name, Nickname, Signature, National identification number, Nationality, Driver's license number, Passport number, House registration details, Professional license number, Professional practice permit number (for specific professions), Social security number, Social insurance number, etc.
Information Regarding Personal Characteristics	Information Regarding Your Personal Characteristics Details about you such as date of birth, gender, height, weight, age, marital status, military service status, photographs, spoken language, behavioral information, preferences, information on bankruptcy status, information on being legally incapacitated or quasi-incapacitated, etc.
Contact Information	Contact Information for contacting you, such as home phone number, mobile phone number, fax number, email address, home mailing address, social media usernames (e.g., Line ID, MS Teams), location map of residence, etc.
Employment and Education Information	Details regarding employment, including work history and educational background, such as type of employment, occupation, rank, position, responsibilities, expertise, work permit status, references, taxpayer identification number, employment history, salary information, employment start and end dates, performance evaluations, benefits and entitlements, personal belongings issued to the employee, work achievements, bank account number, educational

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Types of Personal Data	Details and Examples
	institutions, academic qualifications, study results, and graduation dates, etc.
Insurance Policy Information	Information related to the employee's insurance policy, such as the insurer, insured person, beneficiary, policy number, type of policy, coverage amount, and claim-related information.
Social Relationship Information	Your Social Relationship Information Such as political status, holding political positions, holding directorship positions, relationships with PPS employees, information about contractual relationships with PPS, information about being a stakeholder in businesses dealing with PPS, and so forth.
Information on Use of PPS Services	Information Related to PPS Services Such as account usernames, passwords, PIN numbers, Single Sign-On (SSO ID) data, OTP codes, computer traffic data, location data, photographs, videos, audio recordings, usage behavior data (including websites managed by PPS such as www.pps.co.th or various applications), search history, cookies or similar technologies, device numbers (Device ID), device types, connection details, browser information, language preferences, operating systems used, and so forth.
Sensitive Personal Data	Sensitive personal data may include information such as your race or ethnicity, religious beliefs, disability status, political opinions, criminal record, biometric data, facial image data, and health-related information, among others.

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8. Sources of Personal Data

Sources / Methods of Collection	Categories of Personal Data
1. Direct collection from you through application forms, questionnaires, or interviews.	- Name, surname, age, date/month/year of birth, place of birth, weight, height, nationality, race, phone number, photograph, identification number, current address, video clips, employee ID, email, bank account number - Military status, family or personal status - Family information, position held, salary/wage - Educational background, employment history, training records - Religious, philosophical, or belief affiliations - Disability or health information
2. Collection through tracking technologies or behavior monitoring tools	- Cookie data, IP address, Application Logging, Device ID, Browsing history
3. Collected from external sources JOBBKK, JodsDB, JOBTOPGUN, Linkedin	- First name, last name, age, date of birth, place of birth, weight, height, nationality, ethnicity, phone number, photograph, identification number - Current address, email address - Educational background, employment history, training history - Religious, philosophical, or belief-related information
4. Collected during training sessions	Pre- and post-training knowledge assessment results, Photographs and video recordings of training activities, Additional personal information collected for alumni directory (e.g. nickname, personal interests, work history), Training satisfaction survey results, Trainer evaluation survey results

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9. Employee Personal Data Protection and Storage Employee personal data is securely collected and maintained to prevent unauthorized or accidental access, use, alteration, deletion, or loss. The data is stored in relevant databases and systems, including but not limited to:

1) Payroll systems
2) Human resource management systems
3) Financial systems
4) Information technology systems of the Company and its affiliates
5) Internal audit systems
6) Business proposal and bidding systems
7) Communication applications such as Line, Facebook, MyPPS, email, etc.

10. Roles and Responsibilities

1) Board of Directors
    1. Establishes policies and guidelines on personal data protection.
    2. Oversees the implementation of such policies to ensure they are put into practice effectively.

2) Executive Management
    1. Develops and enforces operational rules and measures for personal data protection tailored to the context of each company, in alignment with the Company's policies, applicable local laws, and international standards.
    2. Establishes a responsible organizational structure to oversee compliance with operational rules.
    3. Ensures that any individuals or legal entities engaged to process personal data on behalf of the Company meet required legal and data protection standards.
    4. Oversees the consistent implementation of policies, guidelines, and procedures, and continuously improves operational practices, including regular performance reporting.

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3) Data Protection Officer (DPO)

1. Monitors and audits the Company's compliance with personal data protection laws, including organizing awareness campaigns and training programs.
2. Provides consultation and guidance to the Board of Directors, executives, and employees on lawful data processing practices.
3. Acts as the contact point for personal data matters, including the protection of data subject rights and coordination with the Office of the Personal Data Protection Committee.
4. Maintains confidentiality of any personal data accessed in the course of performing their duties.

4) Employees

1. Handle personal data with due care and strictly follow applicable laws, regulations, and Company policies.
2. Immediately report any personal data breaches or suspected breaches to the Data Protection Officer.
3. Report any actions that may violate this policy through the Company's whistleblower and complaint channels.

11. Categories of Persons to Whom PPS May Disclose Your Personal Data

Under the purposes outlined in Section 3 above, PPS may disclose your personal data to the following categories of recipients. The categories listed below serve as a general framework for disclosure. Only the recipients relevant to the specific products or services you use or are engaged with will apply.

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Category of Recipients	Details
Government Authorities or Authorized Agencies to Whom PPS May Disclose Personal Data for Legal Compliance or Other Significant Purposes (e.g., Public Interest)	Government authorities, law enforcement agencies, regulatory bodies, or other entities with significant purposes, such as the Cabinet, acting Ministers, Department of Provincial Administration, Revenue Department, Royal Thai Police, Courts of Justice, Office of the Attorney General, Department of Disease Control, Ministry of Digital Economy and Society, Office of the Prime Minister's Secretariat, Department of Consular Affairs, and the Student Loan Fund, among others.
Relevant Committees Involved in PPS's Legal Compliance Operations	PPS may disclose your personal data to individuals serving as members of various committees, such as the Subcommittee on Recruitment and the Committee of the Digital Government Development Agency (DGA), among others.
Contractual parties responsible for administering employee welfare for PPS personnel	External parties engaged by PPS to provide welfare-related services, such as insurance companies, hospitals, payroll service providers, banks, and telecommunications service providers.
Business partners	PPS may disclose your personal data to parties collaborating with PPS for the purpose of providing services to you, such as service providers you interact with through PPS's services, marketing and advertising service providers, financial institutions, platform providers, telecommunications service providers, and others.
Service providers	PPS may delegate other parties to provide services on its behalf or to support PPS's operations, such as data storage providers (e.g., cloud services, document warehouses), system developers, software and application providers, website operators, document

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Category of Recipients	Details
	delivery services, payment service providers, internet service providers, telephone service providers, digital ID providers, social media service providers, risk management service providers, external consultants, transportation service providers, and others.
Other types of data recipients	PS may disclose your personal data to other categories of recipients, such as contacts of PPS, family members, non-profit foundations, temples, hospitals, educational institutions, or other relevant organizations. This disclosure is solely for purposes related to PPS services, training, awards, charitable activities, donations, and similar activities.

12. Cookies

PPS collects and uses cookies, as well as similar technologies, on websites under the supervision of PPS, such as www.pps.co.th, or on your devices depending on the services you use. This is to ensure security in providing PPS services and to offer you, the user, convenience and a better experience when using PPS services. The collected data will also be used to improve PPS websites to better meet your needs. You can configure or delete cookies by yourself through the settings in your web browser.

13. Transfer or Transmission of Personal Data to Foreign Countries

In certain cases, PPS may need to transfer or transmit your personal data to foreign countries in order to provide services to you. For example, this may include sending personal data to cloud systems where platforms or servers are located overseas (such as Singapore or the United States) to support information technology systems located outside Thailand. This depends on the specific PPS services you use or are involved with on a case-by-case basis.

However, at the time of drafting this policy, the Personal Data Protection Committee has not yet announced a list of destination countries with adequate personal data protection standards. Therefore, when PPS needs to transfer or transmit your personal data to a foreign country, PPS will ensure that the personal data transferred is protected by sufficient data

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protection measures in accordance with international standards or will comply with the conditions that allow such transfer or transmission by law, including:

1) It is in compliance with the law requiring PPS to transfer or transmit personal data abroad.
2) You have been informed and have given your consent in cases where the destination country does not have adequate personal data protection standards, according to the list of countries announced by the Personal Data Protection Committee.
3) The transfer is necessary to perform a contract to which you are a party with PPS, or to take steps at your request prior to entering into a contract.
4) The transfer is necessary for the performance of a contract between PPS and another person or legal entity for your benefit.
5) The transfer is necessary to prevent or suppress danger to your life, body, or health or that of another person, when you are unable to give consent at that time.
6) The transfer is necessary for the performance of a mission carried out for important public interest.

14. Retention Period of Your Personal Data

PPS will retain your personal data only for as long as it is necessary to fulfill the purposes for which the data was collected, as specified in the relevant policies, announcements, or applicable laws. Once the retention period has expired and your personal data is no longer necessary for the stated purposes, PPS will proceed to delete, destroy, or anonymize your personal data in accordance with the data deletion and destruction methods prescribed by the Personal Data Protection Committee, applicable laws, or international standards. However, in cases involving disputes, the exercise of rights, or legal proceedings related to your personal data, PPS reserves the right to retain such data until the dispute is resolved by a final order or judgment.

15. Services Provided by Third Parties or Subcontractors

PPS may assign or procure third parties (data processors) to process personal data on behalf of PPS. These third parties may provide various services such as hosting, outsourcing, cloud computing services/providers, or other forms of subcontracted work.

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When PPS assigns third parties to process personal data as data processors, PPS will enter into agreements that clearly define the rights and obligations of PPS as the personal data controller and the appointed third parties as data processors. These agreements will specify the types of personal data to be processed, the purposes and scope of data processing, and other relevant terms. The data processors are obligated to process the personal data strictly within the scope defined by the agreement and as instructed by PPS, and may not process the data for any other purposes.

In cases where a data processor engages a subcontractor (sub-processor) to process personal data on behalf of the data processor, PPS will require the data processor to ensure that an agreement is in place between the data processor and the sub-processor. This agreement must be of the same or higher standard than the agreement between PPS and the data processor.

16. Security of Personal Data

PPS has implemented measures to protect personal data by restricting access rights to such data exclusively to authorized personnel or individuals who are assigned responsibilities and have a legitimate need to access the data for the purposes previously communicated to the data subject. These individuals are required to strictly adhere to PPS's personal data protection measures and maintain the confidentiality of any personal data they become aware of during the course of their duties. PPS employs both organizational and technical security measures that comply with international standards and regulations prescribed by the Personal Data Protection Committee.

Furthermore, when PPS transfers, discloses, or shares personal data with third parties—whether for the purpose of service provision, contractual obligations, or other forms of agreements—PPS will impose appropriate data security and confidentiality measures in accordance with legal requirements to ensure the ongoing protection and security of the personal data collected by PPS.

17. Connection to External Websites or Services

PPS's services may include links to or connections with third-party websites or services. Such websites or services may have their own privacy policies that differ from this policy. PPS recommends that you review the privacy policies of those websites or services before using them. PPS is not affiliated with, does not control, and is not responsible for the content, policies, damages, or actions arising from third-party websites or services.

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18. Data Protection Officer

PPS has appointed a Data Protection Officer (DPO) responsible for overseeing, supervising, and advising on the collection, use, and disclosure of personal data. The DPO also coordinates and cooperates with the Personal Data Protection Committee to ensure compliance with the Personal Data Protection Act B.E. 2562 (2019).

19. Personal Data Protection Practices

1) Collection of Personal Data
    1. Personal data shall be collected only to the extent necessary for the purposes notified to the data subject.
    2. Sensitive personal data or data that may lead to unfair discrimination or inequality that could affect the data subject shall not be collected unless required by law.
2) Storage of Personal Data
    1. Appropriate security measures must be in place to protect personal data from destruction, alteration, unauthorized access, and data leakage.
    2. When personal data is stored by internal personnel, external personnel, or third-party companies, data protection systems must comply with international standards, and agreements regarding the retention of personal data shall be made to limit usage strictly to the necessary purposes.
3) Transfer or Disclosure of Personal Data
    1. The transfer or disclosure of personal data shall be carried out only upon request or with the consent of the data subject.
    2. Cross-border transfer of personal data is permissible under the following circumstances:
        - The data subject is informed of the potentially insufficient data protection standards of the destination country and has given consent.
        - The transfer is necessary to perform a contract to which the data subject is a party, or to act on the data subject's request before entering into a contract.
        - The transfer is necessary to prevent or mitigate harm to the life or health of the data subject when the data subject cannot provide consent.

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4) Rights of Data Subjects under the Personal Data Protection Act B.E. 2562 (2019)

1. The right to access and obtain a copy of their personal data.
2. The right to be informed about data collection when consent has not been obtained.
3. The right to request correction or amendment if the data is inaccurate.
4. The right to request deletion or destruction of personal data, or to anonymize the data as prescribed by law.
5. The right to data portability to another data controller.
6. The right to suspend the use of personal data as permitted by law.
7. The right to object to the collection, use, or disclosure of personal data.
8. The right to file a complaint if a violation occurs regarding the use of data beyond the stated purpose.

5) Use or Disclosure of Personal Data

1. Personal data shall not be used or disclosed beyond the stated purposes, nor disclosed to external persons or companies, except as required by law.
2. Personnel, external parties, or third-party companies are prohibited from using personal data unlawfully and must comply with the personal data protection policies and laws of each country where Project Planning Service Public Company Limited and its affiliates operate.
3. In cases where the collection, use, or disclosure of employees' personal data outside the Kingdom is necessary, the same terms and conditions applied to personal data controllers within the Kingdom will be applied by analogy. Employees' personal data may be collected, used, or disclosed to affiliated companies both inside and outside the Kingdom, depending on the employee's role, responsibilities, and career opportunities. The company will adequately protect employee personal data security regardless of whether the destination country has relevant data protection laws or not.
4. Cross-border transfer of personal data shall be performed only if it benefits the employee in human resource management and to comply with agreements, regulations, or policies of affiliated companies abroad in accordance with local data protection laws. Even if the destination country

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lacks or has lower standards than those stated in this policy, the company will strictly maintain the confidentiality and protection standards of employees' personal data.

5. Employees are responsible for ensuring their personal data is accurate, current, and appropriate by updating it through the company's prescribed forms at least once a year. Employees may request changes at any time by submitting a change request form to the Human Resources and Organizational Development department. Signing the employee data form or change request form constitutes consent for the company to collect, use, or disclose the personal data accordingly.

6) Destruction of Personal Data

1. If personal data is no longer relevant or necessary for the intended purpose, or if the data subject withdraws consent, the data shall be securely destroyed or deleted to prevent leakage.
2. Personal data shall be destroyed or deleted after the retention period has expired unless otherwise required by law.
3. Unless otherwise specified, the company will retain employees' personal data throughout the employment period and for 5 years after termination. After this period, the company will delete the data without requiring further consent from the employee.

20. Penalties for Non-Compliance with the Personal Data Protection Policy

Failure to comply with this policy may result in violations and disciplinary actions under the rules and regulations of PPS (for PPS officers or employees) or under the personal data processing agreements (for personal data processors), depending on the relationship between you and PPS. Additionally, such non-compliance may incur penalties as prescribed by the Personal Data Protection Act B.E. 2562 (2019), including related subordinate laws, rules, regulations, and orders.

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21. Complaints to the Regulatory Authority

If you believe that PPS has not complied with the personal data protection laws, you have the right to file a complaint with the Personal Data Protection Committee or any authorized supervisory agency appointed by the Committee or under the law. However, prior to filing a complaint, PPS requests that you first contact PPS directly to allow us the opportunity to understand the facts, provide clarifications, and address your concerns promptly.

22. Amendments to the Personal Data Protection Policy

PPS may consider revising, amending, or changing this policy as deemed appropriate and will notify you of such changes through the website www.pps.co.th, specifying the effective date of each amendment. Nevertheless, PPS recommends that you regularly review the latest version of this policy via the application or specific channels related to PPS activities, especially before disclosing personal data to PPS.

Continued use of PPS products or services after the policy's effective date constitutes your acceptance of the updated policy. If you disagree with any part of this policy, please cease using our services and contact PPS for further clarification.

23. Contact for Inquiries or Exercising Rights

If you have any questions, suggestions, or concerns regarding the collection, use, or disclosure of personal data by PPS, or about this Policy, or if you wish to exercise your rights under the personal data protection law, you may contact us at:

1) **Data Controller**

Name: Project Planning Service Public Company Limited (PPS)

Address: 381/6 Soi Rama IX 58 (Soi 7, Seri 7),

Rama IX Road, Suan Luang Subdistrict, Suan Luang District,

Bangkok 10250, Thailand

Telephone: +66 (0) 2718 2785–9 ext. 108

Email: dc@pps.co.th

Address 381/6 Soi Rama IX 58 (Soi 7 Seree 7), Rama IX Road, Suanluang, Bangkok 10250
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Tel 02 718 2785-9 Fax 02 300 5545-6 E-mail pps@pps.co.th Website www.pps.co.th

2) Data Protection Officer: DPO

Name: Mr. Weera Yenpreecha

Company: Project Planning Service Public Company Limited (PPS)

Address: 381/6 Soi Rama IX 58 (Soi 7, Seri 7),

Rama IX Road, Suan Luang Subdistrict, Suan Luang District,

Bangkok 10250, Thailand

Telephone: +66 (0) 2718 2785–9 ext. 345

Email: dpo@pps.co.th

Privacy Policy

Revision No. 3

Given on 12 November 2025

(Mr. Prasong Tharachai)

Chairman of the Board

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