

Privacy Policy for Human Resource Management
Project Planning Service Public Company Limited and its Affiliates

1. Introduction

Project Planning Service Public Company Limited and its affiliates (hereinafter referred to in this Policy as “PPS”) recognize the importance of personal data (collectively referred to as the “Data”) of job applicants and personnel (collectively referred to as “you”) and strictly uphold the respect for your privacy rights. PPS is committed to ensuring transparency and accountability in the collection, use, or disclosure of your Data in accordance with the Personal Data Protection Act B.E. 2562 (2019) (“Personal Data Protection Law”) and other applicable laws. This Privacy Policy for Human Resource Management (“Policy”) is established to inform and help you, as a job applicant or personnel, understand the types, purposes, and methods of collection, use, or disclosure (collectively referred to as “Processing”) of your personal data, as well as your rights under the Personal Data Protection Law. This Policy applies to the processing of personal data conducted by PPS, including its authorized officers, relevant persons, and those acting on behalf of or in the name of PPS, as outlined below.

2. Definitions

“Personal Data”	means any information relating to an individual that enables the identification of such individual, whether directly or indirectly. This includes sensitive personal data but excludes data of deceased persons.
“Sensitive Personal Data”	includes information such as race, ethnicity, political opinions, religious or philosophical beliefs, sexual orientation, criminal records, health information, disability status, labor union membership, genetic data, and biometric data (e.g., fingerprint templates, facial recognition data, or iris scan data).
“PPS”	refers to Project Planning Service Public Company Limited.
“Personnel”	refers to employees or staff members who receive salary or wages from the company’s budget and are hired under an employment order, employment contract, or employment agreement as specified.

3. Scope of Application

This policy applies to job applicants and personnel of PPS whose personal data is processed by PPS. It also applies to personnel, contractors, or external parties who process personal data on behalf of or in the name of PPS.

4. Sources of Personal Data Collected by PPS

Sources and Methods of Data Collection	Types of Personal Data Collected
Data Collected Directly Personal data collected directly through the completion of forms on the PPS website, job application forms, or when you directly submit your personal data to PPS.	Full name, nickname, date of birth, age, gender, photograph, nationality, contact address, email, mobile phone number, national identification number, emergency contact information, military status, educational background, work history, etc.
Data Collected Through Technology Personal data collected through the use of technology that detects or tracks your behavior when using the PPS website.	Website cookies, computer traffic data, usage data of communication devices, computers, emails, internet usage, etc.
Data Collected During Work Performance	Family information of the employee, employee ID, salary, compensation, bonuses, position, benefits, provident fund, tax information, employment start date, assigned contract end date, performance evaluation results, training records, leave records, conduct information, biometric data (such as facial recognition data, fingerprint data), religion, health information, etc.

This also includes cases where you provide personal data of third parties to PPS. Therefore, you are responsible for informing such individuals of the details set out in this policy and, where required, obtaining their consent to the disclosure of their personal data to PPS.

5. Legal Basis for the Collection of Personal Data

PPS considers and determines the appropriate legal basis for the collection of your personal data in accordance with the relevant context and the nature of services provided. The legal bases upon which PPS relies includes the following:

Legal Basis for Data Collection	Description
For compliance with legal obligations	For compliance with legal obligations To enable PPS to comply with applicable laws, such as labor protection laws, where the collection of such data is necessary for PPS to perform its legal duties.

Legal Basis for Data Collection	Description
For legitimate interests	For the legitimate interests of PPS and others, provided that such interests are not overridden by the fundamental rights of the data subject regarding their personal data. Such legitimate interests include, for example, actions to ensure the security of PPS's premises, the collection of your personal data prior to entering into a contract, bankruptcy checks, background employment verification from other sources, suitability analysis, comparison and selection of job applicants, as well as internal management or activities within PPS.
Necessary for establishing, exercising, or defending legal claims	For the establishment, exercise, or defense of legal claims, such as retaining executed contracts that are still legally valid and have not yet expired.
To prevent or mitigate harm to the life, body, or health of an individual	To prevent or mitigate harm to the life, body, or health of an individual, such as in cases of emergency medical treatment.
It is necessary for the performance of a contract.	To enable PPS to perform its duties under a contract, or to take steps necessary for entering into a contract to which you are a party with PPS—such as employment contracts, memoranda of understanding, cooperation agreements, or other forms of contracts. This also includes activities related to being a personnel of PPS, such as performance evaluations, welfare arrangements, leave and holiday management, group insurance arrangements, benefits, and the administration of recruitment and employment matters.

In cases where PPS is required to collect your personal data in order to perform contractual obligations, comply with legal requirements, or take necessary steps prior to entering into a contract, your refusal to provide such data or objection to its processing for the stated purposes may result in PPS being unable to proceed with your recruitment or employment, or to provide services as requested, either in whole or in part.

6. Types of Personal Data Collected by PPS

PPS may collect or obtain the following types of personal data:

Types of Personal Data	Description and Examples
Personal Identification Data	Personal identifiers or information from official documents that specify your personal details, such as title, first name, last name, middle name, nickname, signature, national identification number, nationality, house registration information, professional license number (for each profession), photographs, vehicle registration, vehicle details, background verification information, information related to student loan funds, evidence, contracts, insurance, employment, blood type, biometric data (such as facial recognition, fingerprint recognition), etc.
Personal Attribute Data	Detailed information about the employee, such as date of birth, gender, height, weight, age, marital status, military service status, photographs, spoken languages, behavioral information, language proficiency, computer skills, and so forth.
Contact Information	Contact information such as home phone number, mobile phone number, fax number, email address, postal address, location map of residence, and so on.

Types of Personal Data	Description and Examples
Information Related to Employment and Education	Employment details, including work history and educational background, such as your job application, type of employment, occupation, rank, position, duties, expertise, work permit status, personal references, taxpayer identification number, job tenure history, employment history, salary information, start date, termination date, performance evaluations, welfare and benefits, possessions of the employee, work achievements, bank account number, educational institutions, degrees, academic results, graduation date, type of employment contract, terms and conditions of employment, contract duration, position, department, previous companies, work location, working hours, time records (clock-in and clock-out), employee identification number, business cards, employment documentation and evidence, current employment certification, leave information and documents, reasons for contract termination and/or resignation.
Insurance Policy Information	Details of the employee's insurance policy, such as the insurer, the insured person, beneficiaries, policy number, policy type, coverage amount, and information related to claims and compensation.
Social Relationship Information	Your social relationship information, such as holding a director position, relationships with PPS employees, information about having a contractual agreement with PPS, and information about having a stake in businesses dealing with PPS, etc.
Sensitive Personal Information	Your sensitive personal data, such as religion information, disability information, biometric data (facial recognition data, fingerprint data), health-related information, etc.

Types of Personal Data	Description and Examples
Financial and Benefits Information	Details of your salary and benefits, such as salary, wages, allowances, salary certificates, provident fund identification number, contribution rates to the provident fund, information related to the provident fund (e.g., provident fund withdrawals, the amount in the provident fund), bank account information, tax identification number, tax deduction information, and information related to loan benefit requests (e.g., reasons for loan requests, loan amounts requested, loan repayment information).
Personal Data of Other Individuals	Your references, your parents' names, your spouse's name, marriage registration, siblings, number of dependents, birth certificates or identification cards of dependents, emergency contact person, and beneficiaries. The personal data collected about these individuals may include, but is not limited to, their title, first name, last name, identification card number, phone number, address, and personal relationship with the employee.

7. Purpose of Collecting Personal Data

PPS collects your personal data for the following purposes:

- 1) To retain and update information related to you, including documents referring to you.
- 2) To prepare records of personal data processing as required by law.
- 3) To carry out necessary internal organizational management.
- 4) To prevent or stop harm to life, body, or health of any person, including monitoring of contagious diseases.
- 5) To comply with applicable laws, announcements, orders, or legal proceedings, including court-related data handling and exercising your data rights.
- 6) To ensure the security of PPS premises and other assets, as well as those of personnel.
- 7) For recruitment conducted by PPS, where applicants either apply themselves or respond to PPS recruitment announcements.
- 8) To verify the qualifications of job applicants, such as age, nationality, bankruptcy status, criminal record, history of dismissal or termination from employment, conflicts of interest

with PPS business or competitors, etc.

- 9) To conduct interviews and verify educational background and relevant work experience.
- 10) To retain applications for consideration for future job openings for candidates not currently hired.
- 11) To process employee registration, prepare equipment such as computers, mobile phones, email accounts, usernames, and passwords for PPS systems, to facilitate work readiness.
- 12) To manage and process employee welfare and benefits.
- 13) To administer salaries, special compensation, overtime pay, per diems, travel allowances, provident funds, and other employee benefits.
- 14) To manage employee tax matters, such as withholding income tax.
- 15) To organize employee activities such as New Year parties, site visits, seminars, or other social events provided to employees.
- 16) To manage work attendance, holidays, leave, absences, and tardiness.
- 17) To announce new employees, outstanding employees, promotions, transfers, and work anniversaries.
- 18) To set work goals, evaluate employee performance, consider promotions, salary adjustments, and special compensation.
- 19) To arrange training and conduct examinations to assess employee knowledge.
- 20) To investigate suspected misconduct, legal violations, PPS rules or work regulations; to consider and impose disciplinary actions or exercise rights under contracts or law.
- 21) To report employee misconduct to regulatory agencies and authorities as required by law, such as the police, Anti-Money Laundering Office, National Anti-Corruption Commission, Revenue Department, Department of Legal Execution, Royal Thai Police, etc.
- 22) To communicate with the person(s) you have designated for PPS to contact in case of an emergency.

PPS may use your sensitive personal data for the following purposes:

- (1) Religion: For the purpose of identity verification and allocation of benefits (such as providing appropriate meals and granting religious holidays).
- (2) Health information: To process employment or collaboration, provide care in case of emergency illness, arrange annual health check-ups, and analyze and manage employee health.
- (3) Biometric data: To authorize access to restricted areas and record attendance and leave.
- (4) Criminal record: To assist in decisions regarding employment or collaboration, manage the company's reputation, create a blacklist, and for security purposes.

8. Types of persons to whom PPS discloses your personal data.

Under the purposes stated above, PPS may disclose your personal data to the following persons:

Types of Data Recipients	Details
Government agencies or authorities to whom PPS must disclose information for the purpose of complying with legal obligations or other important objectives.	Law enforcement agencies, regulatory authorities, or other entities with important objectives, such as the Revenue Department, the Department of Disease Control, and others.
Contractors or service providers involved in managing employee benefits for PPS.	External parties engaged by PPS to manage welfare-related services, such as insurance companies, hospitals, payroll system providers, banks, and others.
Business partners.	PPS may disclose your information to parties collaborating with PPS who are involved in PPS operations, such as training, job offers, and related activities.
Service providers.	PPS may appoint third-party service providers or supporters to carry out its operations, such as data storage providers (e.g., cloud services, document warehouses), software developers, application and website providers, document delivery services, payment service providers, internet service providers, telephone service providers, digital ID providers, social media service providers, risk management service providers, external consultants, and others.
Other types of data recipients.	PPS may disclose your information to other types of data recipients, such as PPS contacts, family members, non-profit foundations, temples, hospitals, educational institutions, or other agencies, for purposes related to PPS services, training, awards, charitable activities, donations, and similar activities.
Disclosure of Information to the Public	PPS may disclose your information to the public when necessary.
Insurance Companies	For the purpose of arranging group insurance for PPS employees.

9. Transfer or Transmission of Personal Data Abroad

In some cases, PPS may need to send or transfer your personal data to a foreign country, for example, to transfer personal data to cloud systems whose platforms or servers are located outside Thailand to support information technology systems located abroad.

If PPS needs to send or transfer your personal data to a destination country, PPS will take measures to ensure that the personal data transferred or sent is sufficiently protected according to international standards or will comply with conditions to enable such transfer or transmission according to the law, except when you have been notified and have given your consent in cases where the destination country does not have sufficient personal data protection standards. This is in accordance with the list of countries announced by the Personal Data Protection Committee.

10. Retention Period of Your Personal Data

PPS will retain your personal data only for as long as it is necessary for the purpose of collection. Once the data is no longer necessary for those purposes, PPS will delete or destroy your personal data or anonymize it in accordance with the methods and standards of data destruction prescribed by the Committee or by law or according to international standards. However, in cases where there is a dispute, exercise of rights, or legal case related to your personal data, PPS reserves the right to retain such data until the dispute has been finally resolved by order or judgment. Generally, PPS will retain your data as follows:

- 1) For job applicants who are not selected as employees, data will be retained for 1 year from the date PPS receives the personal data.
- 2) For employees, data will be retained throughout the period of employment and will be kept for 5 years after the employment contract has ended.

11. Security of Personal Data

PPS has implemented measures to protect and secure personal data by restricting access to such data only to authorized personnel or individuals who are assigned and have a legitimate need to use the data in accordance with the purposes previously notified to the data subject. These individuals are required to strictly comply with PPS's data protection measures and are obligated to maintain the confidentiality of any personal data they access as part of their official duties.

PPS enforces organizational and technical security measures in line with international standards.

In addition, PPS has established a Privacy Policy that is communicated organization-wide, along with practical guidelines to ensure the secure collection, use, and disclosure of personal data. These measures aim to uphold the confidentiality, integrity, and availability of personal data. PPS also conducts periodic reviews of this policy and related notices at appropriate intervals.

12. Data Protection Officer

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

13. Your Rights under the Personal Data Protection Act B.E. 2019

The Personal Data Protection Act B.E. 2019 provides several rights for data subjects. These rights become effective when the relevant provisions of the law come into force. The details of your rights are as follows:

- 1) Right to Access Personal Data You have the right to access, obtain a copy of your personal data, and request the disclosure of the source of such data collected from sources other than yourself. However, PPS may refuse such requests if legally permitted or if disclosure would adversely affect the rights and freedoms of others.
- 2) Right to Rectification If your personal data is inaccurate, incomplete, or not up to date, you have the right to request a correction to ensure the data is accurate, complete, current, and not misleading.
- 3) Right to Erasure You have the right to request the erasure or destruction of your personal data, or to anonymize the data so that it can no longer identify you, subject to the conditions specified by law.
- 4) Right to Restriction of Processing You have the right to request the restriction of the use of your personal data in the following situations:
 - (1) While PPS is verifying the accuracy of your data as per your rectification request;
 - (2) When your data is unlawfully collected, used, or disclosed;
 - (3) When the data is no longer necessary for the stated purpose, but you wish PPS to retain it for legal purposes;
 - (4) While PPS is establishing the legal basis for processing or verifying its necessity in response to your objection.
- (5) Right to Object to Processing You have the right to object to the collection, use, or disclosure of your personal data. PPS may deny the objection if it can demonstrate a legitimate legal basis or if the processing is necessary for legal claims or for public interest purposes.
- (6) Right to Withdraw Consent If you have previously given consent for the collection, use, or disclosure of your personal data, you may withdraw your consent at any time, unless there is a legal obligation for PPS to retain your data, or a contractual obligation that continues to benefit you.

- (7) Right to Data Portability You have the right to receive your personal data in a commonly used, machine-readable format and to request PPS to transfer or transmit such data to another data controller, subject to conditions set by law.
- (8) Right to Know the Existence and Use of Personal Data You have the right to be informed about the existence, nature, and purposes of processing your personal data held by PPS.
- (9) Right to Know the Source of Personal Data You have the right to request the disclosure of the source of your personal data, especially if you did not provide consent for its collection or storage.

14. Consequences of Non-Compliance with the Personal Data Protection Policy

Failure to comply with this Policy may result in disciplinary action in accordance with PPS's internal regulations (for PPS officers or employees), or pursuant to the terms of a data processing agreement (for personal data processors), depending on the nature of the relationship between you and PPS. In addition, such non-compliance may be subject to penalties under the Personal Data Protection Act B.E. 2019, including subordinate laws, rules, regulations, and relevant directives.

15. Filing Complaints with the Regulatory Authority

If you believe that PPS has not complied with the Personal Data Protection Law, you have the right to file a complaint with the Expert Committee or the relevant supervisory authority as appointed by the Personal Data Protection Committee or as provided by law. However, prior to lodging a complaint, PPS kindly requests that you contact us directly so that we may be informed of the facts, clarify any issues, and address your concerns in the first instance.

16. Amendments to the Personal Data Protection Policy

PPS may review, update, or amend this Policy as deemed appropriate and will notify you of such amendments via our website at <https://pps.co.th>, with the effective date clearly stated for each revised version. We encourage you to regularly check for updates to ensure you are aware of the latest version, particularly before disclosing your personal data to PPS. Your submission of a job application will be regarded as acknowledgment of this Policy.

If you do not agree with the terms, please refrain from submitting your application or contact our Human Resources Department for further clarification.

PPS regularly reviews this Privacy Policy for Human Resource Management and will update it accordingly on our website.

17. Contact and Exercising Your Rights

If you have any questions, suggestions, or concerns regarding the collection, use, or disclosure of your personal data by PPS, or if you wish to exercise your rights under the Personal Data Protection Law, please contact:

1) Data Controller

Project Planning Service Public Company Limited
381/6 Rama IX Soi 58 (Soi 7 Seri 7), Rama IX Road,
Suan Luang Sub-district, Suan Luang District,
Bangkok 10250, Thailand
Tel: +66 (0) 2718 2785-9 ext. 108
Email: dc@pps.co.th

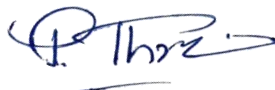
2) Data Protection Officer: DPO

Mr. Weera Yenpreecha
Data Protection Officer (DPO)
Project Planning Service Public Company Limited
381/6 Rama IX Soi 58 (Soi 7 Seri 7),
Rama IX Road, Suan Luang Sub-district,
Suan Luang District, Bangkok 10250, Thailand
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(Mr. Prasong Tharachai)

Chairman of the Board