

## **PRIVACY POLICY**

### **1. Our Privacy Statement**

**One Asia Lawyers (Thailand) Company Limited** (the “**Company**” or “**we**”) has established and disclose this Privacy approach to explain how we process personal data of our employees, customers, and suppliers, since the protection of your personal data is of great importance to us.

We process your personal data in accordance with the applicable regulation relating to personal data protection, in particular the Personal Data Protection Act B.E. 2562 (“**PDPA**”). This Privacy Policy explains how we, as the data controller, collect, use and disclose your personal data. In addition, we regularly review and update this Privacy Policy and in case of any significant update to this Privacy Policy, we will inform you as appropriate.

### **2. Personal Data to be Collected**

Regarding the PDPA, personal data means any information relating to an individual, which enables the identification of such individual, whether directly or indirectly, but not including the information of the deceased persons in particular.

We collect the following personal data for processing to achieve the purposes as herein with the legal bases provided for in the PDPA. In addition, we may process your personal data of a sensitive nature, including your religious beliefs and health information, in accordance with special criteria provided for in the PDPA. We collect your personal data from you, your company directly, and for employees, your personal data may be collected from the recruitment agency company.

#### **i) Employees’ Personal Data We Collect**

##### **General Personal Data**

Name, Surname, Passport number, Date of birth, Gender, Age, Photo, Address, Household registration, Email, Phone number, Line ID, ID card, Marriage status, Bank account information, Education background, Education transcript, Work experience, CCTV recording, Work permit information, Work performance evaluation, and Leave information

##### **Sensitive Personal Data**

Religious beliefs, Fingerprint and Health information

#### **ii) Customers’ Personal Data We Collect**

##### **General Personal Data**

Name, Surname, Gender, Address, Your company’s Name and Address, Job position, Email, Phone number, Tax registration number, Line ID, and ID card

##### **Sensitive Personal Data**

Religious beliefs

#### **iii) Suppliers’ Personal Data We Collect**

**General Personal Data**

Name, Surname, Address, Your company's Name and Address, Job position, Email, Phone number, Tax registration number, Bank account number, and ID card

**Sensitive Personal Data**

Religious beliefs

**3. Purpose of Processing of Personal Data**

The Company collect, use, or disclose your Personal Data for various purposes depending on relationship between you and the Company as follows:

**i) Employees' Personal Data**

- To proceed as necessary with considering and selecting job or trainee applicants and other relevant procedures
- To check your backgrounds and qualifications before an employment under applicable laws
- To proceed with an employment or trainee agreement between you and the Company as well as other agreements in relation to the employment such as a non-disclosure agreement, policy and work rules
- To communicate with employees and trainees, evaluate your work performance, provide trainings, and activity invitation for employees
- To perform human resource management including recruiting processes, managing and complying with an employment agreement between you and the Company such as administering remunerations, welfares and benefits, expense managing, issuing employee card, and administering leaves, etc.
- To conduct business planning, reporting, and forecasting
- To manage risks and undertake internal prevention, audit and administration to comply with laws, and to report information to government authorities as required by laws or upon receiving an order or a writ of attachment from the authority
- To assign rights, obligations and any benefits under the agreement between you and the Company which have been done legally, for example, merger or employment transfer
- To enter our offices via fingerprint recognition scanner
- To monitor security in our buildings or premises via Closed-Circuit Television (CCTV)

**ii) Customers' Personal Data**

- To consider entering into an agreement or to take steps as per an application in relation to our services or to enter into an agreement with you or your company

- To use services of the Company, to perform contractual obligations, to register for providing services in relation to services, payment, to receive or deliver the information or documents between you or your company and the Company including to comply with our internal procedures
- To manage our relationship with you or your company
- To inform any information to you or your company about services that you or your company have with us, to inform benefits, marketing activities, any activity and project invitation of the Company and to communicate about such activity and project including to offer our services
- To survey your satisfaction with our services and to analyze your interests including your service using records in order to evaluate, manage, improve our services
- To conduct business planning, reporting, and forecasting
- To manage risks and undertake internal prevention, audit and administration to comply with laws, and to report information to government authorities as required by laws or upon receiving an order or a writ of attachment from the authority
- To assign rights, obligations, and any benefits under the agreement between you or your company and the Company which have been done legally, for example, merger or transfer of the agreement
- To monitor security in our buildings or premises via Closed-Circuit Television (CCTV)

### **iii) Suppliers' Personal Data**

- To consider your qualifications before entering into an agreement with the Company as a contracting party, or as a director, representative, attorney, or person acting on behalf of a juristic person, and to approve for entering into an agreement between the Company and you or a juristic person who you are director, representative, attorney, or person acting on behalf of such juristic person
- To perform contractual obligations and monitor your work
- To record as database of the Company for the purpose of supplier selection and/or for future reference
- To conduct business planning, reporting, and forecasting
- To manage risks and undertake internal prevention, audit and administration to comply with laws, and to report information to government authorities as required by laws or upon receiving an order or a writ of attachment from the authority
- To assign rights, obligations, and any benefits under an agreement between you or your company and the Company which have been done legally, for example, merger or transfer of the agreement
- To monitor security in our buildings or premises via Closed-Circuit Television (CCTV)

#### **4. Legal Basis for Processing of Personal Data**

The legal basis for the processing of your personal data is as follows:

- When required by the law, a consent shall be obtained;
- When the processing activity is necessary for the performance of contractual obligations to perform contractual obligations between you and the Company;
- When the processing activity is required for the pursuit of legitimate interests of the Company;
- When the processing activity is required for the compliance with our legal obligations.

You have the right to withdraw your consent at any time by the method separately designated by us at the timing of obtaining your consent. However, your withdrawal of consent will not affect the legality of processing conducted based on your consent before its withdrawal.

#### **5. Retention Period for Personal Data**

We will retain your personal data for as long as necessary to fulfill the aforementioned purposes for obtaining and processing your personal data. Specific criteria used to determine our retention periods are the duration we have an ongoing relationship with you, the compliance with applicable laws, the compliance with legal prescription to exercise the rights to legal claims or defend against the rights to legal claims and the necessity of retaining the personal data for other legal or business reasons.

Please kindly be ensured that the retention of personal data after the expiry date of retention period will only occur only in the necessary circumstance. When the retention period has ended or the retention of such data is no longer necessary (whichever is applicable), we will destroy or erase such data from our system.

#### **6. Disclosure of Personal Data**

We may share and disclose your personal data to the following third parties in accordance with the PDPA for the purposes stated in this privacy policy. The Company will inform you to acknowledge and request for consent as necessary and required by the PDPA.

- Subsidiaries, affiliates and any related companies for business purposes
- Government authorities, or other authorities as stipulated by laws, including competent officials, e.g., courts, police officers, the Revenue Department, the Social Security Office, the Department of Labour Protection and Welfare, etc.
- Agencies, service providers and/or sub-contractors for their implementation and procedures, for example, accounting company, tax consultants and work permit agency company

As a result of the aforementioned sharing and disclosure, in some cases your personal data will be transferred to the recipient company in Japan with an appropriate safeguards by executing with the transferee the standard data protection causes including Binding Corporate Rules or Data Processing Agreement (if any or whichever is appropriate) pursuant to the PDPA, unless the data transferred country has appropriate data protection standard as prescribed by the Personal Data Protection Committee or we obtain your consent pursuant to the PDPA. If you wish to receive a copy of

documentation related to these safeguards, please inquire using the contact details at the end of this privacy policy.

## **7. Your Rights as a Data Subject**

You have the following rights regarding personal data obtained and processed by us.

- **Obtaining information regarding processing of data:** You have the right to obtain from us all the requisite information regarding our data processing activities that concern you.
- **Access to personal data:** You have the right to obtain from us confirmation as to whether personal data concerning you are being processed, and, if so, then access to the personal data and certain related information.
- **Rectification or erasure of personal data:** You have the right to have us rectify inaccurate personal data concerning you without undue delay and the right to have us complete any incomplete personal data. Also, if certain conditions are satisfied, you will have the right to have us delete personal data concerning you without undue delay.
- **Restriction on processing of personal data:** If certain conditions are satisfied, you will have the right to have us restrict processing of personal data concerning you.
- **Objection to processing of personal data:** If certain conditions are satisfied, you will have the right to object to processing of personal data concerning you.
- **Data portability of personal data:** If certain conditions are satisfied, you will have the right to receive personal data concerning you in a structured, commonly used, and machine-readable format and the right to transfer those data to another controller without hindrance from us.
- **To be subject to automated decision-making:** If certain conditions are satisfied, you will have the right not to be subject to solely data-based, automated decision-making (including profiling) that produces any legal or similar material effect on you.

If you intend to exercise any of the aforementioned rights, please inquire using the contact details at the end of this privacy policy.

## **8. Data Protection Security Measures**

The Company implements appropriate and strict security measures for preventing unauthorized or unlawful loss, access to, use, alteration, correction or disclosure of personal information.

In case where the Company assigns any third party to process your personal information pursuant to the instructions given by or on behalf of the Company, the Company shall appropriately supervise such third party to ensure your personal information protection in accordance with the PDPA.

## **9. Contact details**

For questions or inquiries regarding this privacy policy, please contact us at:

One Asia Lawyers (Thailand) Co., Ltd.



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