

CENTRALGROUP

HR Privacy Policy (Job Applicant/Candidate)

The Employer and Central Group of Companies (the "**Company**", "**we**", "**us**", or "**our**") takes protection of personal data as an important matter in our businesses. This HR Privacy Policy ("**Privacy Policy**") describes how we collect, use and disclose personal data of job applicant, candidates and minors ("**you**" or "**your**"), and tells you about data protection rights in relation to your Personal Data in connection with recruiting procedures and programs.

For the purpose of this HR Privacy Policy, "**Personal Data**" means any information relating to an identified or identifiable natural person as listed below.

We reserve the right to modify this HR Privacy Policy from time to time, so please review it frequently to see when this HR Privacy Policy was last revised. Any changes to this HR Privacy Policy will become effective when we post the revised HR Privacy Policy on our website or application. We will provide additional notice of significant updates. In case any modification deprives your rights of Sensitive Data in relation to this HR Privacy Policy, the Company will first obtain your consent, except as otherwise permitted by law.

1. What Personal Data we collect

As part of recruiting procedures and programs, we may collect or obtain the following types of information which may include Personal Data about you during recruiting and job interview process, either submitted as part of the online application and/or through alternative channels (e.g. job boards, company's website and professional recruiting firm, Social Media, Job Fair, Networking events, etc.) We may also collect your Personal Data from other sources or through our affiliates, subsidiaries, other companies, or business partners. The specific type of data collected will depend on the employment or services with us and within Central Group.

- 1) **Personal details:** such as title, full name, marital status, date and place of birth, age, gender, blood type, height, weight, military service, photograph, nationality, information on government-issued cards (e.g. national identification card, passport, work permit, driving license and any other license and/or permit such as auditor license, chef license and lawyer license), car registration book, personal loans, student loans, social media account, signatures, CV, application form, bank account details and other identifiers;
- 2) **Contact details:** such as mobile phone number, home telephone number, registered address, present address, e-mail address, information on household registration document, emergency contact details, Line ID, LinkedIn URL, and include other similar information;
- 3) **Information about your job:** such as working experience and previous employment (including position, department and title history and salary and benefits from previous employment), work behavior, your education history, training history, certificates and qualifications.

"**Sensitive Data**" means Personal Data classified by law as sensitive data. We will only collect, use and disclose Sensitive Data, and transfer it across borders, if we have received your explicit consent or as permitted by law.

We will also collect, use, disclose and/or cross-border transfer the following Sensitive Data about you:

- 1) health data and medical data (e.g. medical information, drug testing result, and HIV testing result);
- 2) criminal records; and

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- 3) sensitive data in the official identification document, such as religious.

If you provide Personal Data about members of your family, next of kin, references and/or other dependents for the purposes set forth in the HR Privacy Policy, it is your responsibility to inform them of their rights with respect to the contents of this HR Privacy Policy as applicable to them. You are also responsible for obtaining any required consent from them, and ensuring that you have the right to provide their personal information to us.

2. Why we collect, use or disclose your Personal Data

2.1. The purpose of which you have given your consent:

- **Health and medical data:** such as chronic health conditions or medical history and the information contained in a doctor's certificate/medical certificate for purposes of evaluating the respective suitability of applicants; information on disability for purposes of recruiting;
- **Criminal records:** in the event that we have conducted or received the results of criminal records and/or background checks in relation to you, where relevant and appropriate to your role for purposes of recruitment;
- **Sensitive Data in the official identification documents:** for authentication and verification purposes and welfare allocation (e.g. food preparation, provision of religious holiday, workforce planning and accommodating the work place).

2.2. The purposes we may rely on and other legal grounds for processing your Personal Data

We may also rely on: (1) contractual basis, for our initiation or fulfilment of our employment agreement with you if you are an employee or work contract if you are a worker; (2) legal obligation, for the fulfilment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties; (4) vital interest, for preventing or suppressing a danger to a person's life, body, or health; and/or (5) public interest, for the performance of a task carried out in the public interest or for the exercise of official authorities.

We may collect, use or disclose your Personal Data, including, but is not limited to, for the purposes of **Recruitment management**, including:

Documenting information collected from job applicants as part of the application process, authentication and verification, contacting purposes, evaluating the respective suitability of applicants, making a hiring decision, defining a salary and other basic contract information for a new hire, execution of employment agreement and orientation process, evaluating job applicants/ candidates for their qualification for a particular job, background screening (if you are offered a position with us), and communicating with your designated contacts in case of an emergency.

3. To whom we may disclose or transfer your Personal Data

We may disclose or transfer your Personal Data to the following third parties who collect, use and disclose Personal Data in accordance with the purposes under this HR Privacy Policy. These third parties may be located in Thailand and areas outside Thailand. You can visit their HR privacy policy to learn more details on how they collect, use and disclose your Personal Data as you could also be subject to their privacy policies.

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3.1. Central Group

As affiliated companies within Central Group collaborate and partially share employee services and systems (including website-related services and systems) and as part of our regular reporting activities, we may need to transfer your Personal Data to, or otherwise allow access to such Personal Data by other companies within Central Group for the purposes set out in this HR Privacy Policy.

3.2. Our service providers and business partners

We may also transfer or allow access to your Personal Data to third party suppliers, business partners and service providers including, but not limited to: (1) internet, software, IT service providers and IT support company; (2) recruitment agencies and outsourced HR service providers;

3.3. Third parties required by law

In certain circumstances, we may be required to disclose or share your Personal Data in order to comply with a legal or regulatory obligation. This includes any law enforcement agency, court, regulator, government authority or other third party where we believe it is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise address fraud, security, or safety issues (e.g. the Royal Thai Police and the Ministry of Labour).

4. International transfers of your Personal Data

We may disclose or transfer your Personal Data to third parties or servers located overseas, which the destination countries may or may not have the same equivalent level of protection for Personal Data protection standards. We take steps and measures to ensure that your Personal Data is securely transferred and that the receiving parties have in place an appropriate level of data protection standards or other derogations as allowed by laws. We will request your consent where consent to cross-border transfer is required by law.

5. How long do we keep your Personal Data

We will retain your Personal Data for as long as is reasonably necessary to fulfil the purpose for which we have obtained it, and to comply with our legal and regulatory obligations. Your Personal Data will, in any case, be retained for the duration of your employment or service relationship as well as thereafter as long as there are statutory retention obligations or potential claims resulting from the employment relationship are not yet time-barred.

6. Security of your Personal Data

The Company recognizes the importance of maintaining the security of your Personal Data. Therefore, the Company endeavours to protect your information by establishing security measures for your Personal Data appropriately and in accordance with the confidentiality safeguard of personal information, to prevent loss, unauthorized or unlawful access, destruction, use, alteration, or disclosure; provided, however, that the Company will ensure that the method of collecting, storing and processing of your Personal Data, including physical safety measures follow the information technology security policies and guidelines of the Company.

7. How do we process Personal Data of minors

If you are a minor who is below or at the age of ten years, you are not able to provide your Personal Data to us before the parental consent has been obtained by us in accordance with the applicable laws. We do not intend to collect your Personal Data without your parental consent in accordance with the laws.

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If you are a minor who is above the age of ten years but has not reached the legal age, you are required to obtain the consent from the holder of parental responsibility over you, in accordance with the laws before you provide your Personal Data to us.

8. Your rights as a data subject

Subject to applicable laws and exceptions thereof, you may have the following rights to:

- 1) **Access:** You may have the right to access or request a copy of the Personal Data we are collecting, using and disclosing about you. For your own privacy and security, we may require you to prove your identity before providing the requested information to you;
- 2) **Rectification:** You may have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data that we collect, use and disclose about you rectified;
- 3) **Data Portability:** You may have the right to obtain Personal Data we hold about you, in a structured, electronic format, and to send or transfer such data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) if we are collecting, using and disclosing such data on the basis of your consent or to perform a contract with you;
- 4) **Objection:** You may have the right to object to certain collection, use and disclosure of your Personal;
- 5) **Restriction:** You may have the right to restrict the use of your Personal Data in certain circumstances;
- 6) **Withdraw Consent:** For the purposes you have consented to our collecting, using and disclosing of your Personal Data, you have the right to withdraw your consent at any time;
- 7) **Deletion:** You may have the right to request that we delete or de-identity Personal Data that we collect, use and disclose about you, except we are not obligated to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise, or defend legal claims;
- 8) **Lodge a complaint:** You may have the right to lodge a complaint to the competent authority where you believe our collection, use and disclosure of your Personal Data is unlawful or noncompliant with applicable data protection law.

9. Our Contact Details

If you wish to contact us to exercise the rights relating to your Personal Data or if you have any queries about your Personal Data under this HR Privacy Policy, please contact HR Recruiter to proceed your request or / and coordinate with Data Protection Officer, Legal Team or related persons.
