



The Employee Data Privacy Protection Policy of NNR Global Logistics (Thailand) Co., Ltd.

1. General Provisions

For the purpose of complying with the Personal Data Protection Act B.E. 2562 (2019) and subordinate laws issued thereunder, including any amendments which may be made thereto, (“Laws on Personal Data Protection”) NNR Global Logistics (Thailand) Co., Ltd. (“Company”) has prepared this personal data privacy notice for processes related to personnel of NNR Global Logistics (Thailand) Co., Ltd. (“Privacy Notice”) to inform you regarding how the Company handles information which can or may identify you, whether directly or indirectly, according to the Laws on Personal Data Protection (“**Personal Data**”), for instance, the methods by which Personal Data is collected, used, disclosed or dealt with, whether by manual or automated means, such as recording, organization, storage, adaptation or alteration, retrieval, sending, transfer, disclosure or making available by any means, alignment, combination, prohibition of access or restriction, erasure or destruction (“**Processing**”, “**Process**”, “**Processes**” or “**Processed**”), as well as to notify you of the purposes for such Processing, the retention period of Personal Data, and your rights as the data subject. In this regard, the Company recommends that you read and understand the following terms under the Privacy Notice:

2. Groups or Categories of Persons whom the Company Collects Personal Data

Under this Privacy Notice, groups or categories of persons from whom the Company collects and Processes Personal Data are as follows:

2.1 Job applicants which means persons who may be selected to be personnel of the Company, whereby the Company may directly collect Personal Data from the job applicants or obtain his/her Personal Data from third parties;

2.2 Personnel which means persons who work or perform any duties for the Company and receive wages, welfare benefits, or any other compensations from the Company, irrespective of what such compensation is called, such as directors, executives, managers, employees, personnel. trainees, or any other persons having similar characteristics, but not including contractors or service providers which are business partners of the Company; and

2.3 Persons related to the job applicants and personnel which means persons related to the job applicants and personnel of the Company, and including persons whose Personal Data appear in the relevant documents and processes, such as family members (e.g., father, mother, spouse, and child, etc.), persons who may be contacted in case of emergency, reference person, beneficiaries, and guarantors, etc.



3. How the Company Collects and Receives your Personal Data

3.1 The Company collects and receives your Personal Data via the following methods:

(a) Personal Data which you directly provide to the Company

You may directly provide your Personal Data to the Company, such as when you submit job application forms and additional documents for job application to the Company whether by walk-in, apply at job application booth, such as Job Fair Roadshow, or apply through the Company's website (<http://nnrthailand.com/about-us/>) and including in the event that you attend a job interview, enter into a contract with the Company, and submit documents containing your Personal Data to the Company, etc.

(b) Personal Data which the Company automatically collects from you

The Company may collect your Personal Data by automated means, such as the use of Cookies or other similar technologies. For more details, please see the Company's Cookie Policy

(c) Personal Data which the Company receives from third parties

The Company may receive your Personal Data from third parties, such as job application website of third party, your reference person, recruitment company, government agency, educational institution, social media source, or job application form and/or documents of persons related to you as you are a family member, persons who may be contacted in case of emergency, reference person, beneficiary, or guarantor of such person, etc.

3.2 In collecting your Personal Data, you will be informed of the details as set out in this Privacy Notice, including but not limited to, the lawful basis for the collection, use, disclosure and/or Processing of Personal Data in accordance with the lawful purposes, or in the event that the Laws on Personal Data Protection require your consent for any Processing of Personal Data, the Company will request your explicit consent.

3.3 Where the Company has previously collected your Personal Data before the Laws on Personal Data Protection have become effective, the Company will continue to collect and use your Personal Data in accordance with the original purposes of collection. In this regard, you have the right to withdraw your consent by contacting the Company using the contact details set out in Clause 9 of this Privacy Notice. However, the Company reserves the right to consider your request for the withdrawal of consent and proceed in accordance with the Laws on Personal Data Protection.

4. Collected Personal Data

Your Personal Data that is collected and Processed under this Privacy Notice, regardless of whether such Personal Data was directly provided by you to the Company or automatically collected from you by the Company, or was provided to the Company by third parties, includes the following:



4.1 Personal information, such as first name, last name, date/month/year of birth, age, sex, weight, height, identification number, photograph, signature, nationality, race, religion, marital status, military status, family member details (such as father, mother, spouse, and children, etc.), health condition, and biometric data (such as fingerprint, palm print, and face simulation, etc.), etc.

4.2 Contact information, such as address, telephone number, fax number, e-mail, Line ID, and emergency contact person details, and reference person details etc.

4.3 Information on education and training, such as academic and training background (such as institution name, faculty, program, and year of graduation, etc.), academic certificate, transcript, language skills, computer skills, training and test details, and activities participated during the time of study, etc.

4.4 Information on job application, such as personal profile, working experience, details in resume/CV, criminal record, position applied, expected salary, interviewed details, evidence or reference documents, and details as appeared in the interview assessment form (such as assessment results, knowledge and experience, personal characteristics, team work, and working potentials), etc.

4.5 Information that is used as supporting evidence in the job application or in execution of juristic acts, such as Personal Data which appears in a copy of the national identification card, copy of passport, copy of change of name certificate, copy of house registration book, copy of military service certificate, copy of bank account book, copy of marriage certificate, copy of birth certificate, form for approval of salary of new staff and monthly staff, medical certificate, result of pre-employment medical check, form for specifying beneficiary, social security application form, letter of consent for personal background check, result of personal background check, employment contract, letter of guarantee for performance of employment contract, and relevant documents (such as certificate of employment specifying job position, copy of civil servant card, certificate of employment specifying salary, copy of business registration or document on the incorporation of the Company containing the name of guarantor for performance of employment contract as the owner or partner, etc.), directorship agreement, and power of attorney, etc.

4.6 Information on work and assessment, such as personnel code, position, department, affiliation, chain of command, performance assessment, working behavior, achievement and/or award received, training information, disciplinary action information, details which appear in personnel transfer document of the Company, personnel on loan contract, letter of resignation, and reason for the resignation, etc.

4.7 Information on benefit and remuneration, such as salary, wages, reward, bonus, pension details, welfare, bank account number, guarantor's details, beneficiary's details, social security details, provident fund details, tax details, tax deduction details, health benefit details (including for family member) and/or other benefits, Personal Data which appears in medical certificates, annual health reports, maternity leave forms, welfare money lending forms, salary reduction consent letters, receipts, invoices, compensation request forms (for accident and life insurance) and retirement benefit request form, etc.



4.8 Information on registration statistics, such as starting date, probation end date, working date and time, hours of work, hours of overtime work, annual leave, leave date, leave form, leave details including reasons for such leave, the Company entry and exit record, and usage record of systems of the Company, etc.

4.9 Technical information, such as log file, IP Address, and information that the Company collects through the use of Cookies or other similar technologies, etc.

4.10 Other information, such as voice recording of conversations, and photo and video recording by means of CCTV, etc.

5. Purposes and Lawful Basis for the Collection, Use, Disclosure and Processing of Personal Data

5.1 The Company Processes your Personal Data for the purposes under lawful basis as follows (collectively, the “Purposes”)

No	Purposes	Lawful basis of the Processing
(a)	For the purpose of recruitment, job applicant selection, interview, and any transactions in relation to the recruitment process	<ul style="list-style-type: none"> •Contractual basis: The Processing of Personal Data of the job applicants is necessary for the consideration of their request to apply for a job and enter into the Company’s recruitment process. •Legitimate interest basis: The Processing of Personal Data of the job applicants or persons related to the job applicants is necessary for the legitimate interests of the Company in its recruitment process or performance after recruitment, such as job applicant selection, and consideration of the qualification of job applicants, etc. •Consent basis: The Company collects Personal Data of prospective employees by the Company’s own initiative, from third parties, such as recruiters via website(s), whereby the prospect employees have not expressed their intention to apply for a job with the Company. •Consent basis: The Processing of your Personal Data as family members or reference persons of the job applicants will be relying on the consent received from you.
(b)	For the purpose of salary and benefit approval for the Company’s employees	<ul style="list-style-type: none"> •Contractual basis: The Processing of Personal Data of the job applicants is necessary for the consideration of the job applicant’s request who has passed the interview process and has entered into salary and benefit approval of the employee before entering into an employment contract or other contracts in order to be placed as an employee of the Company. Legitimate interest basis: The Processing of Personal Data of the job applicants is necessary for the legitimate interests of the •Company as the Processed Personal Data is necessary for the

		consideration of salary and benefit approval of the employees of the Company.
(c)	For the purpose of any other processes in relation to employment and placement of an employee into work, such as conducting medical check-ups before commencement of the job, beneficiary specification, social security registration, criminal record check, entering into an employment contract, and entering into a work guarantee contract, etc.	<ul style="list-style-type: none"> •Contractual basis: The Processing of Personal Data of personnel is necessary for the entry into an employment contract and other relevant contracts, including undertaking any processes necessary before entering into such contract. •As for the guarantor for performance of employment contract, the Processing of Personal Data of the guarantor for performance of employment contract is necessary for the entry into a guarantee contract which the guarantor for performance of employment contract is a party. •Legitimate interest basis: The Processing of the Personal Data of personnel and persons related to the personnel is necessary for the Company in its human resources management, such as verifying and considering the personnel's qualification in order to identify the appropriate position for the personnel, etc. <p>Legal basis: For the directors and executives of the Company, the disclosure of Personal Data of directors and executives of the Company is necessary for the performance according to the Securities and Exchange Act B.E. 2535 (1992), such as preparation of forms and documents to be submitted to relevant entities.</p> <p>Consent basis: The Processing of sensitive Personal Data, such as criminal records, health information and biometric information will be based on the consent received from the personnel.</p>
(d)	For the purpose of management of welfare and benefit of personnel, including but not limited to welfare money loan, medical expense reimbursement, discounts for personnel, annual physical examination, insurance, and claims related to insurance	<ul style="list-style-type: none"> •Contractual basis: The Processing of Personal Data of personnel is necessary for the Company to perform its obligations according to the employment contracts and any other contracts to which the personnel is a contracting party. •Legitimate interest basis: The Processing of Personal Data of personnel and persons related to the personnel is necessary for the Company in its human resources management, such as allocation of welfare and benefit for the personnel and persons related to the personnel. •Compliance with the laws for labour protection and social security purpose basis: The Processing of Personal Data of employees is necessary for the compliance of laws to fulfil the purpose of labour protection and social security, benefits relating to medical treatment of legal right holder, road accident victim protection, or social protection. •Consent basis: The Processing of sensitive Personal Data of personnel and persons related to the personnel, such as health information, for the management of group insurance and other benefits, will be undertaken by relying on the consent received from the personnel and persons related to the employees.
(e)	For the purpose of the performance of duty of	•Contractual basis: The Processing of Personal Data of relevant personnel is necessary for the performance of duty or work

	<p>personnel according to the employment contract, employment agreement, appointment contract, or any other contracts entered into with the Company</p>	<p>according to the scope of work specified in the employment contract, employment agreement, appointment contract, or any other contracts to which the personnel have entered into with the Company, such as the use and disclosure of name, surname and Personal Data which appears in the employee's national identification card to verify identity as an authorized person in contract signing or exercising any juristic acts on behalf of the Company, including the use and disclosure of the personnel's name in the notification, approval letter, form, or other documents of the Company according to the scope and duty or work which such employees are responsible, etc.</p> <ul style="list-style-type: none"> •Legitimate interest basis: The Processing of Personal Data of employee is necessary for the legitimate interests of the Company in its business operation and compliance with the applicable laws of the Company.
(f)	<p>For the purpose of record of working time, payment of salary, bonus, remuneration or any other benefits</p>	<ul style="list-style-type: none"> •Contractual basis: The Processing of Personal Data of employees is necessary for the payment of wages, salary, bonus, remuneration and/or any other benefits according to the employment contracts and any other contracts to which the personnel is a contracting party. •Legal basis: In some cases, the Processing of Personal Data of personnel and persons related to the personnel is the performance in compliance with the applicable laws of the Company, such as withholding tax pursuant to the taxation laws, etc. •Consent basis: The Processing of sensitive Personal Data, such as biometric information will be based on the consent received from the employees.
(g)	<p>For the purpose of the compliance with the laws relating to human resource management and legitimate orders of government agencies and relevant officers</p>	<ul style="list-style-type: none"> •Legal basis: The Processing of Personal Data of employees and persons in relation to the employees is the performance in compliance with the applicable laws of the Company, including but not limited to labour law, social security law, taxation law, securities and exchanges law, Personal Data protection law, such as submission of annual registration statement (Form 56-1) to the Securities and Exchange Commission, submission of Personal Data of employee to relevant government agencies, such as Revenue Department, Social Security Office, and Department of Empowerment of Persons with Disabilities, and Department of Skill Development etc.
(h)	<p>For the purpose of assessment of work or duty of the employees</p>	<ul style="list-style-type: none"> •Legitimate interest basis: The Processing of Personal Data of employees is necessary for the legitimate interests in the assessment of work of the employees, human resources management, or any other benefits in the business operation of the Company.
(i)	<p>For the purpose of the management of training</p>	<ul style="list-style-type: none"> •Legitimate interest basis: The Processing of your Personal Data of employee is necessary for the legitimate interests in the human

	<p>personnel, including but not limited to the collection of the names of persons who wish to attend the training, and the operation and management of registration and other facilities</p>	<p>resource management of the Company, such as personnel transfer or secondment, etc.</p>
(j)	<p>For the purpose of personnel transfer and secondment</p>	<ul style="list-style-type: none"> • Legitimate interest basis: The Processing of your Personal Data of employee is necessary for the legitimate interests in the human resource management of the Company, such as personnel transfer or secondment, etc. • Contractual basis: The Processing of Personal Data of employee is necessary for the performance of the employment contract, personnel transfer contract which the employee is a contracting party, or any other contracts in similar manners. • Where the Company sends or transfers Personal Data of employees to other countries, the Company will ensure that the recipient country has sufficient standard for the protection of Personal Data. In some cases, the Company may require consent from the employees for the sending or transferring of Personal Data of employees to other countries, subject to the requirements under the Laws on Personal Data Protection.
(k)	<p>For the purpose of human resources management in other aspects, such as disciplinary punishment, termination of employment, resignation, and retirement, etc.</p>	<ul style="list-style-type: none"> • Contractual basis: The Processing of Personal Data of personnel is necessary for the performance according to the employment contract and other contracts which the employees are contracting parties, such as termination of employment, where the employee resigns or retires, and disciplinary punishment record for the employee who violates working rules or regulations, etc. • Legal basis: The Processing of Personal Data of employees is necessary for the performance in compliance with the applicable laws of the Company, such as the performance pursuant to the termination process, resignation or retirement of employees in accordance with the labour protection law and the law on provident funds, etc. • Compliance with the laws for labour protection purpose basis: The Processing of Personal Data of employees is necessary for the compliance of applicable laws of the Company to fulfil the purpose of labour protection, such as disciplinary punishment and employment termination, etc. • Legitimate interest basis: The Processing of Personal Data of employee is necessary for the legitimate interests of human resources management of the Company, such as disciplinary punishment and disciplinary punishment records of the



		employees and the termination of being employees of the Company, etc.
(l)	For the purpose of communications with the job applicants, personnel and persons related to the personnel	<ul style="list-style-type: none"> •Legitimate interest basis: The Processing of Personal Data is necessary for the legitimate interests of the Company in communicating with the job applicants, personnel, and persons related to the personnel.
(m)	For the purpose of establishment, compliance, exercise or defense of legal claims of the Company	<ul style="list-style-type: none"> •Legitimate interest basis: The Processing of Personal Data is necessary for the establishment, compliance, exercise or defense of legal claims in various stages according to the laws, such as investigation and/or inquiry by government officials, case preparation, prosecution and/or pursuit of the case in court, etc.
(n)	For the purpose of monitoring, protecting and ensuring the security of persons and properties of the Company.	<ul style="list-style-type: none"> •Legitimate interest basis: The Processing of Personal Data is necessary for the legitimate interests of the Company in monitoring, protecting and ensuring the security of properties of the Company. For example, the CCTV footages can be used to prevent loss or damage to the Company's properties or to track properties or claim damages in the case where the properties of the Company are lost or damaged, etc. •Preventing or suppressing a danger of person's life, body, or health basis: The Processing of Personal Data is necessary for the benefit in monitoring, preventing, or suppressing any circumstances which may be dangerous to person's life, body, or health.
(o)	For any transaction that is necessary and beneficial to you or those which are directly related to the purposes set forth above.	<ul style="list-style-type: none"> •Legitimate interest basis: The Processing of Personal Data is necessary for the legitimate interests of the Company in carrying out any transactions which are necessary for the Company and/or beneficial to you or directly related to the purposes set forth above. •In this regard, where the Laws on Personal Data Protection require your consent for any Processing of Personal Data, the Company will request for your explicit consent.
(p)	For other purposes that the Company will notify you of	<ul style="list-style-type: none"> •The Company will notify you of any other purposes that cause the Company to Process your Personal Data other than the purposes set forth above or when the Company changes the original purposes that were set forth. •In this regard, where the Laws on Personal Data Protection require your consent for any Processing of Personal Data, the Company will explicitly request the consent from you.

5.2 Your Personal Data which the Company will Process for the Purposes set forth in Clause 5.1 above that relate to the compliance with laws or contracts or are necessary for entering into contracts with you, is the data which is necessary for the achievement of the said Purposes. If you do not intend to



provide such Personal Data to the Company, there may be legal implications or the Company may not be able to perform its duties pursuant to the contract which has been entered into with you or may not be able to enter into a contract with you (as the case may be). In such event, it may be necessary for the Company to decline to enter into the contract with you or to cancel the sale and purchase or the provision of any relevant services to you, whether in whole or in part.

5.3 In the event that the Company will Process your Personal Data in a manner and/or for purposes which are not consistent with the Purposes set forth above, the Company will put in place additional policies or notifications for the protection of Personal Data and/or send notice to you to provide explanations concerning such Processing of Personal Data. In this regard, you should review such additional policies or notifications in conjunction with this Privacy Notice (as the case maybe).

6. Disclosure of Personal Data

6.1 The Company may disclose your Personal Data in accordance with the Purposes and the rules prescribed under the laws to the following entities and persons:

(a) NNR Global Logistics (Thailand) Co., Ltd. in and outside Thailand, including executives, directors, staffs, employees and/or relevant in-house personnel, and as necessary on a need-to-know basis for the Processing of your Personal Data.

(b) Business partners, service providers, and data processors designated or hired by the Company to perform duties in connection with the management/Processing of Personal Data for the Company in the provision of various services, such as employee's medical check by business partners, information technological services, data recording services, payment services, mailing services, delivery services, printing services, health services, insurance services, training services, data analysis services, research services, marketing services, or any other services which may be beneficial to you or relevant to the Company's business operation, such as commercial bank, hospital, life insurance company, and non-life insurance company, etc.

(c) Advisors of the Company, such as legal advisors, lawyers, auditors, or any other internal and external experts of the Company.

(d) Relevant governmental agencies which have supervisory duties under the laws or which have requested the disclosure pursuant to their lawful powers or relevant to the legal process or which were granted permission in pursuant to applicable laws, such as Department of Labour Protection and Welfare, Department of Skill Development, Department of Empowerment of Persons with Disabilities, Social Security Office, Department of Provincial Administration, Department of Business Development, Department of Intellectual Property, Office of Securities and Exchange Commission, the Stock Exchange of Thailand and subsidiaries of the Stock Exchange of Thailand (such as Thailand Securities Depository Company Limited), Office of the Personal Data Protection Commission, Office of Trade Competition Commission, Royal Thai Police, Office of the Attorney General, court, and Legal Execution Department, etc.



(e) Customers, vendors, contracting parties of the Company which you have contacted or are relevant to your duty or position, or any other persons in similar manners.

(f) Any persons or any other entities that you have given consent to disclose your Personal Data to.

6.2 The disclosure of your Personal Data to third parties shall be in accordance with the Purposes or other purposes permitted by law, provided that if the law requires your consent to be provided, the Company will request for your prior consent.

6.3 In the event that the Company discloses your Personal Data to third parties, the Company will put in place appropriate safeguards to protect the Personal Data that has been disclosed and to comply with the standards and duties relating to the protection of Personal Data as prescribed by the Laws on Personal Data Protection. Where the Company sends or transfers your Personal Data outside Thailand, the Company will ensure that the recipient country, the international organization or such overseas recipient has a sufficient standard for the protection of Personal Data. In some cases, the Company may request your consent for the transfer of your Personal Data outside Thailand, subject to the requirements under Laws on Personal Data Protection.

7. Retention Period

The Company will retain your Personal Data for the period necessary to fulfil the Purposes for which the Personal Data was Processed, whereby the retention period will vary depending on the Purposes for which such Personal Data was collected and Processed. The Company will retain Personal Data for the period prescribed under the applicable laws (if any) by considering the statute of limitations under the laws for any legal proceedings that may occur from or in relation to the documents or Personal Data collected by the Company and having regard to the Company's business practices and relevant business in relation to each category of Personal Data.

In this regard, the Company will retain your Personal Data for the period not exceeding 10 years, starting from the date your legal relations/transactions with the Company come to an end. However, the Company may retain your Personal Data for a longer period of such time prescribed if the laws permit or such retention of Personal Data is necessary for the establishment of the right of claim of the Company.

After the period of time set forth above has expired, the Company will delete or destroy such Personal Data from the storage or system of the Company and other persons providing services to the Company (if any) or anonymize your Personal Data, unless in the event that the Company can continue to retain such Personal Data as prescribed by the Laws on Personal Data Protection or other applicable laws. In this regard, for additional details regarding the retention period of your Personal Data, you can contact the Company by using the contact details set out in Clause 9 of this Privacy Notice.

8. Your Rights in relation to Personal Data



As the data subject, you have the following rights in relation to your Personal Data, subject to the rules, methods and conditions under the Laws on Personal Data Protection. In this regard, if you wish to make a request to exercise your rights, you can contact the Company by using the contact details set out in Clause 9 of this Privacy Notice.

8.1 Right of Access

You have the right to access your Personal Data and may request that the Company provide you with a copy of such Personal Data in accordance with the requirements under the Laws on Personal Data Protection.

8.2 Right to Data Portability

You have the right to obtain your Personal Data, including to request that your Personal Data is transmitted to another data controller or to you, except where it is technically unfeasible, in accordance with the requirements under the Laws on Personal Data Protection.

8.3 Right to Object

You have the right to raise an objection to the Processing of your Personal Data in certain circumstances prescribed under the Laws on Personal Data Protection.

8.4 Right to Erasure

You may request that the Company delete, destroy or anonymize your Personal Data in certain circumstances prescribed under the Laws on Personal Data Protection.

8.5 Right to Restriction

You have the right to request that the Company restrict the Processing of your Personal Data in certain circumstances prescribed under the Laws on Personal Data Protection.

8.6 Right to Rectification

You have the right to request that your Personal Data be rectified if the Personal Data is inaccurate, not up-to-date, incomplete, or may cause a misunderstanding.

8.7 Right to Withdraw Consent

If the Company relies on your consent as the lawful basis for Processing your Personal Data, you have the right to withdraw such consent which has been provided to the Company at any time.

8.8 Right to Lodge a Complaint

If you have any concerns or questions about any aspect of the Company's practices in relation to your Personal Data, please contact the Company using the contact details set out in Clause 9 of this Privacy Notice. Where there is reason to believe that the Company is in breach of Laws on Personal Data Protection, you have the right to lodge a complaint to the expert committee appointed by the Personal



Data Protection Committee in accordance with the rules and methods prescribed under the Laws on Personal Data Protection.

However, the Company reserve the right to consider your request to exercise your rights and act in accordance with the requirements under the Laws on Personal Data Protection.

9. How to Contact the Company

The Company has designated NNR Global Logistics (Thailand) Co., Ltd. as the coordinator for matters relating to the Company's Personal Data protection. If you have any questions or would like to exercise your rights as set out in this Privacy Notice, you may contact the Company using the contact information provided below:

NNR Global Logistics (Thailand) Co., Ltd.

Email: naowarat@nnrbkk.com

Address:

89 Motorway Road., Kwang Klongsongtonnoon, Khet Lat Krabang, Bangkok 10520

Data Protection Officer

E-mail: naowarat@nnrbkk.com

Address:

89 Motorway Road., Kwang Klongsongtonnoon, Khet Lat Krabang, Bangkok 10520

10. Changes to This Privacy Policy

The Company may make changes to this Privacy Policy from time to time to reflect any changes to our Processing of your Personal Data and to comply with the changes to the Laws on Personal Data Protection or any applicable laws. In this regard, the Company will notify you of any significant changes to the Privacy Policy and the amended Privacy Policy through appropriate means. The Company encourages you to review such communication in order to be aware of any changes made to this Privacy Policy from time to time.