

**Notification on the Collection, Processing, Use, and Disclosure of Employees' Personal Data
Srithai Superware Public Company Limited**

Srithai Superware Public Company Limited (the “Company”) places great importance on and is committed to protecting the personal data of its employees. Accordingly, the Company has established appropriate measures to ensure the security and protection of personal data, as well as guidelines for compliance with the Personal Data Protection Act B.E. 2562 (2019) and other relevant laws. This is to ensure that employees are informed of and understand the Company’s purposes for collecting, processing, using, and disclosing personal data, as well as their legal rights under applicable laws, as outlined below:

Data Controller Information

Name: Srithai Superware Public Company Limited
 Contact Address: 15 Suksawat Road, Soi 36, Bangpakok Sub-district, Rat Burana District, Bangkok 10140
 Contact Information: Phone +66 2427 0088, Ext. 2203
 Email: dpo@srithaisuperware.com

Personal Data Collected by the Company

The Company has received employees’ personal data and collects and processes such data in accordance with the Consent Form for the Collection, Processing, Use, and Disclosure of Personal Data.

The Company collects only the personal data necessary for the purposes previously informed to the employees. The types of personal data collected are categorized as follows.

Types of Personal Data	Details
Basic Personal Data	Including: Prefix, Name, Surname, Age, Date of Birth, Address, ID Card Number, Phone Number, Signature, Email, Marital Status, Military Status, Employment History, Education History, Credit Information
Sensitive Personal Data	Health Information, Disability Information, Criminal History, Blood Type, Fingerprints, Facial Image Data, Salary
Third-Party Information/ Reference Person	Spouse, Family Members, Emergency Contact, Beneficiary under the Employee’s Insurance Policy. The Company collects only the necessary personal data, including: Name, Surname, Relationship, Address, Phone Number.
Technical Data	Information on website and system usage from the Company’s computers, contact and communication data between the data subject and other users, usage log data such as device identifiers, computer IP addresses, device IDs, records of entering and leaving the Company to track attendance (late arrivals and absences), system login statistics, and visit times, collected through cookies or other similar technologies.

Purpose and Legal Basis for Data Processing

Purpose of Data Processing	Activity	Legal Basis
1. To recruit, select job applicants, conduct interviews, and perform any activities related to hiring employees.	To recruit or perform activities after the recruitment process of employees, such as evaluating and verifying the qualifications of job applicants until they are hired as employees of the Company.	Legitimate Interests
	Processing of employees' personal data upon job application is necessary to evaluate the application of job applicants who have expressed their intent to apply for a position and enter the company's recruitment process.	Contractual Basis
	Processing of employees' personal data, conducting job interviews, verifying educational or employment history from other sources, analyzing data, comparing, selecting, preparing contracts, and checking criminal records will be carried out based on the consent obtained from job applicants.	Consent Basis
2. For the management of employee compensation, benefits, and welfare (both handled by the Company itself and through external service providers).	The processing of employees' personal data is necessary for the legitimate interests of the Company, as the personal data processed is essential for approving salaries and benefits for the Company's employees.	Legitimate Interest Basis
	Managing employees' salaries, compensation, wages, bonuses, overtime pay, accommodation, travel allowances, and other benefits, including social security fund, provident fund, workmen's compensation fund, and employees' tax obligations, such as withholding income tax. Additionally, providing employees with rights such as sick leave, sterilization leave, maternity leave, medical expense reimbursement, or benefits claims in cases of accidents or illness in accordance with the Labor Protection Act B.E. 2541 (1998).	Contractual Basis, Legitimate Interest Basis, and Consent Basis (in cases involving sensitive data)
3. To carry out any activities related to employment, such as medical examinations, employee registration, entering into employment contracts, and entering into guarantor contracts for employment, etc.	The processing of personal data of employees and individuals related to the employees is necessary for the company's human resource management and compliance with applicable laws, such as verifying and evaluating the qualifications of employees for placement in suitable positions.	Legitimate Interest Basis
	The Company may send or transfer employees' personal data to partners or affiliated companies, both domestic and international, in cases where the Company has entered into a service contract with partners or clients that result in the temporary or permanent transfer of the employee's workplace. In such cases, the Company will transfer the data only	Legitimate Interest Basis and Contractual Basis

Purpose of Data Processing	Activity	Legal Basis
	when the employee has agreed to perform duties under the contract and has consented to the relocation of the workplace in accordance with labor protection laws.	
	In the case of the Company's directors and executives, the disclosure of their personal data is necessary for compliance with the Securities and Exchange Act B.E. 2535, such as the preparation of forms and documents to be submitted to the relevant authorities.	Legal Basis
	The processing of employees' sensitive personal data, such as criminal history, health information, and biometric data, will be carried out based on the consent obtained from the employees.	Consent Basis
4. For the management of training and performance evaluation, as well as the promotion of the Company's activities and products (both conducted by the Company itself and through external service providers).	<p>Set work goals, evaluate employees' performance, consider promotions, salary adjustments, and review bonuses.</p> <p>Participating in training and knowledge assessments in various areas for employees, including promoting internal company activities through event photography, group photos, and publishing promotional materials in books, magazines, bulletin boards, videos, and the Company's website.</p> <p>Using sensitive personal data of employees in levels 1 - 6.1 to record attendance, absences, and lateness through a digital fingerprint/face recognition scanner at the main entrance/exit of the company.</p>	<p>Contractual Basis</p> <p>Legitimate Interest Basis and Consent Basis</p>
5. To comply with laws related to human resource management and lawful orders from government agencies and relevant officials.	The processing of personal data of personnel and those related to the personnel is in compliance with the Company's laws, including but not limited to labor laws, social security laws, tax laws, securities and exchange laws, and the transfer of personal data of personnel to relevant government agencies such as the Revenue Department, Social Security Office, Department of Labor Protection and Welfare, Student Loan Fund, Department of Empowerment of Persons with Disabilities, Department of Skill Development, and the Legal Execution Department, etc.	Legal Basis
6. To manage the termination of employment contracts (both handled by the Company itself and through external service providers).	Managing employee resignation, retirement, termination, and notifying relevant agencies such as the Revenue Department, banks, Social Security Office, Immigration Office, the Foreign Workers Division, etc.	Legal Basis and Legitimate Interest Basis

Sources of Personal Data

1. The Company obtains personal data of employees directly on the date they apply for employment with the Company, either directly or via a recruitment agency, as the case may be. Personal data may also be obtained through annual health check-ups as required by law.
2. The Company may automatically collect employees' personal data through various means such as the use of cookies or similar technologies. For more details, please refer to the Company's Cookie Policy available on its website.
3. The Company may receive employees' personal data from third parties, such as job application websites, employee references, recruitment agencies, etc.

Processing of Personal Data

1. The Company collects, processes, uses, and discloses employees' personal data for the purposes previously stated. The Company shall not disclose or transfer any personal data to unrelated third parties under any circumstances, unless necessary. In such cases, the Company will inform the employee and obtain their written consent in advance.

2. The Company processes personal data lawfully, fairly, and transparently, in compliance with applicable laws. The processing is carried out in accordance with the expectations of the employee as the data subject. The Company shall disclose all relevant details about the processing, including the identity of the data controller and the nature of the data processing, which will be limited in purpose, necessity, and proportion.

3. The Company implements a sensitive data management system to ensure personal data security, maintaining data integrity and confidentiality. The Company has established both organizational and technical security measures to prevent unauthorized processing, access, use, or disclosure of personal data, and to protect against data loss, damage, or destruction.

4. If there are any subsequent changes or additions to the purposes of data processing, such as in order to perform a contract or to comply with legal requirements, the Company will notify employees of the new or amended purposes through internal communication channels such as bulletin boards or email. A record of such changes will be maintained. If consent is required by law, the Company will obtain prior consent from the employee before proceeding with any new data processing activities.

5. The Company may collect and use employees' personal data obtained from other sources only when necessary and may request the employee's consent (if required by law). This is done for the purposes outlined above, to ensure that the employee's personal data remains up to date, and to enhance the quality and efficiency of the Company's operations.

Retention of Personal Data

The Company will retain employees' personal data only for as long as necessary, depending on the purposes for which the data was collected and processed. The retention period may vary according to the specific processing purposes. Additionally, the Company will retain personal data for the duration required by applicable laws (if any), taking into account the statutory limitation periods for potential legal proceedings arising from or related to the documents or personal data collected by the Company in each case. The Company will also consider internal practices and industry standards relevant to each type of personal data.

In general, the Company will retain employees' personal data for no longer than **two (2) years** from the date the legal relationship between the employee and the Company ends. However, the Company may retain

such data for a longer period if required by law or if the retention is necessary for the establishment, exercise, or defense of the Company's legal claims.

Rights of Employees as Data Subjects

1. **Right to Withdraw Consent:** Employees have the right to withdraw their consent at any time while their personal data is being held by the Company, unless restricted by law or a contract that benefits the employee. Withdrawal of consent may impact the employee, and they are encouraged to seek clarification or understand the consequences before proceeding.
2. **Right of Access to Personal Data:** Employees have the right to access their personal data and to request a copy of such data. They may also request the Company to disclose the source of any personal data that the employee did not provide directly or give consent for.
3. **Right to Data Portability:** Employees have the right to request the transfer of their personal data to another data controller in an automated format, where technically feasible. They may also request to receive such data directly.
4. **Right to Object to Data Processing:** Employees have the right to object to the processing of their personal data if it is being collected, used, or disclosed for the Company's legitimate interests, provided such processing exceeds the employee's reasonable expectations. This right may be limited if the Company can demonstrate compelling legal grounds or if processing is necessary for legal compliance or the establishment, exercise, or defense of legal claims.
5. **Right to Erasure or Destruction of Personal Data:** Employees have the right to request that the Company delete or destroy their personal data, or anonymize it, if they believe it has been unlawfully collected, used, or disclosed, or if the Company no longer requires it for the purposes outlined in this policy.
6. **Right to Request the Suspension of Data Processing:** Employees have the right to request a temporary suspension of the use of their personal data in cases where the Company is in the process of verifying a request to rectify or object to the processing of their personal data, or where the Company no longer has the necessity to retain the data and is required to delete or destroy it under applicable laws.
7. **Right to Rectify Personal Data:** Employees have the right to request the Company to rectify their personal data to ensure that it is accurate, up to date, complete, and not misleading.
8. **Right to Lodge a Complaint:** Employees have the right to file a complaint with the competent authority if they believe that the collection, use, and/or disclosure of their personal data is in violation of or non-compliant with applicable data protection laws.

The exercise of the above rights by employees may be subject to limitations under applicable laws. In certain cases, the Company may be required to deny or be unable to fulfill a data subject request, such as when the Company must comply with legal obligations or court orders, where the exercise of such rights may infringe upon the rights or freedoms of others, or where the Company needs to retain the data to establish, exercise, or defend legal claims. In such cases, the Company will inform the employee of the reasons for the refusal.

Contacting the Company

Employees may contact the Company's Data Protection Officer (DPO) to submit requests regarding the exercise of their personal data rights, using the contact details provided above. There will be no charge for



the processing of such requests. The Company will review and respond to the employee's request within 30 days from the date the request is received.

This Personal Data Processing Notice was announced on April 30, 2022.