

Privacy Policy for Employees

C.U. Dent Innovation Co., Ltd. (the Company) values and respects privacy rights and is committed to protecting your personal data securely. The Company recognizes its responsibilities under the Personal Data Protection Act B.E. 2562 (2019) and has developed this Privacy Policy for the Human Resources Department (Policy) to inform employees about:

- How the Company collects personal data
- The types of data collected
- The purposes of data processing
- How data is disclosed
- Security measures to protect personal data
- Employees' legal rights regarding their personal data

1. Scope of the Policy

This policy applies to the personal data of employees and other individuals associated with Company personnel, such as family members or emergency contacts.

2. Definition of Personal Data

2.1. Personal Data: Any information that identifies an individual, directly or indirectly, excluding data of deceased persons.

2.2. Sensitive Data: Personal data regarding race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal history, health, disabilities, trade union membership, genetic data, biometric data, or any other information classified as sensitive by the Personal Data Protection Committee.

3. Types of Personal Data Collected

The Company may collect various types of personal data, depending on the intended use, including:

- **Identity and personal details:** Name, surname, date of birth, age, gender, marital status, education, skills, work experience, photographs, military service status, and government-issued identification documents.
- **Contact details:** Address, phone number, email, and social media contacts.
- **Financial information:** Salary, wages, tax information, bank account details, and loan records.
- **Employment information:** Work location, attendance records, leave history, job position, and disciplinary records.
- **HR and company operations data:** Recruitment, benefits, IT system usage, and participation in company events.
- **Sensitive data:** Health information, religious beliefs, nationality, biometric data, and criminal records.

4. Purpose of Collecting, Using, or Disclosing Personal Data

The Company processes personal data based on legal grounds such as:

- **Contractual obligations:** Employment agreements, job assignments, training, performance evaluations, and compensation.
- **Legal compliance:** Labor laws, tax regulations, and disease control laws.
- **Legitimate interests:** Human resource management, workplace security, and fraud prevention.
- **Protection of life or health:** Emergency medical care and disease prevention.

- **Legal claims:** Establishing, exercising, or defending legal claims.
- **Consent:** Certain sensitive data (e.g., biometric data, religious beliefs) may be processed only with explicit consent.

5. Disclosure of Personal Data

The Company may disclose personal data to comply with legal obligations, regulatory authorities, or contractual agreements with external parties such as insurers, payroll providers, or law enforcement agencies.

6. International Data Transfers

If the Company transfers personal data to other countries, it ensures appropriate security measures to protect the data.

7. Data Retention Period

Personal data is retained only for the period necessary to fulfill its purposes, comply with legal obligations, or meet contractual requirements. After this period, data is securely deleted or destroyed.

8. Data Security

The Company implements technical and organizational measures to protect personal data from loss, unauthorized access, modification, or disclosure.

9. Employee Rights

Employees have the following rights regarding their personal data:

- **Access:** Request copies of personal data.
- **Correction:** Request corrections to inaccurate data.
- **Withdrawal of consent:** Withdraw previously given consent.
- **Objection:** Object to data processing.
- **Deletion:** Request data deletion in certain circumstances.
- **Data portability:** Request electronic copies of their data.
- **Filing complaints:** Lodge complaints with data protection authorities if they believe their data rights have been violated.

10. Contact Information

For inquiries or to exercise data rights, employees may contact:

C.U. Dent Innovation Co., Ltd.

Address: 34 Henri Dunant Road, Wang Mai, Pathumwan, Bangkok 10330

Phone: 02-218-8863, 083-979-7644