

**PRIVACY STATEMENT**  
**BANGCHAK CORPORATION PUBLIC COMPANY LIMITED**

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**PRIVACY STATEMENT**  
**Bangchak Corporation Public Company Limited**

**1. Introduction**

Bangchak Corporation Public Company Limited (“Bangchak,” “we,” “us,” or “our” ) has established and disclose this Privacy Statement as its approach to explain how we collect, use or disclose personal information and how we protect personal information and properly handle such information according to the Personal Data Protection Act B.E. 2562 (“PDPA”).

This Privacy Statement is for the following data subjects:

- Our customers: General customers, Bangchak member card customers, and directors, agents or authorized representatives or persons acting on behalf of juristic person customers
- Current vendors, prospective vendors as well as directors or authorized representatives or persons acting on behalf of juristic person vendors
- Job applicants, trainee applicants and their reference persons
- Employees, trainees and their family members
- Shareholders
- Others whose personal information collected, used or disclosed by us

Bangchak will not collect any personal information which is unnecessary in order to achieve the purpose of processing. However, Bangchak may, in some case, obtain your sensitive data which appear inseparably on a personal identifiable document, such as religious data on identified card, for the processing. In that case, Bangchak asks you to cover such sensitive data before hand it to us. If the data is unable to be covered up due to any reason whatsoever, Bangchak will collect such unnecessary data as an inseparable part of the set of data needed in order to achieve the purpose and Bangchak will not process that unnecessary sensitive data. In the event that Bangchak needs to process any sensitive data to achieve any purpose particularly, Bangchak will ask explicitly for your consent for Bangchak to process your sensitive data.

In this regard, Bangchak does not collect personal information of minors who are under 10 years old. In the case where a minor who is under 10 years old wishes to inquire, use our website or application, use our services, or enter into any agreement with us by which the minor is required to provide his/her personal information to Bangchak, the minor’s parents or legal guardian have to take such action on behalf of the minor. In the case where a minor is over 10 years old but has not reached the legal age and cannot take legal actions which the minor has to provide the personal information (e.g. name, address, e-mail) to Bangchak, Bangchak may ask for consent from the minor’s parents or legal guardian directly or may ask the minor to inform his/her parents or legal guardian to give consent for such action(s) to Bangchak.

## **2. Details of Collection, Use or Disclosure of Personal Information**

### **2.1 Customers**

#### **2.1.1 Personal information we collect, use or disclose and sources of information**

##### **(1) Personal information we collect, use or disclose**

Bangchak collects several types of personal information, including:

- Identity Data (for example, name, surname, identification card number, passport number, birthdate, gender, age, nationality, marital status, photos, and in some cases we may process sensitive data such as race, religion, fingerprint only with your explicit consent or when permitted by law)
- Contact Data (for example, address, telephone number, e-mail, LINE ID, Facebook account)
- Financial or transaction data (for example, credit card number, cash card number, income information, transactions related to our products or services)
- Communication data (for example, images or voice recordings when communicating with us)
- Geolocation data (for example, IP address or GPS Location)

##### **(2) Sources of information**

Bangchak may collect your personal information from various sources as follows:

###### **(a) Collect information directly from you, for example:**

- Procedures for applications for using our services, contract signing, form filling, questionnaires, registrations or submission of claims or requests for exercising your rights
- Your communication with us via our contact channels, e.g. telephone, e-mail, LINE, Facebook Messenger, etc.
- Information on participating in activities held by us, e.g. static images or videos
- Automatic data storage system, e.g. when you use our website or application, etc.

###### **(b) Collect information from other sources, for example:**

- Our customers, agents or service providers
- Bangchak Group or our business partners
- Government authorities or other publicly available sources such as company website, information made available on the internet or social media platforms, e.g. Facebook, etc.

#### **2.1.2 Purposes of Collection, Use or Disclosure of Personal Information**

Bangchak collects, uses or discloses your personal information for various purposes depending on relationship between you and Bangchak as follows:

<b>Processing purposes</b>
(a) To consider applications for using our products or services or to enter into an agreement between you or legal entity which you are an authorized representative and Bangchak
(b) To use products, benefits or services of Bangchak, including products, benefits or services of Bangchak Group and our business partners which are jointly launched with Bangchak, to perform contractual obligations, to comply with our internal procedures, receipt or delivery of information or documents between you and Bangchak including to comply with any regulations of government authorities which are necessary for the performance of contract between you and Bangchak
(c) To participate in activities of Bangchak and Bangchak Group which are operated by Bangchak, Bangchak Group or third parties (e.g. lucky draw, prize trivia quizzes, trainings, seminars, or field trips, etc.)
(d) To assess, improve and develop our products, services and sales promotion
(e) To comply with legal obligations and law enforcement requests, and to report or disclose information to government authorities as required by laws
(f) To establish, verify, comply or exercise the rights to legal claims or defend against the rights to legal claims
(g) To conduct business planning, reporting and forecasting
(h) To prevent fraud or undertake detection, investigation or other legal actions
(i) To monitor security in our building or premises including I.D. card deposit before accessing such areas and using CCTV to collect images of those who contact us at our building or premises
(j) To manage risks and undertake internal audit and administration
(k) To manage our relationship with you, for example to communicate on any information enquiry, to manage your feedbacks, to offer benefits, and to inform you of any notification without marketing purposes
(l) To inform you of any information about products or services, benefits, sales promotion, marketing activities, activity invitation, and to offer products or services of Bangchak and Bangchak Group
(m) To survey your needs, satisfactions and suggestions about our products and services and to analyze your member card usage behavior, and spending or service using records, including your interests in order to offer products or services and develop our products and services to meet your needs.
(n) To disclose to our agencies, contractors/subcontractors and service providers for any operations of Bangchak
(o) To disclose to our group companies and business partners in order to improve our services and offer benefits and current products or services of Bangchak, Bangchak Group and our business partners including products or services to be jointly launched in the future, and to inform any benefits and sales promotion

### **2.1.3 Data Retention Period**

Bangchak retains your personal information for as long as is considered necessary for the purpose for which it was collected, used or disclosed as set out in this Privacy Statement. The criteria used to determine our retention periods include: we retain the personal information for the duration we have an ongoing relationship with you and provide the services to you; or we may retain the personal information for a longer period as necessary to comply with applicable laws, or to be in accordance with legal prescription, or to establish, comply with or exercise the rights to legal claims or defend against the rights to legal claims, or to be comply with, for any other cause, our internal policies and regulations.

### **2.1.4 Data Disclosure**

Bangchak may disclose your personal information in certain circumstances, for the purposes set out in this Privacy Statement to:

- (1) Subsidiaries and any related companies (“Bangchak Group”) (i.e. (1) a company that holds shares in Bangchak and/or a company whose shares are held by Bangchak, and/or (2) a company whose shares are held by the company/companies indicated in (1) herein above whether directly or indirectly) for business purposes, internal management, offering for sale of other products and services which you may be interested in, including undertaking any other activity as set out in this Privacy Statement.
- (2) Government authorities, supervisory authorities or other authorities as stipulated by laws, including competent officials.
- (3) Agencies, contractors/subcontractors and/or service providers for any operations of Bangchak such as
  - Carriers, providers of card issuing or destruction, document storage and destruction service providers, printing house, marketing agency, research companies, IT development and maintenance companies, travel and accommodation services companies
  - Auditors, lawyers, tax and legal advisers and any consultants
  - Call center service providers
  - Gas station design service providers
- (4) Our business partners or other third parties as per your consent or contractual requirements or legal requirements, as the case may be

## **2.2 Vendors**

### **2.2.1 Personal Information We Collect, Use or Disclose and Sources of Information**

#### **(1) Personal information we collect, use or disclose**

Bangchak collects several types of personal information, including:

- Identity Data (for example, name, surname, identification card number, passport number, birthdate, gender, age, nationality, marital status, photos, and in some cases Bangchak may process sensitive data such as religion, fingerprint, health information or criminal records only with your consent or when permitted by law)
- Contact Data (for example, address, telephone number, e-mail, LINE ID)
- Transaction data (for example, bank account number, financial history information)
- Communication data (for example, images or voice recordings when communicating with us)
- Information on participating in activities held by Bangchak (for example, static images or videos)
- Information on monitoring work performance under agreement (for example, images or voice recordings during the work performance)
- Geolocation data (for example, IP address or GPS Location)

#### **(2) Sources of information**

Bangchak may collect your personal information from various sources as follows:

##### **(a) Collect information directly from you, for example:**

- Procedures for applications for using our services or taking steps as per your request before entering into contract, contract signing, form filling, questionnaires, registrations or submission of claims or requests for exercising your rights
- Your communication with us via our contact channels, e.g. telephone, e-mail, LINE, etc.
- Automatic data storage system, e.g. when you use our website or application, etc.

##### **(b) Collect information from other sources, for example:**

- Our agents or service providers
- Bangchak Group or our business partners
- Government authorities or other publicly available sources, such as company website, information made available on the internet or social media platforms, e.g. Facebook, etc.

### **2.2.2 Purposes of Collection, Use or Disclosure of Personal Information**



Bangchak collects, uses or discloses your personal information as a registrant to be vendor or a vendor or a director, agent, authorized representative or person acting on behalf of the individual or the legal entity registering to be vendor or the vendor of Bangchak for several purposes depending on relationship between you and Bangchak as follows:

<b>Processing purposes</b>
(a) To consider your qualifications before entering into an agreement with Bangchak
(b) To consider and approve entering into an agreement between you and Bangchak
(c) To perform contractual obligations and inspect work performance under the agreement between you and Bangchak, to comply with our internal procedures, to receive and deliver documents between you and Bangchak, or to provide building/premises entry cards
(d) To comply with legal obligations and law enforcement requests, and to report information to government authorities as required by laws
(e) To consider your employees or representatives' qualifications, to inspect your employees or representatives' work performance, including to monitor security during work performance under the agreement between you and Bangchak
(f) To establish, verify, comply or exercise the rights to legal claims or defend against the rights to legal claims
(g) To conduct business planning, reporting and forecasting
(h) To undertake detection, investigation and other legal actions
(i) To monitor security in our buildings or premises including I.D. card deposit before accessing such areas, and using CCTV to collect images of those who contact us at our building or premises
(j) To manage risks and undertake internal audit and administration
(k) To monitor your employees or representatives' work performance via CCTV for surveillance and security purposes during work performance under the agreement between Bangchak and you
(l) To invite you to participate in any activities held by Bangchak or third parties including communication on such activities which your images and voice will be recorded during such activities
(m) To record in our database for the purpose of vendor selection and/or for any other project in the future

### **2.2.3 Data Retention Period**

Bangchak retains your personal information for as long as is considered necessary for the purpose for which it was collected, used or disclosed as set out in this Privacy Statement. The criteria used to determine our retention periods include: we retain the personal information for the duration we have an ongoing relationship with you; or we may retain the personal information for a longer period as necessary to comply with applicable laws, or to be in accordance with legal prescription, or to establish, comply with or exercise the rights to legal claims or defend against the rights to legal claims, or to be comply with, for any other cause, our internal policies and regulations.

## **2.2.4 Data Disclosure**

Bangchak may disclose your personal information in certain circumstances, for the purposes set out in this Privacy Statement, to:

- (1) Subsidiaries and any related companies (“Bangchak Group”) (i.e. (1) a company that holds shares in Bangchak and/or a company whose shares are held by Bangchak, and (2) a company whose shares are held by the company/companies indicated in (1) hereinabove whether directly or indirectly) for business purposes, internal management, offering for sale of other products and services which you may be interested in, including undertaking any other activity as set out in this Privacy Statement.
- (2) Government authorities, supervisory authorities or other authorities as stipulated by laws, including competent officials.
- (3) Agencies, contractors/sub-contractors and/or service providers for any operations of Bangchak such as
  - Carriers, document storage and destruction service providers, printing house, marketing agency, research companies, IT development and maintenance companies, building management companies.
  - Auditors, lawyers, tax and legal advisers and any consultants
- (4) Our business partners or other third parties as per your consent or contractual requirements or legal requirements, as the case may be.

## **2.3 Job Applicants, Trainee Applicants and their Reference Persons**

### **2.3.1 Personal Information We Collect, Use or Disclose and Sources of Information**

#### **(1) Personal information we collect, use or disclose**

Bangchak collects several types of personal information, including:

- Identity Data (for example, name, surname, identification card number, passport number, birthdate, gender, age, nationality, marital status, photos, and in some cases Bangchak may process sensitive data such as race, religion, blood type, criminal records, health information or disability condition only with your consent or when permitted by law)
- Contact Data (for example, address, telephone number, e-mail)
- Transaction data (for example, salary)
- Other relevant personal data (for example, work experience and educational background, reference person(s), and family members information)
- Communication data (for example, images or voice recordings when communicating with us)

#### **(2) Sources of information**

Bangchak may collect your personal information from various sources as follows:

##### **(a) Collect information directly from you, for example:**

- Procedures for job or trainee applications, form filling and contract signing, attached documents for selection, questionnaires, or any relevant registrations.
- Your communication with us via our contact channels, e.g. telephone, e-mail etc.
- Automatic data storage system, e.g. when you use our website or application, etc.

##### **(b) Collect information from other sources, for example:**

- Reference persons specified in our job and trainee applications
- Universities or job recruitment companies
- Government authorities or other publicly available sources, such as company websites, job recruitment websites, information made available on the internet or social media platforms, e.g. Facebook, etc.

### **2.3.2 Purposes of Collection, Use or Disclosure of Personal Information**

Bangchak collects, uses or discloses your personal information for various purposes depending on relationship between you and Bangchak as follows:

<b>Processing purposes</b>
(a) To proceed as necessary with considering and selecting job or trainee applicants and other relevant procedures, e.g. your application via our website, other job recruitment websites or directly with Bangchak, interview procedures, assessment and selection procedures, and/ or job offering procedures
(b) To check your background and qualifications before employment under applicable laws, including checking your criminal records, health records and information from your specified reference persons
(c) To be benefit for internal human resource management for recruitment process (e.g. disclosing your information or reporting your interview information to relevant divisions and authorized persons for decision making including employment contract preparation and other human resource management procedures)
(d) To monitor security in our building or premises, including I.D. card deposit before accessing such areas and image recordings within our building or premises via CCTV

### **2.3.3 Data Retention Period**

Bangchak retains your personal information for as long as is considered necessary for the purpose for which it was collected, used or disclosed as set out in this Privacy Statement. In the case where your application is unsuccessful, Bangchak will retain your personal information for 2 (two) years for contacting you in case of any suitable job position available for you in the future only with your consent.

### **2.3.4 Data Disclosure**

Bangchak may disclose your personal information in certain circumstances, for the purposes set out in this Privacy Statement, to:

- (1) Subsidiaries and any related companies (“Bangchak Group”) (i.e. (1) a company that holds shares in Bangchak and/or a company whose shares are held by Bangchak, and (2) a company whose shares are held by the company/companies indicated in (1) herein above whether directly or indirectly) for offering you with any other job position as such company deems suitable for your qualification.
- (2) Agencies, service providers and/or subcontractors for any operations of Bangchak, e.g. document storage and destruction service providers, IT development and maintenance service providers, etc.
- (3) Government authorities, supervisory authorities or other authorities as stipulated by laws, including competent officials.

- (4) Other third parties as per your consent or contractual requirements or legal requirements, as the case may be.

## **2.4 Employees, Trainees and their Family Members**

### **2.4.1 Personal Information We Collect, Use or Disclose and Sources of Information**

#### **(1) Personal information we collect, use or disclose**

Bangchak collects several types of personal information, including:

- Identity Data (for example, name, surname, identification card number, passport number, birthdate, gender, age, nationality, marital status, photos, and in some cases Bangchak may process sensitive data such as race, religion, criminal records, fingerprint, health information or disability condition only with your consent or when permitted by law)
- Contact Data (for example, address, telephone number, e-mail)
- Transaction data (for example, bank account number, salary)
- Information relevant to your work (for example, working information, work permit information, work performance evaluation, leave records, medical records, use of our information systems)
- Other relevant personal data (for example, work experience and educational background, information of reference persons and family members, and in some cases Bangchak may process family members' sensitive personal data such as medical records only with their consent)
- Images or voice recordings during work performance (for example, recording via CCTV)
- Information on participating in activities held by Bangchak (for example, static images and videos)

#### **(2) Sources of information**

Bangchak may collect your personal information from various sources as follows:

- (a) Collect information directly from you, for example:
  - Procedures for entering into employment contract with us, contract signing, contract form filling, documents attached to contract, questionnaires, or any relevant registrations.
  - Your communication with us via our contact channels, e.g. telephone, e-mail etc.
  - Automatic data storage system, e.g. when you use our website, our internal information technology system or our application, etc.
- (b) Collect information from other sources, for example:
  - Reference persons specified in our job applications.
  - Hospitals providing your pre-employment health check-up and annual health check-up

- Government authorities or other publicly available sources, such as company website, job recruitment websites, information made available on the internet or social media platforms, e.g. Facebook, etc.

## 2.4.2 Purposes of Collection, Use or Disclosure of Personal Information

Bangchak collects, uses or discloses your personal information for various purposes depending on relationship between you and Bangchak as follows:

<b>Processing purposes</b>
(a) To proceed with our employment contract procedures and other relevant agreements between you and Bangchak (e.g. non-disclosure agreement, company's work-related policies and work rules), including any amendments to such contract or relevant agreements
(b) To communicate with employees, evaluate your work performance, provide trainings, certifications, and registration for participating in any activities for employees
(c) To administer employee remunerations and benefits, including payroll accounting, expense management, applicable tax deduction and social security
(d) To perform personnel management, including managing employees and performing our obligations under the employment contract between you and Bangchak (e.g. issuing employee card, examining work attendance, managing annual leave, personal business leave or sick leave, etc.), and to perform your obligations under the employment contract between you and Bangchak, and to undertake any procedures relating to resignation, employment termination, severance pay, post-employment benefits, and reporting to relevant authorities
(e) To manage your health and safety (e.g. examining your pre-employment health check-up result, providing annual health check-up, providing health insurance or other insurance, etc.)
(f) To survey your working satisfaction and other information, including your engagement with Bangchak for analyzing and developing our working and internal policies and procedures
(g) To invite you to participate in any activities held by Bangchak and third parties including communication on such activities which your images and voice will be recorded during such activities
(h) To conduct business planning, reporting, and forecasting
(i) To comply with legal obligations and law enforcement requests, and to report information to government authorities as required by laws
(j) To establish, verify, comply or exercise the rights to legal claims or defend against the rights to legal claims
(k) To monitor your work performance via CCTV for surveillance and security purposes during the work performance
(l) To monitor security in our building or premises and image recordings within our building or premises via CCTV

(m) To manage risks and undertake internal prevention, audit and administration (e.g. investigation of fraud, employees' disciplinary offences or any other illegal actions, examination of qualifications and professional licenses for certain positions, conflict of interest assessment for certain managing positions, monitoring by supervisory authorities or any other legal proceeding)
(n) To disclose to our customers, vendors or other third parties due to your rights and obligations for work performance under employment contract
(o) To disclose to agencies, service providers, subcontractors, and insurer for any operations of Bangchak (e.g. providing building entry cards)
(p) To disclose your employment information to your prospective employers where you specify Bangchak as your referred current employer
(q) To disclose to Bangchak Group

### **2.4.3 Data Retention Period**

Bangchak retains your personal information for as long as is considered necessary for the purpose for which it was collected, used or disclosed as set out in this Privacy Statement. The criteria used to determine our retention periods include: we retain the personal information for the duration we have an ongoing relationship with you under employment or internship contract; or we may retain the personal information for a longer period as necessary to comply with applicable laws, or to be in accordance with legal prescription, or to establish, comply with or exercise the rights to legal claims or defend against the rights to legal claims, or to be comply with, for any other cause, our internal policies and regulations.

### **2.4.4 Data Disclosure**

Bangchak may disclose your personal information in certain circumstances, for the purposes set out in this Privacy Statement, to:

- (1) Government authorities, supervisory authorities or other authorities as stipulated by laws, including competent officials.
- (2) Agencies, service providers and/or subcontractors for any operations of Bangchak such as
  - Carriers, document storage and destruction service providers, printing house, marketing agency, IT development companies, building management company.
  - Auditors, lawyers, tax and legal advisers and any consultants
- (3) Hospitals providing pre-employment health check-up and annual health check-up
- (4) Bangchak Group or other third parties as per your consent or contractual requirements or legal requirements, as the case may be.



## **2.5 Shareholders**

### **2.5.1 Personal Information We Collect, Use or Disclose and Sources of Information**

#### **(1) Personal information we collect, use or disclose**

Bangchak collects several types of personal information, including:

- Identity Data (for example, name, surname, identification card number, passport number, birthdate, gender, age, nationality, and in some cases Bangchak may process sensitive data such as religion, or health information only with your consent or when permitted by law)
- Contact Data (for example, address, telephone number, e-mail)
- Communication data (for example, images or voice recordings when communicating with us)
- Information on participating in activities held by Bangchak (for example, static images or videos)

#### **(2) Sources of information**

Bangchak may collect your personal information from various sources as follows:

- (a) Collect information directly from you, for example:
  - Procedures for entering into contract, contract signing, form filling, questionnaires, any relevant registrations, or submission of claims or requests for exercising your rights.
  - Your communication with us via our contact channels, e.g. telephone, e-mail etc.
- (b) Collect information from other sources, for example:
  - Thailand Securities Depository Company Limited (TSD)

### **2.5.2 Purposes of Collection, Use or Disclosure of Personal Information**

Bangchak collects, uses or discloses your personal information for various purposes depending on relationship between you and Bangchak as follows:

<b>Processing purposes</b>
(a) To perform contractual obligations between you and Bangchak, to hold shareholders' meetings, to distribute dividends to shareholders, to manage shareholders' registration under public limited company law, to comply with our internal procedures, to receive and deliver documents between you and Bangchak
(b) To invite you to participate in any activities held by Bangchak and third parties including investor relation activities held for shareholders and communication on such activities which your images and voice will be recorded during such activities

(c) To comply with legal obligations and law enforcement requests, and to report information to government authorities as required by laws
(d) To manage risks and undertake internal audit and administration

### **2.5.3 Data Retention Period**

Bangchak retains your personal information for as long as is considered necessary for the purpose for which it was collected, used or disclosed as set out in this Privacy Statement. The criteria used to determine our retention periods include: we retain the personal information for the duration we have an ongoing relationship with you; or we may retain the personal information for a longer period as necessary to comply with applicable laws, or to be in accordance with legal prescription, or to establish, comply with or exercise the rights to legal claims or defend against the rights to legal claims, or to be comply with, for any other cause, our internal policies and regulations.

### **2.5.4 Data Disclosure**

Bangchak may disclose your personal information in certain circumstances, for the purposes set out in this Privacy Statement, to:

- (1) Government authorities, supervisory authorities or other authorities as stipulated by laws, including competent officials
- (2) Agencies, contractors/sub-contractors and/or service providers for any operations of Bangchak such as
  - Carriers, document storage and destruction service providers, printing house, marketing agency, research companies, IT development and maintenance companies, travel and accommodation services companies
  - Auditors, lawyers, tax and legal advisers and any consultants

## **2.6 Others Whose Personal Information Collected, Used or Disclosed by Us**

### **2.6.1 Personal Information We Collect, Use or Disclose and Sources of Information**

#### **(1) Personal information we collect, use or disclose**

Bangchak collects several types of personal information, including:

- Identity Data (for example, name, surname, identification card number, passport number, birthdate, gender, age, nationality, marital status, and in some cases Bangchak may process sensitive data such as race, religion, health information or disability conditions only with your consent or when permitted by law)
- Contact Data (for example address, telephone number, e-mail)
- Transaction data (for example, bank account number, income information, transactions related to our products or services)
- Communication data (for example, images or voice recordings when communicating with us)
- Information related to employment status at Bangchak (for example, job position, salary, work performance)

#### **(2) Sources of information**

Bangchak may collect your personal information from various sources as follows:

- (a) Collect information directly from you, for example:
  - Procedures for applications for using our services, contract signing, form filling, questionnaires, registrations or submission of claims or requests for exercising your rights
  - Your communication with us via our contact channels, e.g. telephone, e-mail, etc.
  - Automatic data storage system, e.g. when you use our website or application, etc.
- (b) Collect information from other sources, for example:
  - Our customers, agents or service providers
  - Bangchak Group or our business partners
  - Government authorities or other publicly available sources, such as company website, information made available on the internet or social media platforms, e.g. Facebook, etc.

### **2.6.2 Purposes of Collection, Use or Disclosure of Personal Information**

Bangchak collects, uses or discloses your personal information for various purposes depending on relationship between you and Bangchak as follows:

<b>Processing purposes</b>
(a) To undertake as per your request or comply with agreement between you and Bangchak (e.g. membership application for receiving benefits, participating in any activities of Bangchak such as lucky draws, prize trivia quizzes, seminars, trainings, corporate social responsibility activities, reward events, and Bangchak youth football player project
(b) To comply with our internal procedures, receipt or delivery of information or documents between you and Bangchak
(c) To survey your satisfaction and to assess and develop our products, services and sales promotion
(d) To invite you to participate in any activities held by Bangchak or third parties including communication on such activities which your images and voice will be recorded during such activities
(e) To comply with legal obligations and law enforcement requests, and to report or disclose information to government authorities as required by laws
(f) To establish, verify, comply or exercise the rights to legal claims or defend against the rights to legal claims
(g) To monitor security in our building or premises, including I.D. card deposit before accessing such areas and image recordings within our building or premises via CCTV
(h) To manage risks and undertake internal audit and administration
(i) To disclose to our agencies, service providers and/or subcontractors for undertaking any activities and projects of Bangchak, and to survey your satisfaction in such activities and projects
(j) To undertake any procedures relating to resignation, employment termination, severance pay, post-employment benefits and reporting to relevant authorities
(k) To disclose your employment information to your prospective employers where you specify Bangchak as your referred former employer

### **2.6.3 Data Retention Period**

Bangchak retains your personal information for as long as is considered necessary for the purpose for which it was collected, used or disclosed as set out in this Privacy Statement. The criteria used to determine our retention periods include: we retain the personal information for the duration we have an ongoing relationship with you and provide the service to you; or we may retain the personal information for a longer period as necessary to comply with applicable laws, or to be in accordance with legal prescription, or to establish, comply with or exercise the rights to legal claims or defend against the rights to legal claims, or to be comply with, for any other cause, our internal policies and regulations.

### **2.6.4 Data Disclosure**

Bangchak may disclose your personal information in certain circumstances, for the purposes set out in this Privacy Statement, to:

- (1) Subsidiaries, and any related companies (“Bangchak Group”) (i.e. (1) a company that holds shares in Bangchak and/or a company whose shares are held by Bangchak, and/or (2) a company whose shares are held by the company/companies indicated in (1) hereinabove whether directly or indirectly) for business purposes, internal management, offering for sale of products and services which you may be interested in, including undertaking any other activity as set out in this Privacy Statement.
- (2) Government authorities, supervisory authorities or other authorities as stipulated by laws, including competent officials.
- (3) Agencies, contractors/subcontractors and/or service providers for any operations of Bangchak such as
  - Carriers, providers of card issuing or destruction, document storage and destruction service providers, printing house, marketing agency, research companies, IT development and maintenance companies, travel and accommodation services companies
  - Auditors, lawyers, tax and legal advisers and any consultants
- (4) Our business partners or other third parties as per your consent or contractual requirements or legal requirements, as the case may be.

### **3. Lawful Basis for Processing of Personal Data**

Bangchak only processes your personal information as it is necessary for the scope set out in this Privacy Statement, as follows:

- To take steps at your request prior to entering into a contract and to perform contractual obligations between you and Bangchak;
- Where it is necessary to comply with legal or regulatory obligations which Bangchak is subject to;
- Where it is necessary for legitimate interests of Bangchak, except where such interests are overridden by the interests or fundamental rights and freedom of an individual;
- Where we obtain your explicit consent (as required by law only); or
- Where it is necessary for establishment, compliance, exercise or defense of the rights to legal claims.

In the case where the personal information collected by Bangchak as stated above is necessary for Bangchak's performance of contract or compliance with applicable laws and you do not provide us with such necessary personal information, Bangchak may be subject to legal liabilities and/or may not be able to manage or administer the contract or give any convenience for you.

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

### **4.1 Your rights under the PDPA**

According to the PDPA, you have certain rights relating to your personal information as follows:

#### **(1) Right to Withdraw Consent**

You have the right to withdraw consent given to us for collecting, using or disclosing your personal information at any time, unless there is a restriction of the withdrawal of consent by law or the contract which gives benefits to you.

However, the withdrawal of consent shall not affect the collection, use or disclosure of personal information you have already given consent legally. In addition, where you withdraw consent, you may experience less convenient in using our products or services, or may not receive our benefits or special offers, or may experience other effects in using our products or services.

#### **(2) Right to Access**

You have the right to request access to and obtain copy of your personal information, which is under our responsibility, or to request the disclosure of the acquisition of the personal information obtained without your consent.

#### **(3) Right to Data Portability**

Where Bangchak arranges your personal information to be in the format which is readable or commonly used by ways of automatic tools or equipment, and can be used or disclosed by automated means, you have the right to receive your personal information and are also entitled to:

- (a) request us to send or transfer your personal information in such formats to other data controllers if it can be done by the automatic means;
- (b) request to directly obtain your personal information in such formats that we send or transfer to other data controllers, unless it is impossible to do so because of the technical circumstances.

#### **(4) Right to Object**

You have the right to object to the collection, use or disclosure of your personal information for direct marketing purposes or on grounds stipulated by law.

#### **(5) Right to Erasure**

You have the right to request Bangchak to erase, destroy or make your personal information become unidentifiable data, when permitted by law.

#### **(6) Right to Restriction of Processing**

You have the right to request Bangchak to restrict the use of your personal information when permitted by law.

**(7) Right to Rectification**

Bangchak will ensure that your personal information remains accurate, up-to-date, complete, and not misleading. However, if you consider that your personal information is inaccurate or changed, you have the right to request Bangchak to modify your personal information to be accurate, up-to-date, complete, and not misleading.

**(8) Right to Complaint**

You have the right to file a complaint to a competent official under the PDPA anytime Bangchak violates or does not comply with the PDPA.

**4.2 How to exercise your rights**

You may exercise the data subject rights listed above via the following channels:

- E-mail: [privacy@bangchak.co.th](mailto:privacy@bangchak.co.th)
- Call Center 1651
- Privacy setting page (via this website or mobile application)
- Notification setting page (via this website or mobile application)

If you wish to exercise your subject right, please download “Data Subject Rights Request Form” [here](#) and send the completed form to [privacy@bangchak.co.th](mailto:privacy@bangchak.co.th)

**4.3 Processing Time**

Bangchak will proceed with your request within the processing time specified as follow upon the receipt of your valid request together with complete supporting information. Until then, your personal information will remain unchanged in our database and may be processed, or you may be contacted by us, our partners, or those who have obtained your personal information.

<b>Your Rights as a Data Subject</b>	<b>Processing Time</b>
1. Right to Withdraw Consent	7 days
2. Right to Access	30 days
3. Right to Data Portability	30 days
4. Right to Object	30 days
5. Right to Erasure	30 days



6. Right to Restriction of Processing	30 days
7. Right to Rectification	30 days
8. Right to Complaint	-

**5. Personal Data Protection Security Measures**

**5.1 Implementation of Security Measures**

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

**5.2 Disclosure of Personal Information to Data Processor**

Bangchak properly supervises third parties to which Bangchak has appointed to process personal information pursuant to our orders or on our behalf.

**6. Contact information**

If you have any questions or inquiries about the protection of your personal information, collection, use or disclosure of your personal information, or exercise of your rights, or have any claims, please contact us at:

**Bangchak Corporation (Public) Company Limited and Data Protection Officer**

Address: Bangchak Corporation (Public) Company Limited and Data Protection Officer  
2098 M Tower, 8<sup>th</sup> Floor, Sukhumvit Road, Phra Khanong Tai, Phra Khanong, Bangkok  
10260

Tel: +66 2335 8888

E-mail: [privacy@bangchak.co.th](mailto:privacy@bangchak.co.th)

**7. Link to Third Party Websites via Bangchak Website**

This Privacy Statement applies to the sales of products or provision of services and use of Website of Bangchak only. When you link to third party websites via Bangchak Website, the personal information protection shall be in accordance with the Privacy Statement of such third party websites which are not related to Bangchak.

**8. Update to this Privacy Statement**

Bangchak regularly reviews and, if appropriate, updates this Privacy Statement from time to time to ensure that your personal information is properly protected. In case of any significant update to this Privacy Statement, Bangchak will inform you through the appropriate channel(s).

As of 10 October 2021