

Privacy Notice

Relating to Collection, Usage and Disclosure of Personal Data Concerning Human Resource Management (the “Notice”)

Thai Union Group Public Company Limited and its affiliates in Thailand (“**TU Group**”) hereby inform you details of the processing, whether collection, usage and disclosure (“**Processing**”) of Personal Data of current employees, staffs, consultants, probationary employees, interns and job applicants, including former employees, staffs, consultants, probationary employees and interns, as well as, anyone who is related to TU Group personnel, such as their family members, emergency contact persons, in relation to the human resource management of TU Group under the Personal Data Protection Act B.E. 2562, EU General Data Protection Regulation and other applicable laws and regulations. This Notice provides important information in the following areas:

1. Objectives for Processing of Personal Data

The Processing of your Personal Data is for management and administrative purposes in order to ensure that TU Group is able to manage human resource appropriately, effectively and lawfully throughout the recruitment process, employment and after the termination of employment. Additionally, the Processing of your Personal Data is to comply with any legal requirement, fulfill contractual obligations, pursue the legitimate interests and protect TU Group in legal proceedings.

You are free to decide whether you will provide your Personal Data to TU Group. However, please note that if you decide not to do so, you may not be eligible to receive certain benefits. For instance, TU Group may have insufficient information to enter into a contract with you or comply with certain obligations or commitments in some circumstances.

The objectives for TU Group’s Processing of your Personal Data are as follows:

Item No.	Objective	Legal Basis
1	To conduct your identity and signatory verification including authentication in relations to recruitment, applicant selection, testing, interview, job assessment and job offering.	<ul style="list-style-type: none"> • contractual basis • legitimate interest basis
2	To process internal management regarding the employment e.g., submitting information or interview report of the candidate to the selecting person and for the preparation of employment contracts, training and other processes that must be prepared for new employees.	<ul style="list-style-type: none"> • contractual basis • legitimate interest basis
3	For unsuccessful applicants, to consider and contact you in case that there will be any position in the future that may suit you.	<ul style="list-style-type: none"> • legitimate interest basis
4	To conduct medical check-up and criminal record check for the employment process.	<ul style="list-style-type: none"> • consent basis
5	To perform human resource management e.g., employee’s record, employee cards, new employee announcement, probation evaluation, updating of employee’s record, leave management, training, development of skills and knowledges, job assignment, authorization, appointment, changing of job position, reorganization, performance assessment, best employee announcement, retirement, promotion,	<ul style="list-style-type: none"> • contractual basis • legitimate interest basis

Item No.	Objective	Legal Basis
	salary adjustment, bonus payment as well as career path and succession planning along with any process related with human resource management.	
6	To perform actions regarding payment of wages or other compensations e.g., record of normal working time, overtime, working on holiday, leaves and absence or desertion of work, payroll process including payment of wages and other compensations.	<ul style="list-style-type: none"> • contractual basis • legitimate interest basis
7	To provide welfare and benefits e.g., the annual health check-up including general health check-up and preventive and work-related health examination, health insurance, provident fund, housing loan, other benefits such as support for marriage, childbirth, family members or employee death.	<ul style="list-style-type: none"> • contractual basis • consent basis
8	To consider and approve payment of medical expenses e.g., medical treatment record, medical certificate, medical treatment and medical payment, record of nursing room usage and medicine service.	<ul style="list-style-type: none"> • consent basis
9	To check and verify your identity in order to record working hours and/or to enter the area for working, meeting, training, attending seminar and various activities. Your fingerprints and/or your face for fingerprint/facial recognition system will be collected with your explicit consent or as permitted by law.	<ul style="list-style-type: none"> • consent basis
10	To apply for and renew visa, work permit, and to obtain any approval relating to work.	<ul style="list-style-type: none"> • contractual basis • legitimate interest basis • consent basis
11	To comply with applicable laws and regulations e.g., labour laws, data protection laws, public health laws, tax laws. For example, employee's record, tax deduction and payment, social security deduction, seizure and remittance of salary, bonus and other compensations according to the order, warrant or notice such as the execution order, remittance order for student loan fund.	<ul style="list-style-type: none"> • legal obligation
12	To provide information support for internal process or procedure, which may involve transferring of your information to relevant departments as necessary and in accordance with the purpose of each process, setting your authorization for using various systems and accessing to personal data, including supporting for working tools and equipment.	<ul style="list-style-type: none"> • contractual basis • legitimate interest basis
13	To arrange training, party or any event for your benefit e.g., birthday announcement, health record, food allergy and any other allergy record.	<ul style="list-style-type: none"> • consent basis
14	To manage welfare, accident and danger alleviation measures and protection for the propose with respect to preventive medicine or occupational medicine, the assessment of working capacity, medical diagnosis, the provision of health or social care, medical treatment, employment protection and other public interests.	<ul style="list-style-type: none"> • contractual basis • legitimate interest basis • legal obligation
15	To communicate, coordinate, perform duties or any activity on behalf of TU Group with customers, business partners, any company within TU	<ul style="list-style-type: none"> • contractual basis

Item No.	Objective	Legal Basis
	Group, government agencies, state enterprises, public organizations, independent legal organizations, any other agency or third party, and to execute contracts and their amendments, grant the authorization, clarify, provide information, give statements to third parties, and to attend trainings, seminars, academic seminars or lectures for third parties.	
16	To perform any duty or obligation according to the employment contract, employment agreement, appointment contract, or any other contract which you have entered into with TU Group.	<ul style="list-style-type: none"> • contractual basis • legitimate interest basis
17	To process your request either before or after entering into a contract with TU Group.	<ul style="list-style-type: none"> • contractual basis • legitimate interest basis
18	To process internal communication and advertisement, and to contact you in appropriate channels.	<ul style="list-style-type: none"> • contractual basis • legitimate interest basis
19	To comply with lawful requests of government agencies, court order and applicable governmental or agency regulations both inside and outside the country necessary for TU Group to establish, comply with or exercise any legal claim.	<ul style="list-style-type: none"> • legitimate interest basis • legal obligation
20	To manage resignation, retirement, termination, including informing thereof to related government authorities and third parties e.g., Revenue Department, banks, Social Security Office, Immigration Office.	<ul style="list-style-type: none"> • contractual basis • legal obligation
21	To perform TU Group's task for public interest or for complying with official authority order.	<ul style="list-style-type: none"> • legitimate interest basis • legal obligation
22	To pursue TU Group's legitimate business interests such as preventing fraud or reporting potential crimes.	<ul style="list-style-type: none"> • legitimate interest basis
23	To conduct a survey of working standards and employee engagement within TU Group (personal data may be collected on anonymous basis for analysis, such as age).	<ul style="list-style-type: none"> • legitimate interest basis

2. Collected Personal Data

For Objectives as specified above, TU Group is required to collect, use, process and disclose your personal data as follows ("**Personal Data**"):

- personal details such as name, surname, photo, gender, date/month/year of birth, weight, height, identification number, passport number, VISA, work permit, educational and training background, nationality, race, ethnic origin, religious or philosophical beliefs and criminal record, marital status, military status, family member details (such as father, mother, spouse, and children, etc.);
- personal identification/verification such as facial recognition data, fingerprint recognition data and signature recognition data, Personal Data which appears in a copy of the 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, etc;

- health data such as vaccination record, health benefits information and/or other benefits, Personal Data which appears in the medical certificate, annual health report, pregnancy record, maternity leave, food allergy information;
- information related to work such as working experience, leave details including reasons for such leave, time stamp, disciplinary record, termination, training record, employee annual assessment, promotion, rotation and usage record of systems, etc.;
- contact information such as address, email, line ID, Facebook and contact number;
- financial information such as bank account, tax number;
- information of third party such as spouse, family member, reference person or emergency contact person and beneficiary person from various welfare by collecting personal data such as name, surname, relationship, telephone number and other data as necessary;
- any other information necessary for supporting human resource administration and management such as photo, video recording or/and voice recording in any format such as live, CCTV and etc.

3. Retention

TU Group will retain your Personal Data for the period necessary to fulfil the objectives for which the Personal Data is Processed.

- Employed personnel: TU Group will retain your Personal Data for the duration of your employment and 10 years after the termination of your employment and pursuant to the legal prescription.
- Unemployed personnel: TU Group will retain your Personal Data for the period of 5 years from the date of application so that such Personal Data may be used to contact you if there is a position that may be suitable for you in the future.

4. Sensitive Data

TU Group will ask for your explicit consent before collection, use and disclosure of your sensitive personal data unless TU Group is entitled to collect, use and disclose such sensitive personal data by provision of laws e.g. sensitive data of data subjects who are in the Kingdom of Thailand obtained by TU Group before the effective date of Part 2 of Personal Data Protection Act B.E. 2562 (which is 1st June 2022), information disclosed to the public with your explicit consent or to prevent or suppress a danger to life, body or health of the person where you are incapable of giving consent.

5. Disclosure of Personal Data

TU Group may disclose your Personal Data as necessary on a need-to-know basis in accordance with the objectives, the Notice and the applicable laws for human resource management to TU Group (a list of companies under TU Group is attached herewith) and the following third parties.

- Government Authorities such as
 - Department of Labor Protection and Welfare
 - Department of Employment
 - Immigration Office
 - Department of Consular Affairs and Embassies
 - Social Security Office
 - The Revenue Department
- Contractual party which is necessary for the legitimate interest of TU Group
- Data Processing systems or processors of TU Group for example;
 - Provident Fund Management Company
 - Insurance Company

- Cornerstone OnDemand International Ltd.
- E-Unite system
- Business Plus
- Workplace
- Survey Company related to Employee Satisfaction and Engagement
- Training and Development Company and related parties
- Trade Partners
- Certified and audit authorities
- Any third party who has legitimate rights to access to your Personal Data.

TU Group will disclose your Personal Data to a company or third party who has a sufficient standard for the protection of your Personal Data.

6. Your Rights

As a Data Subject, you have the rights as following:

- To withdraw consent for the collection, use or disclose Personal Data;
- To request access to and obtain copy of your Personal Data or to request the disclosure of the acquisition of your Personal Data obtained without consent;
- To request to obtain Personal Data and request for transferring Personal Data to third party if it can be done by the automatic means;
- To object the collection, use or disclosure of the Personal Data;
- To request to erase or destroy Personal Data, or anonymize the Personal Data to become the anonymous data;
- To request to restrict the use of Personal Data;
- To request to update, complete Personal Data collected so that they are not misleading.

You can exercise your rights by e-mailing TU Group or sending a written letter to TU Group together with a copy of your identification card or equivalent details as requested by TU Group. TU Group will process such Personal Data in accordance with and to the extent permitted by applicable laws.

Please note that TU Group reserve our rights under the laws to reject your request in certain circumstances. If TU Group rejects your request, you will be notified the reason for such rejection. TU Group will try our best to satisfy you with how we process your Personal Data. However, if you have unresolved concerns, you can complain to TU Group or proceed further to the Data Protection Authorities.

7. Protection of Personal Data

TU Group determines to protect your Personal Data with our security standard and will provide appropriate safeguards to protect your Personal Data in order to ensure that your Personal Data will be legally and appropriately collected, used or disclosed.

8. Changes to the Notice

TU Group reserves the right to make changes to this Notice to be appropriate and in accordance with the laws. Please frequently check any update or change to the Notice.

9. Contact

In case that you have any enquiry regarding this Notice, would like to exercise your rights or need any assistance, please contact Human Resource Department of the related company in TU Group for convenience and in order to expedite the process.

However, in case that there is any inconvenience from such channel, you may send an e-mail to HR PEOPLE CONNECT PeopleConnect@thaiunion.com as an alternative communication channel.

Announced on 1 June 2022

A handwritten signature in blue ink, appearing to be "Thiraphong Chansiri".

Mr. Thiraphong Chansiri
President and CEO

A handwritten signature in blue ink, appearing to be "Kulshaan Singh".

Mr. Kulshaan Singh
Group Director, Human Resources

Attachment
List of Companies under TU Group

Update 1 June 2022

1. i-Tail Corporation PCL.
2. Okeanos Food Co., Ltd.
3. Pakfood PCL.
4. TCM Fishery Co., Ltd.
5. EHS Training and Service Company Limited
6. Thai Union Feedmill PCL.
7. TMAC Co., Ltd.
8. TMK Farm Co., Ltd.
9. Thai Union Group PCL.
10. Thai Union Graphic Co., Ltd.
11. Thai Union Hatchery Co. LTD.
12. Thai Union Ingredient Co., Ltd.
13. Thai Union Lifescience Co., Ltd.
14. Thai Union Manufacturing Co., Ltd.
15. Thai Union Seafood Co., Ltd.