

Personal Data Protection Policy for Employees

This Personal Data Protection Policy (hereinafter referred to as the “Policy”) is prepared to clarify details regarding the collection, use, or disclosure of personal data of job applicants, employees, outsourced personnel, interns, or any related persons (hereinafter referred to as “you”), which Ornsirin Holding Public Company Limited and its subsidiaries (collectively referred to as the “Ornsirin Group”) have received or are under the control of the Ornsirin Group, in accordance with the Personal Data Protection Act B.E. 2562 (2019) and/or related subordinate laws on personal data protection (collectively referred to as the “personal data protection laws”).

The Ornsirin Group aims to ensure your confidence in the collection, use, disclosure, and/or transfer of your personal data to overseas. Therefore, this Policy has been prepared for the following purposes:

- (1) to ensure that the operations of the Ornsirin Group relating to your personal data comply with the personal data protection laws;
- (2) to inform data subjects of how the Ornsirin Group collects, uses, discloses, and/or transfers personal data overseas, including other details as required by personal data protection laws.

1. Definitions

The following terms shall have the meanings set forth below:

Personal Data means any information relating to a person which enables the identification of such person, whether directly or indirectly.

Sensitive Personal Data means personal data as specifically defined under personal data protection laws, including race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any other data as prescribed by the Personal Data Protection Committee.

2. Collection of Personal Data

2.1 Personal Data Collected Directly

The Ornsirin Group collects your personal data directly through various channels, including online channels such as email, your personal social media accounts (e.g., LINE), websites and recruitment platforms, as well as other direct channels such as telephone or submission of application documents in person.

2.2 Personal Data Collected from Other Sources

The Ornsirin Group may collect your personal data from sources other than directly from you, such as affiliated companies within the Ornsirin Group, third-party websites (e.g., job recruitment websites), educational institutions or universities, hospitals, insurance companies, references, and public sources. The personal data collected will depend on your relationship with the Ornsirin Group or your use of its products or services.

2.3 Types of Personal Data Collected

- General personal data such as title, name, surname, gender, nationality, blood type, weight, height, date of birth, photographs, signature, marital status, lifestyle information, and/or any other information you choose to provide which may be considered personal data.

- Contact information such as registered address, current address, type of residence, mobile phone number, email, social media accounts (e.g., Facebook, LINE), records of correspondence and communication, and emergency contact details and relationships.

- Official identification data such as national ID card, passport, visa, house registration, name change documents, marriage certificate, government officer/state enterprise ID, foreigner identification documents, work permit, professional license, vehicle registration, driver's license, death certificate, military service records, military service completion documents, and official documents of children.

- Personal qualifications such as education history and academic records, special skills, training history, hobbies, language skills, other competencies, copies of educational certificates, curriculum vitae (Resume), and internship approval letters from educational institutions or universities.

- Employment information such as occupation, position, current workplace, employment start date, end date, length of service, department, position, employment certificates, salary slips from previous employment, reasons for leaving employment, work experience, employment references, affiliated company, directorship in companies/legal entities, and employment details (e.g., job title, employee ID, department, salary/wages, job responsibilities, working days and hours).

- Financial information such as salary, monthly income and expenses, assets/liabilities, withholding tax information, bank account number, copies of bank passbooks, taxpayer identification number, and tax deduction details.

- Employee-related information such as social security registration/resignation data, social security number, certification documents, insurance information, provident fund information, employee benefits usage, welfare data (e.g., loan programs), performance evaluation, KPI data, employee awards, probation evaluation, benefit usage (e.g., loan usage, loan type, amount, interest, repayment period), benefits received, warning letters, resignation letters, resignation reasons, and related supporting information.

- Technical data such as device-related information, email usage history, browser usage, IT account data, automatically collected data from website visits, technical specifications, identifiable technical data, cookies, IT-related information on devices and browsers used to access websites, and IP address.

- Other information such as CCTV data, complaint records, litigation data, and requests for exercising rights.

- Sensitive personal data such as religion, race, health data, criminal records, disability, and biometric data such as fingerprint data.

In the event that the Ornsirin Group collects, uses, discloses, and/or transfers your sensitive personal data, it will do so only with your explicit consent or where permitted by law.

If you do not provide personal data to the Ornsirin Group, we may be unable to carry out your requests related to such personal data or fulfill contractual obligations, which may result in inconvenience or inability to comply with such requests.

2.4 Personal Data of Third Parties

Where you provide personal data of third parties to the Ornsirin Group, you are responsible for informing such third parties (e.g., directors, authorized persons, authorized signatories of your affiliated company, family members, close persons, references, or emergency contacts) of the details in this Policy regarding the collection, use, disclosure, and/or transfer of personal data overseas, and for obtaining consent or having other

legal bases to enable the Ornsirin Group to collect, use, disclose, and/or transfer such personal data of those third parties in accordance with applicable laws.

2.5 Personal Data of Minors, Quasi-Incompetent, and Incompetent Persons

The Ornsirin Group does not intend to collect personal data of minors, quasi-incompetent persons, or incompetent persons, unless consent has been obtained from a person exercising parental authority (where consent is required and the minor cannot provide consent by themselves under the law), a guardian, or a curator, as the case may be.

If the Ornsirin Group becomes aware that such personal data has been collected without the required consent unintentionally, the Ornsirin Group will delete such data as soon as practicable, unless there is a lawful basis permitting the collection, use, disclosure, and/or transfer of such personal data in accordance with applicable laws.

3. Purposes for Collection, Use, and/or Disclosure of Personal Data and Relevant Legal Bases

In general, the Ornsirin Group will collect, use, or disclose your personal data only as necessary or as required by law. The Ornsirin Group relies on the following legal bases: (1) consent; (2) necessity for the performance of a contract between you and the Ornsirin Group; (3) necessity to prevent or suppress danger to life, body, or health of a person; (4) necessity for compliance with legal obligations of the Ornsirin Group; (5) legitimate interests of the Ornsirin Group; (6) public interest for the performance of tasks carried out in the public interest or the exercise of official authority; and (7) necessity for the establishment, exercise, or defense of legal claims, and/or other legal bases as permitted under applicable laws, for the collection, use, disclosure, and/or transfer of your personal data overseas.

3.1 Purposes for Collection, Use, and/or Disclosure of Personal Data Based on Legal Grounds Other than Consent

The Ornsirin Group will collect, use, and/or disclose your personal data for the following purposes:

- For recruitment processes, such as screening candidates, interview selection, preliminary selection, testing, hiring consideration, and background checks.

- For communication purposes, such as contact and coordination.

- For human resource management and employment relationship management, such as employee onboarding, performance evaluation, salary adjustment, and other compensation payments; organizing training both within and outside the Ornsirin Group; assigning you to work within or outside the Ornsirin Group on a permanent or temporary basis; organizing company activities; venue rental; organizing social events; distributing rewards; changes in employment conditions; assigning duties appropriately; supporting employee operations; monitoring working hours (e.g., attendance and leave usage); appointment, transfer, or change of position; termination of employment; appointment of representatives or authorization for transactions on behalf of the Company; identity verification; issuance of identification cards, access cards, and/or other access control cards; and organizational restructuring.

- For administration, compensation, and employee benefits, such as salary payment, reimbursements, welfare, expenses, bonuses, compensation, indemnities, medical and health expenses, and providing benefits and welfare to you and related persons; annual health check-ups; medical treatment; leave management/approval; insurance; social security; provident fund management; tax processing; withholding tax; rewards; scholarships;

and other employee benefits (e.g., provident fund, social security, employee insurance), including insurance and life insurance benefits, and salary review.

- For internal management of the Ornsirin Group, such as CCTV monitoring in workplace areas; recording images and audio in meetings or company activities; internal audit and investigation; fraud-related reporting; supervision, investigation, and evidence collection; establishment, exercise, or defense of legal claims, or legal proceedings.

- For compliance with laws and internal policies of the Ornsirin Group, such as compliance with policies, announcements, or orders of the Ornsirin Group; compliance with legal obligations; cooperation with government authorities or other competent authorities; and submission of reports as required by law.

- For prevention or suppression of danger, such as preventing or suppressing danger to life, body, or health of a person.

- For management of the Ornsirin Group's information systems, such as system administration and troubleshooting; development of employee databases and records; system security; and maintenance of employee database systems.

3.2 Purposes Requiring Consent

The Ornsirin Group relies on consent for the collection, use, and/or disclosure of sensitive personal data for the following purposes:

- Religious information as stated in job application forms for consideration and complaint handling, and as stated on national identification cards, which the Ornsirin Group collects from copies of such identification cards without any specific intention to use such data.

- Racial information as stated in job application forms for the purpose of applying for work permits in cases where employees are foreign nationals.

- Health data for maintaining employment records, leave management, providing welfare, medical expenses, annual health check-ups, insurance processing, data analysis and statistical reporting for improving human resource management and employee well-being, use in emergency situations, use for medication at company premises, complaint handling, and prevention of communicable diseases (e.g., COVID-19 questionnaires).

- Criminal records for background checks and employment consideration.

- Biometric data such as fingerprint scans for identity verification in recording attendance and/or access to workplace areas.

- Disability data for verification of qualifications and suitability for employment, complaint handling, facilitating workplace accommodations, and/or providing additional benefits to persons with disabilities.

4. Disclosure of Personal Data

The Ornsirin Group may disclose your personal data to the following recipients for the purposes specified above:

- Companies within the Ornsirin Group, including Ornsirin Holding Public Company Limited and its subsidiaries.

- Business partners of the Ornsirin Group, such as banks, financial institutions, and insurance companies.

- External service providers, such as companies providing employee forms and ID cards, hospitals, courts, companies providing documentation services for foreign employee employment, legal advisors, accounting advisors, billing/payment system providers, employee welfare service providers, security service providers, IT system providers, and cloud service providers.
- Government agencies, such as the Revenue Department, Social Security Office, Legal Execution Department, Department of Employment, Department of Skill Development, or other government authorities upon request.

5. Cross-Border Transfer of Personal Data

The Ornsirin Group may transfer your personal data to recipients located in foreign countries for the purposes specified above, such as (1) business partners of the Ornsirin Group, to enable overseas partners to provide services to you or for communication with brokers or agents abroad; and (2) external service providers who provide information technology systems to the Ornsirin Group, where it is necessary to transfer data overseas for cloud storage with servers located abroad.

As the destination countries may or may not have personal data protection standards equivalent to those prescribed in Thailand, the Ornsirin Group will implement appropriate procedures and measures to ensure that such transfers are conducted securely and that recipients provide adequate personal data protection standards or fall within other exceptions as permitted under personal data protection laws.

6. Retention Period of Personal Data

The Ornsirin Group will retain your personal data for an appropriate period as necessary to fulfill the purposes for which the personal data was collected, in accordance with this Policy and applicable laws. However, the Ornsirin Group may retain your personal data for a longer period as required to comply with applicable laws and regulations, as well as internal policies or operational requirements of the Ornsirin Group.

7. Personal Data Security Measures

(1) The Ornsirin Group will implement personal data security measures covering administrative, technical, and physical safeguards to prevent loss, destruction, alteration, modification, use, disclosure, or unauthorized or unlawful access to personal data, in accordance with applicable laws. Such measures may include, but are not limited to, access control over personal data and devices used for storage and processing, taking into account usability and security; authorization and user access rights management for accessing, using, disclosing, and processing personal data; user access management; assignment of user roles and responsibilities to prevent unauthorized access, disclosure, awareness, copying, or theft of storage or processing devices; implementation of audit trail mechanisms to monitor access, modification, deletion, or transfer of personal data; alignment with appropriate methods and media used for the collection, use, or disclosure of personal data; and identity verification of individuals accessing or using personal data, in accordance with the Ornsirin Group's information security policies.

(2) The Ornsirin Group will promptly notify data subjects, including providing remediation measures, in the event of a personal data breach or leakage to the public resulting from deficiencies in the Ornsirin Group's security measures. However, the Company shall not be responsible for any damage arising from the use or

disclosure of personal data to third parties, including negligence or failure to log out from databases or social media systems of the Ornsirin Group by the data subject or any other person authorized by the data subject.

8. Amendment of the Personal Data Protection Policy

The Ornsirin Group may change, revise, or amend this Policy from time to time. The updated Policy will be published on www.hrornsirin.co.th and shall be effective in place of all previous versions. If you wish to be informed of any changes, the Ornsirin Group recommends that you regularly review the Policy through the aforementioned channel. However, the Ornsirin Group will notify you of any significant changes and will seek your consent again where necessary and as required by law.

9. Cookie Policy

The Ornsirin Group uses cookies that store or remember user information until the browser is closed or until the user deletes or rejects the collection of cookies. However, if you choose to allow cookie tracking, you will find that using the website becomes more convenient, as cookies help store information about the websites you have visited or accessed. In addition, the website will use the collected cookie data for statistical analysis and/or for other activities of the Ornsirin Group in order to improve the products and services of the Ornsirin Group.

10. Rights of the Data Subject

Under the personal data protection law, you have the following rights as a data subject:

(1) Right to Withdraw Consent, you have the right to withdraw your consent previously given to the Ornsirin Group for the collection, use, or disclosure of your personal data at any time. However, refusal to provide consent or withdrawal of consent may affect the performance of contractual obligations or legal obligations that the Ornsirin Group is required to comply with. As a result, the Ornsirin Group may be unable to proceed with your requests related to such personal data, and you may not receive certain conveniences. If you wish to understand the potential impacts in detail, please contact the Ornsirin Group via the contact channels specified in Clause 11.

(2) Right of Access and to Obtain a Copy of Personal Data, you may have the right to request access to and obtain a copy of your personal data under the responsibility of the Ornsirin Group, as well as to request disclosure of the source of such personal data. For the security of personal data, the Ornsirin Group may verify your identity before providing the requested information.

(3) Right to Rectification, you may have the right to request correction of your personal data if such data held by the Ornsirin Group is incomplete, inaccurate, misleading, or not up to date.

(4) Right to Data Portability, you may have the right to receive your personal data in an electronic format. You also have the right to request the Ornsirin Group to transmit or transfer such personal data to another data controller under the conditions prescribed by law.

(5) Right to Object, you may have the right to object to the collection, use, or disclosure of your personal data in certain circumstances, such as direct marketing.

(6) Right to Erasure, you may have the right to request the Ornsirin Group to delete or destroy your personal data, or to anonymize such data so that it can no longer identify you, subject to conditions prescribed by law.

(7) Right to Restrict Processing, you may have the right to request the Ornsirin Group to restrict the use of your personal data in certain circumstances.

(8) Right to Lodge a Complaint, you have the right to lodge a complaint with the competent authority if you believe that the collection, use, and/or disclosure of your personal data is unlawful or not in compliance with the personal data protection law. However, the Ornsirin Group would appreciate the opportunity to address your concerns or complaints for clarification and resolution before you contact the relevant authority.

In the event that the exercise of data subject rights is restricted by law or other applicable exemptions, and the Ornsirin Group is unable to comply with your request, the Ornsirin Group will inform you of the reasons for such refusal.

11. Contact Channels

For inquiries regarding personal data, submission of suggestions, or requests to exercise data subject rights, please contact:

Ornsirin Group:

79 Moo 8, San Pu Loei Subdistrict, Doi Saket District, Chiang Mai

Tel: 053-295-709 or visit www.ornsirin.co.th

You may find further details regarding the personal data protection policy for customers and business partners on the Company's website. You may also contact the Data Protection Officer of the Ornsirin Group as follows:

Data Protection Officer: Ms. Nongnuch Kasorn Tel: 053-295709 ext. 102

Effective from 15 November 2024 onwards