



## Privacy Policy for Employees

Delta Electronics (Thailand) Public Company Limited and Delta Green Industrial (Thailand) Company Limited (collectively referred to as “**Company**”) realize the importance of personal data. Therefore, this privacy policy has been established (“**Privacy Policy**”) for Company personnel, including directors, consultants, executives, current employees/staff, former employees/staff, employees of labor contractors, students and interns, as well as any other persons whose personal data being acquired from the Company’s personnel, such as family members, reference persons, people for emergency contacts, or guarantors, etc. (collectively referred to as “**You**”). This policy is intended to describe the Company’s method of collecting, using, disclosing and/or transferring personal data, in line with the rights and choices of the personal data subjects under this privacy policy, as well as the channels to contact the Company in case of a desire to exercise the rights or inquire about this privacy policy.

The Company may change or update this privacy policy from time to time to keep current data. In the event of a change in practices or a policy on the collection, utilization, disclosure and/or transfer of personal data or when the applicable law is changed, the Company will notify you in order to provide you with sufficient information about such changes, modification or updates. This privacy policy will be effective immediately upon its being publicized or published on the website or the Company’s application. Therefore, please check on regularly that the privacy policy for latest update and changes.

### 1. Collection of personal data

#### 1.1 Types of personal data

**Personal Data** means data about a person, which allows the person to be identified whether directly or indirectly, but not including data of the deceased persons.

**Sensitive Personal Data** means personal data specifically required by laws, such as race, ethnicity, political opinions, religion beliefs or philosophy, sexual behavior, criminal records, health information, disability, labor union information, genetic and biometric data, including simulated data of fingerprints and face imaging, etc., which must be proceeded with a special care. The Company will collect, use and/or disclose sensitive personal data only with your expressing consent, or in the event that the Company is required to operate within the scope required by laws.

## 1.2 Sources of personal data

- (1) **The Company receives personal data from you directly:** The Company may collect or receive your personal data from the recruiting, hiring, and filling job application processes, as well as the attached documents and questionnaires in job selection and interview through various channels, such as walk-in, direct application with the Company, job announcement board, website of the Company, labor fairs, meetings, networks, and events, including data and updates from your employment or other processes during the time you are an employee or staff or personnel of the Company.
- (2) **The Company obtains your personal data from other sources:** The Company may collect or receive your personal data from other sources, such as employment agencies, job application websites, social media, or Delta Group, or business partners. The type of data collection will depend on nature of employment or services of the Company and Delta Group, including data from reference persons or guarantors, personal background investigation, navigating system, and networks. This is in accordance with the necessity as required by laws.

## 1.3 Personal data collection

The Company may collect or obtain various types of data, including your personal data. This depends on your interaction with the Company, as well as employment contract, working relationship, and types of data you own.

## 1.4 Personal data collection

The Company may collect your personal data, including the following data:

Types of personal data	Details and Examples
First and last name data	such as a title, first name, last name, surname, or last name, surname of woman before married, including your signature
Personal characteristics and identity data	date of birth, place of birth, age, gender, height, weight, blood type, marital status, number of children, military status, photographs, and movement pictures
Identification data issued by government agencies	such as ID number, passport number, tax Identification number, social security number, foreign work permit number, driver's license number, vehicle registration number, motorcycle registration number

Types of personal data	Details and Examples
Contact information data	such as the address according to house registration, current address, home phone number, personal mobile phone number, email, social media accounts (Facebook, line ID), business card
Education data	such as education history, results of examinations for each education level, educational qualifications, including training of professionals in specific fields, namely professional license of auditors, attorney's license, or membership license with another professional organization, and results of language skill level test, computer skills
Data about your job application history and employment	such as job application letter, job application form, resume/curriculum Vitae (CV), past employment, test or interview, criminal background, comments for job consideration, employee code, position, affiliation, wages, salary, provident fund, welfare, benefits, work history, overtime, job leave records, training, welfare reimbursement, probationary work assessment, performance appraisal, promotion, appointment, transfer, job changes, and punishment, including start date of work, length of service, termination date, reason for leaving the job or dismissal, etc.
Financial data	such as bank account number, account status, history of wage payment, salary, overtime pay, compensation, benefits, legal deductions, voluntary deductions
Communication device data	such as communication device and your use of personal communication devices to access the Company's website, system or application, such as access to audio, video, photograph, camera, GPS location, calendar information, call log information, contact persons, addresses, messages or emails (email body), Unique Device Identifier (UDID), IP Address Clickstream/Tracking information for websites, RFID Unstructured Data Login, credentials security code, access code or password, user account, name account, access password, data about user activities

Types of personal data	Details and Examples
Views and opinions	such as views and opinions on the Company, such as your preferences for employment, benefits, welfare, training and development, scholarship, professional licenses and certificates, working relationship, or any other data you send to the Company for comments, criticisms, complaints, advice, poll response, inquiries, and any information that you personally provide as human resource communications
Sensitive data	such as religion, criminal records, health data, disability, labor union data biometric data, including simulated data of fingerprints and face imaging
Sensitive data (continued)	Note: The Company will collect, utilize, disclose data, and/or transfer your sensitive personal data only with your providing consent or when the Company is necessary to do so within the scope required by laws.
Other personal data	such as data obtained from various social media communication, audio recordings, and video recordings from CCTV (CCTV), photos or moving pictures of activities organized by the Company, and any other data that are legally considered as personal data
Third party data	<p>such as data about spouses, children, parents, family members, reference persons or people for emergency contact, guarantors, beneficiaries of welfare benefits, including data from former employers, of which the Company will collect personal data such as first name, last name, relationship, telephone number, and other data according to the necessities</p> <p>Note: It is your responsibility to provide details of this privacy policy to such persons, as well as obtain necessary consent from them, while assuring to the Company that you have the rights to provide personal data of those individuals to the Company and such persons consent for the Company to collect and utilize their personal data in a lawful manner as described in this privacy policy, unless it is required by laws</p>

	to disclose personal data of third parties to the Company without requesting for consent.
--	---

## 2. Legal basis and purposes for data collection, utilization, or disclosure of your personal data

### 2.1 Legal basis

The Company will consider establishing a legal basis for collecting, utilizing, or disclosing your personal data as appropriate. The legal basis as references for the Company can be as follows:

Legal basis	Details
Contractual Basis	To make a contract to which you are a party, such as employment contract or any other contracts, and/or to provide benefits to you under the contract
Legal Obligation	To perform duties as required by laws, such as labor protection law, social security law, compensation law, labor relations law, provident fund law, taxation law, computer law
Legitimate Interest	For the legitimate interest of the Company and other persons, but not against the scope that you can reasonably expect and with no violation to your fundamental rights or freedom
Necessity for Life	To prevent or avoid dangers to your life, body or health
Your consent	To collect, use, or disclose your personal data if your consent is required.

### 2.2 Purposes of collecting your personal information - The Company may collect, utilize, disclose, and transfer your personal data, which are collected for the purposes as follows:

Purposes	Details	Data processing basis
1. To carry out processes and procedures according to	1) To continue the commissioning processes and procedures throughout the term of employment	• Fulfill the contract

employment contract or any other contracts related to the employment between you and the Company	<p>contract, such as employee registration, preparation of employee data, employee card, probationary evaluation, performance appraisal, employee data update, management of annual leave, leave/absence from work, pregnancy notification, work certificates, resignation, and other request forms</p> <p>2) To operate on personnel management, such as training, development of skills, knowledge, and abilities, work assignment, power of attorney, appointment, transfer, job change, organizational restructure, performance appraisal, job position and salary adjustment, bonus payment, as well as support for career paths and job succession planning</p> <p>3) To verify and check on your identity in order to record your working hours at work, meetings, training seminars, or various activities, and/or records of entry and exit to the Company's important areas that require safety by collecting your fingerprints and/or face recognition data</p>	<ul style="list-style-type: none"> <li>• Legitimate interest</li> </ul>
2. To manage compensation, welfare, and benefits	<p>1) To perform wage payment or other compensation, such as checking the time in and out of work, overtime or working on holidays, leave, absence or abandonment of duties making payroll and the process of paying salaries and compensation</p> <p>2) To provide welfare and benefits for you, including annual health check, health insurance for employees and their families, provident fund, home loan, emergency loan, grants and welfare benefits such as marriage, childbirth, family or employee death</p>	<ul style="list-style-type: none"> <li>• Fulfill the contract</li> </ul>
3. To proceed in accordance with relevant laws	<p>1) To perform legal actions, such as employee registration, withholding and Paying taxes, social security deduction, suspension of</p>	<ul style="list-style-type: none"> <li>• Compliance with the law</li> </ul>

	<p>salary/bonus/compensation, and remittance according to court order or executing officer, including student loan fund enforcement</p> <p>2) To proceed with the establishment of the Welfare Committee, the Safety Committee, Safety Officer, and various activities as required by laws</p> <p>3) To make considerations on leave or health-related medical information, incompleteness or disability, worker protection, including assistance in case that you are injured at work for health and safety at work</p>	
4. To support data and processes within the Company	<p>1) To report, analyze, and record statistics in finance and business for administration, budget planning, accounting management, and business plans</p> <p>2) To support data in the implementation of procedures or processes within the Company in sending your information to relevant agencies by using only necessary data that in accordance with objectives of each process</p> <p>3) To determine the rights for the utilization of various systems and access to personal data, as well as support of tools and equipment that facilitate the work for you</p> <p>4) To manage the Company's assets that are given to employees, such as cards for entering the building, keys, mobile phones, notebook computers, cars</p> <p>5) To manage travel or accommodation related to work, funding assistance, outside working, travel expenses, and reimbursement for any expenditures related to work</p>	<ul style="list-style-type: none"> <li>• Fulfill the contract</li> <li>• Legitimate interest</li> </ul>
5. To perform various activities of the Company both inside and outside the organization	<p>1) To organize activities or participation in various activities both inside and outside the Company, including announcement the results or publicizing of</p>	<ul style="list-style-type: none"> <li>• Fulfill the contract</li> </ul>

	<p>certain activities which may utilize personal data such as your name, surname, photographs or moving pictures from the participation in those activities for publishing and publicizing according to the objectives of each activity</p> <p>2) To develop training, seminars/observational visits, including outside activities for your convenience, in which the Company may disclose your personal data as necessary to external service providers for arrangement of transportation, foods, accommodations, and places for you</p>	<ul style="list-style-type: none"><li>• Legitimate interest</li></ul>
--	---	---



Purposes	Details	Data processing basis
5. To organize activities or participation in various activities both inside and outside the Company (continued)	3) To check your understanding, conduct questionnaires or surveys of your opinions, and evaluate the results of such questionnaires or surveys	<ul style="list-style-type: none"> <li>• Fulfill the contract</li> <li>• Legitimate interest</li> </ul>
6. To inspect, supervise, and manage risks	<p>1) To verify communication related to work. The Company is obliged and reserves the right to inspect and examine the electronic communications that have been sent using a network account or equipment that the Company has given to you at work in order to ensure that the Company's information resources are used correctly and in compliance with the laws and the Company's policy.</p> <p>2) To effectively supervise the operations in accordance with the rules and regulations of the Company.</p>	<ul style="list-style-type: none"> <li>• In compliance with the laws</li> <li>• Legitimate interest</li> </ul>
7. To maintain security within the building or the Company's office	To present the employee card for your identity before entering and leaving the building or the Company's areas, as well as record data on entering and leaving the areas, including images inside and outside the building or the Company's areas with CCTV	<ul style="list-style-type: none"> <li>• Legitimate interest</li> </ul>
8. To manage data for former employees	<p>1) To operate on business continuity for understanding and collecting evidence of various decisions according to your roles and duties, as well as maintain knowledge in the business after you leave the Company</p> <p>2) To conduct a survey to understand why you decide to leave the Company. The Company will need such</p>	<ul style="list-style-type: none"> <li>• Legitimate interest</li> </ul>

	<p>data for analysis, improvement of operations and retaining the Company's employees</p> <p>3) To collect your data for a period of 5 years from the date of employment termination as employee or personnel of the Company</p> <p>To prove and verify in case of conflicts that may arise within the limitations of laws</p>	
--	--	--

### 2.3 Purposes for collection of your sensitive personal data

The Company may collect, utilize, or disclose your sensitive personal data only when the Company receives your consent or as required by laws for the Company to do so. Such sensitive personal data may be collected according to the following objectives:

Types of sensitive personal data	Details
Criminal records	To check the history and suitability for work and maintain the legitimate interest of the Company and/or other persons
Health data and disability	To comply with labor protection laws and manage the facilities, activities, and welfare that are suitable for you throughout the period of employment under the contract
Biometric data	Collection and utilization of biological records such as simulated fingerprints and face image data to be used to identify and verify the identity of the employee for the access to important areas for safety or benefit of working-hour records
Religion, ethnicity, labor union data	To provide facilities, activities, and welfare that are suitable for you, including the data utilization for management of care to you equally and fairly according to human rights principles



### 3. Persons to whom the Company may disclose or transfer your personal data

To carry out the purposes stated in this privacy policy, your personal data may be disclosed or transferred to various persons or entities inside the Company and to people or external entities as follows:

#### 3.1 Inside the Company

Your personal information may only be disclosed or submitted to various departments within the Company that are relevant and have the necessary roles and duties for the purpose. These people or teams of the Company will be allowed to access your personal information as necessary and appropriate, such as

- (1) Human Resources (HR) officers or other relevant personnel by assigning the access rights to data according to roles, duties, and responsibilities
- (2) The management or your direct supervisors who are responsible for managing or making decisions about you or when considering actions related to HR procedures
- (3) Support departments or teams, such as Information Technology (IT) Division, Administration Department, Accounting and Finance Department

#### 3.2 Outside the Company

- (1) **Delta Group:** such as affiliates and/or subsidiaries of the Company, which collaborate and share personnel, services, and systems (including web-related services and systems) and are part of normal reporting activities. The Company may need to transfer your personal data to the Delta Group or allow the Delta Group to access such personal data for the purposes specified in this privacy policy.
- (2) **Service Providers and the Company's partners:** The Company may transfer your personal data to service providers and/or partners and service providers, including but not limited to internet service providers, software and information technology support providers, recruitment agencies, and HR service providers, and financial institutions to perform any operations related to the hiring processes and procedures, such as payroll, provident fund, welfare benefits for housing loans, health insurance, life insurance, training, evaluation for corporate management, travel and accommodation reservation, office building, external auditors, and consultants in various fields. When utilizing services from outside, the Company must ensure that those service providers comply with the requirements of laws and your personal data will be protected by appropriate technical and organizational measures.

- (3) **Third parties as required by laws:** The Company may need to disclose or pass on your personal data to government agencies, regulators, or other agencies as required by laws to comply with the laws such as the Revenue Department, Social Security Office, Department of Labor Protection and Welfare, Legal Execution Department, Student Loan Funding, Department of Skills Development, National Office for the Promotion and Development of the Quality of Life of Persons with Disabilities, Bank of Thailand, Securities and Exchange Commission, Ministry of Commerce, Ministry of Labor, or any other authorities by virtue of the laws or regulations. This also includes the compliance with orders from law enforcement agencies and courts to employees, government agencies, or other third parties. The Company is obliged to comply with legal or regulatory obligations, or to protect the rights of the Company and the rights of others, as well as for personal safety, or investigation, prevention, or dealing with fraud issues, or security, or safety (e.g. the Royal Thai Police and the Ministry of Labor). In the case that the Company receives your consent for disclosure from outside agencies, such as your new employers, the Company may disclose your data to certify your former employment conditions or provide your data to educational institutions that you previously studied to improve their educational quality and standards, or quality of graduate research projects.
- (4) **Professional consultants:** The Company may need to disclose your personal data to professional consultants in auditing, legal, accounting, and tax services who assist in the Company's businesses and help the Company to file or pursue the lawsuits or take legal actions or any other legal procedures.
- (5) **Organizations or Third Parties:** The Company may disclose your data to organizations or third parties who contact the Company for the purpose of verifying the working status of your transactions, such as applying or using credit services, job application. The Company will disclose your data only by specific confirmation on employee status and other data as you disclose to such organizations or third parties.

#### 4. Transfer your personal information to foreign countries

The Company may need to transmit or transfer your personal data to the parent company or the same subsidiaries in foreign countries or transfer data to other recipients, such as sending or transferring personal data to store on a server or Cloud in foreign countries, and/or performing a contract as part of the Company's business operations. The Company will proceed according to procedures and measures to ensure that the persons receiving data transfer in the country of destination maintain adequate personal data protection standards as required by laws. The Company will ask for your consent to transfer your personal data to foreign countries if necessary, to comply with the laws.



**5. How long will the Company keep your personal information?**

The Company will retain your personal data for as long as it is reasonably necessary to fulfill the purposes under this privacy policy and will store your data for an additional 10 years from the date you retire as an employee, staff or personnel of the Company for the purpose of proving and verifying in case of conflicts that may arise within the limitations of laws.

**6. Security of your personal data**

The Company will try to protect your data by having appropriate security measures for your personal data and in accordance with the confidentiality of personal data in order to secure appropriate processing of personal data, as well as to prevent the violation of personal data, or unauthorized/unlawful access by people, destruction, usage, alteration or disclosure without permission. The Company has established policies, regulations, and criteria for personal data protection, including measures to prevent the recipients of data from using or disclosing information outside the intended purpose, or without authorization. The Company has updated policies, rules, and regulations periodically as necessary and appropriate. The Company also establishes policies for executives, employees, staff, contractors, and recipients of data from the Company, who have duties to maintain the confidentiality of your personal data in accordance with the confidentiality measures set by the company.

**7. How will the Company process the personal data of minors?**

In the event that the Company is already aware that the subject of personal data that the Company will collect is a minor, the Company will not collect data from such minor until obtaining the consent from the authorized parents to act on behalf of the minor.

In the event that the Company does not know beforehand that the subject of personal data is a minor. Then, it is later learned that the Company collects personal data of such minor without the consent of the authorized parents to act on behalf of the minor (if the consent is required and the minor is unable to give consent on his own by laws). The Company will promptly delete such data and may collect, utilize, disclose, and/or transfer such data only if the Company can rely on other legitimate grounds rather than the consent.

## 8. The rights of personal data subjects

Subject to the provisions of laws and relevant legal exemptions, you will have the rights as stated below:

- (1) **Access:** You may have the rights to request for an access or to obtain a copy of personal data that the Company collects, utilizes or discloses about you for your privacy and security. The Company may ask you to verify your identity before providing the data you request.
- (2) **Correction:** You may have the rights to request for corrective actions of personal data that the Company collects, utilizes, or discloses about you and that are incomplete, incorrect, causing misunderstanding and not updated.
- (3) **Data transfer:** You may have the rights to obtain personal data that the Company holds about you in an organized format and can be read in the form of electronic for the transmission or transfer such data to another personal data controller, where they must be (a) the personal data you provide to the Company and (b) the personal data you provide to the Company with your consent for collection, utilization, or disclosure or contract that the Company has with you.
- (4) **Objection:** You may have the rights to object to collection, utilization, or disclosure of your personal data, such as direct marketing.
- (5) **Request for suspension of use:** You may have the rights to request for suspension of use of your personal data in certain circumstances.
- (6) **Withdrawal of consent:** For the purposes that you give your consent for the Company to collect, utilize or disclose your personal data, you have the rights to withdraw your consent at any time.



- (7) **Deletion or destruction of data:** You may have the rights to request that the Company take actions for deletion or destruction, or make your personal data that collected, utilized, disclosed by the company as the data which cannot be identified the persons who own them, unless the data retention by the said company is for compliance with the laws or to establish as legal claims for defense or protection as stated in the laws.
- (8) **Submission of complaint:** You may have the rights to submit a complaint to the authorized units if you believe that collecting, using or disclosing personal data of the company is unlawful or inconsistent with applicable data protection laws.

For exercising of any of the above rights, you can contact the Company at the address as shown in “Channels to contact the Company.”

Please note that some of your requests for the rights as set forth above may result in the Company being unable to process your data in accordance with the Company’s duties to you under employment contract, compensation management, benefit management, payment for salaries, wages, and benefits, training and development, scholarships, professional licenses and certificates, management of succession plans for high potential personnel, and working relationship with you, or unable to perform its obligations under the laws.

## 9. Channels to contact the Company

If you have any questions of would like to suggest or have any concerns about the Company’s practices regarding this privacy policy, or submit a request to exercise any of the rights in this privacy policy, please contact the Company by the details as shown below.

When the Company receives your request to exercise your rights, the Company will consider acting as you request in a secure way according to the Company’s data retention policy.

**Contact the Company’s Personal Data Protection Officer:**

[DPO@deltathailand.com](mailto:DPO@deltathailand.com)

**Contact the Company’s Recruitment Officer:**

