

Privacy Policy for Employees and Personnel

Effective Date 1 June 2022

Mega Life Sciences Public Company Limited and its affiliates (the “Company”) value and recognize the importance of privacy and the protection of Personal Data. To comply with the Personal Data Protection Act, B.E. 2562 (and the relevant rules and regulations issued thereunder) (“**Personal Data Protection Act**”), we have issued this Privacy Policy for Employees and Personnel of the Company to notify and explain about the Company’s practices regarding the collection of your Personal Data, details of Personal Data collected, the purposes of such collection, how your Personal Data is disclosed and protected, including your rights as data subjects.

1. Scope of this Privacy Policy Employees and Personnel

This Privacy Policy covers Personal Data of employees and personnel of the Company, for example, directors, advisors, executives, current employees, past employees, interns and other persons related to the Company’s personnel such as family members of our employees and emergency contact persons, etc.

2. Types of Personal Data We Collect

“Personal Data” means any information relating to an identified or identifiable natural person (“Data Subjects”), excluding information relating to deceased individuals.

“Sensitive Personal Data” means a special category of data specified by law, for example, race, political opinion, belief, religion or philosophy, sexual orientation, criminal record, health data, disability data, labor union information, genetic data, biometric data or any other similar data as provided by law. The Company is required to take special care of such data, including obtaining consent or otherwise being permitted by law to collect, use and/or disclose such data.

Where we receive a copy of your ID card or where we obtain data from your ID card via electronic means for the purpose of identity proofing in the job application process, updating employee data, handling requests or entering into any transactions with the Company, we may receive data relating to your religion, which is considered Sensitive Personal Data. We do not have a policy to collect such Sensitive Personal Data without your consent. In such cases, we will handle such data in accordance with applicable laws and regulations.

3. Personal Data We Collect

Types of Personal Data	Details
Basic Personal Data	For example, prefixe, name, surname, nickname, gender, photograph, weight, height, date of birth, age, nationality, personal identification number, passport number, social security number, driver's license number, tax ID number, bank account number, number plate, current address, registered address, email, telephone number, marital status, military status, educational background, work experience etc.
Sensitive Personal Data	For example, health data, facial recognition, with explicit consent from you or as permitted by law.
Employment Data	For example, employee number, work position, employment status, employment commencement date, employment termination date, period of employment, wages and compensation, attendance, overtime, leave and absences, training, provident fund, welfare and benefit, reasons for resignation, probation evaluation, performance evaluation, promotion, appointment, relocation, change in position and disciplinary action records.
Other Data	For example, personal profile, resume, Curriculum Vitae (CV), information on knowledge, capability, licenses, information from tests or interviews, communications via social media, financial information, opinions, testimonials, location, device number, voice recording, visual information from CCTV, still or motion pictures from the Company's activities and any other data which is considered Personal Data under the law.
Third Parties' Data	For example, spouse, family members, referees or emergency contact persons, beneficiaries under welfare programs where the Company will collect only necessary information such as full name, relationship with you, telephone number and other necessary information.

4. How we collect your Personal Data

4.1 Directly from you

We may receive your Personal Data through recruitment or job application process, information provided by you on job application form and supporting documents for the Company's recruitment consideration, surveys, interviews, including updates to your Personal Data in various processes in the course of your employment or contract with us.

4.2 From other sources

We may collect your Personal Data from other sources, for example, job application web sites, recruitment agencies, references or referees, information from other personal information searches, as necessary and permitted by law.

4.3 Third Parties' Personal Data

We may collect third parties' Personal Data as voluntarily provided by you including Personal Data of your spouse, children, father, mother, family members, emergency contact persons, beneficiaries, referee or previous employers, for the Company's welfare and benefit administration or emergency contact or reference for your own interests. You are requested to notify such persons of this Privacy Policy and obtain such persons' consent, if necessary, unless consent to disclose such third parties' Personal Data to the Company is not required by law.

5. Purposes of Collection, Use and Disclosure of Personal Data

The Company collects, uses or discloses your Personal Data for the following purposes based on the lawful bases provided under the Personal Data Protection Act :

5.1 Contractual obligations (for example, employment contract or any other contract, processing your requests/ applications before entering into a contract, as applicable), including in the following activities of the Company:

- Employment-related activities, for example, making employees list, employees information, employee card, probation evaluation, updating employees information, managing annual leave and absences, maternity leave notice, issuing certification letters, resignation from employment and other requests that may be made by you.

- Human resources activities, for example, training, knowledge and skill improvement, work assignment, power of attorney, appointment, relocation, change of position, company reorganization, performance evaluation, promotion, salary increase, bonus payment, career support and succession planning.
- Welfare and benefits provided to you, for example, annual health check-up, group insurance for employees and their family members, provident fund, and other financial supports (e.g. marriage, maternity support, funeral support in case of death of employees or their family members)
- Other internal affairs of the Company, for example, giving access to the Company's systems and information, management of Company's property delivered to the employees such as company access cards, keys, mobile phones, computers/ notebooks, cars.

5.2 Legal obligations, for example, under labor protection laws, social security laws, workmen compensation law, labor relations law, provident fund law, tax law, anti-money laundering law, computer law, for the following purposes and activities :

- Employees list, tax deduction and payment, social security payment, seizing and delivering salaries, bonuses and compensations as required by law such as in the process of legal execution or as required by the student loan fund.
- Monitoring and supervising work performance in accordance with the Company's regulations.

5.3 Legitimate interests of the Company as can be reasonably expected by you and which do not violate your fundamental rights and freedom, for the following purposes :

- Security of the Company's offices or other premises, for example, obtaining entry card to enter the Company's offices/ branches, recording of images by CCTV within the Company's premises
- Organizing events and activities within and outside the Company, including announcements or publications which may include your Personal Data such as your name, still or motion images of you during your participation in the Company's activities to promote such activities in accordance with the specific objectives of each activity.
- Training, seminars, outing – for your convenience, we may disclose your Personal Data to service providers for the purpose of arranging transportation, accommodation and other venues for you.
- Knowledge testing, completing surveys and evaluations.

- Monitoring, supervision, risk management and general administration and management of the Company's internal affairs.

5.4 We will obtain your consent if required by law or where we are unable to rely on other lawful bases for processing your Personal Data, for example:

- To verify and prove your identity for recording your attendance and/or access to the Company's premises to perform your duties, we will collect your face data (Facial Recognition) with your explicit consent or as permitted by law for the purpose of payroll or benefits administration, including office attendance, OT or work on holidays, leave and absences, payment of salary and compensation.

6. How we disclose your Personal Data

For the purposes set out in this Privacy Policy, your Personal Data may be disclosed or delivered to various departments within the Company or external parties as follows :

6.1 Within the Company

Your Personal Data may be disclosed or delivered to various departments within the Company, where relevant and as necessary for specific purposes. Such persons will be given access to your Personal Data only to the extent necessary and appropriate.

- Human Resources (HR) or other relevant officers, with restriction of access based on their responsibilities.
- Executives or your direct supervisors responsible for managing or making decisions that concern you in connection with HR matters.
- Other support team or departments such as IT department, administration, and finance department.

6.2 Outside the Company

Your Personal Data may be disclosed to the following external parties :

6.2.1 Government agencies, supervisory bodies or any other entities as required by law, for example, Revenue Department, Social Security Office, Department of Labor Protection and Welfare, Legal Execution Department, Student Loan Fund, Department of Skill Development, Office of Empowerment of Persons with Disabilities, Office

of the Securities and Exchange Commission, Ministry of Commerce, Ministry of Labor or any other agency exercising the power and duty under the law.

6.2.2 Agents, contractors/subcontractors, service providers in providing various services such as provident fund, banks in providing housing loans, health insurance, accident insurance, training, organizational evaluation, travel and accommodation booking, office rental, external auditors, and advisors. We will ensure that third parties engaged by the Company to process Personal Data carry out such processing in accordance with the Company's instructions and have appropriate data security measures.

6.2.3 External parties : The Company may disclose your Personal Data to external organizations or persons who make enquiries to the Company to verify transactions, such as loan or credit applications and job applications. In such cases, the Company will only disclose your employment status and other information that you have disclosed to such external parties, and where your consent is given to disclose your information to external parties such as your new employer, we may disclose your information to confirm your previous employment status or to your previous academic institution, to improve the quantity and standard of education or for research on graduates.

7. Storage and Retention of your Personal Data

We will retain your data for no longer than necessary and purpose in relation with Employee Privacy Policy and/or the Personal Data Protection Act B.E. 2562 (2019) of Thailand and/ or applicable laws.

We will delete or destroy your personal data or anonymize your personal data when it is no longer necessary or the above retention period is completed.

8. Rights relating to your Personal Data

You have the following rights subject to the Company's internal process and conditions of the Personal Data Protection Act:

- To update your Personal Data to be accurate, current, complete, and not misleading, if you are current employees or personnel of the Company.
- To request the Company to delete your Personal Data, if you believe that the collection, use and disclosure of your Personal Data is unlawful, or it is no longer necessary for the Company to store such data for the purposes set out in this Privacy Policy, or if you have exercised the right to revoke your consent or to object to the processing of your Personal Data.

- To access and request electronic copy of your Personal Data, disclosure and transfer of your Personal Data to other entities via electronic means, unless it is technically impossible to do so.
- To object to the processing of your Personal Data if the collection, use and disclosure of your Personal Data is for the Company's legitimate interests as can reasonably be expected by you, unless the Company is able to show that the basis of such processing outweighs your rights, or such processing is necessary to comply with the law or for initiating or defending legal claims.
- If you have given your consent to the Company's collection, use and disclosure of your Personal Data, you have the right to withdraw your consent at any time while your Personal Data is kept by the Company, unless such right is restricted by law or contract that is beneficial to you. Such withdrawal of consent may affect you. Therefore, you should consult with the Company before you exercise the right to withdraw your consent.
- If you believe that the Company handles your Personal Data in violation of the Personal Data Protection Act, you have the right to submit your complaint to the relevant authority.

9. Personal Data Security Measures

We have established appropriate safeguards to prevent the loss, unauthorized access to, use, alterations, amendments or disclosure of your Personal Data.

We will ensure that third parties engaged by the Company to process Personal Data carry out such processing in accordance with the Company's instructions and have appropriate data security measures.

10. Company's contact details

If you wish to exercise your data subject rights, or have any questions or complaints, you may contact us at :

Mega Life Sciences Public Company Limited

384 Moo 4, Soi 6, Phattana 3 Road, Bangpoo Industrial Estate, Preaksa Sub-district, Mueng Samutprakarn District, Samutprakarn Province. Tel : 02 401 8686

Or email : DPO@MEGAWECARE.COM