

Privacy Notice for Candidate

Dear Candidate,

Sumitomo Corporation Thailand Ltd. and Sumi-Thai International Limited and Sumi-Thai Holdings Limited (“Company”, “we” or “our”) values your privacy and strives to protect your personal data (“Personal Data”) based on a Thai Personal Data Protection Act B.E. 2562 (2019) (“PDPA”).

This Privacy Notice explains: -

- what kind of Personal Data do we collect? This includes what you tell us about yourself (“you”, “your” or “yourself”) and what we learn through a recruitment process.
- how do we use your Personal Data?
- who do we disclose the Personal Data to?
- what are the choices we offer? This includes how to access and update your Personal Data.
- what are your privacy rights and how does the law protect you?

1. What kind of Personal Data do we collect?

We collect and use many kinds of the Personal Data, depending on circumstances relating to the recruitment process.

We collect the Personal Data about you from a variety of sources, including but not limited to: -

- Directly from you as a part of recruitment process (e.g., application forms, CVs or resumes, etc.);
- The data that we have received during the recruitment process (e.g., during an interview session, telephone or video calls, etc.);
- Identification documents (e.g. ID card, passport, driving license, etc.);
- The data that we have or may have received when you have entered into our systems, tools or websites;
- The application forms or other documents you have completed at the beginning or during the recruitment process; and/or
- Any correspondences with you through interviews, meetings or any other assessments e.g., CCTV, visual and/or voice recording equipment, etc.

In some cases, we may collect your Personal Data from third parties, such as references from your former employers (e.g., period and performance during the previous employments, etc.), data from recruitment agencies, data from accessible sources e.g., LinkedIn, JobsDB, Facebook, etc., data from employment background check providers, data from credit reference agencies and data from a criminal record check.

The categories of your Personal Data that we will collect, subject to the applicable law, includes but not limited to: -

- **Personal details:** Name, gender, date of birth, marital status, personal identification number, passport number, social security number, contact details (e.g., email address,

telephone number, social media, etc.), nationality, work entitlement in Thailand, photograph on your identification card or passport, driving license, authorized signatures, photographs, and CCTV images/footage;

- **Educational details:** The details of, for instance, educational background, transcript, educational achievements, etc.;
- **Family details:** Names and contact details of family members, including spouse and dependents;
- **Professional details:** The details of profession, professional memberships, employer's feedback, professional qualifications, skills, experience, trainings and employment history (CV or resume);
- **Transactional details:** The details of your salary and benefits (e.g., bonus, pensions and insurance coverage, etc.);
- **Other details:** The information we have or may have received from the interview with you;
- **Sensitive Personal Data:** -
 - Religious;
 - Health/medical/biological data; and
 - Criminal record

During the processing of your Personal Data, we may collect some of your sensitive Personal Data for you to be able to attend the interviews; if successful, to be ready for your position and to ensure that we have complied with the laws in relation to an employment. We will not collect, use, and/or disclose this category of data without your consent, unless the law permits us to do so.

We may collect your employment history, documents and related test results to process and decide whether or not you meet basic requirements to obtain the position. If so, we will further decide whether it is suitable to offer you the interview. If we decide to offer you the interview, we will use the data you have provided during the interview to decide whether or not to offer you the position. If we decide to offer you the position, we may then take up the references and/or any other checking process before confirming an offer.

2. How do we use your Personal Data?

We may collect and use your Personal Data only if we have proper reasons. This includes sharing it outside the Company. When we collect, use and/or disclose of your Personal Data, we will rely on one or more of the legal grounds as follows: -

- **Contractual basis** - When it is necessary to fulfil the recruitment process for entering into an employment contract that we have or may have with you;
- **Legal obligation** - When it is necessary for us to process your Personal Data in order to comply with the laws or legal obligations;
- **Legitimate interest** - When it is our legitimate interest to process your Personal Data for the benefit of Company, as permitted by the law, and as long as your interest does not exceed the benefits of the Company; and/or

- **Consent** - When you give your consent to us to process your Personal Data for stated purposes.

The purposes for which we process your Personal Data, subject to the applicable law, and the legal basis on which we perform such processing, are: -

Purposes of collection, use and disclosure of Personal Data	Legal basis
<ul style="list-style-type: none"> • To process your job application • To confirm your identity • To evaluate your skills, qualifications and suitability for the position • To carry out background and reference checks that we are able to • To communicate with you about the recruitment process • To keep records related to our recruitment process 	<ul style="list-style-type: none"> • Contractual basis
<ul style="list-style-type: none"> • To comply with regulatory requirements and/or obligation 	<ul style="list-style-type: none"> • Legal obligation
<ul style="list-style-type: none"> • To process on your background and reference checks when it is applicable based on your consent 	<ul style="list-style-type: none"> • Consent
<ul style="list-style-type: none"> • To prevent crimes and manage a security of our premises, for example, we may install the CCTV in and around our premises and these may collect your photo videos or voice recording 	<ul style="list-style-type: none"> • Legitimate interest

When we rely on the **legitimate interests** as the reason for processing the Personal Data, it has considered whether or not your rights are overridden by our interests and has concluded that they are not.

In case you refuse to give us your Personal Data

Under the circumstance that it is necessary for us to collect your Personal Data in accordance with the laws or under the contract terms between you and Company and you decline to such collection, we may not be able to meet the obligations that have been agreed with you, or to enter into the contract with you. In this given circumstance, we may refuse to offer you the interview and/or position at us. In any case, we will notify you while we are collecting your Personal Data.

3. Who do we disclose Personal Data to?

We may internally circulate your Personal Data to the followings for the purpose of processing your Personal Data: -

- Our employees who have a managerial responsibility over the candidates, or who act on their behalf;
- Our human resources personnel who has a responsibility for a certain HR process (e.g., recruitment, assessment, pre-employment screening, etc.);
- Our employees in a recruitment team who will assess and consider to offer the interview;

- Our employees in a regulatory compliance unit with the responsibility to investigate the issues of non-compliance with laws and regulations, policies and contractual requirements;
- Our employees in IT and system owners who manage a user's access;
- Our audit and investigation employees in relation to specific audits/investigations; and/or
- Our facility's managerial and security personnel.

We may also need to share your Personal Data with certain external third parties, including but not limited to: -

- Your referees;
- Recruitment agency;
- Academic institutions (e.g., universities, colleges, etc.) in validating the data you have provided;
- Third party suppliers who provide services on our behalf; and/or
- Third parties who undertake a background screening on our behalf (e.g., credit checking agencies, criminal checking bureaus, etc.).

Except as described in this Privacy Notice, we will not use your Personal Data for any purposes other than the purposes as described to you in this Privacy Notice. Should we intend to collect, use or transfer additional Personal Data which is not described in this Privacy Notice, we will notify you and obtain your consent, where required, prior to the collection, use and disclosure, except where the laws permit us to do so without your consent. You will also be given the opportunity to consent or decline the approval of such collection, use and/or transfer of Personal Data.

4. Retention of Personal Data

We retain your Personal Data for as long as it is necessary to carry out the purposes for which it was collected that is for recruitment reasons or compliance with the applicable laws.

We will hold to your Personal Data throughout the duration of recruitment process, and for 1 year after the recruitment process. Unless otherwise required or necessary in the event of regulatory or technical reasons, we may keep your Personal Data for longer than of the recruitment period. If we do not need to retain your Personal Data any longer than it is legally required or necessary, we will destroy, delete or anonymize it. If you have been offered with the position at the Company, we will retain your Personal Data after the end of recruitment process, and this will comply with the Privacy Notice for Employees of Company, which will be a separate policy form from this Privacy Notice.

5. Accuracy of your Personal Data

We will need your cooperation to ensure that your Personal Data is up to date, complete and accurate. Please inform us of any changes to your Personal Data by: -

- Contacting Human Resources representative at Ms. Siriporn S.; or
- Updating your information at/via sutthisarn.siriporn@sumitomocorp.com.

We will occasionally request updates from you to ensure that the Personal Data we use to fulfill the purposes of collection, usage and/or disclosure is up to date, accurate and complete.

6. What are your privacy rights and how does the law protect you?

Under certain circumstances, you may have the right to your Personal Data in accordance with the laws on a personal data protection, which we highly value your rights and will act in accordance with the laws, rules, or regulations related to the processing of your Personal Data in a timely manner.

You will be protected and obtain legal rights regarding your Personal Data as follows: -

- **Right to Withdraw:** In case where we process your Personal Data with your consent, this enables you to withdraw your consent to our processing of your Personal Data, which you can do at any time. We may continue processing your Personal Data if we have another legitimate reason to do so;
- **Right to Access:** This enables you to receive a copy of Personal Data we hold about you;
- **Right to Correct:** This enables you to have any incomplete or inaccurate information we hold about you corrected. Please refer to Article 5 for more details on the accuracy of your Personal Data;
- **Right to Erasure:** This enables you to ask us to delete, destroy or anonymize your Personal Data where there is no good reason for us to continue processing it. You also have the right to ask us to delete your Personal Data where you have exercised your right to object to the processing (see below). Nonetheless, we will consider a request to delete carefully according to the laws regarding the processing of your Personal Data;
- **Right to Object:** This enables you to object to the processing of your Personal Data where we are relying on the legitimate interest. You also have the right to object where we are processing your Personal Data for direct marketing purposes and profiling activities;
- **Right to Restrict Processing:** This enables you to ask us to suspend the processing of your Personal Data, for example, if you want us to establish its accuracy or a reason/lawful basis for processing it;
- **Right to Portability:** In some cases, you have the right to request for the copy of your Personal Data in an electronics form in cases where the Personal Data that you provided to us and such processing is upon your consent, or where it is necessary to process such Personal Data in order to meet the obligations under the contract; and
- **Right to Lodge a Complaint:** This enables you to file the complaint with a related government authority, including but not limited to, the Thailand Personal Data Protection Committee, when you see that we, our employees or service providers violate or do not comply with the PDPA or other notifications issued under the PDPA.

You may exercise your rights at any time by informing us via the contact specified in Article 10 below, without having to pay any fees to access your Personal Data or exercising any other rights. However, we may charge a reasonable fee if your request does not have a rigid ground, is duplicated or is clearly more than necessary. In other words, we may refuse to proceed with your request under those situations.

We may need to request certain Personal Data from you in order to verify your identity and guarantee your right to access the Personal Data (or to exercise any other rights) which is considered a security measure to ensure that your Personal Data will not be disclosed to those who is not authorized to access the Personal Data. We may also contact you for more information about the request for a quicker response.

We will make every effort to respond to your legitimate request within 30 days. Under some circumstances, we may take more than 30 days depending on a complexity or duplication of your request. In such case, we will inform you on a status of your request.

Handling of Complaints

In the event that you wish to make the complaint about how we process your Personal Data, please contact our Data Protection Officer at dpo.th@sumitomocorp.com and we will try to consider your request as soon as possible. This does not prejudice your right to file the complaint with a government authority or Thailand Personal Data Protection Committee.

7. Security of your Personal Data

Information is our asset and therefore we place a great importance on ensuring the security of your Personal Data. We regularly review and implement up-to-date physical, technical and organizational security measures when processing your Personal Data. We have internal policies and controls in place to ensure that your Personal Data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties. Our employees are trained to handle the Personal Data securely and with utmost respect, failing which they may be subject to a disciplinary action.

8. Your Responsibilities

Once you have entered into our recruitment process, you have an obligation to provide your Personal Data so that you may exercise your statutory rights. Failing to do so, you might not be able to exercise your statutory rights.

You will need to provide your Personal Data, such as personal information, contact information, etc. to us to proceed with the recruitment process.

If you do not provide such Personal Data, we may not be able to exercise the rights and obligation efficiently to fulfil the foresaid obligation or will hinder our ability to administer the rights and obligations arising as a result of relationship efficiently, and therefore may refuse to have or continue the relationship with you.

9. Revision of our Privacy Notice

We keep our Privacy Notice under a regular review and thus the Privacy Notice may be subject to changes. The date of last revision of Privacy Notice can be found on the top page of this notice and via [<https://www.sumitomocorp.com/en/asia-oceania/sct>].

10. Contact us

If you have any questions in regard to the protection of your Personal Data or if you wish to exercise your rights, please contact our Data Protection Officer through the following channels: -

- Email us at dpo.th@sumitomocorp.com ; or
- Call us at +66 2654 0079