

Privacy Notice of Hitachi Elevator (Thailand) Co., Ltd. for employees, directors, top management, shareholders, employee's family members, or any person whose personal data has been provided by the employee.

Hitachi Elevator (Thailand) Co., Ltd. (“the Company”) values the importance of the protection of personal data of employees, directors, top management, shareholders, employees' family members, or any person whose personal data has been provided by the employee. This Privacy Notice describes practices regarding the collection, usage, and/or disclosure of personal data including the rights of the personal data subject to the Personal Data Protection Act B.E. 2562.

1. Scope of the Entry into Force

1.1. Person who makes the announcement comes into force

This announcement is effective for employees, directors, top management, shareholders, or internal personnel working for the Company or those who come to work for the Company including but not limited to family members of employees or any person whose personal data has been provided by the employee (“you”) such as employees, current employees, consultants or experts, directors, top management, former employees, interns, references, guarantors, family members, etc.

2. Collected Personal Data

2.1 Source of Personal Data

2.1.1 Receive Personal Data Directly from You

The Company receives personal data from you directly through the process of recruiting, interview and selection process, labor contract preparation process, and other related processes through various channels provided by the Company such as website, email, telephone, fax, text message (SMS), questionnaire, application form or any other channels.

2.1.2 Obtain Personal Data from Other Sources

The Company may obtain your data from other sources such as employees, employment agencies, job-recruiting websites, affiliated companies, persons you refer or certify, or by checking your background and qualifications, for example from the university you graduated from, the same agency, or organization that you used to work for, government agencies, etc.

3. Types of Personal Data the Company Collects

The Company will collect, use and/or disclose your personal data only as necessary to achieve the objectives of the Company in Article 6.

However, the personal data that the Company collects will be based on the relationship between you and the Company on a case-by-case basis.

The personal data collected by the Company is divided into two types as follows:

3.1 General Personal Data includes the following data:

Article No.	Personal Data Type	Example of Data
3.1.1.	Personal Data	<ul style="list-style-type: none">- Name, surname- Signature- Gender, age, date of birth- Nationality, country of residence- Marital status, military status- Photograph- Document data issued by government agencies are used for identification and verification, such as a copy of an ID card, a copy of a passport, a copy of house registration, a copy of a birth certificate, a copy of a driving license, a copy of marriage certificate, a copy of adoption registration certificate, etc.
3.1.2.	Contact detail	<ul style="list-style-type: none">- Address according to important documents, address according to the current document, place of work- House map in a brief- Phone number, email- Username or account for various electronic/social communication such as ID Line, etc.
3.1.3.	Financial Data and Assets Detail Data	<ul style="list-style-type: none">- Bank account number- Information on the salary certificate, salary slip/bonus, or other proof of income

Article No.	Personal Data Type	Example of Data
		<ul style="list-style-type: none"> - Taxpayer identification number - Tax deduction information - Vehicle registration plate. - Number of stocks held
3.1.4.	Education and Work detail	<ul style="list-style-type: none"> - Educational record - Employee ID - Workplace, department/section/division - Diploma certificate of education, training, awards - Language test scores - Performance evaluation information - Work permit - Leave records, illness records - Records of working in the field - Start date - end date of work - Benefits information
3.1.5.	Technical Data	<ul style="list-style-type: none"> - IP address - Cookies ID - Video and audio recordings - CCTV footage - Location information via GPS - Other technical data from the usage of the Company's applications
3.1.6.	Other Data	<ul style="list-style-type: none"> - Registration information for attending the Company's seminars/activities - Your travel information such as itinerary, flight information, etc.

3.2 Sensitive Personal Data

Sensitive Personal Data means personal data that is defined under Section 26 of the

Personal Data Protection Act B.E. 2562. The Company has no purpose for collecting your sensitive personal data except only to achieve the objectives in Article 6, such as health data from coronavirus (Covid-19) test results, body temperature data, vaccination result data, annual health check results, medical certificates, biometric data from fingerprint, face recognition, disability, criminal record, etc.

If the event that the Company asks to collect a copy of your ID card except in the case where the Company keeps a copy of your ID card with the need for religious and/or blood group data. The Company asks you to make the following personal data invisible by asking you to cross out the religious and/or blood group personal data that appears on the page of the ID card copy due to the Company does not have the purpose for collecting such personal data which is sensitive personal data from you. If you do not cross out, the Company will assume that you consent to the Company to cross out that data.

4. Collection of Personal Data of Minors, Incompetent Persons, or Quasi-incompetent Persons

If the event that you are a minor, an incompetent person, or a quasi-incompetent person, the Company has no purpose for collecting personal data of minors, incompetent persons, or quasi-incompetent persons except with the consent of a user of parental power or a guardian depending on the case. If the event that the Company collects personal data of minors, incompetent persons, or quasi-incompetent persons without the consent of such person, the Company will immediately delete or destroy such personal data. Unless there is a legal basis to empower the Company to collect, use and/or disclose personal data without obtaining consent. The Company will only collect, use and/or disclose necessary personal data to achieve the objectives related to you and the Company.

5. Methods of Retention of Personal Data

The Company maintains personal data in document and electronic formats, and keeps your personal data as follows:

- 5.1. Servers of the Company in Thailand
- 5.2. Servers of the Company in foreign countries

6. Purposes for Collecting, Using, and/or Disclosing Personal Data

The Company has the purpose of collecting, using, and/or disclosing your personal data and the following legal basis :

However, the purposes and legal basis will be under the relationship between you and the Company. Therefore, the purposes and legal basis are chosen on a case-by-case basis.

Article No.	Purpose	Legal Basis
6.1	To carry out the performance of an employment contract or any other contract related to employment between you and the Company such as <ul style="list-style-type: none">● Recording of your information/details in the employment contract.● Dictate Job description in the labor contract.● Collect family members' information to provide welfare/ benefits.● Qualification check for the benefit of working for the Company, such as not being a stakeholder with the Company, etc.● Verify the background of the guarantor of work, etc.	Contractual Basis Legitimate Interests
6.2	To collect personal data from you for the preparation of employee registration files.	Legal Obligation
6.3	To create your user account in the Company for working such as preparing company emails, issuing employee cards, etc.	Legitimate Interests
6.4	To communicate and publicize, providing various information within the organization such as <ul style="list-style-type: none">● Notify affiliation, employees, internal personnel for job development and performance evaluation, such as On-boarding process● Introduce new employees in advance to internal personnel through various media of the	Contractual Basis Legitimate Interests

Article No.	Purpose	Legal Basis
	Company such as e-mail, internal announcements, etc.	
6.5	To execute the Non-Disclosure of Confidential Information (NDA) contract.	Contractual Basis
6.6	To implement the work regulations of the Company.	Contractual Basis Legitimate Interests
6.7	To implement the Company's various policies.	Contractual Basis Legitimate Interests
6.8	To organize trainings, seminars, participating in any legal activities including the Company organized and/or related to the Company to comply with the law including, but not limited to, the development of operational abilities such as <ul style="list-style-type: none"> ● Company training to develop competency related to your position. ● Annual Basic Fire Fighting and Evacuation Training ● Book air tickets and accommodation for you in case of off-site training, etc. 	Legal Obligation Contractual Basis Legitimate Interests
6.9	To manage salaries, compensation, various benefits, annual bonuses, cremation expenses, tax deduction, social security, medical expense reimbursement, money freezes according to the orders of government agencies, student loan deduction, deduction of the traffic fines, deduction of installments sent to the bank including other related expenses.	Legal Obligation Contractual Basis Legitimate Interests
6.10	To manage human resource operations such as <ul style="list-style-type: none"> ● Entering - leaving working hours includes exercising the legal leave. The Company will collect your personal data through various methods as the Company determined and 	Legal Obligation Contractual Basis Legitimate Interests

Article No.	Purpose	Legal Basis
	<p>considered appropriate, such as submitting a medical certificate via the application when the employee is on leave for more than 3 consecutive days, tapping the employee card, checking in - checking out through the Company's application, etc.</p> <ul style="list-style-type: none"> ● Check your location via GPS when you are working in the field ● Evaluation of probation, assessment of promotion, assigning/appointing, changing of position, publicizing/advertising organization, etc. ● Sending an appointment for the annual meeting agenda and meeting minutes to the Board of Directors via email (E-mail) or messenger. ● Making a power of attorney, etc. 	
6.11	<p>To record the meeting between you and the Company and/or that you join on behalf of the Company. The Company may record still images and/or Video and audio recordings to check and verify your identity and/or for internal operations of the Company, such as to preparing meeting minutes, for the benefit of paying meeting fees, etc.</p>	<p>Contractual Basis Legitimate Interests</p>
6.12	<p>To publicize and inform third parties to know the Company's information. The Company may disseminate some of your personal data including but not limited to your still images and/or Video and audio recordings with, for example</p> <ul style="list-style-type: none"> ● Publicize your history, educational qualification, your work experience through the Company's website to make decisions for those who are 	<p>Contractual Basis Legitimate Interests</p>

Article No.	Purpose	Legal Basis
	<p>interested in attending seminars/training sessions in which you are a lecturer.</p> <ul style="list-style-type: none"> ● Publish your videos with sound to produce a video introducing the Company. ● Disclose your contact data to customers/partners of the Company, etc. 	
6.13	<p>Implement health and safety management services including but not limited to occupational disease control such as</p> <ul style="list-style-type: none"> ● Prepare a record of health data. ● Prepare a health assessment form for personnel before entering the workforce. ● Annual physical examination for risky occupations as required by law. ● Investigate employees who may have work-related illnesses and prepare accident investigation reports or the occurrence of accident, etc. 	<p>Legal Obligation Contractual Basis</p>
6.14	<p>To implement welfare provisions as required by law including those specified by the Company such as</p> <ul style="list-style-type: none"> ● Health insurance preparation. ● Provident fund preparation. ● Providing scholarships for employees' children. ● Social security preparation must be registered according to the form prescribed by the law sps.1-03/1, sps.103/sps.9-02, etc. 	<p>Legal Obligation Contractual Basis</p>
6.15	<p>To comply with laws and orders of government agencies such as the Social Security Office, the</p>	<p>Legal Obligation</p>

Article No.	Purpose	Legal Basis
	Revenue Department, courts, and other government agencies, etc.	
6.16	To manage the Company's information technology, such as processing your request when you request to exercise your rights as a personal data subject, keeping your personal data accurate and up to date, etc.	Legal Obligation Legitimate Interests
6.17	To operate security within the organization and buildings such as video recording with CCTV, employee card making, etc.	Legal Obligation Legitimate Interests
6.18	To contact you in the event of an emergency with you.	Legitimate Interests
6.19	To implement business plan, include internal audit supervision, the Company's risk assessment, and/or companies within the group for the Company, to reach achievement to assess and improve the effectiveness of risk management, control, and governance processes in a systematic and orderly manner.	Legitimate Interests
6.20	To comply with laws relating to public interest in public health such as health protection from dangerous communicable diseases or epidemics that may be transmitted or spread into the Kingdom, etc.	Legal Obligation
6.21	Establish legal claims, compliance with the law, and exercise or defense against the Company's legal claims.	Legal Obligation Legitimate Interests

The Company collects, uses, and/or discloses your personal data on the legal basis that the Personal Data Protection Act B.E. 2562 grants the power without asking for consent. However, there are cases where the Company may require your explicit consent because the law requires, The Company will ask for your consent for the collection, usage, and/or disclosure of your personal data via the “Consent Form for the Processing of Personal Data” and if you are an employee and provides personal data of your family members or any person to the Company, it is your responsibility to notify them of this Privacy Notice regarding personal data. If there is a case in which explicit consent is required, you must be the one who requests consent for the processing of such person's personal data to the Company.

The Company will seek your consent for activities that, in consideration of your relationship with the Company, require consent, which has the following purpose.

Article No.	Purpose	Legal Basis
6.22	<p>To perform any acts between you and the Company requiring consent, such as</p> <ul style="list-style-type: none">● Requesting to collect health data for annual health check, medical expense reimbursement, management and allocation of vaccination.● Requesting to collect your fingerprint data and/or face recognition data for check-in and check-out operations.● Requesting to keep a copy of your ID card for air ticket booking or issuing a visa, etc.	Consent

The Company would like to inform you if you must provide personal data to the Company for the performance of a law or contract, or if it is necessary to provide personal data to enter that contract. If you do not wish to provide personal data to the Company, it may result in the Company's failure to perform certain legal, contractual, or service provision with you due to your personal data being necessary for that process.

Any personal data that the Company has collected before June 1, 2022, which is the date the Personal Protection Act B.E. 2562 came into force, the Company can continue to collect and use such personal data under its original purpose. However, if you do not wish to let the Company collect and use personal data obtained from you before June 1, 2022, unless otherwise required by law, you can withdraw your consent by contacting the Company's personal data protection officer according to the channels that the Company provided in Article 12 of the Announcement.

7. Disclosure of Personal Data

The Company may disclose your personal data to others under your consent or as permitted by law to disclose as follows:

7.1 Management within the Organization

The Company may disclose your personal data within the Organization to the extent that it is necessary for your administration under this notice to benefit you and others.

7.2 Law Enforcement

If the law or government agency requests it, the Company must disclose your personal data as necessary to government agencies such as courts or other government agencies.

7.3 Business Partners

The Company may disclose certain personal data to its business partners for contact and coordination purposes stated in this notice.

7.4 Affiliated Companies

The Company may disclose certain personal data to companies within its affiliates for working on projects related to you.

7.5 Service Provider

The Company may disclose certain personal data to service providers for operations such as

7.5.1. Training, seminar

7.5.2. Transport service

7.5.3. Document preservation and destruction service

7.5.4. Marketing service

7.5.5. Technology service

7.5.6. Business consulting company, auditor, legal or tax advisors, etc.

7.6. Business Transfer

The Company may disclose personal data including your personal data for reorganization, merger, divestiture, or other transfers of property, whereby the receiving party will consistently treat your personal data with this notice including the Personal Data Protection Act.

8. Personal Data Storage Period

The Company will keep your personal data for the period necessary to achieve the purposes related to this notice. However, it may be necessary for the Company to keep it afterward if otherwise required by law or to complete the performance of the contract.

The Company will delete, destroy, or make your personal data non-identifiable when it is out of necessity or at the end of such period.

9. Rights of Data Subject

You being the subject of personal data have the right to perform the following actions:

9.1 Right to Withdraw Consent

If you have given your consent, the Company will collect, use and/or disclose your personal data. Either the consent you have given before the date on which the Personal Data Protection Act comes into force or afterward. You have the right to withdraw your consent at any time.

9.2 Right to Access

You have the right to request access to your personal data, which is the responsibility of the Company, ask the Company to make copies of such personal data for you including requesting the Company to disclose how the Company obtains your personal data.

9.3 Right to Portability

You have the right to obtain your personal data if the Company has provided that personal data is in a form that is readable or usable using an automated tool or device and that personal data can be used or disclosed by automated means; including the right to request the Company send or transfer personal data in such form to another data controller if it can be done by the automatic means, and you have the right to obtain personal data that the Company send or transfer to other Data Controllers unless it is impossible to do so because of the technical circumstances.

9.4 Right to Object

You have the right to object to the collection, usage, and/or disclosure of your personal data at any time.

If the collection, usage, and/or disclosure of personal data is made to carry out necessary operations under the Company's legitimate interests or of another person or juristic person without exceeding the extent that you can reasonably expect or to carry out missions in the public interest, the Company will continue to collect, use and/or disclose your personal data only to which the Company can reasonably demonstrate by law that it is more important than your fundamental rights or it is for confirmation and compliance with the law or litigation on a case-by-case basis.

9.5 Right to Erasure/Destruction

You have the right to request removal or destroy your personal data or make the personal data non-identifiable if you believe that your personal data has been unlawfully collected, used, and/or disclosed under applicable law or that the Company has no need to keep personal data for the purposes related to this announcement or when you have exercised the right to withdraw your consent or exercised the right to object as stated above.

9.6 Right to Restriction of Processing

You have the right to request a temporary suspension of the usage of personal data if the Company is in the process of reviewing your request to exercise your right to correct your personal data or object or in any other cases that the Company is out of necessity and needs to delete or destroy your personal data according to the relevant laws, but you ask the Company to suspend the usage instead.

9.7 Right to Rectification

You have the right to request that your personal data be corrected, up-to-date, complete, and without causing misunderstandings.

9.8 Right to Lodge a Complaint

You have the right to complain with the relevant legal authority if you believe the collection, usage, and/or disclosure of your personal data is an act that violates or fails to comply with the relevant laws.

You can exercise your rights as the data subject by contacting the Company's personal data protection officer according to the details at the end of this announcement, the Company will notify the result of the operation within 30 days from the date the Company receives an exercise request from you according to the form or method specified by the Company. If the Company refuses the request, the Company will inform you of the reason for the refusal via various channels such as text message (SMS), e-mail, telephone, mail, etc.

10. Sending or Transferring Personal Data Abroad

The Company may transmit or transfer personal data to individuals, organizations, or servers located in foreign countries only for the fulfillment of the objectives and legal basis specified in Article 6. However, the Company will use caution and consider your safety as important by sending or transferring personal data only as necessary. The Company will take various measures to ensure that the transfer of your personal data to the destination country has adequate personal data protection standards or other cases as required by laws.

11. Amendment to the Privacy Notice

To comply with the Personal Data Protection Act B.E. 2562 to effectively protect your personal data, the Company may review, amend, change, or cancel this personal data protection notice at any time and the Company will notify you after such change every time.

This announcement is the latest amendment and is effective from June 1, 2022.

12. Details of Personal Data Protection Officer

If you have any questions or want to ask more about the Company's privacy notice or want to exercise your rights as the subject of personal data, please contact the

Personal Data Protection Officer or Personal Data Protection Group of Hitachi Elevator (Thailand) Co., Ltd. having address at No. 30 Soi Onnuch 55/1 Prawet Sub-district, Prawet District, Bangkok 10250, e-mail : kalyakorn.ditsri.no@hitachi.com and telephone number 02 320 5777.