

# SUMITOMO MITSUI AUTO LEASING & SERVICE (THAILAND) CO., LTD.

## PRIVACY NOTICE FOR APPLICANTS

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The purpose of this Privacy Notice (the “Notice”) is to provide details with regard to the collection, use and disclosure of your Personal Data by **Sumitomo Mitsui Auto Leasing & Service (Thailand) Co., Ltd.** (the “Company”) pursuant to the Personal Data Protection Act B.E. 2562 (2019). This Notice shall apply to you as an applicant, including family members and other third parties in which you have provided Personal Data in other respects.

### DEFINITION

“**Personal Data**” means any information relating to a natural person, which enables the identification of such person, whether directly or indirectly, but not including the information of the deceased persons.

“**Sensitive Personal Data**” means a Personal Data pertaining to racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any data which may engender the unfair discrimination against the data subject or affect the data subject in the same manner as prescribed by law.

“**Legal Basis**” means the justifiable ground to collect Personal Data as prescribed in the Personal Data Protection Act B.E. 2562 (2019).

### CATEGORIES OF PERSONAL DATA WHICH THE COMPANY COLLECTS

The Company will collect all or part of your Personal Data as specified in this Privacy Notice, as necessary for proceeding with the purposes of the Company which informed in this Privacy Notice.

- **Personal identification and general contact information** such as prefix, name, surname, nickname, age, sex, date of birth, nationality, occupation, current address or address of house registration, picture, living status, marital status, personal phone number, home phone number, personal email address etc.
- **Information contained in the attachment** such as Curriculum Vitae / Resume, identification card, passport, Thai work permit or Thai professional license, driving license, documents certifying your education and other documents (such as in the case of attaching additional documents related to apply for the position)
- **Information regarding occupation, expertise or special skills** such as work skills, language skills, special knowledge, work experience and work history, educational background, current and previous workplace, working period from past to present etc.

- **Assessment information by the Company** such as skills assessment result, comments to the applicant, interview result, the agreement related to employment date, appointed position, probationary period, salary and other conditions which related to offer for employment etc.
- **Sensitive Personal Data** such as religion, blood group, health information of disability status, criminal records etc.

## SOURCE OF PERSONAL DATA

The Company will collect your Personal Data directly and indirectly from the following sources:

- From you directly and verbally such as through face to face interactions, or through telephone, via documents for instance cover letter, curriculum vitae/resume or other documents. This shall include any other communication channel such as email, fax, online network e.g. recruitment websites in which you have provided your Personal Data for applying for a vacancy with the Company etc.
- From other sources such as recruitment agencies, persons referred to in your job application to inquire regarding your work, other organizations you have/ had worked for, government organizations etc.

## OBJECTIVE OF COLLECTING PERSONAL DATA

The Company shall solely collect your Personal Data for use and/or disclosure in compliance with the objectives and the legal basis under this Notice. In the case of necessity where the Company is required to collect additional Personal Data or use Personal Data for other purposes apart from the stipulated objectives within this Notice, the Company is obliged to inform you on the Personal Data collection and/or the new objectives respectively. The Company may request for additional consent on collecting, using and disclosing of your Personal Data according to the law if such consent is required by law.

OBJECTIVE OF THE COLLECTION	LEGAL BASIS
1. Contacting for interview appointment, notifying the interview result and vacancy offer for entering into an employment agreement with you.	<b>General Personal Data</b> <ul style="list-style-type: none"> <li>- For compliance with the agreement or entering into the agreement.</li> <li>- For the legitimate interest of the Company.</li> </ul>
2. Processing of the application, utilizing the information and internally disclosing within the Company for the interview, performance assessment, qualification and suitability of the position applied, this shall include	<b>General Personal Data</b> <ul style="list-style-type: none"> <li>- For compliance with the agreement or entering into the agreement.</li> <li>- For the legitimate interest of the Company.</li> </ul>

other vacancies which the Company deems appropriate.	<p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
3. For internal management on the recruitment process, such as a request for permission and proposal of vacancy and offer employment to you, which has been conducted internally.	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
4. Checking the applicant's background from third parties or external organizations.	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
5. Recording or maintaining of your Personal Data for consideration and contacting to you. In the event the Company re-opens this vacancy or other vacancies in the future which the Company has considered the said vacancy appropriate for you (only if you do not pass the job interview or do not enter into a contract with the company for other reasons.).	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- Request for explicit consent.</li> </ul>
6. Protect the legitimate rights of the Company or dispute allegations against the Company such as legal action, initiation of legal proceeding, litigation, alternative dispute resolution and other proceedings to protect the legitimate rights of the Company or dispute allegations against the Company as permitted by law.	<p><b>General Personal Data</b></p> <ul style="list-style-type: none"> <li>- For the legitimate interest of the Company.</li> </ul> <p><b>Sensitive Personal Data</b></p> <ul style="list-style-type: none"> <li>- To establish rights to a legal claim, compliance or exercise of rights to claim as permitted by law; or for dispute allegations.</li> </ul>

## IMPACT FROM THE REFUSAL IN PROVIDING PERSONAL DATA

The Company will collect your Personal Data to determine your qualification and suitability of entering into an employment agreement. In the event where you do not provide Personal Data to the Company, the Company may not be able to accurately assess your ability and suitability. In some cases, such Personal Data is an essential element for the applied vacancy. As such, the Company may decide to reject your application if you do not provide such required Personal Data.

## DISCLOSING, SENDING OR TRANSFERRING PERSONAL DATA TO A FOREIGN COUNTRY

To achieve the objectives stated above, the Company may be required to disclose your Personal Data to persons or organizations including but not limited to the following:

- Service providers and agents who have been hired by the Company for instance service providers on IT system or other databases, job recruitment agents and recruitment platform service providers;
- Organization which the applicant had prior worked with;
- Reference person which the applicant had specified;
- Police officers, courts, arbitrators, lawyers, officers and persons or organizations associated with the judicial process and dispute resolution.

## RETENTION PERIOD OF PERSONAL DATA

The Company will collect and retain your Personal Data for the period necessary to **consider entering into an employment agreement with you**. Once such objective has elapsed, the Company will store your Personal Data for the following retention periods:

- In the case the Company employs you, the Company will retain your Personal Data for the duration of the employment agreement and not exceeding 10 years after termination of employment.
- In the case the Company does not employ you for any reason such as the Company does not offer you employment or you turn down such offer, and you consent for the Company to collect and store your Personal Data in the Company database, the Company will retain your Personal Data for a period not exceeding 2 years from the date of rejection of employment or declination of such offer.
- In the case the Company does not employ you for any reason such as the Company does not offer you employment or you decline such offer, and you do not consent for the Company to collect and store your Personal Data in the Company database, the Company will remove and destroy your Personal Data without delay and within 30 days from the date of rejection of employment or declination of such offer.

Nonetheless, the Company may retain all or part of your Personal Data for a duration beyond the period specified above for compliance with the law, any undertaking for debt collection, and to protect the legitimate rights of the Company, or to rebut any allegations made against the Company. In such case, the Personal Data may be retained for as long as it is necessary for the Company to abide with the specified objectives and/or for the duration stipulated by law.

## RIGHTS OF DATA SUBJECT IN THE PROCESSING OF PERSONAL DATA

You have the following legal rights to your Personal Data collected by the Company:

1. **Right on withdrawal of consent** - You may withdraw some or all of your given consent for the collection, use, and disclosure at any time throughout the period the Company keeps the Personal Data. Notwithstanding, the withdrawal of consent shall not affect the completeness or accuracy of the collection, use, or disclosure of Personal Data by the Company that the you have already given consent prior to the withdrawal;
2. **Right to access and request for a counterpart of Personal Data** – you are entitled to request access to and obtain a copy of the Personal Data related to you, or to request the disclosure of the acquisition of the Personal Data obtained without your consent;
3. **Right on the portability in sending or transferring of Personal Data** – you have the right to request the Company to send or transfer the Personal Data concerning you to another person pursuant to the condition prescribed by law;
4. **Right to object on the collection, use or disclosure of Personal Data** – you are entitled to object to the collection, use or disclosure of your Personal Data by the Company pursuant to the condition prescribed by law;
5. **Right on the erasure of Personal Data** – you have the right to request the Company to erase, destroy or anonymize the Personal Data to become anonymous data which cannot identify you pursuant to the condition prescribed by law;
6. **Right to restrict processing of Personal Data** – you have the right to request the Company to restrict the use of your Personal Data pursuant to the condition prescribed by law;
7. **Right on rectification of Personal Data** – you have the right to request the Company to rectify incorrect information or input data to any incomplete information;
8. **Right to complaint** – you are entitled to file a complaint with the personal data protection committee in the event that the Company or employee or contractor of the Company violates or does not comply with the Personal Data Protection Act B.E. 2562 (2019).

In this regard, you can exercise your rights by notifying the Company in writing to the Company's contact information below. In the case where the Company may not make such request, the Company shall provide a reason on the refusal along with the response.

#### **AN AMENDMENT OF THE NOTICE**

The Company reserves the right to rectify this Notice to be in accordance with the amendment to the applicable laws and appropriateness of the business respectively. This Notice has been recently revised on 1<sup>st</sup> December 2021.

#### **CHANNEL AND CONTACT INFORMATION OF THE COMPANY**

Sumitomo Mitsui Auto Leasing & Service (Thailand) Co., Ltd.

Address: 87/2 CRC Tower, All Seasons Place, 41<sup>st</sup> Floor, Wireless Road, Lumpinee, Pathumwan, Bangkok 10330

Email address: dpo\_committee@smauto.co.th