

## **Privacy Notice for Provident Fund**

**Grundfos (Thailand) Company Limited** (hereinafter referred to as the “Company” “we” or “us”) values your privacy and strives to protect the personal data of employees and related persons to our employees, which were given to us for the provident fund management. In addition to ensure that the Company will protect and retain your personal data in accordance with the laws on Personal Data Protection, and also inform and notify you about the collection, use and/or disclosure of your personal data (hereinafter referred to as “Data Processing” or “Personal Data Processing”), your rights as a data subject and our contact details, this Privacy Notice is therefore made as follows:

### **1. Collection of Personal Data**

The Company may collect your Personal Data under the following main purposes:

1.1 name, surname, date of birth, age, working period, salary, and other information in connection with the employment where is proper for being a member of provident fund for creating a membership.

1.2 Address, phone number, e-mail for contacting with a member.

1.3 Information about savings rate, investment policy for managing of a member's fund account.

1.4 Information about the beneficiary person such as name, surname, relationship and phone number for receiving benefits from the compensation fund. However, Prior to giving information of the beneficiary person, please notify him/her of this privacy.

1.5 Information where is necessary for reporting to regulatory agencies such as the Securities and Exchange Commission (SEC).

1.6 Financial information such as bank accounts also for processing under the taxation law.

1.7 Information on use and access to IT system, computer, system, website, application, network system, electronic device, email to be consistent with Information Technology Policy and applicable laws.

1.8 Information chosen by employee will be shared and disclosed through our system, application, tool, questionnaire, assessment, and document.

1.9 Information collected from your engagement with us, such as attending a meeting, participation in any activity, survey response, assessment response, including photograph and video.

1.10 Copy of documents that can be used to identify employees, such as identification card, passport, other documents issued by government agencies, civil registration.

1.11 Other information where is necessary for the fulfillment of our performance under the contract and regulation, as well as in compliance with the laws.

In case that the member refuses to provide Personal Data that is required to comply with the law or contract or to enter into a contract with us, it may impair the performance under contract and the right to access our services provided for you.

In addition, we may be required to collect and process your sensitive data under the certain purposes as provided in this Privacy Notice. That is to say, your Biometric Data, such as fingerprint, face recognition, in order to identify and verify the member, to prevent crime and to maintain our legitimate interests of us or another person. In case of necessity, we will process your sensitive data following your explicit consent and pursuant to the purposes stated herein only, we will also use our best efforts to provide adequate security measures to protect your sensitive data.

## 2. Purposes of Collection, Use, and/or Disclosure of Personal Data

2.1 Pursuant to the purposes, the Company may process your Personal Data in accordance with applicable law and a legal basis. The legal basis on which the Company performs such processing are as follows:

Purposes	Legal Basis
(1) To carry out data collection of employees and family members or other related persons that have been notified by the employee in accordance with our Information Technology Policy and the applicable laws.	Contractual Basis Legal Obligation
(2) To perform in compliance with the laws on tax.	Legal Obligation
(3) To report your information to regulatory agencies such as the Securities and Exchange Commission (SEC).	Legal Obligation
(4) To register you with the fund.	Legal Obligation Legitimate Interest
(5) To communicate with you for the purpose of managing your fund account.	Legal Obligation Legitimate Interest
(6) To obtain the benefit from the Compensation Fund.	Legal Obligation
(7) To communicate with you in case of necessity or emergency.	Legitimate Interest

2.2 The Company may collect, use and disclose the personal data of your family members provided to us and process of them based on various legal basis in consistent with the law.

2.3 In processing the personal data of job applicants, their family members, and other persons related to the employees provided to us, we process them based on the foregoing legal basis without the consent given by the data subject. Nevertheless, some personal data, for example sensitive personal data, are required to obtain an explicit consent from the data subject for data processing. In this regard, you are obligated to notify them of this Privacy Notice and/or request their consent (if necessary) for processing in case that their personal data have provided to us.

2.4 In the event that the personal data collected by the Company is necessary for the Company's performance under a contract or in compliance with the applicable laws, the Company may be unable to perform any action for your provident fund or to manage it following the purpose of employment or it may also affect your obtaining of benefits, welfares or facility management if you do not provide your necessary personal data for doing so.

### **3. Retention of Personal Data**

3.1 We will retain the Personal Data for the period where is necessary to fulfill the purposes of each type of Personal Data unless the law is otherwise permitted for a longer retention period. In case that the retention period of Personal Data cannot be clearly stated, we will retain your Personal Data for a period that may be expected following the standard of collection (for example, 10 years for prescription under general principle of law).

3.2 To comply with our contracts and regulations and for the necessary period, we retain your Personal Data throughout the duration of your employee's status but not exceeding 10 years from the date of termination of your employment.

3.3 We retain Personal Data of your beneficiary person for the necessary period to fulfill the purposes of this Privacy Policy.

3.4 In the event that we use your Personal Data under your consent, we will process your Personal Data until the withdrawal of your consent. However, we will continue retaining your Personal Data where is necessary for our record. In this regard, we will record that you have withdrawn your consent, so that we can respond to your request in the future.

3.5 We provide an audit system for the deletion or destruction of Personal Data when the retention period has expired or is unrelated to or is unnecessary for the purpose in which such Personal Data was collected.

The Company will only process Personal Data in accordance with the stated purpose herein. In some cases, the Company may consider that your Personal Data can be processed for

other relevant and non-contradictory purposes apart from the original purpose; However, provided that the Company is necessary to process your Personal Data for other purposes that are not related to the original purpose, the Company will request a new consent from you.

Furthermore, if the employee wishes to withdraw his/her consent from such data processing, you can contact the Company to do so according to this Privacy Notice. Such withdrawal of consent may nevertheless affect employee in the management of human resource by the Company, for example, a recruitment, a selection, an appointment and/or any various services carrying out for the benefit of our employees. Therefore, please be advised and inquire us about the effects of your withdrawal of consent before.

#### **4. Disclosure of Personal Data to Third Parties**

4.1 We disclose and share your Personal Data with other persons and entities. (“Third Parties”) for the purpose of collecting and processing Personal Data as set forth in this Privacy Notice, for example, disclosing to a company who is designate by us as a fund manager. or to a registrar who maintains and manages all member information, to service provider for IT system, financial institution, government agency and other parties necessary for us carrying out the purposes of collecting and processing personal data under this Privacy Policy.

4.2 We will require the person receiving the Personal Data to take appropriate measures to protect your Personal Data and will process such personal data only where is necessary. In addition to take step for preventing the unauthorized use or disclosure of such Personal Data.

#### **5. The Right of Personal Data Subject**

You are entitled to exercise the rights of data subject in accordance with the laws on Personal Data Protection, whereby the Company will respect your rights and proceed complying with the law, statute or regulation relating to the processing of your personal data under certain circumstances promptly. You have the rights to process your personal data as follows:

## 5.1 Right to withdraw consent

In the event that the company processes your personal data pursuant to your consent, you have the right to withdraw your consent for processing your personal data to the company at any time. The company may however continue to process your personal data on the ground of another lawful basis.

## 5.2 Right of access

You have right to request for a copy of your personal data from the company.

## 5.3 Right to rectification;

You have right to rectify your personal data to be accurate, up-to-date and complete.

## 5.4 Right to erasure

You have the right to request the company to delete, destroy, or anonymize your personal data in the circumstances that there is no reasonable reason for the company to continue processing your personal data. In addition, you can require the company to delete as well as exercise the right to object where is stipulated in the next Article. Nonetheless, the exercise of right hereof shall not be for the purpose of erasure all personal data, and the company shall carefully consider each request by the laws on processing your personal data.

## 5.5 Right to object

You have the right to raise an objection to the processing of your personal data in certain circumstances prescribed under the laws on personal data protection. Besides, you have the right to object to the processing of your personal data in the case that the company processes your personal data for marketing purposes, recording and analyzing the psychological and behavioral characteristics of individuals (Profiling).

## 5.6 Right to restriction

You have the right to request the company to restrict of processing of your personal data temporarily, for instance, when you wish the company to correct your personal data or when

you request the company to justifying the lawful basis for processing under the laws on personal data processing.

#### 5.7 Right to data portability

In some cases, you may request the company to transfer or transmit your general personal data to other data processor via electronics. However, this right is particularly in the case of your personal data submitted to the company by consent basis, or where such personal data is required to be processed in order to fulfil the obligation under the contract.

#### 5.8 Right to lodge a complaint

You have the right to lodge a complaint to the governmental agencies as well as the Personal Data Protection Committee in the case that you believe that the Company, its employees, or service provider violates or fails to comply with the law on personal data protection or other announcements issued by the virtue of such a law.

At any time, you may exercise your rights by contact the company following information provided in Article 7. of this privacy notice.

The Company may request some certain information from you to verify your identity and ensure your right to access personal data (or to exercise any other rights) to observe the security measures ensuring that your personal data will not be disclosed to any person, who is not entitled to access such information

The Company will endeavor responding to all legitimate requests within 30 days. In some cases, the Company may take more than 30 days if your request is complicated, or you are submitting more than a request.

Unless requesting to exercise your rights to complain about the performance of our personal data protection laws and directly to us. We reserve the right to charge a fee as a fee for processing other requests for rights from personal data subjects. as appropriate but we will notify you clearly which requests to exercise your rights as the subject of your personal data may be subject to such charges.

## **6. Improvement, Review or Amendment the Privacy Notice**

The Company may update, review, or amend this Privacy Notice, whether in whole or in part or from time to time, to be consistent with the law, rules and regulations of authorized authorities, and the Company's operations; provided that, this policy is amended.

## **7. Contact Us**

If there is reasonable reason to doubt or believe that there is any violation of personal data, complaint, or the exercise of Data Subject rights under this policy or the Personal Data Protection Act B.E. 2562, you can contact the company by:

### **Head of working group on Personal Data Protection Act**

92 Chaloe Phrakiat Rama 9 Road, Dokmai Subdistrict

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