# **Privacy Notice**

# for Training & Development

Grundfos (Thailand) Company Limited (hereinafter referred to as the "Company" "we" or "us") values your privacy and strives to protect the personal data of our employees and interested person. In order 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

We will directly collect your personal data as follows:

- 1.1 Contact information, such as name-surname, telephone number, mobile phone number, e-mail, social media accounts (e.g. Facebook) or unique identifier (UID) of Line etc.;
- 1.2 Personal information, such as gender, nationality, occupation, Employee ID, job title, date of birth, photograph, signature, card number, identification card, passport number, including information from a driver's license, house registration, or information on cards issued by government agencies, educational background, training courses. Generally, The Company shall not collect and use the religious and blood-type information showing on a copy of ID card or documents displaying the personal history of employees or participants. In case that you gave us a copy of ID card, you may request to conceal such information. If you do not do so, it is deemed that you have granted us to conceal such information. In this regard, such documents shall be deemed as effective and enforceable in all respects by law. In the event that, however, such information cannot be concealed by the Company due to some technical limitation, the Company will collect and use such information as part of your identity document only;

- 1.3 Interest information, such as information about your interest in training or our personnel development as well as information about opinions, expectations, satisfaction in participating in the training, etc.;
- 1.4 Other information, such as information on the evaluation of the participant, score data, test result and data from taking a photo or recording video, expressing opinions, answering questions, as well as participating in various activities of the participant and screening information according to epidemic prevention measures, etc.;

# 2. Purposes and Legal Basis for Processing of Personal Data

We collect, use, or disclose your personal data for the following purposes:

| Purposes   | Legal Basis          |
|--|----------------------|
| 2.1 To carry out training activities.  | Contractual Basis    |
|  | Legitimate Interest. |
| 2.2 To assess your competence and knowledge and to                                       | Contractual Basis    |
| issue a training certificate.  | Legitimate Interest. |
| 2.3 To fulfil the performance of a contract to which you                                 | Contractual Basis    |
| are a party, or in order to take steps at the request prior to entering into a contract. | Legitimate Interest. |
| 2.4 To verify your identity and carry out your request.                                  | Contractual Basis    |
|  | Legitimate Interest. |
| 2.5 To carry out training activities   | Contractual Basis    |
|  | Legitimate Interest. |

If you are unable to provide the personal data we request We may not be able to provide you with our services, for example, we may not allow you to participate in our training or human resource development by any other means.

#### 3. Disclosure of Personal Data to Third Parties

We may disclose your personal data to our group of companies ("Group of Companies"), other companies who are our business partners, our service providers, consultants, law enforcement agencies, courts, officials, government agencies, regulators, and agents, including but not limited to contractors/subcontractors and/or service providers for any operations related to the training and personnel development employing, such as event organizers (organizer), travel agencies, speakers, training institutes, etc. Nevertheless, the Company will provide measures to maintain the security of your personal data.

The Company may be required to send or transfer your Personal Data overseas, that may have standards for personal data protection higher or lower than the law in Thailand. The Company will however comply with the measures and the relevant laws.

#### 4. Retention of Personal Data

The Company will collect your Personal Data for as long as it is necessary to carry out the purposes of collecting and processing such Personal Data, however, The Company may keep your Personal Data for a longer period in case of the requirement by the law.

# 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 pursuing 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. Modification of the Privacy Notice

In order to comply with the Personal Data Protection Act B.E. 2562 this Privacy Notice It may be amended from time to time and the Company will display the current version on the Company's website.

### 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 Chaloem Phrakiat Rama 9 Road, Dokmai Subdistrict

Prawet District, Bangkok 10250, Thailand

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