



บริษัท ปูนซีเมนต์เอเชีย จำกัด (มหาชน)

Asia Cement
Public Company Limited

ASIA CEMENT PUBLIC COMPANY LIMITED

PRIVACY POLICY 2022



Scope: **All companies of the Asia Cement Group**

Author: **Legal Affair Division**

Issued: **June 2022**



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Asia Cement
Public Company Limited

Dear colleagues,

This document provides information on how **Asia Cement Public Company Limited and its affiliates company** (“Asia Cement”, “we”, “us” or “our”) processes your personal data. This Privacy Policy (“**Privacy Policy**”) will be implemented by us to collect, use and disclose personal data of the personal data subject, such as, job applicants, employees, shareholders, customers, vendors, suppliers, contractors and agents of ASIA CEMENT to whom ASIA CEMENT provides or receives any product or service and/or with whom ASIA CEMENT engages or enters into any transaction, including visitors, event attendees and any other individuals directly or indirectly engaged by or with ASIA CEMENT with regard to ASIA CEMENT’s course of business activities (hereinafter referred to as “**you**” or “**your**”) with your acknowledgement and agreement in accordance with the applicable contractual terms and conditions and provisions of the laws pertaining to personal data protection, including but not limited to the Personal Data Protection Act B.E. 2562 (2019) (“**PDPA**”), as part of Terms and Condition of ASIA CEMENT.

This document should be read in conjunction with other related policies and procedures that ASIA CEMENT implements and maintains, including the amendment thereof, regarding compliance with applicable PDPA as published or announced by ASIA CEMENT from time to time, which is including but not limited to [The Security of Our Building and Premises Privacy Policy Notice](#) as Annex A.

ASIA CEMENT is the personal data controller in terms of section 6 of PDPA. This Privacy Policy will notify you how we collect, use and disclose your personal data as set out in this document.

Sincerely Yours,

A handwritten signature in black ink, appearing to be 'CD' followed by a long horizontal stroke.

Claudio DEALBERTI
Managing Director

A handwritten signature in blue ink, appearing to be 'NR' followed by a long horizontal stroke.

Nopadol RAMYARUPA
Managing Director



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1. TYPES OF PERSONAL DATA COLLECTED, USED AND DISCLOSED BY ASIA CEMENT.

General personal data, which mean data relating to a person which allows the person to be identified, whether directly or indirectly, but excluding specific data of a deceased person.

Sensitive personal data, which means any personal data pertaining to race, ethnic origin, political view, doctrinal, religious, or philosophical belief, sexual behaviour, criminal record, health record, disability, labour union record, genetic data, biological data, or any data which may affect the data subject in the same manner, as prescribed under the PDPA.

2. THE PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy is intended to inform you, as the personal data subject, to be aware of natures, purposes and details of the collection, usage, and/or disclosure of your personal data as well as your legal rights in respect to personal data.

3. YOUR PERSONAL DATA THAT ASIA CEMENT COLLECTS, USES, AND/OR DISCLOSES

3.1 ASIA CEMENT collects, uses and/or your personal data as follows:

Particular	Data
Internally disclosed information	Name, Employee ID number, department, title, employment status, company e-mail address, information of mobile phone for business
Basic information	Name, address, age, birth date, sex, phone number, email address, face photograph, race, nationality, religion, marital status, military status (for male)
Pay-related information	Decision method for annual and monthly earnings, bonus and salary, retirement allowance bank account details, cheque number, credit/debit card, information and financial transactions history, withholding tax
HR information	Performance evaluation, educational background, qualification/license, visa and work permit for foreigners, title, professional background, disciplinary punishment/official commendation, criminal records, training records, welfare and



	benefits information, social security information, medical claim, group insurance information, provident funds, personal income tax or other information relevant to the course of human resource management of ASIA CEMENT
Family and relatives information	Family structure, living-together/separated, presence of dependents, health condition, emergency contact details
Physical and health information	Health condition, medical records, physical or mental disabilities, results of health checkup
Security	still picture, moving picture, and CCTV footage.
Website	website-visiting data.
Marketing communication	photographs taken at events

(Unless otherwise specified in this Privacy Policy, personal data and sensitive data about you as specified above will be collectively called “Personal Data”)

Personal Data collected by ASIA CEMENT prior to the effective date of PDPA, ASIA CEMENT will continue collecting and using such Personal Data for the same purposes. In this regard, you have the right to withdraw consent if you as a data subject do not wish to allow ASIA CEMENT to collect and use such Personal Data pursuant to PDPA.

3.2 CCTV

ASIA CEMENT collects, uses and/or discloses your personal data concerning individual accessing into ASIA CEMENT’s premises and surrounding areas monitored by the camera monitoring system including the operation of the camera monitoring system or individual entering or visiting ASIA CEMENT’s premises by registering and/or exchanging identification card, driving license of any individual or other identification documents and how to treat and protect such data in accordance with PDPA, relevant laws and regulations. Detail of which is attached in Annex A of this Privacy Policy.

4. PURPOSES OF COLLECTING, USING AND/OR DISCLOSING YOUR PERSONAL DATA

ASIA CEMENT will collect your Personal Data for your good experiences and benefits in using our products and/or services; for performing legal obligations required by any law applicable to ASIA CEMENT or you; and for any purposes as provided in this Privacy Policy, as follows:

- To review/decide of your employment engagement and management, employment conditions, response to enquiries and business communication. Also, to apply for visa and work permit for foreign directors or employees.



- To sell products and/or provide services to you including managing your account, shipping, operations related to accounting and finance, after-sales services, product recall or return, and to take any appropriate action in order to properly deliver the products and/or services as agreed.
- To enter into a contract and/or to perform obligations under a contract that you are a business partner, supplier, vendor, service provider, and/or contractor. ASIA CEMENT will collect, use, and/or process your Personal Data for purchasing, hiring, inspection of goods and/or services, delivery, payment, business relationship management and support, and/or review and assess the performance of contracts.
- To improve, promote and develop our business for better and suitable products and/or services to satisfy your ultimate needs;
- To offer and provide privileges, recommendations and other information including eligibility to attend special activities or events.
- To encourage your participation in social and environmental responsibilities.
- For compliance with the regulations or other regulatory and licensing requirements under the relevant law.

We will process your personal data under the above purposes based on any of the following legal basis:

- **Legal Obligation:**
We are required to comply with the legal obligations determined by the applicable laws;
- **Vital Interest:**
We are required to prevent or suppress of any danger to a person's life, body, or health;
- **Contract:**
We are required to perform our obligations, or exercise our rights, under our contracts with you or in order to take steps at your request prior to entering into a contract;
- **Public Task:**
We are required to perform a task in the public interest by us, or for the exercising of official authority vested in us;
- **Legitimate Interests:**
We are required to pursue our legitimate interests and those of third parties. We will balance our legitimate interests and that of any relevant third parties, as the case maybe, and your fundamental rights and freedoms. We will apply legitimate interest only where we consider that it is not outweighed by your interests or rights which require protection of their Personal Data; or
- **Consent:**
We are required to obtain your consent just in the case that any of the above underlying legal basis cannot be identified.

We will use legitimate interests basis in a way to have a minimal privacy impact and to protect your rights and interests which will not cause any unjustified harm and will not override your legitimate interests include the following



- To record images from CCTV, to exchange ID cards or alike identification documents before entering buildings;
- To maintain relationship with customers through appropriate means, e.g., complaint handling, satisfaction survey, customer care and service support by ASIA CEMENT's staff, notification or offering any products and/or services;
- To manage risks, monitor including to refer such tasks to Asia Cement group;
- To prevent, respond, and minimize potential risks arising from corruption, cyber threat, debt default or contractual breach (e.g., bankruptcy related data), law violation (e.g., offences related to property, life, body, liberty or fame); including sharing Personal Data to enhance work standards of affiliated companies/other companies in the same business in order to prevent, respond, and minimize the above risks;
- To collect, use and/or disclose the Personal Data of directors, shareholders, representatives, agents of customers that are juristic person;
- To contact, record voice and/or image during meetings, trainings, seminars, events or booth activities, as well as customer care and service support and complaint handling; and

5. DISCLOSURE OF PERSONAL DATA

Personal data shall be kept confidential as prescribed by law and in accordance with the purposes specified above. In this regard, the Company will disclose Personal Data to: (1) companies in Asia Cement group (“**Group Companies**”); (2) any third-party service providers who provide services to us in our ordinary course of business; (3) third parties who process transaction data submitted by business establishments in ASIA CEMENT network; (4) data processors and suppliers of goods or services engaged by the ASIA CEMENT; (7) agents, service providers or subcontractors of ASIA CEMENT ; (8) banks, financial institutions, government agencies, committees or authorities under the law in Thailand or elsewhere; (9) any persons to whom ASIA CEMENT may assign the rights under the contract; and/or (10) any other persons approved by you.

6. SENDING OR TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES

The Company may send or transfer any personal data to other countries, provided that the destination country or international organisation receiving the personal data has an adequate personal data protection standard in accordance with the criteria as required by their domestic law and Thailand PDPA.

7. PERSONAL DATA COLLECTION PERIOD

The Company shall not keep your personal data for any longer than the period the Company deems necessary for the purpose of which we have obtained it, except where such data are required by applicable laws to be kept for a longer period.



8. PROTECTION YOUR PERSONAL DATA

For retention of your Personal Data, ASIA CEMENT implements technical measures and organizational measures to ensure appropriate security in the Personal Data processing and preventing Personal Data breach. ASIA CEMENT has set out policies, rules and regulations on Personal Data protection, e.g. applicable security standards of information technology and measures to prevent data receivers from using or disclosing the data which is outside the purposes set out under this Privacy Policy or without authorization or unlawful. ASIA CEMENT has amended and updated the applicable policy, rule and regulation as frequently as necessary and appropriate.

Moreover, ASIA CEMENT's executives, staffs, employees, contractors, agents, advisers and data receivers are obligated to keep the Personal Data in confidence pursuant to confidentiality measure provided by ASIA CEMENT.

9. YOUR RIGHTS UNDER APPLICABLE LAW

Your rights described here are legal rights that you should be informed. You may exercise any of these rights within legal requirements and policies at the present or as amended in the future as well as regulation set out by ASIA CEMENT. In case you are under 20 years old or your legal contractual capacity is restricted, your parent, guardian or representative could exercise the rights on your behalf.

Your rights under the applicable personal data protection laws, including but not limited to the Personal Data Protection Act B.E. 2562 (2019), include the following:

- To request access to and obtain a copy of the personal data related to you which are under the responsibility of the Company as personal data controller, or to request for disclosure of how such personal data were obtained without your consent;
- To require the Company, as personal data controller, to take action to ensure that your personal data are correct, updated, complete and not misleading;
- To request to obtain personal data in the event that the Company, as personal data controller, has made the personal data available in a format which is generally readable or usable by automatic tools or devices and where the personal data may be used or disclosed automatically;
- To object to the collection, use or disclosure of the personal data related to you which are legally permitted to be collected without your consent at any time;
- To request the Company, as personal data controller, to delete or destroy the personal data or make the personal data subject unidentifiable from the personal data in cases as prescribed by law;
- To request the Company, as personal data controller, to suspend the use of personal data in cases as prescribed by law;
- To withdraw consent at any time, subject to the terms of Clause 8; and



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- To file a complaint in the event that the Company, as personal data controller, or its personal data processor, including any employee or contractor in charge of the Company, as personal data controller, or its personal data processor, violates or fails to comply with the personal data protection laws.

The Personal Data Subject's request for the above purposes will be processed and responded within 30 days after we have received your request and all completed information and support documents.

10. CONTACT CHANNELS

If you have any suggestions or inquiries regarding collection, usage, and/or disclosure of your Personal Data as well as a request to exercise your rights under this Privacy Policy, you may contact ASIA CEMENT and/or the Data Protection Officer via the following channels:

Asia Cement Public Company Limited

Tel.: 02 641 5600

Address: 23/124-128 Soi Soonvijai, Rama 9 Rd., Bangkapi, Huay Kwang, Bangkok 10310

Data Protection Officer (DPO)

Respond area: **Legal Affair Division**

Tel.: 02 641 5600

Address: 23/124-128 Soi Soonvijai, Rama 9 Rd., Bangkapi, Huay Kwang, Bangkok 10310

Email: Thanaphon.pipathpollakai@acc.co.th

Last updated June 2022



ANNEX A

THE SECURITY OF OUR BUILDINGS AND PREMISES PRIVACY NOTICE

(e.g. collection, use, disclosure, transfer and process of your CCTV and its recordings, identification card, driving license of any individuals or other identification documents before entering into our buildings and premises)

1. GENERAL PROVISIONS

This document provides information on how **Asia Cement Public Company Limited and its affiliate companies** (“ASIA CEMENT”, “we”, “us” or “our”) process personal data concerning individual accessing ASIA CEMENT’s premises and surrounding areas monitored by the camera monitoring system including the operation of the camera monitoring system or individual entering or visiting ASIA CEMENT’s premises by registering and/or exchanging identification card, driving license of any individual or other identification documents and how to treat and protect such data in accordance with the Personal Data Protection Act B.E. 2562 (“PDPA”), relevant laws and regulations.

The Objective of this Notice of the Security of Our Premises Privacy Notice (hereinafter referred to as the “**Privacy Notice**”) is to inform you of the way that we collect, use, or disclose your personal data in respect of the operation of the camera monitoring system, the registration and/or exchange identification card, driving license of any individuals or other identification documents when entering our buildings and premises. The Privacy Notice will also inform you of your rights and the way in which you can exercise such rights pertaining to your personal data.

2. PERSONAL DATA CONTROLLER AND CONTACT DETAILS

ASIA CEMENT is the Controller of your personal data when you enter any buildings or premises of the ASIA CEMENT which are as follows:

- Pukrang Cement Factory
- Takli Cement Factory
- Cha-am Cement Factory
- All Ready-Mix Concrete plant

Contact details for any personal data protection concerns are as follows: E-mail: Thanaphon.pipathpollakai@acc.co.th Address: 23/124-128 Soi Soonvijai, Rama 9 Rd., Bangkok, Huay Kwang, Bangkok 10310



3. PURPOSE AND LEGAL BASIS

We collect, use, disclose, transfer, and process your personal data via the camera monitoring system, utilize video surveillance footage, register and/or exchange identification card, driving license of any individual or other identification documents before entering our buildings and premises to protect our property and staff and to ensure occupational safety, health, and environment of the individuals present in our buildings and on our premises based on the following legal basis.

3.1 Legal obligation

We are required to comply with the legal obligations determined by the applicable laws including but not limited to safety and environment in the workplace laws.

3.2 Vital interests

We always surveillance to take an action to prevent or suppress of any danger to property, life, body, and health of persons in our buildings and premises.

3.3 Legitimate interests.

To carry out any other acts to achieve the CCTV monitoring purposes and to protect your health and personal safety as well as your belongings as well as our security and safety for our buildings, premises, properties and staff, therefore, it is in our legitimate interests to do. We will balance our legitimate interests and that of any relevant third parties, as the case maybe, and your fundamental rights and freedoms related to the protection of the CCTV recorded data, identification card, driving license of any individuals and other identification documents before entering our buildings or premises concerning you. We will endeavor to achieve the right balance as appropriate.

4. THE CAMERA MONITORING SYSTEM (CCTV)

The Camera Monitoring System (CCTV) is installed in all buildings on ASIA CEMENT premises in areas that are designated for camera monitoring. Our CCTV devices are intentionally in operation 24 hours a day and 7 days a week.

The Camera Monitoring System (CCTV) is comprised of cameras that monitor the indoor and outdoor surrounding areas of the buildings and premises, including handling areas, entrance doors, gates and driveways leading the buildings and premises. The cameras are installed, monitored and recorded without excessively disturbing the right to privacy of persons being monitored. The buildings and premises being monitored and recorded by cameras are designated with a camera pictogram. The cameras record surveillance footage on a continuous basis.



Personal data included in video surveillance footage recorded by the cameras is retained on the recording device for a period no longer permitted by the applicable laws allowing us any possible incident to be investigated together with to use, disclose, transfer, or process other information necessary for the handover of the video surveillance footage to the governmental and regulatory organizations, insurance company or the relevant third party.

Upon the expiry of a permission by the applicable laws, surveillance footage is thereby deleted and rewritten. Certain parts of the records (including personal data contained therein) may be retained on a selective basis for a longer period for us to determine, exercise or defend our legal claims or defense or on the grounds of our legitimate interest.

5. IDENTIFICATION CARD OR DRIVING LICENSE OF ANY INDIVIDUALS

Our security guard will request any individual to register and/or exchange identification card, driving license or other identification documents of any individuals before entering our buildings and premise at the designated place at gate or entrance areas of the buildings and premises, and driveways leading the buildings and premises.

Personal data contained in the identification card, driving license or other identification documents (such as photo of the holder, identification number, driving license no., laser tag, address, date of birth, date of issue, and date of expiry) is retained on our recording device for a period no longer those permitted by the applicable laws depended on nature of the incident required to be investigated by usage, disclosure, transferring, or processing of other information that are necessary for being surrendered together with the personal data contained in the identification card, driving license or other identification documents to the governmental and regulatory organizations, insurance company or the relevant third party.

Upon the expiry of a permission by the applicable laws, personal data contained in the identification card, driving license or other identification documents, shall be thereby deleted. Certain parts of the records (including personal data contained therein) may be retained on a selective basis for a longer period for us to determine, exercise or defend our legal claims or defense or on the grounds of our legitimate interest.

6. SHARING AND TRANSFERRING PERSONAL DATA

Video surveillance footage from the camera monitoring system and personal data contained in the identification card, driving license or other identification documents may only be disclosed to governmental and regulatory organizations, competent officers, courts or administrative authorities, insurance company or the relevant third party for the purposes of administrative or criminal proceedings. In exceptional cases, to protect our right, it is our legal interests to disclose



the video surveillance footage and personal data contained in the identification card, driving license or other identification documents of any individual who visited or entered into our buildings or premises to any relevant parties, such as our counsel, attorney-at-laws and/or insurance companies if instructed by the company management.

External service providers and supervisors of camera monitoring systems (CCTV) may now and then inspect the video surveillance footage based on our express instruction to do so and where technical interventions are required. Access data of such persons is regulated by agreements or contracts on personal data processing that guarantee that they are at least the same level of data protection as this Privacy Notice.

7. DATA SECURITY

We implement and maintain adequate technical and internal measures as well as information security controls and processes in accordance with business practice corresponding to the potential risk for you as the personal data subject.

8. YOUR RIGHTS AS A DATA SUBJECT

Your rights under the applicable personal data protection laws, including but not limited to the Personal Data Protection Act B.E. 2562 (2019), include the following:

- To request access to and obtain a copy of the personal data related to you which are under the responsibility of the Company as personal data controller, or to request for disclosure of how such personal data were obtained without your consent;
- To require the Company, as personal data controller, to take action to ensure that your personal data are correct, updated, complete and not misleading;
- To request to obtain personal data in the event that the Company, as personal data controller, has made the personal data available in a format which is generally readable or usable by automatic tools or devices and where the personal data may be used or disclosed automatically;
- To object to the collection, use or disclosure of the personal data related to you which are legally permitted to be collected without your consent at any time;
- To request the Company, as personal data controller, to delete or destroy the personal data or make the personal data subject unidentifiable from the personal data in cases as prescribed by law;
- To request the Company, as personal data controller, to suspend the use of personal data in cases as prescribed by law;
- To withdraw consent at any time, subject to the terms of Clause 8; and



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- To file a complaint in the event that the Company, as personal data controller, or its personal data processor, including any employee or contractor in charge of the Company, as personal data controller, or its personal data processor, violates or fails to comply with the personal data protection laws.

9. UPDATES TO THE PRIVACY NOTICE

We are authorized to amend or update the Privacy Notice on a continuous basis. Any amendments of this Privacy Notice become effective upon their publication in the amended Privacy Notice, which can be found at:

Asia Cement Public Company Limited
Legal Affair Division

Tel.: 02 641 5600

Address: 23/124-128 Soi Soonvijai, Rama 9 Rd., Bangkapi, Huay Kwang, Bangkok 10310

Email: Thanaphon.pipathpollakai@acc.co.th

Last updated June 2022