

## **Privacy Notice for Employees, Service Providers, Contractors or Participants in activities or projects of The Siam Commercial Bank Public Company Limited**

We, The Siam Commercial Bank Public Company Limited (the “**Bank**”, “**SCB**”, “**we**”, “**our**” or “**us**”), care about the privacy of our employees, workers, service providers and contractors (“**you**”). Thus, we provide this Privacy Notice under the Personal Data Protection Act B.E. 2562 (“**PDPA**”) to inform you of (a) the methods, objectives and details of the data that we collect, store, use or disclose (b) duration of data collection; (c) disclosure of personal data; (d) your rights as the owner of personal data; and (e) the keeping of privacy and security of personal data and how you can contact us.

This Privacy Notice applies to the following natural persons:

- (1) Employees or workers of the Bank pursuant to employment agreements;
- (2) Service providers and contractors of the Bank, including their employees or staff under the agreements with the Bank (e.g. service agreement, hire of work agreement, agency contract) including its employee or staff;
- (3) Job applicants, whether they are applying directly with the Bank, or through agency or other entities;
- (4) Former employees, of whom the Bank needs to retain or use their personal data as required by laws;
- (5) Parents, descendants, relatives, spouses, or beneficiaries of employees;
- (6) Guarantors of employees, staff, service providers or contractors under the employment agreements, service agreements, hire of work agreements, agency contracts or other similar agreements with the Bank;
- (7) Speakers and lecturers for training courses organized by the Bank;
- (8) Trainees or participants in projects or activities organized or participated by the Bank;
- (9) Directors, advisors, or authorized persons of the Bank;
- (10) Employees of companies in SCB<sup>X</sup> Group;
- (11) Reference persons in job applications or other contracts made with the Bank;
- (12) Student trainees, scholarship students of the Bank including their guarantors or other relevant persons; and
- (13) Any natural person entering into contract or participating in any activity (whether directly or indirectly) with the Bank for the purposes stated in this Privacy Notice.

### **1. How the Bank collects, uses, and discloses your personal data**

The Bank will only collect, use or disclose your personal data when it is necessary, or where there is a lawful basis to do so. This includes where the Bank collects, uses or discloses your personal data based on (a) legal obligations; (b) performance of contract; (c) legitimate interests; (d) consent and/or (e) other lawful bases for the following purposes:

#### **1.1. Legal obligations of the Bank**

As the Bank is subject to supervision and regulations and must comply with applicable laws and regulations, it is necessary for the Bank to collect, use or disclose your personal data for various reasons as required by the following laws and governmental regulations:

- (1) the Personal Data Protection Act;
- (2) the Civil and Commercial Code, Labour Protection Act, Labour Relations Act including other relevant labour laws;
- (3) the Social Security Act, Provident Fund Act, Workmen Compensation Act, Cremation Fund Act, or other laws relating to the provision of welfare for employees or workers;

- (4) the Empowerment of Persons with Disabilities Act, Skill Development Promotion Act and/or other relevant laws;
- (5) the Revenue Code or other tax laws;
- (6) the Orders and regulations issued by government authorities, such as court orders, orders from governmental or supervisory agencies, or regulatory authorities;
- (7) the Anti-money laundering and suppression of terrorism funding (AML/CFT) laws;
- (8) Checking of background, assets or securities holding of employees as required by laws, including reports made to relevant regulatory or governmental authorities; and
- (9) Checking and verifying of background or qualifications for the appointment of executives or other key positions as required by rules and regulations issued by relevant regulatory authorities or other relevant laws.

## 1.2. Performance of contract made between you and the Bank

The Bank will collect, use and disclose your personal data in accordance with application documents, agreements or contracts made between you and the Bank and for the purposes stated therein, as follows:

- (1) Job application, recruitment, interview, questionnaire, performance assessment of the candidate;
- (2) Employment, negotiation, employment approval, preparation, modification, change, renewal, or any other actions with respect to employment agreements and/or agency agreements, including change of working conditions;
- (3) Preparation of employee profile registration, book-keeping of employee profile registration on the Bank's system, including to create, delete, edit employees' personal data and grant or revoke the rights of the employee;
- (4) Preparation of payroll and calculation of wages, salaries or compensations to be paid by the Bank to you, including making payments or setting aside workers compensation reserves;
- (5) Arrangement for welfare, benefits, payments, loans, credits and reimbursements concerning welfare programs granted by the Bank to employees;
- (6) Arrangement, change, or cancellation of health insurance, life insurance, accidental insurance or other types of insurances;
- (7) Grant, permission or alteration, deletion and control of the rights to access or use the Bank's assets or systems;
- (8) Arrangement and provision of office equipment and supplies for employees and sales agents e.g. uniform, name cards, signs, licenses, computers and mobiles distribution and employee or sales agent cards, including arrangement for returning of the same upon employment termination;
- (9) Review and assessment for the appointment of executives or other key positions;
- (10) Compliances with the employment agreement work rules, regulations and orders of the Bank;
- (11) Record and management of data concerning leaves of employees; entitlement;
- (12) Performance review and job assessment;
- (13) Grant of scholarships and internship;
- (14) Arrangements relating to termination or expiration of the employment agreement between the Bank and employee, including retirement;
- (15) Organisation of activities by internal and external personnel;
- (16) Arrangement in relation to any internal and external trainings, license acquisition, projects or employees' or agents' capacity development programs, including issuance of training certificates or licenses;

- (17) Communications and announcements to employees related to the performance of contract via any communication channels;
- (18) Preparation of Power of Attorney; and
- (19) Preparation of salary certificate, income statement, work certificate, or other certificates concerning employment, agency, or other types of service agreements;
- (20) The analysis, evaluation, and report preparation through the Bank's system for considering performance and improving employee's work efficiency; and
- (21) The disclosure of your personal data to SCB X Public Company Limited for the purpose of analysing and summarizing the overall Employee Survey, as well as for the benefit of managing human resources within SCB<sup>X</sup> Group.

### 1.3. Legitimate interests of the Bank

The Bank relies on the legitimate interests by balancing the nature of your personal data that the Bank collects, uses and discloses with the normal reasonable expectations and provide safeguards to reduce any negative impacts on your fundamental rights and freedoms. This may include processing your personal data to:

- (1) Use personal data of non-applicants during the process of recruitment, interview and assessment of applicants, including to store the personal data of the beneficiaries of employees;
- (2) Perform duties under a contract between the Bank and another person, where your personal data is necessary but you are not a contractual party;
- (3) Record and keep personal data on the Bank's internal storage system;
- (4) Enhance staff knowledge and capabilities including relevant management and planning for corporate structuring projects;
- (5) Pursue safety and business continuity measures including perform the Bank's internal risk management function, and report incidents resulting from the Bank's operations;
- (6) Conduct employee and agent background check;
- (7) Perform the Bank's accounting, financial, or other internal management operations;
- (8) Undertake measures and actions towards surveillance, prevention, investigation, complaint handling, investigation of suspicious behaviours, or fraudulent behaviours, money laundering, and terrorism misconduct, including actions to prevent such incidents;
- (9) Undertake and record of disciplinary action, make criminal report, give statements or information to the police, competence officer, court and other competent authorities;
- (10) Take action relating to disputes, dispute resolution including establish, exercise, or defend the legal claim;
- (11) Provide and disclose of information regarding employee status, employment information, human resource management, salary framework development, benefits, compensation, and employee welfare to third parties, such as SCB X Public Company Limited and companies in SCB<sup>X</sup> Group for the purpose of analysis and improvement to ensure alignment with the policies and standards of the companies in SC<sup>X</sup> Group;
- (12) Prepare reports for the Bank's internal departments including questionnaires, collecting, and analysing various data to support the work within the organisation or for planning, management, implementation of administrative measures, workforce development, or any related activities;
- (13) Make travel and accommodations or other facilities arrangements for employees, such as ticket and hotel reservations, or meals;
- (14) Communicate with and make announcement to employees via any channels; and
- (15) Membership process for cooperatives and cremation fund ;

- (16) The inspection, monitoring, measurement, governance, management, risk control, and evaluation of employee performance in each of the Bank's internal departments according to the criteria set by the Bank of Thailand or regulatory authorities, which cannot be justified on the basis of legal compliance;
- (17) Actions that are beneficial for applying for the renewal of the license necessary for the Bank's business operations;
- (18) The verification of employee data or the use of employee information through the Bank's internal human resource system to support promotional activities, participation in various bank product campaigns, and the consideration of compensation for the Bank's IC License employees;
- (19) Facilitating to employees, companies in the SCB<sup>X</sup> group, and the Bank's business partners in submitting employee information for coordination, compliance with organizational policies, and eligibility for benefits from promotional activities organized jointly by the Bank, companies in the SCB<sup>X</sup> group, or the Bank's business partners; and
- (20) Use of information from former employees, employees of companies in the SCB<sup>X</sup> group, and individuals who are not employees, in the process of reporting irregular events and operational damages (Incidents), fact-finding, imposing disciplinary actions on employees, as well as storing necessary data of these individuals for the purpose of data analysis, legal proceedings of the Bank, and compl
- (21) iance with the criteria set by the Bank of Thailand or regulatory authorities, which cannot be justified on the basis of legal compliance.

#### 1.4. Consent

Normally, the Bank will not collect, use or disclose your personal data if the Bank does not have any lawful bases to do so. However, if necessary, the Bank will ask for your consent to collect, use or disclose your personal data for your benefits the following purposes:

- (1) Collect, use and disclose your sensitive personal data for authentication, criminal background check or welfare and health benefits;
- (2) Send or transfer your personal data to a country of destination with inferior data protection standards; and
- (3) When the data subject is classified as a minor, quasi-incompetent or incompetent whose consent must be given by their parent, guardian or curator (as the case may be).

#### 1.5. Other lawful bases

Apart from the above lawful bases, other lawful bases that the Bank may rely on the following bases when collecting, using or disclosing your personal:

- (1) Prepare historical documents or archives for the public interest, or purposes relating to research or statistics;
- (2) Believe that the use of your personal data is of vital interest or to prevent or suppress a danger to a person's life, body or health; or
- (3) Believe that the use of your personal data is necessary to carry out a public task, or exercise official authority.

## **2. What personal data the Bank collects**

The personal data that the Bank collects may vary depending on the objectives and necessities and may include both general and sensitive personal data.

Your personal data that the Bank collects, uses, and discloses are as follows:

Category	Examples of personal data
Personal details	<ul style="list-style-type: none"> <li>- Given name, middle name, surname, hidden name (if any)</li> <li>- Gender, date of birth and age</li> <li>- Marital status</li> <li>- Nationality</li> <li>- Educational background</li> <li>- Work experiences</li> </ul>
Contact details	<ul style="list-style-type: none"> <li>- Mailing address</li> <li>- House registration address</li> <li>- Email address</li> <li>- Phone number</li> <li>- Facsimile number</li> <li>- Social media accounts</li> </ul>
Identification and a Authentication details	<ul style="list-style-type: none"> <li>- Photo on ID card, employee card, or sale agent card</li> <li>- ID number</li> <li>- Passport information</li> <li>- Driving licence</li> <li>- Signatures</li> <li>- Photos or videos taken or recorded during training sessions or examinations.</li> </ul>
Employment details	<ul style="list-style-type: none"> <li>- Positions and responsibilities</li> <li>- Salary and reimbursement</li> <li>- Leaves information</li> <li>- Performance assessment</li> <li>- Assessment and other evaluations</li> <li>- Reimbursement and welfare usage and claims</li> <li>- Disciplinary actions</li> </ul>
Welfares and benefits	<p>Information relating to:</p> <ul style="list-style-type: none"> <li>- Finance and tax</li> <li>- Life insurance, health insurance and non-life insurance</li> <li>- Provident fund</li> <li>- Cremation fund</li> <li>- Loan or debts</li> <li>- Education of the employee's child</li> </ul>
Geographic information and information relating to your devices and software	<ul style="list-style-type: none"> <li>- GPS location</li> <li>- IP address</li> <li>- Technical specifications and uniquely identifying data</li> </ul>
Investigation data	<ul style="list-style-type: none"> <li>- Background, anti-money laundering and counter terrorism checks</li> <li>- Consent and metadata of relevant information exchanges between and among individuals and/or organisations, including emails, voicemail and live chat.</li> </ul>

	<ul style="list-style-type: none"> <li>- The recording of photos or videos during training sessions or examinations as required by the Bank.</li> </ul>
User login and subscription data	<ul style="list-style-type: none"> <li>- Login credentials for phone including internet browsing history</li> </ul>
Information concerning security and information required to support our regulatory obligations	<ul style="list-style-type: none"> <li>- Visual images</li> <li>- Personal appearance</li> <li>- Detection of any suspicious and unusual activity</li> <li>- CCTV images and motion pictures</li> <li>- Video recordings</li> </ul>
Sensitive personal data	<ul style="list-style-type: none"> <li>- Race</li> <li>- Religion</li> <li>- Health-related information e.g. blood type, health examination results</li> <li>- Biometric information, such as facial recognition, fingerprint, and retina recognition.</li> <li>- Criminal records</li> <li>- Information relating to trade union</li> <li>- Disabilities</li> </ul>
Other information	<ul style="list-style-type: none"> <li>- Records of correspondence and other communications between you and us, in whatever manner and form, including but not limited to phone, email, live chat, instant messages and social media communications.</li> <li>- Information that you provide to us by filling in forms or communicating with us, whether face-to-face, by phone, email, or electronic channels.</li> </ul>

### 3. Sources of your personal data

Normally, the Bank will collect your personal data directly from you. The Bank sometimes may get it from other sources, in which case the Bank will ensure that our sources of your personal data comply with the PDPA.

Personal data that the Bank collects from other sources may include:

- (1) Information you have asked the Bank to collect for you, e.g. information about your accounts or property holdings with other companies including transactional information;
- (2) Information of any persons relevant to you (e.g. your family, relatives, job, or scholarship guarantor) that is necessary for the Bank to proceed with the relevant employment, benefits and welfare purposes;
- (3) Information from third-party service providers and/or governmental authorities, e.g. information that helps us to combat fraud or information related to your social interactions (including your communications on social media, with individuals, organisations, clearing houses, custodians, and any other stakeholders, obtained from the companies from which information is collected);
- (4) Information from our trusted business partners or other third parties involved in your transactions;
- (5) If information arises out of your insurance policy or claims thereunder, the Bank may also collect:
  - (a) Information about your medical records obtained through an agreement or with your consent;
  - (b) Information about your insurance claims history;
  - (c) Information from other parties involved in your insurance policy or claim; or

- (d) Information from publicly available sources.
- (6) Information from CCTV and surveillance devices; or
- (7) Information from companies in SCB<sup>X</sup> Group, relating to your work or engagement.

Other than the above-mentioned information, the Bank may collect personal data of the following third parties from you:

- Emergency contact;
- Guardian, family members or other individuals who have relationship with you;
- Beneficiaries to receive welfares from the Bank; and
- Persons who you refer to in the job application or contract with the Bank.

By providing the personal data of the above-mentioned parties, you have the obligation to inform the data subjects of the details of the collection, use and disclosure to the Bank.

#### **4. Your rights**

PDPA aims to give you more control of your personal data. You have legal rights concerning your personal data. These rights include:

##### 4.1 Right to access and obtain copy

You have the right to access and obtain your personal data held by the Bank, except in the case where the Bank is entitled to reject your request under the law or a court order, or where your request may affect the rights and freedoms of other persons.

##### 4.2 Right to rectification

You have the right to rectify your personal data to be up-to-date, complete, accurate . at any time.

##### 4.3 Right to erasure

You have the right to request the Bank to delete, destroy or anonymize your personal data, except in the case where the Bank has the legal grounds to deny your request.

##### 4.4 Right to restrict

You have the right to request the Bank to restrict the processing of your personal data under certain circumstances, for example when your personal data is pending examination process to rectify your personal data, or when it is no longer necessary for the Bank to retain the personal data.

##### 4.5 Right to object

You have the right to object to the processing of your personal data, except in the case where the Bank has compelling legitimate grounds which may override your own interests, or when the processing of your personal data is carried out to comply with, exercise or defend legal claims, or if such personal data processing is necessary for the performance of a task carried out under public interests.

##### 4.6 Right to data portability

You have the right to request that the Bank transfer your personal data to any third parties, or request to obtain your personal data that the Bank has transferred to any third parties provided that it is technically feasible.

#### 4.7 Right to withdraw consent

You have the right to withdraw your consent given to the Bank at any time according to steps and procedures prescribed by the Bank, except where such consent, by its nature, is non-withdrawable. Nevertheless, the withdrawal of your consent shall not affect the collection, use or disclosure of your personal data to which you already consented prior to the said consent withdrawal.

#### 4.8 Right to lodge a complaint

You have the right to make a complaint with the Personal Data Protection Committee or their office to receive a fair remedial action.

### **5. How the Bank shares your personal data**

The Bank may disclose your personal data to the following third parties or organisations under the rules prescribed by the PDPA:

- (1) Companies in SCB<sup>x</sup> Group, business partners and/or other persons that the Bank has legal relationship with, including directors, management, employees, workers, contractors, authorised persons and consultants of such persons;
- (2) The Bank's customers or service receivers, where the disclosure is necessary for you to perform your duties, or it has other lawful bases to do so;
- (3) Business partners, agents, third party service providers and other entities (e.g. external auditors, depositories, document warehouses providers, IT service providers), provided that the disclosure of your personal data must have a specific purpose, and is made on lawful basis, as well as is subject to appropriate security measures;
- (4) Any relevant persons as a result of activities relating to sales claims and/or assets, corporate restructuring or merger of the Bank where the Bank may transfer their rights to such merged entity including any persons with whom the Bank is required to share data for a proposed sale claims and/or assets, corporate restructuring, merger, financial arrangement, asset disposal or other transaction relating to the Bank's business and/or assets used in its business operation;
- (5) Legal counsel, attorneys, fraud prevention agencies, courts or governmental authorities or any person with whom the Bank is required or permitted by law and other relevant regulations, court orders or other authorities, to disclose the personal data;
- (6) Third-party guarantors or other persons that provide benefits or services to you (such as insurance company relevant to work, products, or services);
- (7) Your attorney-in-fact, legal representatives, sub-attorneys, or any other authorised persons or representatives legally empowered or entitled to use your account; and
- (8) Governmental agencies, state enterprises, state agencies relating to the disclosure of your personal data in accordance with the law and/or regulatory authority (e.g. the Department of Labour, Legal Execution Department, Education Loan Fund, the Bank of Thailand, the Securities and Exchange Commission, the Office of the Insurance Commission or the Ministry of Digital Economy and Society).

### **6. International transfer of personal data**

In case where it is necessary for the Bank to transfer your personal data internationally, the Bank will use its best efforts to send or transfer your personal data to reliable business partners, service providers or recipients of the Bank in the safest way to keep your personal data secure , including the following circumstance:

- (1) It is required by law;
- (2) The Bank has informed you of the inadequate personal data protection standards of the destination country and has obtained your consent;
- (3) It is necessary for the performance of a contract to which you are a party or in accordance with application/request prior to execution of contract;
- (4) It is necessary to comply with a contract between the Bank and other individual or juristic parties, for your own interest;
- (5) It is for a vital interest or it is to prevent or suppress a danger to a person's life, body or health and you're incapable of giving consent at such time; or
- (6) The Bank needs to carry out activities relating to the public interest.

## **7. Retention period of personal data**

The Bank will keep your personal data for as long as you still have the relationship with the Bank as our employee, service provider, contractor under the employment agreement, service agreement, hire of work agreement, agency contract, or other agreements of the same kind that you have entered into with the Bank. The Bank will only keep your personal data for a period of time that is appropriate for the type of personal data and the purpose the Bank holds it for in accordance with the PDPA.

The period of time that the Bank retains your personal data is corresponding to the prescription period and law enforcement period under the laws. However, the Bank may retain your personal data after the expiration of such period if the Bank is obligated to do so under the laws, or if any existing claims or complaints will reasonably require the Bank to keep your personal data, or for regulatory or technical reasons, whereby if the Bank is required to keep your personal information for a longer period of time, the Bank will continue to keep your personal data secure.

Apart from this, the Bank may need to retain CCTV surveillance in our offices, branches or at ATM machines, records of visitors to our premises, and voice recordings through SCB Call Center to prevent fraud and for security reason, including to investigate any suspicious transactions at the request of our customers or related persons to validate those transactions.

## **8. Cookies**

The Bank may collect cookies and similar technologies when you use our systems, products and/or services, including when you use our websites for the operations and the Bank's services, electronic systems, to make transactions through internet banking, or applications of the Bank.

The collection of cookies and similar technologies helps the Bank to recognise you and your preferences, and customise our services to your needs. The Bank may use cookies for a number of purposes, such as improving your online experience, as well as our understandings of how you interact with our e-mails, and allowing us to improve our communications with you, particularly, to ensure that online adverts displayed to you will be more relevant to you and of your interests.

## **9. Use of personal data according to the original purposes**

The Bank has the right to collect and use your personal information that the Bank has collected before the enforcement of the PDPA if the collection and use are for the original purposes. If you do not wish the Bank to collect and use such personal data, please inform the Bank to withdraw your consent at any time.

## **10. Security**

The Bank has implemented different measures to ensure that your personal data is secure, such as data encryption, and also requires our staff and third-party contractors to follow our applicable privacy standards and policies and exercise due care and implement appropriate security measures when processing personal data.

## **11. How to contact us**

If you have any questions about the Privacy Notice of the Bank or would like to exercise your rights, please contact the Bank via People Contact Center Tel 02-544-4444

In addition you may contact our Data Protection Officer at [people.pdpa@scb.co.th](mailto:people.pdpa@scb.co.th) or our head office located at 9 Ratchadapisek Road, Chatuchak, Chatuchak, Bangkok 10900.

## **12. Changes to this Privacy Notice**

The Bank may change or update this Privacy Notice from time to time by notification or announcement of the revised Privacy Notice on our website.

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Update December 19, 2024