



Notification of Energy Complex Company Limited

PS/0015/65

Privacy Notice – Vendors & Suppliers

Energy Complex Co., Ltd. (“**Company**”) is aware of the significance and duties under the Personal Data Protection Act 2019 (B.E. 2562). The company prioritizes the respect of the privacy of current and potential vendors and suppliers, business partners, who are ordinary persons operating on behalf of a legal entity that is the data subject (hereinafter called “**partner**”) and is determined to protect your data to ensure that the partner’s data are protected under the personal data protection law and other relevant laws. Therefore, the company announces this privacy notice to inform the details concerning data collection, use, and disclosure (collectively called “**processing**”) and the legitimate rights of the data subject to the following details.

No. 1 Types of persons to collect personal data

This privacy notice covers the current and potential vendors and suppliers, business partners, and ordinary persons operating on behalf of the legal entity who is the data subject, such as directors, advisors, employees, representatives, and related to any of the company’s personnel.

“**Vendor**” refers to an ordinary person or legal entity who performs the transactions with the company or is approved to sign the purchasing/employment/hiring contract with the company, either current or potential vendors or suppliers, business partners, including suppliers, manufacturers, vendors and suppliers who provide products and services to the company, and the authorized person to act on behalf of the legal partners as the case may be, such as a person with parental power, incompetent’s curator, and quasi- incompetent’s custodian.

No. 2 Personal data refer to:

2.1 “Personal data” refers to data concerning an individual that can identify the person directly or indirectly but not including data of a deceased person, such as name, surname, nickname, address, date of birth, age, phone number, ID card number, disabled person ID card number, passport number, social security number, driving license number, tax number, bank account, credit card number, e-mail, car registration number, land title deed, IP Address, Cookie ID, and Log File.

However, the following data is not considered personal data: business information contact that does not identify the person, such as the company name, company address, legal entity number, work phone number, work e-mail, workgroup e-mail such as info@company.co.th, anonymous data or pseudonymous data that become anonymous by the technical technique, and data of a deceased person.

2.2 “Sensitive data” refers to personal data concerning race, ethics, political opinions, beliefs, religions or philosophies, sexual orientation, criminal records, health information, disability, labor union information, genetic information, biometric information, or other data that have a similar effect on the data subject as determined by the Personal Data Protection Committee, which the company must operate the data carefully. The company shall collect, use, and/or disclose the sensitive data when receiving your consent or if necessary for the proceeding allowed by law.

Hereinafter in this privacy notice, if there is no specification of “personal data” and “sensitive data” concerning the service user, they are collectively referred to as “personal data.”

If the company receives a copy of your ID card or identification document or exports data from your ID card or identification document via an electronic method for authentication purposes for legal relations and/or any transactions with the company, the receiving data may contain sensitive data. The company has no plans to store the mentioned data; therefore, please remove or conceal the data. If you fail, the company reserves the right to take necessary actions to protect your sensitive information.

No. 3 Collecting personal data

The company stores your personal data as necessary based on the objective of the data use, and the company shall inform you afterward. Collected personal data by the company are categorized.

Type of Personal Data	Collecting Details
Personal data (basic)	For example, title, name, surname, nickname, gender, photo, date of birth, age, nationality, ID number, current address, permanent address, e-mail, phone number, and marital status.
Other data	<ul style="list-style-type: none"> (a) Contact data, such as address, phone number, e-mail, LINE ID, Facebook ID, Google ID, X (formally Twitter) ID, ID of other social media, and information of emergency contact person. (b) Financial data, such as bank account number. (c) Communication data, such as photos or voice recordings when contacting with the company. (d) Activity participation, such as photos or videos. (e) Study and training records, such as education, training courses. (f) Company data, such as workplace name, workplace address, phone number, e-mail, position, and superior’s name. (g) Behavior data and preference, such as activity, food, drinks, and confectionary.

No. 4 Sources of personal data

The company collects personal data and sensitive data via the following processes.

- 1) The company collects your data directly from you via the company's systems, name card exchange, e-mail, LINE ID, telephone, fax, letter, electronic registration, company information system, and the use of the company's website or applications.
- 2) The company collects your data from other sources, such as public websites, partner/vendor's company, outside service providers, or signatories of the subsidiary or companies in the PTT Group or other people.

When you agree and give consent to give personal data relating to outsiders, which includes but is not limited to a person involved with customers and service users of either business or other areas, such as family members, you guarantee and assure the accuracy of data and affirm that you have informed the person about this privacy notice.

No. 5 Objectives of personal data collection, use, and disclosure

The company collects, uses, or discloses your personal data with the objectives under the following data processing principles.

5.1 Contractual Basis To comply with the contract that you are the signatory of, such as an employment contract or other contracts, or to execute your request/application before signing a contract, as the case may be.

5.2 Legal Obligation To perform the obligation determined by law, such as the civil and commercial code, taxation law, anti-money laundering law, laws concerning state enterprise, computer law, and personal data protection law.

5.3 Legitimate Interest For the legitimate interest under the expected and reasonable scope that does not violate your basic rights and freedom.

5.4 Consent The company must obtain your consent if processing your personal data is required by law or if there is no legitimate reason for processing.

Objectives for partners

The company collects, uses, or discloses your personal data under the following objectives.

Operational Objective	Details	Fundamental of Data Processing
1. To consider and sign a commercial contract	Consideration and signing of a commercial contract and necessity of contractual basis, transaction execution relating to the company business, compliance with employment contract, service contract, confidentiality contract, MOU, other	<ul style="list-style-type: none">• Contractual Basis

Operational Objective	Details	Fundamental of Data Processing
	commercial contracts, and agreement and cooperation between the company and partner to prepare the data for the procurement process, such as making TOR.	
2. To consider the qualifications of the registering partner	Consider the qualifications of the registrant and register the partner as determined by each department, or the partner registration on the company's online system.	<ul style="list-style-type: none"> • Contractual Basis
3. To consider the qualifications of the bidder	Coordinate the business operation between the partner registrant or the partner and the company. Consider the qualifications of the bidder according to the procurement procedure, and the service provider applicant, legal advisor, accounting advisor, business consultant, tax consultant, auditor, financial advisor, financial institute, and accounting and finance system development advisor.	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest
4. To establish a legitimate claim	For establishing legitimate claims, being compliant with or exercise the claim, contestation the right of claims, legal obligations and claims for law enforcement, and reporting data to government authorities.	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest
5. Information technology management	Arrange the information system to collect, process, and link data with current and potential partners, who are ordinary persons operating on behalf of a legal entity who is the data subject.	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest • Consent
	Arrange and serve the information technology system to process partners' data, such as Facebook, LinkedIn, X (formally Twitter), YouTube, and Line Application.	<ul style="list-style-type: none"> • Contractual Basis • Legitimate Interest • Consent
6. To manage, develop, and execute any affairs to operate business	Products and/or service management (including websites and applications), inspection, fraud prevention or crimes, relationship management with current or potential partners, business partners, who are ordinary persons operating on behalf of a legal	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interest • Consent

Operational Objective	Details	Fundamental of Data Processing
efficiently	entity who is the data subject.	
7. To manage advertisement, public relations, and marketing activities	Our services include public relations, marketing campaigns, product analysis and development, product recommendation and presentation, and advertisement. We also assist in creating and managing the company's public relations media.	<ul style="list-style-type: none"> • Consent
8. To ensure safety and security, manage access to the company and assigned premises.	For the safety of the company's buildings and premises, and visitors passes before entering the office area, recording visitor's picture via CCTV or similar measures.	<ul style="list-style-type: none"> • Legitimate Interest
9. Complaints, disputes, case and risk management.	<ol style="list-style-type: none"> 1) Inspection and investigation of debased behavior, fraud, or any act violating the law or peace and order of the public. 2) Any inspections, investigations, inquiries, or legal proceedings relating to the company's business operations or legal relations with you shall be carried out to exercise the rights and resolve disputes, or conflicts on a tentative basis. 	<ul style="list-style-type: none"> • Contractual Basis • Legal Obligation • Legitimate Interest

No. 6 Disclosure of personal data

6.1 Your personal data may be disclosed or sent to departments in the company that have the roles only under the objective. To execute the processes, management, and internal communication, these persons or the teams may be allowed to access your personal data as necessary and if related only. The right to access is determined by the roles and responsibilities of the support departments and teams, such as digital, accounting, and finance.

6.2 The Company may disclose your personal data (as necessary) to outside personnel or organizations according to the objectives prescribed in this policy. The outside personnel or organizations may be located in Thailand or abroad.

1) Subsidiaries, joint ventures, and companies in the PTT Group

The company may share your personal data with companies in the PTT Group and joint venture for risk management, data exchange, and internal audit.

2) Outsiders who are service providers related to the company's operation

The company may disclose your personal data to such persons, whether they are the data controller or processor, such as the bank that provides the information technology service, Cloud and data storage service providers, application providers, hospitals, survey and analysis service providers, and translation service providers.

3) Relevant government authorities

The company may disclose your personal data to state officers and government authorities with the legal authority to protect the company's rights, others, or your interests. Plus, to respond to the request of the government authorities, such as the State Audit Office of the Kingdom of Thailand, Office of the National Anti-Corruption Commission, Department of Disease Control, Royal Thai Police, Court of Justice, Revenue Department, Department of Mineral Fuels, Department of Consular Affairs, embassy, Legal Execution Department, Department of Labor Protection and Welfare, Student Loan Fund, Social Security Office, Department of Skill Development, and Department of Labor Employment. The company shall send your personal data only if it complies with the law and the company sees fit.

4) Outside people or organizations

The company may share your personal information with external parties, such as professional advisors (legal advisors, external auditors) and outside organizations involved in activities related to the company's objectives, including publicizing or processing such activities.

No. 7 Request of consent and potential impact of Consent Withdrawal

7.1 If the company collects, uses, or discloses your data based on your consent, you can withdraw your consent at any time. Your consent withdrawal shall not affect the collection, use, or disclosure of data to which you have already consented.

7.2 If you are a minor, incompetent person, or quasi-incompetent person according to the Civil and Commercial Code, please inform the details of the person who has the parental power of the minor, curator, and custodian to allow the company to request their consent.

By informing the company, you may withdraw your consent to collect, use, and disclose all or some of your personal data as stated in this privacy notice.

If you withdraw your consent for the company to collect, use, or disclose your personal data. In that case, you may lose the interests from the company's business operation that you may get when giving consent to the company.

No. 8 Sending or transmitting personal data abroad

8.1 The company may transmit your personal data abroad on a contractual basis if necessary for your interest or to process your employment request. Additionally, the company may transmit your personal data if required to prevent harm to the life, body, or health of an employee or other individuals, to comply with the law, or to execute a mission for the public interest.

8.2 The company may collect personal data on a computer, server, or Cloud served by another person and use the other's program or platform software and platform package service to process your personal data. The company shall not allow the unconcerned person to access personal data and determine them to have the appropriate preventive measures to protect personal data.

8.3 If personal data needs to be sent or transmitted abroad, the company will comply with the personal data protection law and take the necessary measures to protect your personal data. You can also exercise your rights regarding personal data as prescribed by law. Additionally, the company will require the data recipient to implement appropriate preventive measures, process the data only if necessary, and prevent any unauthorized use or disclosure of personal data.

No 9. Retention and retention period

9.1 The company shall retain your personal data as long as necessary, considering the necessary objectives of collection, use, and processing, including compliance with the enforced laws.

The retention period criteria apply as long as the company is still in contact with you, whether you are the registrant, partner, director, representative, authorized person, or an operator working on behalf of an individual or legal entity registered as a partner or company partner. Please let me know if you need further clarification. The company may continue retaining the data as long as it is necessary for law compliance or during the prescription period to establish a legal claim, comply with or exercise the right to claim or contest over the right of claims, or for other reasons according to the company's policy and regulations.

9.2 The company shall continue collecting, using, and disclosing your personal data. However, you conclude relations with the company, as necessary, based on the law and regulation for the legitimate interest, or shall store the data in a form that cannot directly or indirectly identify the person, such as creating "anonymous data" or "pseudonymous data" with technical methods.

9.3 The company may retain your personal data as long as necessary for achieving the data processing purpose stated in this privacy notice. The company shall store your data for a maximum of ten years from the day you conclude the relationship with the company or the day you last contact the company. The company may store your data longer if allowed by law.

9.4 To comply with legal requirements, the company will keep your data in an appropriate format for the required time. However, the company will only retain your data beyond this period if doing so serves a legitimate interest less significant than your basic right to privacy.

9.5 The company shall process the investigation to erase or destroy personal data, anonymize the data so it cannot identify the data subject permanently, or execute other methods to limit all personal data after the retention period or when there is no necessity for storing such data, or when the company has to follow your order to erase your data.

No. 10 Personal data protection by company

The company shall store your personal data based on technical and organizational measures to maintain data processing safety appropriately and prevent violations. The company sets the policy, regulations, and criteria for personal data protection and preventive measures to prevent the data receiver from using or disclosing the data for other purposes, without authority, or wrongfully. Further, the company revises the policy, regulations, and criteria as necessary and appropriate. The executives, employees, contractors, suppliers, advisors, and data receivers must maintain confidentiality according to the measures determined by the company.

No. 11 Rights of the Data Subject

You have the right to execute the following processes.

(1) Right to withdraw consent

If you have given consent to the company to collect, use, and/or disclose your data (either before or after the effectiveness of personal data protection law). In that case, you can withdraw your consent at any time while the company possesses your data unless there is a legal limitation or a beneficial contract for you.

Your consent withdrawal may affect your use of products and/or services. You may not be eligible for benefits, promotions, or new proposals, receive better products or services that fulfill your needs, or get useful information. Therefore, you must study and query the impact before withdrawing your consent.

(2) Right to access

You have the right to access your personal data and request the company to make a copy of the data or disclose the acquisition of the data possessed by the company. The company may reject your request if the access or receiving of a copy adversely affects the rights and freedom of others or if the company must comply with the law or order of the court that does not allow data disclosure.

(3) Right to data portability

You have the right to access your personal data in a readable format through automated tools, and the company must use these tools to disclose personal data. Additionally, you can request the company to provide your data in a transferable format to another data controller if it can be processed automatically. You also have the right to receive such data that the company sent or transferred to the data controller directly unless it cannot be processed due to technical difficulties.

Your personal data must be data you have given the company consent to collect, use, and/or disclose or the data that are necessary for the company to collect, use, and/or disclose to facilitate you to use the company's products and/or services as per your objective, that you are the signatory with the company, or to process your request before using the company products and/or services, or other personal data prescribed by the authorized person.

(4) Right to object data processing

You have the right to object to collecting, using, and disclosing your personal data at any time. This right is applicable if the collection, use, and/or disclosure of your personal data is not necessary for the legal interest of the company, individual, or legal entity within the reasonable scope expected of them or for processing the mission for the public interest. With your objection, the company is still able to collect, use, and/or disclose your personal data as long as the company can give a more vital legal reason than your basic right, confirm the legitimate rights, comply with the law, or for litigation as the case may be.

Additionally, you have the right to object to collecting, using, and/or disclosing your personal data for marketing and scientific, historical, or statistical research purposes.

(5) Right to erasure

You have the right to request the erasure or destruction of your personal data or anonymize them if you believe your data were collected, used, and/or disclosed wrongfully or if the company does not need them for the relevant purposes prescribed in this privacy notice, or you use the right to withdraw your consent or object as stated above unless the company must be compliant with the law or exercise a legal right to retain such data.

(6) Right to restriction

You have the right to request the temporary suspension of data used in case the company is investigating the request to amend the data, your objection, or other cases that the company has no necessity and must delete or destroy your data, but you request the suspension instead.

(7) Right to rectification

You have the right to request the company to rectify and update your data accurately and completely to avoid ambiguity.

(8) Right to lodge a complaint

You have the right to lodge a complaint to the person in authority if you believe that the data collection, use, and/or disclosure violates or is not compliant with the relevant laws.

You can request to use the legal right by filling out the Data Subject Request Form on www.energycomplex.co.th or email pdpa@energycomplex.co.th to request the form.

The exercise of your rights above may be limited under the relevant laws. In some cases, the company may reject or cannot process your request due to necessary reasons, such as to

comply with the law or the court order for the public interest, or the right may adversely affect the rights and freedom of others. If the company rejects the request, the company shall inform the reason.

No. 12 Personal data security measures

The company prioritizes the significance of data security, such as encryption and data access limitation, to ensure that the company personnel and outside service providers operating on the company's behalf follow the personal data protection standard, which includes the duty to prevent data leaking. In addition, the company shall implement appropriate security measures for data processing.

The company reviews and revises personal data security steps and measures constantly to maintain an appropriate data security level to the risk and to continue the confidentiality, completion, availability, and liquidity of the data processing process, as well as to prevent the loss and unauthorized data access, use, modification, amendment, or disclosure. The company shall implement security measures to process all electronic or document data.

No. 13 Connecting with the Outsider's website

Using the company's applications or website, it may connect with social media, platforms, and other websites operated by outsiders. The company is trying to connect with the website that the standards of personal data protection are in place only. However, the company cannot be responsible for content or personal data protection standards on that website unless stated otherwise. Such persons collect any data given to the outsider's website and are under the personal data protection notice/policy of such persons (if any). Please study and follow the personal data protection notice/policy that appeared on that website separately.

No. 14 Update of privacy notice of vendors and supplies

The company shall review and announce the privacy notice every three years unless there is a change in law or proceeding with significance. The company shall announce the essence of the update before the effective date and publish the updated version via the appropriate channel. The company may ask for your consent if required by law. The company recommends checking the update of this privacy notice periodically.

No. 15 Contact channels

If you believe that processing your personal data is not compliant with the Personal Data Protection Act 2019 (B.E. 2562), you have the right to complain to the personal data protection officer.

Energy Complex Company Limited

Location: Energy Complex Company Limited 555/1 Vibhavadi Rangsit Road,
Chatuchak Sub-district, Chatuchak District, Bangkok 10900
Tel: 0-2140-1234
E-mail: callcenter@energycomplex.co.th

Data Protection Officer

Location: Energy Complex Company Limited 555/1 Vibhavadi Rangsit Road,
Chatuchak Sub-district, Chatuchak District, Bangkok 10900
Tel: 0-2140-1148
E-mail: pdpa@energycomplex.co.th

No. 16 Applicable laws

The privacy notice is under enforcement and interpretation according to Thai laws, and the Thai court has authority for any potential dispute consideration.

Announced on 19 May 2022.

Sirasak Chandrema
President