



## Notification of Energy Complex Company Limited

PS/0013/66

### Privacy Notice - Visitors

Energy Complex Co., Ltd. (“**Company**”) is aware of its significance and duties under the Personal Data Protection Act 2019 (B.E. 2562). The company prioritizes the visitor's privacy, persons who request to enter the buildings, workspace, and office (collectively called “**visitor**”), and is determined to protect your data to ensure that they are protected under the personal data protection law and other relevant laws. Therefore, the company announces this privacy notice to inform the details concerning the data collection, use, and disclosure (**collectively called “processing”**) and the legitimate rights of the data subject as the following details.

#### **No 1. Types of persons to collect personal data**

This privacy notice covers the visitor's personal data, the person who requests to enter the buildings, workspace, and office buildings.

“**Visitor**” refers to someone outside the company who requests access to the building or to contact someone about work or other business with the company; they are referred to as an external contact.

#### **No. 2 Personal data** refers to:

2.1 “Personal data” refers to data concerning the individual that can identify the person directly or indirectly, not including the data of a deceased person, such as name, surname, nickname, date of birth, address, 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, motorbike registration number, land title deed, IP Address, Cookie ID, and Log File.

However, the following data is not considered personal data: business contact information 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 a 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 explicit consent only 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.**”

### **Steps of exchange the visitor pass to enter the buildings and return the pass**

(1) When visitors arrive at a company's office or designated area, they must exchange their ID card, driver's license, or any other government-issued document for a visitor or contractor pass. This process takes place at the reception in the lobby. The visitor must provide the name, company, and floor of the contact person they are visiting.

(2) A company staff receives the visitor's card and hands the visitor or contractor a visitor's pass in exchange. The company staff shall keep the visitor's ID card or document or put the first name, surname, and ID card number from the ID card reader and take a photo of the ID card.

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 contacting or using services in the building areas, the receiving data may contain sensitive data. The company has no plans to store the mentioned data and will conceal the religion and blood type data that may appear on the card to protect your sensitive data.

(3) When the visitor returns the visitor or contractor pass, company staff shall return the visitor's ID card or document given in (1). In an emergency, the staff shall keep the ID card, driving license, or document given in (1) until the visitor leaves the premises.

### **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, address, phone number, and e-mail.
Sensitive data	For example, a COVID-19 vaccination record and face recognition that has your consent or is legally allowed.

#### No. 4 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.

Operational Objective	Details	Fundamental of Data Processing
1. To control the access to the buildings, workspace, office, or specific areas of the company.	To control the access to the buildings, workspace, office buildings, and company's specific, to monitor, prevent, obstruct, and examine the access to such areas without authorization to maintain the safety in the buildings, workspace, office buildings, or company's specific areas, as well as the visitor pass exchange, registration, record of information of the visitor who contacts with the company in the building or the contractor who works for the company in the workspace, office buildings, or company's specific areas within the designated areas, the history record of the eligible person to access the company's buildings and premises.	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
2. To execute the company's procedures	To execute the internal procedures before working in the building, workspace, office buildings, or company's specific areas.	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
3. To take care of the employees and company properties	To take care of the employees and company properties, including the use of CCTV to record the image of persons in the buildings, workspace, office buildings, and company's specific areas of the company.	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
4. To establish the legitimate claim, compliant with, or exercise the right to claim	To establish the legitimate claim, be compliant with or exercise the legitimate claim, and process the prosecution (if any) with the relevant person, as well as the judgment enforcement.	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
5. To be compliant with the law	<p>(1) To be compliant with laws, order of authority, NGO, or authorized officer, such as to follow the summon, seizure notice, order from the court, police, attorney, and government authority.</p> <p>(2) To comply with the law regarding the public interest in the public health, such as health</p>	<ul style="list-style-type: none"> <li>• Legal Obligation</li> </ul>

Operational Objective	Details	Fundamental of Data Processing
	prevention from dangerous communicable diseases or tentative communicable pandemic diseases.	

## No. 5 Disclosure of personal data

5.1 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.

5.2 The company may disclose your personal data (as necessary only) 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 ventures 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 share your personal data with state officers and government authorities authorized to protect the rights of the company, other individuals, or yourself. This is done in response to requests from government authorities such as the State Audit Office of the Kingdom of Thailand, the 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. However, the company will only share your data if it complies with the law and if the company deems it necessary.

4) Outside people or organizations

The company may disclose your personal data to outside people or organizations, such as a professional advisor (legal advisors, outside auditors) and outside organizations that the company would like to publicize or process activities according to the objective stated above.

## **No. 6 Retention and retention period**

The company shall retain your personal data as long as necessary, considering the necessary objectives of collection, use, and processing. The company may store your data longer if allowed by law. The company shall delete, destroy, or anonymize your data within one year or when there is no necessity for storing such data.

## **No. 7 Personal data protection by company**

The company shall store your personal data based on the 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. 8 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 work remunerations and deserved benefits from the company, as you may need to receive secure 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 affects the rights and liberty 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 the collection, use, and/or disclosure of your personal data at any time if the collection, use, and/or disclosure of your data aims for the necessary processes under the legal interest of the company, individual, or legal entity under your expected and reasonable scope, or for processing the mission for the public interest. The company will continue collecting, using, and/or disclosing your data as long as it can give a more vital legal reason than your basic right, or it is for confirming the legitimate rights, compliance with laws, or litigation, as the case may be.

Additionally, you have the right to object to the collection, use, and/or disclosure of your personal for marketing and scientific, historical, or statistical research purposes.

#### **(5) Right to erasure**

You have the right to request for the deletion or destruction of your personal data or anonymize them if you believe your data are 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 the 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 amend and update your data accurately and completely to avoid ambiguity.

#### **(8) Right to lodge a complaint**

You have the right to complain to the person in authority if you believe that the data collection, use, and/or disclosure violates or is not compliant with the law.

You can request to use the legal right by filling out the Data Subject Request Form on [www.energycomplex.co.th](http://www.energycomplex.co.th) or email [pdpa@energycomplex.co.th](mailto:pdpa@energycomplex.co.th). to request the form.

Your exercise of the right may be limited under the relevant laws. In some cases, the company may reject or cannot process your request due to compulsory reasons, such as to comply with the law or the court order for the public interest, or the right may adversely violate the rights and freedom of others. If the company rejects the request, the company shall inform you of the reason.

## **No. 9 Personal data security measures**

The company prioritizes the significance of your 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 the appropriate security measures for data processing.

The company reviews and revises the 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, and 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. 10 Update of privacy notice of visitors**

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 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. 11 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](mailto: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](mailto:pdpa@energycomplex.co.th)

## No. 12 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 4 August 2023.

Sirasak Chandrema  
President

Latest update on 4 August 2023