

Notice No. 3/2025
Privacy Notice for Employees and Related Persons

NS-Siam United Steel Company Limited (hereinafter referred to as "Company", "we", "our" or "us") takes our responsibilities regarding personal data protection of employees, family members and related persons of employees seriously, and we commit to respect your privacy rights and concerns in accordance with Personal Data Protection Act B.E. 2562, including the Royal Decree, Rules, Announcements, Regulations, Regulations, Practices, Measures, Guidelines, Orders issued under the Personal Data Protection Act B.E.2562 (2019) ("Personal Data Protection Laws"). We have prepared this privacy notice for employees and related persons (the "Notice") to determine our policies and procedures in relation to collection, use, and disclosure of your personal data (hereinafter referred to as "process" or "processing"), as well as outlining your rights under applicable Personal Data Protection Laws and the channels to contact us as follows:

1. Definition

"Employee" means the definition of employee as defined in the Personnel Management Regulations and Personnel Management Guidelines of the company.

"Related Person(s)" means family member or any person whom the Employee provides their personal data to the Company, i.e., reference person, beneficiary etc.

"You" means Employee and Related Person(s)

2. Sources of Personal Data Collection

We collect and use various types of personal data. The types of personal data that we collect depend on our human resources management process. We collect your personal data from various sources, including, without limitation to:

2.1 We may directly collect your personal data from you from the following sources:

- 2.1.1 From the job recruitment process, internship recruitment process, supporting documents provided upon job recruitment process, such as job applications, internship applications, including supporting documents for any application or registration related to the Company's recruitment process;
- 2.1.2 From the enforcement of employment contracts and supporting documents, or any registration related to the internal work processes of the Company;
- 2.1.3 From the communication between you and the Company's employees or other Related Persons of the Company;
- 2.1.4 From the use of the Company's systems, data centers, servers, software, applications, platforms, or any networks by you in your work functions;
- 2.1.5 From the participation in the Company's activities or other privileges and benefits that the Company offers to you;
- 2.1.6 From communication between the Company and you via the Company's contact channels such as telephone, email, LINE, Facebook or other related channels.

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2.2 We may indirectly collect your personal data from other following sources:

2.2.1 From the Company's affiliates;

2.2.2 From referral, emergency contact, or family members on the job applicant forms and other related supporting documents;

2.2.3 From recruiter websites, headhunters, or existing Company's employees;

2.2.4 From service providers who provide background checks in terms of education, work experience, credit check, and criminal check;

2.2.5 From hospitals; and

2.2.6 From government sectors (i.e., Department of Employment).

3. Personal Data that We Collect

The Company will collect the personal data of the Employees as detailed below. In the event that you do not provide such personal data, this may affect the Company's ability to comply with the employment contract, employment conditions, labor laws and/or any other relevant laws.

Moreover, the Company will collect the personal data of persons related to you as detailed below. In the event that you have provided the personal data of the Related Persons for the purposes specified in this Notice, you are responsible for informing them of the rights of the data subjects as described in this Notice. You are responsible for obtaining any necessary consent from them and ensuring that you have the right to provide their personal data to us.

The Company may collect your personal data in various formats, such as in document or electronic format. However, if the Employees or Related Persons refuse to provide the personal data required to comply with the law or to enter into a contract with the Company, the performance of the contract and the right to access the benefits or services provided by the Company may not be able to be carried out completely.

3.1 Employee's Personal Data

The Company collects general personal data of employees for use in accordance with the purposes stated in this Notice, including:

(1) Information and documents related to the recruitment process, such as personal history (Resume / Curriculum Vitae or CV), and personal data that may appear in application letters, job applications, and employer opinions;

(2) Contact Information such as current home address, telephone number, email address, LINE ID, and social media account;

(3) Identifying Information such as title, name, surname, nickname, signature, nationality;

(4) Information about Personal Attribute such as date of birth, age, gender, body proportions, marital status, information about military service, interests, opinions, habits, behaviors, attitudes, aptitudes, skills, leadership, ability to work with others, emotional intelligence, organizational commitment, which may be obtained from observation and analysis of the Company and the Company's

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employees during their work or participation in activities with the Company, or from assessments of the Company or those hired by the Company to do so;

(5) photograph and videos;

(6) Educational information, abilities and development potential and other characteristics of employees, such as education level, qualifications, educational institutions, educational history, internship history, training history, educational results, test results, legal rights to work, professional qualifications, language abilities and other abilities, information from references that employees have provided to the Company;

(7) Professional Information about work experience and employment history such as job position, employer details, salary and compensation and benefits;

(8) Information about the places where work can be performed;

(9) Information required to report to regulatory agencies, such as the Ministry of Labor, the Personal Data Protection Committee;

(10) Financial Information such as wages, salary, income, taxes, provident funds, bank accounts that the Company use to transfer salary and benefits, loans, tax exemptions and tax deductions;

(11) Information related to social security, labor protection, benefits, welfare and benefits that you receive or are entitled to receive according to the human resources management regulations, order and policy of the Company;

(12) Records of your work entry and exit, work duration, overtime work, absences and leave, and other types of leave according to the Company's regulations

(13) Your employee identification, work history, job positions, meeting attendance, comments on being on the Company's committees or various working groups, history of committees or working groups, registry of committee or working group;

(14) Information on the use and access of information systems, computers, work systems, websites, applications, network systems, electronic devices, emails to comply with the Company's information technology policy and relevant laws;

(15) Information collected from participation with the Company, such as participating in activities, response to surveys and assessments;

(16) Information that you choose to share and disclose through the Company's systems, applications, tools, questionnaires, assessments and documents;

(17) Copies of documents that can be used to identify employees, such as national identification cards, passports, other documents issued by government agencies, and household registration;

(18) Information about vehicles, driver's licenses, driving ability, and in cases where the Employee drives vehicles provided by the Company, the Company will collect information about the Employees' driving behavior;

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(19) Other information necessary for investigating conflicts of interest, such as information on shareholdings and relationships with business partners;

(20) Other information necessary for compliance with employment contracts, welfare benefits, analyzing and managing the Company's operations, management of Employees' information after termination of employment, and complying with various laws;

(21) Information related to appeals, complaints, investigations, and disciplinary actions.

3.2 Related Persons Personal Data

The Company collects general personal data of individuals related to Employees, including, family members or dependents of the Employees, who are entitled to receive benefits in accordance with the Company's regulations, rules and human resources management policies, such as spouses, children, parents, beneficiaries, and emergency contact persons that are provided to the Company, for use in accordance with the purposes stated in this Notice, including:

- (1) Contact Information such as home address, telephone number;
- (2) Personal Information such as title, name, surname;
- (3) Personal Attribute such as age, status;
- (4) Professional Information such as occupation, job position, work address.

3.3 Sensitive Data of Employees

The Company may be required to collect and process your sensitive data for the purposes stated in this Notice, including:

(1) Health Information such as blood type, weight and height as appears on medical records, medical certificates or other documents such as health examination results, chronic disease documents, color blindness documents, food allergy documents, drug allergy documents, medical treatment history, medication history, medical receipts, accident records, both in cases where you have accidents during work or due to work, and other accidents;

- (2) Biometric Data such as face scans, fingerprint scans;
- (3) Criminal records;
- (4) Religion, ideologies, philosophies, race and disability;

Where necessary, the Company will process sensitive data of Employees and Related Persons with the express consent of Employees or Related Persons only for the purposes specified by law. The Company will, to our best efforts, provide adequate security measures to maintain the security and protection of sensitive data of Employees and Related Persons.

In addition, the Company will request your express consent in the following cases:

(1) In case where the Company uses a picture of your national identification card (which contains your sensitive data, such as religion and/or blood type) and criminal history to verify and confirm your identity prior to conducting related operations;

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(2) In the case of disclosure or transfer of your personal data and sensitive data outside of Thailand to a country who may not have sufficient standards of personal data protection (except in cases where the Personal Data Protection Act stipulates that it can be processed under other legal bases or without consent)

(3) In the case where you are a minor, an incompetent person, a quasi-incompetent person who must obtain consent from your parents, guardians, custodians or curator (as the case may be) (except in cases where the Personal Data Protection Act stipulates that it can be processed without consent). In particular, if the Company has knowledge that the owner of the personal data is a minor, in which case the Company must obtain consent from his or her parents or guardians, we will not collect personal data from the minor until we have received consent from the person exercising parental authority, except in cases where there is a legal basis for the Company to be able to process the personal data without consent.

Where you have provided personal data of Related Persons for the purposes set out in this Notice, you are responsible for informing them of their rights as described in this Notice. You are also responsible for obtaining any necessary consent from them and ensuring that you have the right to provide their personal data to us.

4. Purposes and Lawful Basis of Processing

We may process your personal data for all operations in accordance with our objectives related to human resource management activities. The Company processes personal data for reasons according to one or more lawful bases, based on the objectives which are classified according to the following lawful basis:

Lawful Basis	Purposes of Processing
Legitimate Interest	<ul style="list-style-type: none"> ○ For legitimate interests related to human resource management, data analysis and allocation of personnel, personnel development, promotion, transfer, bonus, salary adjustment, retirement, medical welfare, medical record, insurance welfare and other employee welfare such as hospital, cafeteria, fitness center, recreational activities, conducting various employee activities, internal communication, communication with external parties, various registration procedures, authorization, certification, preparation of documents for public release, report preparation, reporting to government agencies and/or regulatory agencies, verifying identity and verifying the accuracy of information received from Employees, analyzing and creating a database of work history and/or opinions, communication, sending news and public relations, improving working environment, providing facilities, maintaining information security, creating user accounts, identification for log in to the work system and accessing the

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Lawful Basis	Purposes of Processing
	information system, maintaining security, preventing accidents and crimes, investigating and managing complaints relating to corruption, litigation cases or disputes.
Contract	<ul style="list-style-type: none"> ○ To carry out an action related to employment contracts, agreement on work conditions, compliance with employment contracts, Employee registration, orientation, compensation payment, accident insurance, compliance with regulations, code of ethics, assignment of work, transfer and adjustment of employee positions, transfer of Employees to work in group companies or affiliated companies, training, performance evaluation, management of health and safety, management of labor relations in terms of work discipline, and to be used in compliance with the Company's human resource management regulations.
Legal Obligation	<ul style="list-style-type: none"> ○ To comply with laws, regulations and orders of legal authorities, such as laws on labor protection, labor relations, social security, safety, occupational health and working environment, occupation and environmental diseases, communicable disease control and other related laws.
Consent	<ul style="list-style-type: none"> ○ For Employee ID card and Related Persons ID card ○ To record biometric data, such as facial images, fingerprints, in the case of Employees' work attendance system and recording entry and exit from specific areas ○ To issue Company's certificate of employment ○ To confirm the financial information of Employees with financial institutions ○ Drug testing of Employees ○ To reimburse medical expenses of Related Persons of Employees ○ To produce a power of attorney for Employees to act according to the authority assigned by the Company

The Company may use other lawful basis in addition to those specified above for collecting, using or disclosing personal data in the following activities, as the case may be:

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(1) where the Company prepares historical documents or archives for public interest, or in relation to research or statistics;

(2) where the Company believes that the collection, use or disclosure of your personal data will be for the purpose of preventing or suppressing a danger to the life, body or health of an individual (Vital Interest), such as using blood type information or information about employee health for use in an emergency that is dangerous to your life;

(3) where the Company needs to process personal data in cases where consent from the data subject is required, and the purpose of processing personal data has been notified before requesting consent, such as collecting sensitive data for purposes that do not comply with the exceptions of Section 26 of the Personal Data Protection Act B.E. 2562 and marketing cases that cannot be reasonably expected by the data subject.

The Company will process personal data only for the purposes as stated in this Notice. In some cases, the Company may consider that it can process personal data for other purposes that are related and not in conflict with or in addition to the original purpose. However, in the event that the Company needs to process data for purposes unrelated to the original purpose, the Company will request new consent or take other actions so that the processing of personal data for the new purpose is lawful. If you do not intend the Company to store your personal data, you can exercise your rights as a data subject as stated at the end of this Notice. The Company would like to inform you that if you do not provide your personal data to the Company, this may affect the Company's ability to proceed with your application or request or according to contract. The Company may not be able to offer or provide some or all of the Company's products, goods, services or benefits, and you may experience inconvenience, or inability to perform contracts, and may suffer damages or loss of opportunities. In some cases, your failure to provide such data may affect the Company's or your compliance with any laws to which you or are obligated, and may have related penalties.

5. Disclosure to Third Parties

The Company may disclose or transfer your personal data to external parties to process your personal data as follows:

5.1 Disclosure of personal data within Thailand

In order to achieve the purposes of this Notice, the Company may disclose your personal data to the Company's affiliated companies, reference persons, educational institutions (e.g. universities, colleges, etc.) to verify the information you have provided to the Company, service providers who conduct background checks on the Company's behalf (i.e., credit bureaus, criminal background check agencies, hospitals), service providers related to personnel recruitment and selection processes, employment, security, qualification and ability testing, information systems, financial institutions, auditors, business partners or allies, information system developers, government agencies, and other persons necessary for the Company to be able to perform any of the purposes for collecting and processing personal data as specified in this Notice.

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5.2 Transfer of personal data outside of Thailand

5.2.1 The Company may disclose or transfer your personal data to affiliated companies or other persons outside of Thailand where necessary for the performance of a contract to which you are a party or for the performance of a contract between the Company and another person or entity for your benefit or to take action at your request before entering into a contract or to prevent or suppress danger to the life, body or health of you or another person, to comply with the law or to carry out an important public interest mission.

5.2.2 The Company may store your information on computer servers or clouds provided by other parties and may use programs or applications of other parties in the form of ready-made software and ready-made platform services to process your personal data, but the Company will not allow unrelated persons to access your personal information and will require those other parties to have appropriate security measures.

5.2.3 In the event that your personal data is transferred outside of Thailand, the Company will comply with the Personal Data Protection Laws and take appropriate measures to ensure that your personal data is protected and that you can exercise your rights related to your personal data in accordance with the Personal Data Protection Laws. The Company will also require those who receive the data to take appropriate measures to protect your data and process such personal data only as necessary and take steps to prevent others from using or disclosing your personal data without authorization.

6. Retention of Personal Data

6.1 The Company has established security measures for personal data, both in document and electronic forms, to prevent the loss, access, use, alteration, modification or disclosure of personal data without authorization or unlawful action;

6.2 The Company will retain your personal data and Related Persons' personal data for as long as necessary to achieve the purposes according to each type of personal data, unless the law provides for a longer retention period. In cases where the retention period of personal data cannot be clearly specified, the Company will retain the data for the period that may be reasonably expected according to the standards of retention (e.g., the general legal statute of limitations is 10 years);

6.3 The Company will retain personal data of Employees for the duration of their employment with the Company to comply with the contract and for the period as necessary after their employment with the Company ends;

6.4 The Company will retain personal data of family members or other persons that you have provided for the period necessary for processing to achieve the purposes under this Notice, especially to comply with your rights to receive welfare under the Company's regulations and human resources management policy;

6.5 In the event that the Company processes your personal data under consent, the Company will process such personal data until the you request to withdraw your consent and the Company has completed the your request. However, the Company will still retain the your personal data only as necessary for the record of the your withdrawal of consent so that the Company can respond to your

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request in the future. If the you wish to withdraw your consent for such data processing, you may contact the Company and notify your intentions in accordance with this Notice. Please note that the withdrawal of consent may affect your use of the Company's human resource management, recruitment, selection, employment and/or various services, or for the your benefits. Therefore, you should study and inquire us about the impact before withdrawing your consent;

6.6 The Company will establish an audit system to delete or destroy personal data when the retention period has expired or when it is no longer relevant or necessary for the purposes for which the personal data was collected.

7. Data Subject Rights

You have rights over your personal data in accordance with the Personal Data Protection Laws. The Company will respect your rights and will promptly take action in accordance with laws, rules or regulations related to the processing of your personal data under certain circumstances. You have the following rights regarding your personal data:

7.1 Right to Access

You have the right to request access to and receive a copy of your personal data that the Company holds, or request that the Company disclose the source of such personal data that you have not given consent to.

7.2 Right to Portability

You have the right to request your personal data that you have provided to the Company by giving consent, subject to the contract between the Company and you, per your request you have made to the Company, or as specified by the Personal Data Protection Committee, only if the Company has made such personal data in a format that is generally readable or usable by tools or devices that work automatically and can use or disclose personal data by automatic means, including the right to (1) request that the Company send or transfer personal data in such format to another data controller when it can be done by automatic means and (2) request personal data that the Company has sent or transferred personal data in such format directly to another data controller, except where technical conditions are not possible.

7.3 Right to Object

You have the right to object the Company's collection, use or disclosure of your personal data in the event that:

(1) the Company collects your personal data because it is necessary to perform a mission for the public interest of the Company or the exercise of government rights or for the lawful interests of the Company or another person or juristic person;

(2) the Company collects, uses or discloses your personal data for direct marketing purposes; or

(3) the Company collects, uses or discloses your personal data for scientific, historical or statistical research purposes, unless it is necessary to perform a mission for the public interest of the Company.

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7.4 Right to Erase or Destroy

You have the right to request the Company to erase, destroy or anonymize your personal data in the event that (1) your personal data is no longer necessary for the Company to keep for the purposes; (2) you withdraw your consent and the Company has no legal authority to continue to collect, use or disclose such personal data; (3) you object to the Company's collection, use or disclosure of your personal data collected by it due to the necessity to perform its mission for the public interest or the exercise of government rights or for the legitimate interests of the Company or other persons or juristic persons, and the Company cannot reject such objection; (4) you object to the collection, use or disclosure of your personal data for direct marketing purposes; or (5) your personal data has been unlawfully collected, used or disclosed, unless the Company is required to keep your personal data for compliance with the law, the establishment of legal claims, or the exercise or defense of the Company's claims.

7.5 Right to Restrict

You have the right to suspend the use of your personal data in the event that (1) the Company is in the process of verifying your request to exercise your right to correct your personal data to be accurate and up-to-date, (2) the Company collects, uses or discloses your personal data unlawfully, (3) the Company is no longer required to collect, use or disclose such data for any purpose but you wish the Company to retain your personal data for your legal benefit, or (4) you wish the Company to suspend the use of your personal data while it is in the process of verifying or verifying your objection to personal data.

7.6 Right to Rectify

You have the right to request that the Company correct your personal data to be accurate, current, complete and not misleading.

7.7 Right to Withdraw Consent

If you have given your consent to the collection, use or disclosure of your personal data, whether before or after the effective date of the Personal Data Protection Laws, you have the right to withdraw your consent given to the Company at any time while your personal data is stored by the Company, unless restricted by law or you are still under an effective contract. However, your withdrawal of consent will not affect the collection, use or disclosure of personal data that you have previously given your consent to the Company in accordance with the law. In addition, your withdrawal of consent may prevent the Company from performing the contract or your request. The Company may therefore have to terminate the existing relationship and/or contract that you have with the Company.

7.8 Right to Lodge a Compliant

You have the right to lodge a complaint with the relevant agency or legal authority in the event that the Company or the personal data processor, including the Company's employees or contractors or the personal data processor, violates or fails to comply with the Personal Data Protection Laws.

บริษัท เอ็นเอส-สยามยูไนเต็ดสตีล จำกัด
NS-Siam United Steel Co.,Ltd.

สำนักงานใหญ่/โรงงาน : 12 ซอย ซี่ 2 ถนนปภกรณสังเคราะห์ราษฎร์ ตำบลมาบตาพุด อำเภอเมือง จังหวัดระยอง 21150 โทรศัพท์ 0 3868 5144 / 0 3868 5155
Head Office/Factory : 12 Soi G2, Pakorn Songkrohraj Road, Maptaphut, Muang, Rayong 21150 Thailand Tel : +66 3868 5144 / +66 3868 5155
สำนักงานขาย : 695/1 หมู่ที่ 12 ตำบลบางแก้ว อำเภอบางพลี จังหวัดสมุทรปราการ 10540 โทรศัพท์ 0 2700 4400-4
Sales Office : 695/1, Moo 12, Bang Kaeo, Bang Phli, Samut Prakan 10540 Thailand Tel: +66 2700 4400-4



In case you wish to exercise any of the rights under Sections 7.1 to 7.7 above, you may submit a request to the Company as determined by the Company. Upon receiving your request, the Company will consider your request in accordance with the criteria and conditions stipulated by law and will complete your request and notify you of the results of the consideration and action within 30 days from the date on which the Company has received the request and all supporting documents for the action according to the request.

In case you exercise the rights of the data subject, the Company may not be able to comply with some of your requests while the Company is considering or taking action on your request.

The Company will not charge you a fee for the exercise of such rights, except if the Company deems that your request to exercise your rights is an excessive exercise of rights or without any other reasonable cause, the Company may charge a fee for the exercise of your request at the rate announced by the Company. You may request to exercise your rights of the data subject from the date the Personal Data Protection Act comes into force onwards.

In the event that you request the Company to delete, destroy, restrict the processing of personal data, temporarily suspend use, convert personal data into a form that cannot identify the data subject, or withdraw consent, this may prevent the Company in the performance of duties under the employment contract or related laws. In exercising the rights mentioned above, the Company reserves the right to charge the costs related to and necessary for processing personal data as requested by the data subject.

8. Security Measures

8.1 We secure your personal data in a controlled and secure environment which is protected from unauthorized access, use, or disclosure. We maintain reasonable administrative, technical, and physical safeguards in an effort to protect against any unlawful or unauthorized access, use, modification, and disclosure of Personal Information under our control.

8.2 We will implement security measures to safeguard your personal data which is under our control. Your personal data will be stored in a secure server which is controlled by authorized personnel with confidentiality. Your personal data and sensitive personal data will be encrypted in our server which only authorized personnel with the password can access.

9. Use of Personal Data for the Original Purpose

The Company has the right to continue to collect and use your personal data that the Company has collected before the effective date of the Personal Data Protection Laws in relation to the collection, use and disclosure of personal data for the original purposes. If you do not wish for the Company to continue to collect and use such personal data, you may notify the Company to withdraw your consent at any time.

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10. Amendment of Notice

In compliance with the Personal Data Protection Laws, this Notice may be amended from time to time and the Company will post the most current version on the Company's website.

11. Contact Us

If you have any questions, concerns or wish to exercise your rights related to your personal data, please contact the Company at:

Data Protection Officer**NS-Siam United Steel Company Limited**

Address : 12 Soi G2, Pakorn Songkrohraj Road, Maptaphut, Muang Rayong, Rayong 21150

Telephone Number : 038-685155

Email Address : privacy_info@ns-sus.com

Issued on March 1, 2025
NS-Siam United Steel Company Limited



(Mr. Mansaung Klaimanee)
Data Protection Officer

บริษัท เอ็นเอส-สยามยูไนเต็ดสตีล จำกัด
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