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Human Resource Privacy Policy  
(as of 10 March 2025)

**Human Resource Privacy Policy**

**Rabbit Holdings Public Company Limited.**

**Rabbit Holdings Public Company Limited** (the "**Company**", "**we**", "**us**", or "**our**") recognizes the importance of the protection of personal data. Therefore, we will follow security measures when there is a collection, use, and/ or disclosure of your Personal Data (as defined below).

This privacy policy (the "**Privacy Policy**") was created to inform you that in the Company's recruitment operation, hire-purchase, and managing human resource, the Company may be required to collect use and/or disclose your Personal Data, as a job applicant, interviewee, current employee, ex-employee, staff, outsource, intern, trainee, secondment employee, retired employee, officer, manager, executive director, executive director, person who received power of attorney, and/or any person which the Company and/or companies within the BTS Group (the "**BTS Group of Companies**") received personal data.

This Privacy Policy applies to recruitment operation, hire-purchase, and managing human resource at the Company's business premises, via websites, telephone, email, walk-in, call center, post, online social media, online communication channels and other channels which we receive your Personal Data.

From time to time, we may adjust and/or update this Privacy Policy which we will provide additional notification if there is a significant adjustment and/or update. The date of the latest adjustment and/or update will be specified at the top of the Privacy Policy. We encourage you to carefully read this Privacy Policy and regularly check the Privacy Policy to review any adjustment and/or update we might make in accordance with the terms of this Privacy Policy.

**1. WHAT PERSONAL DATA WE COLLECT**

For the purposes of this Privacy Policy, "**Personal Data**" means any directly or indirectly identified or identifiable information as listed below.

We may directly or indirectly collect your Personal Data from other sources, such as during the recruitment and interview process, at the beginning and throughout your employment, or during the period of agreement we have with your employer, as a part of hire-purchasing.

Additionally, we may collect your Personal Data from third parties, such as the BTS Group of Companies, the Company's service providers (e.g. survey service provider, independent advisor, project advisor, financial advisor, legal advisor or accounting advisor), the Company's business partners who are third parties, other third parties (e.g. reference person, employer), public domain (e.g. online social media), and third-party's website or the relevant government agencies. The specific type of Personal Data which we collect will depend on your relationship with us or the BTS Group of Companies and the services or products you wish to receive from us or the BTS Group of Companies. The following are examples of Personal Data which we may collect:

- 1) **Personal information**, such as title, name-surname, nickname, age, date of birth, nationality, date and place of birth, weight, height, birthmark, blood type, signature, education experience, work experience, training experience, skill, hobby, behavior, marital status, gender, language, occupation, job title, workplace, identifiable information on documents issued by government agencies (e.g. identification card, passport, alien registration card, driving license), information on name card, photograph, recorded audio, signature and vehicle registration number, certificate of employment and salary, certificate of training, information related to health insurance, information related to smoking and drinking behavior, and information related to conscription;
- 2) **Contact information**, such as postal address, house registration address, identification card address, workplace address, map of house and workplace area, personal and business phone number, facsimile number, email address, LINE user account or Facebook account, and other information related to online social media;
- 3) **Identification by government**, such as national ID card, passport, house registration, vehicle registration, driver's license, work permit, death certificate, company's affidavit, certificate of name change, conscription certificate, and VISA;
- 4) **Work related information**, such as employee number, job title, date of start and end of employment, work experience, probation result, information related to offsite work (e.g., offsite workplace, time and date of offsite work, travel plan) work record, discipline record, transfer record, promoting record, logbook, complaint record, information related to lawsuit, bankruptcy,
- 5) **Financial information**, such as information related to opening a bank account, bank account passbook, credit card, debit card or bank account information, credit card number, debit card number, transaction information, payment type, payment due date, bank account details, payment information and history, current compensation, salary, wages, list of income and expense, information related to withheld tax and loan, minute

of shareholders meeting, list of shareholder, shareholder number, securities holder number, amount of share and securities, dividend;

- 6) **Transaction information**, such as supporting information of a transaction, power of attorney receipt (i.e. agreement, land title deed);
- 7) **Profile information**, such as user account, password, and rabbit card data
- 8) **Technical information**, such as Internet Protocol (IP) address, web beacon, log, device model and type, hardware-based identifiers, i.e. universal device identifier (UDID), media access control information, software-based identifier, i.e. identifier for advertisers for iOS operation system (IDFA), or identifier for advertisers for Android operation system (AAID), connection information, access information, single sign-on (SSO) information, login log, access time, time spent on our webpage, cookies, login data, search history, browsing detail, browser type and version, time zone setting and location, plug-in browser types and versions, operating system and platform, and other technology on devices used to access the platform;
- 9) **Other information**, such as other information appeared in CV or resume, Terms of Reference, bidding, report of conflict of interest, and/or information related to engineering report;
- 10) **Personal data of person related to you**, such as, personal data of your children (such as birth certificate, amount, type, gender, relation, education institute, government issued identification document, Registration of Legitimation of Child, education fee invoice, transcript, diploma, benefit) marriage certificate, personal data of your spouse (such as income, relation, government issued identification document, information related to health insurance).
- 11) **Information from CCTV**, please see details on how we collect, use and/or disclose Personal Data in the “**CCTV Privacy Policy**” at [Personal Data Protection Policies | Rabbit Holdings](#);
- 12) **Sensitive data**, such as sensitive data as shown in the identified document and religion information as you provide to us, health data (such as certificate from doctor), criminal record, disability data, biometric data (such as finger scan or face scan), sensitive personal data contained in complaints/reports or legal cases (e.g., religion, health information, disabilities) as appeared in police daily report or complaint made to the police.

If you provide Personal Data of any third party (such as emergency contact person, spouse, child, reference person, or adviser) to us, e.g. their name-surname, address, relationship, signature and

contact information, and related document, you represent and warrant that you have the authority to do so by (1) informing such third party about this Privacy Policy; and (2) obtaining consents (as required by law or as necessary) so that the Company can use such Personal Data in accordance with this Privacy Policy.

We have no intention to collect sensitive data ("**Sensitive Data**"), however, in case that we do, we will only collect, use, and/or disclose Sensitive Data on the basis of your explicit consent or as permitted by law.

We only collect the Personal Data of minor, quasi-incompetent person and incompetent person after obtaining the consent of their parent or guardian. We have no intention to collect Personal Data from persons under the age of 20 without the consent of their parents as required by law, or from quasi-incompetent person and incompetent person without the consent of their guardian or curator (as the case may be) as required by law. In the event that we learn that we have collected Personal Data from anyone under the age of 20 without the consent of their parents as required by law or from quasi-incompetent person and incompetent person without the consent of their guardian or curator (as the case may be) as required by law, we will immediately delete such Personal Data or only collect, use and/or disclose such Personal Data if we can rely on other legal bases other than the consent basis or as permitted by law.

## 2. **THE PURPOSE FOR COLLECTION, USE, AND/OR DISCLOSURE OF PERSONAL DATA**

We collect, use and/or disclose Personal Data for the following purposes:

2.1 **THE PURPOSES OF WHICH WE RELY ON CONSENT:** Once we obtain your consent we will collect, use, and/or disclose Personal Data and/or Sensitive Data for the following purposes:

- 1) **General Personal Data for the purposes of marketing and communications which we cannot rely on other legal bases:** To provide marketing communications, re-marketing, advertisement, privilege, sales, special offers, notification, newsletter, update report, announcement, promotional activity, news and information relating to our products or services, including products and services of BTS Group of Companies and our business partner, to you;
- 2) **Health data** (Such as doctor certificate): To verify and assess your record, experience and suitability for employment, to check and follow up on performance during employment, to collect as work record, to arrange work shift, to grant leaves, to procure and provide benefits, hospital fees, health annual check-up, insurance, to analyze and improve human resource management, for emergency case or to provide medication at the our office

- 3) **Criminal record:** To verify and assess your record, experience and suitability for employment (for selected position), and for fraud blacklist.
- 4) **Biometric data** (such as finger scan or face scan): for workplace access control and/or recording entry and exit times.
- 5) **Disability data:** To verify and assess your record, experience and suitability for employment, to handle complaints, to calculate and contribute to Empowerment for Person with Disability Fund.
- 6) **sensitive personal data contained in complaints/reports or legal cases** (e.g., religion, health information, disabilities): for the purposes of receiving complaints, resolving issues, recording and verifying information, requesting further details, collecting whistle blowing tips, and/or further communications.
- 7) **Heal data in accordance with the law or government order in a case where we cannot rely on other law:** to submit to government agencies related to disease control

If we rely on your consent for the collection, use and/or disclosure of Personal Data, you have the right to withdraw your consent by contacting us (**as specified herein under “Our Contact Details”**).

The withdrawal of your consent will not affect the legality of the collection, use and/or disclosure of Personal Data and Sensitive Data that was based on your consent prior to such withdrawal. However, if you do not give consent for Sensitive Data, do not provide us your Sensitive Data or later withdraw your consent, we may not be able to proceed properly with the recruitment process.

## **2.2 THE PURPOSE THAT WE MAY RELY ON OTHER LEGAL BASES FOR COLLECTION, USE, AND/OR DISCLOSURE OF PERSONAL DATA**

We may also rely on (1) contractual basis, for our initiation, entering into or fulfilment of a contract with a data subject; (2) legal obligation basis, for the fulfilment of our legal obligations; (3) legitimate interests basis, for the purpose of our legitimate interests and the legitimate interests of third parties in proportion to your benefits and fundamental rights in relation to the protection of your Personal Data; (4) vital interests basis, for preventing or suppressing a danger to a person's life, body or health; and/or (5) public interests basis, for the performance of a task carried out for the public interest or for the exercising of the state authorities (6) for establishment and raising of potential legal claims and/or (7) for legal obligation, such as employee evaluation, labour protection, social security, or other legal bases permitted under personal data protection laws (as the case may be). Depending on the context of the relationship with us, we may collect, use and/ or disclose Personal Data for the following purposes:

- 1) **To operation related to recruitment and/or employment:** such as recording information from applicants as a part of recruitment process, authentication and background check, evaluate applicant's qualification and suitability, making decision to hire, enter into contract, to provide work permit and employment document and/or setting salary, benefits, and other information required in the contract for certain position;
- 2) **To communicate:** such as for communication regarding your application, or other activities, to send document, to contact referral person or emergency contact, to inform and invite to participate in activities;
- 3) **For the administration of compensation and benefits,** such as salary payments and reimbursement of welfare expenses, bonuses, severance pay, compensation, medical and healthcare expenses, as well as providing various rights and benefits to you and related persons. This includes annual health check-ups, medical treatments, leave management/approval, insurance and social security arrangements, provident fund management, reward distribution, fitness memberships, meal payments via employee cards, cooperative member benefits, scholarships, and after-school or school break childcare services, as well as the disbursement of benefits under insurance and life insurance policies;
- 4) **For human resource management and employment relationship administration,** such as recording employment data and work history; monitoring work performance and working hours; managing onboarding processes (including documentation for employing foreign nationals); organizing work-related activities; evaluating performance, suitability, and job results; considering promotions, transfers, position or location changes; assigning internal or external work duties (permanent or temporary); reviewing salary adjustments; issuing employee ID cards, building access cards, and/or other access control badges; conducting data analysis, planning, and internal resource management; overseeing operations, providing support, and facilitating the use and maintenance of company property; providing work guarantees; offering advice and handling complaints, disciplinary actions, terminations, resignations, and retirements; managing a blacklist of employees involved in serious misconduct within the Company and companies in the BTS Group; and/or issuing relevant documents or certifications, such as employment confirmation letters or letters of commendation;
- 5) **For Training Purpose:** such as to Orientation, training and seminar whether held inhouse or offsite, including facilitate in organizing the training and received attendee's feedback.
- 6) **For the operations of the Company and the BTS Group companies,** such as managing internal operations and the Company's assets; facilitating communication with BTS

Group companies and business partners; considering the appointment, revocation, or authorization of individuals to conduct transactions with BTS Group companies and business partners—including the inclusion of your name and personal data in related contracts to carry out such transactions; and for other purposes related to or stated in your employment or service contract with the Company or your employer, the Company's work regulations, personnel management policies, or any other documents related to human resource management. This also includes using your data as supporting documents for various transactions, for risk assessment and decisions related to investment and funding, for use as evidence and reference information, for preparing and maintaining important company records, and/or for utilizing employee databases to facilitate the election of the Workplace Welfare Committee and the Occupational Safety Committee as required by labour law and as deemed appropriate by the Company;

- 7) **For our business and companies in the BTS Group business:** such as To allow you to trial new products and/or services of the Company and/or companies in the BTS Group, including the offering and promotion of products and/or services from the Company, companies in the BTS Group, and business partners; for the installation of advertising media; for survey purposes, management planning, sales activities, value enhancement of advertising spaces; and/or to provide services to you (e.g., provision of train tickets, ticket refunds, or reimbursement of train fare value);
- 8) **To fulfill the Company's financial responsibilities,** including accounting and auditing requirements (both internal and external), such as forecasting and budgeting, cost/budget analysis and control. This includes using your data to support account opening, financial statement closing, loans and funding arrangements; processing salaries and other income; carrying out tax-related actions (e.g., income tax withholding); handling expense reimbursements, payment orders, and issuing invoices for debt collection; verifying the accuracy of accounting entries and supporting documents for payments; and/or preparing financial records, balance sheets, and expense summaries within the Company or companies in the BTS Group;
- 9) **To manage IT-related matter:** such as for IT management, management of communication system, IT security system and to control access to data and system and to conduct IT security audit; internal business management in accordance with internal compliance requirements, policies and procedures; and to revise and update our database;
- 10) **To comply with legal obligations and orders of government agencies:** such as, where the Company or the BTS Group of Companies has a reasonable ground to believe that they shall comply with the laws and/or orders or shall provide such cooperation to act in



compliance with the laws, legal proceedings or government authorities' orders which include government authorities outside Thailand and/or shall cooperate with courts, regulators, government authorities and law enforcement authorities. We may have to disclose Personal Data to comply with the said legal provisions, legal proceedings or government orders which include internal investigation process or crime/fraud prevention and/or establishment of legal claims;

- 11) **To protect our interests:** such as to protect the security and integrity of the business operation of the Company, the BTS Group of Companies or other relevant entities, to exercise our rights and protect the interests of the Company and the BTS Group of Companies or other relevant entities where it is necessary and legally to do so, e.g. to detect, prevent and proceed with matters in relation to any corruptions, intellectual property infringement claims or violations of laws, to manage and prevent loss of assets, to detect and prevent misconduct within the premises of the Company or the BTS Group of Companies, to ensure the compliance of the terms and conditions of the Company, the BTS Group of Companies or other relevant entities, to monitor incidents; to prevent and report criminal offences, and to protect the security and confidence in the businesses of the Company and the BTS Group of Companies;
- 12) **To transfer in case of there is a transfer of business:** such as in case of sale, transfer, merger, organizational restructuring, or other event of the similar nature, the Company may transfer your Personal Data to one or many third party(ies) as part of such transaction;
- 13) **To manage risks:** such as to perform risk management, performance monitoring and risks assessment; and/or
- 14) **To provide security:** such as to prevent or suppress a danger to a person's life, body, health, or property, e.g. to control contagious diseases or epidemics, to catch of thieves, to take action in an emergency situation, to coordinate and safeguard in relation to insurance and injury.

In case we are required to collect the Personal Data from you to comply with the laws or our contractual obligations with you or to enter into an agreement with you, we may not be able to achieve the abovementioned purposes if we do not receive the Personal Data as we request.

### **3. TO WHOM WE DISCLOSE YOUR PERSONAL DATA**



We may disclose or transfer your Personal Data to the following third parties who collect, use, and/or disclose Personal Data in accordance with the purposes under this Privacy Policy. These third parties may be located inside or outside Thailand. You can read their privacy policy to learn more on how they collect, use and/or disclose Personal Data since you will also be subject to their privacy policies.

### **3.1 BTS Group Companies**

As we are part of the BTS Group of Companies which may collaborate, jointly provide service to customers and partially share systems, e.g. service system and website-related systems, we may need to transfer Personal Data to, or otherwise allow such Personal Data to be accessible by, other companies within the BTS Group of Companies for the purposes set out herein. In this regard, other companies within the BTS Group of Companies could also rely on the consent obtained by us to use your Personal Data. Please see the list of the Company in the BTS Group at [list-of-companies-under-bts-group-th.pdf](#)

### **3.2 Our service providers**

We may engage other companies, agents or contractors to perform services on our behalf or to accommodate the provision of services. We may disclose Personal Data to the third-party service providers, including, but not limited to, (1) Companies coordinating and preparing documentation for the employment of foreign staff (2) Employee benefits calculation service providers (3) Payroll management system service providers (4) Fund management companies administering provident funds (5) Developers of infrastructure, software, internet, websites, and IT service providers (6) Data storage and cloud service providers (7) Document storage and/or destruction service providers (8) Warehousing and logistics service providers (9) Travel agencies/tour companies (10) Event organizers (11) Credit rating agencies (12) Envelope printing companies or print house (13) Registration and vote-counting system providers (14) Uniform providers (15) Card manufacturers (16) Training institutions and/or (17) Compliance audit service providers.

In the course of providing such services, the service providers may have access to the Personal Data. However, we will provide the Personal Data only to the extent that it is necessary for them to perform the services, and we ask them not to use the Personal Data for any other purposes. We will ensure that all service providers we work with will keep the Personal Data secure.

### **3.3 Our business partners**

We may transfer the Personal Data to our business partners to conduct business and provide services, including but not limited to, third-party hotel booking sites, banks, financial

institutions, securities companies, insurance companies, hospitals, insofar as business partners receiving the Personal Data agree to treat the Personal Data in a manner consistent with this Privacy Policy.

### **3.4 Third parties stipulated by law**

In certain circumstances, we may be required to disclose or share your Personal Data to third parties in order to comply with a legal or regulatory obligation. Such Third parties may include but are not limited to: the Ministry of Interior, Ministry of Commerce, Ministry of Labour, Ministry of Public Health, the Revenue Department, Department of Labour Protection and Welfare, Department of Intellectual Property, Department of Business Development, Excise Department, Customs Department, Consular Affairs Department, Department of Rail Transport, Legal Execution Department, Department of Skill Development, Department of Disease Control, District Offices, Social Security Office, Immigration Bureau, the Stock Exchange of Thailand, the Securities and Exchange Commission, the Bank of Thailand, the Office of Insurance Commission, the Board of Investment, the Anti-Money Laundering Office, the Student Loan Fund, the police, embassies, consulates, state agencies requesting employee information, law enforcement authorities, courts, regulatory bodies, or other third parties deemed necessary by the Company to comply with legal or regulatory obligations, to protect the Company's rights or the rights of others, to ensure personal safety, to detect, prevent, or address fraud, or to support security operations.

### **3.5 Expert advisors**

We may have to disclose the Personal Data to our expert advisors including, but not limited to, (1) independent advisors; (2) legal advisors who assist us in our business operations and provide litigation services whether for defending or initiating legal actions; and/or (3) auditors who provide accounting services or conduct financial audit for the Company.

### **3.6 Third parties connected with business transfer**

We may disclose or transfer the Personal Data to our business partners, investors, major shareholders, assignees or transferees in the event of any organizational restructuring, rehabilitation, amalgamation, business transfer, whether in whole or in part, purchase or sale, joint venture, assignment of rights, transfer or disposal of our business, assets or shares, whether in whole or in part, or any similar transaction. In case that such event happens, the receiving party will comply with this Privacy Policy to protect the Personal Data.

### **3.7 Other third parties**

We may be required to disclose Personal Data based on the legal bases in accordance with the purposes as specified in this Privacy Policy to other third parties, such as the Thai Institute of Directors Association, educational institutions, shareholders, creditors, debtors, customers, complainants or external parties requesting access to CCTV footage, and/or members of the general public, as the case may be.

#### **4. CROSS-BORDER TRANSFER OF PERSONAL DATA**

We may disclose or transfer the Personal Data to third parties or servers located overseas, which the destination countries may or may not have the equivalent data protection standards. This may include, but is not limited to, IT service providers, system development and maintenance providers, data storage and cloud service providers, banks/financial institutions, securities companies, shareholders, companies in which the Company invests, business partners, agents and distributors, consulting firms, international customers, overseas business partners, hotels, training providers, embassies, and/or consulates. We will take steps and measures to ensure that the Personal Data be securely transferred, the receiving parties have in place suitable data protection standard, and the transfer is legal or lawfully permitted under the applicable laws.

#### **5. HOW LONG WE RETAIN PERSONAL DATA**

We will retain the Personal Data for as long as is reasonably necessary to fulfil purposes for which we obtain them and to comply with the relevant laws and regulations. However, we may have to retain the Personal Data for a longer duration, as required by the applicable laws.

#### **6. COOKIES AND HOW THEY ARE USED**

Cookies are specific data used for your computer when you visit websites. Cookies will collect or track information relating to your use of the website which will be used to analyze trends, administer our websites, track users' movements around the websites, or to remember users' settings. Some types of cookies are necessary because without them, the site would not be able to function properly while other types of cookies will help us improving your experience on the website, adjusting contents according to your needs and making your website browsing more convenient as such types of cookies will remember the users (in a secure manner) as well as your language preferences.

Usually, most internet browsers allow you to set whether or not to accept cookies. If you reject cookies, it might affect your use of the websites and without cookies the ability to use some or all of the features or areas of the websites may be limited. Please see our **"Cookie Policy"** for more details at [Personal Data Protection Policies | Rabbit Holdings](#).

## 7. DATA SECURITY

As a mean to protect personal privacy of the Personal Data, we have provided appropriate security measures, which includes administrative, technical and physical safeguards in relation to the access or the access control, to maintain the confidentiality, correctness and availability of the Personal Data against any illegal or unauthorized loss, alteration, correction, use, disclosure or access to the Personal Data in compliance with the applicable laws.

In particular, we have implemented access control measures which are secured and suitable for our collection, use, and disclosure of the Personal Data. We also restrict access to the Personal Data as well as the use of storage and processing equipment by imposing access rights and rights to grant permission to access the Personal Data, manage the access to limit only authorized persons can access to the Personal Data and implement user responsibilities to prevent unauthorized access, disclosure, perception, unlawful duplication of the Personal Data or theft of device used to store or process the Personal Data. This also includes measures that enable the re-examination of unauthorized access, alteration, erasure, or transfer of the Personal Data which is suitable for the method and means of collecting, using and/or disclosing of the Personal Data.

## 8. RIGHTS AS A DATA SUBJECT

Subject to applicable laws and exceptions thereof, a data subject can exercise the following rights:

- 1) **Access:** Data subjects may have the right to access or request a copy of the Personal Data collected, used and/or disclosed by us. For privacy and security of the data subject, we may require the verification of the data subject's identity before providing the requested Personal Data;
- 2) **Rectification:** Data subjects may have the right to have incomplete, inaccurate, misleading or outdated Personal Data collected, used and/or disclosed by us be rectified;
- 3) **Data Portability:** Data subjects may have the right to obtain the Personal Data relating to them in a structured and electronic readable format, and to send or transfer such data to another data controller, provided that they are (a) Personal Data which you have provided to us or (b) if the Personal Data were collected, used and/or disclosed by us on the consent basis or to perform our contractual obligations with the data subject;
- 4) **Objection:** Data subjects may have the right to object to the collection, use and/or disclosure of the Personal Data;

- 5) **Restriction:** Data subjects may have the right to restrict our use of the Personal Data if the data subject believes that such Personal Data are inaccurate, our collection, use and/or disclosure is unlawful, or such Personal Data are no longer necessary for a particular purpose;
- 6) **Consent Withdrawal:** For the purposes the data subjects have consented to our collection, use and/or disclosure of the Personal Data, data subjects may have the right to withdraw consent at any time;
- 7) **Deletion or Destruction:** Data subjects may have the right to request that we delete, destroy or anonymize the Personal Data collected, used, and/or disclosed by us unless our retention of such Personal Data is required in order to comply with a legal obligation or to establish, exercise or defend legal claims; and
- 8) **Complaints:** Data subjects may have the right to lodge a complaint to relevant government authority relating to the protection of the Personal Data if the data subjects believe that our collection, use and/or disclosure of the Personal Data is unlawful or in compliance with applicable data protection laws.

## 9. OUR CONTACT DETAILS

If you wish to contact us to exercise the rights relating to Personal Data or if there are any queries about Personal Data under this Privacy Policy, please contact our Data Protection Officer (DPO) at:

1) **Rabbit Holdings Public Company Limited**

1000/9, BTS Visionary Park – South Tower, 24<sup>th</sup> Floor, Unit No.2404-2407,

Phahonyothin Road, Chom Phon Sub-district, Chatuchak District, Bangkok 10900

Telephone: 02-0278770-9

Email: dpo@rabbitholdings.co.th

This Privacy Policy shall become effective as of 10 March 2025.

*-Signed-*

(Ms. Soraya Satiangoset)

Director