

**Announcement of**  
**Bangkok Commercial Asset Management Public Company Limited**  
**Subject: Personal Data Protection Principles for BAM Employees**

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## **Principles and Rationale**

Bangkok Commercial Asset Management Public Company Limited (BAM) has established and published its Personal Data Protection Principles on the Company's website. As the data controller of Employee personal information, The Company has developed specific Personal Data Protection Principles for its Employees. These principles outline the purposes and procedures for collecting, using, and disclosing Employee Personal Data, while detailing data subjects' legal rights, protection measures, and management guidelines in accordance with the Personal Data Protection Act, B.E. 2562 (2019).

### **1. Definitions**

"**The Company**" refers to Bangkok Commercial Asset Management Public Company Limited (BAM)

"**Policy**" refers to the Company's Personal Data Protection Policy.

"**Personal Data**" refers to any information relating to an individual as defined in the Policy.

"**Employee**" refers to any individual who has entered into an employment with the Company for remuneration, including those employed before the Policy's implementation and publication on the Company website: <http://www.bam.co.th/corporate/images/attachments/PDPA.pdf>

"**Employee Personal Data**" refers to the personal data submitted by the data subject during the employment application process, as well as personal data collected throughout the duration of employment with the Company.

### **2. Employee Personal Data Protection Principles**

The Company recognizes the importance of Personal data protection and is committed to processing Employee Personal Data in accordance with the Personal Data Protection Principles as set forth in the Policy.

### **3. Data Collection**

The Company shall ensure that Employee Personal Data is collected in a lawful, diligent, and privacy-conscious manner, only when necessary and in accordance with the principles of data minimization. All Employee Personal Data collected shall be securely retained and processed solely for the purpose of fulfilling employment contracts and providing Employee benefits, in compliance with applicable laws and regulations.

### **3.1 Employee Personal Data Collection by the Company**

The Company collects various types of Employee Personal Data based on the intended purpose of use, including:

- (1) Personally identifiable information and related details, such as national identification number, nationality, age, weight, height, IP address, and other relevant identifiers.
- (2) Contact information, including address, phone number, email, and other relevant details.
- (3) Educational profile information
- (4) Career and employment history information
- (5) Financial and banking information, such as assets, liabilities, and bankruptcy status.
- (6) Information regarding personal preferences and interests
- (7) Information from interactions between the data subject and the Company, including engagement through the Company's branches, websites, company applications, social media, meetings, phone calls, chats, emails, interviews, and other communication channels.
- (8) Company premises access information, including CCTV footage and records of attendance and entry/exit times.
- (9) Information about Employee equipment, including brand, model, and other relevant details.
- (10) Location information, including geographic data from cookies and other tracking technologies.
- (11) Third-party information related to individuals referred by the Employee, including details of family members, beneficiaries of various benefits, references, and other relevant information.

The Company may be required to collect sensitive data, which refers to information that necessitates explicit consent from Employees, unless processing is permitted by law in the absence of consent or in compliance with legal orders or provisions. The following types of sensitive data may be collected:

- (1) Biometric data, such as fingerprints and iris scan data
- (2) Criminal record information
- (3) Health information
- (4) Religious beliefs and racial Information

The Company does not collect information related to Employees' political opinions, genetic information, or sexual behavior.

### **3.2 Data Sources**

The collection of Employee Personal Data may occur either directly from the Employee or from other sources. This can include information provided prior to employment, such as job applications and resumes, or data collected during employment, such as information submitted through forms when applying for Employee benefits.

In some cases, the Company may collect information about individuals related to Employees, even if there is no direct relationship between the Company and the data subject. However, such information is collected for legitimate business interests, to the extent necessary, or for the purpose of providing welfare rights to Employees.

#### **4. Employee Personal Data Usage and Processing**

The utilization of Employee Personal Data involves activities such as collection and assessment, all conducted on a legal basis in accordance with the Company's Policy. The Company collects, uses, and discloses Employee information for the following purposes:

##### **4.1 Necessity for Contract Fulfillment**

- To execute the processes and procedures outlined in the employment contract between the Company and the Employee, including any other related agreements (if applicable), such as non-disclosure agreements, policies and/or workplace conduct codes. This includes any amendments or additions to such contracts or agreements.
- To communicate with Employees, evaluate performance, and organize training, seminars, job visits, and events.
- To manage remuneration and welfare, including the preparation of payroll, management of various expenses, tax deductions, social security, remuneration reviews, salary suspension, and remittance of salaries, bonuses, and other compensation, as well as complying with orders or warrants, notices to freeze, and remittance of funds.
- To manage human resources operations, including Employee management and ensuring compliance with employment contracts between Employees and the Company, such as tracking attendance and managing vacation days, business leave, and sick leave.
- To manage Employee occupational health and safety, including health insurance.
- To prevent and investigate fraudulent activities or other unlawful actions, including disciplinary investigations and complaint management.
- To conduct risk management, supervision, auditing, and internal controls, such as fraud investigations, Employee misconduct assessments, and verification of qualifications and professional licenses related to Employees.
- To carry out various processes and procedures related to resignation and layoff, including the payment of compensation, post-termination benefits, and reporting to relevant authorities.
- To monitor attendance, manage leave, and handle absenteeism, including business and sick leave.

## **4.2 Legitimate Interests**

- To ensure security within the Company's buildings or premises, including the issuance of Employee identification cards.
- To monitor employee attendance through time in-out records and document activities within office buildings, or branches using CCTV.
- To execute business planning, reporting, and forecasting.

## **4.3 Compliance with Legal Obligations**

- To comply with legal obligations and law enforcement requirements, including reporting information to relevant authorities, such as the Bank of Thailand, the Anti-Money Laundering Office, the Revenue Department, the Social Security Office, the Department of Labor Protection and Welfare, or in response to orders, warrants, or notices to freeze and remit funds issued by the police, Enforcement Department, or the court.
- To establish, comply with, assert, or defend against legal claims.
- To prevent and investigate activities related to money laundering, terrorism financing, and other criminal offenses.
- To collect evidence in relation to grievances or petitions.

## **4.4 Consent**

“The consent provided by you, as an Employee, is intended for the specific purposes outlined in the consent letter or consent management system. Failure to provide consent may prevent the Employee from participating in the activities specified in the consent. The Employee acknowledges that they have been informed about the Personal Data Protection Policy, including the storage and eventual destruction of their consented data, as detailed on the Company’s website at [www.bam.co.th](http://www.bam.co.th).”

# **5. Personal Data Retention**

## **5.1 Personal Data Security Maintenance Measures**

The Company ensures that Employee Personal Data is stored with appropriate security measures, in accordance with the Company’s policies.

## **5.2 Employee Personal Data Retention Period**

Personal data provided by Employees to the Company, including documents and forms submitted during their employment, will be retained in physical, photocopy, or electronic form for as long as necessary to fulfill the purposes for which it was collected, used, or disclosed, as of outlined in these Principles. The retention period begins with the commencement of the employment relationship under the employment contract and may

extend for the duration required by law or for the legal period necessary to establish, comply with, exercise or defend against claims. The Company may also retain Personal Data for other purposes in accordance with its internal regulations, including those governing the storage and destruction of Company documents, as outlines in the regulations of Bangkok Commercial Asset Management Public Company Limited.

### **5.3 Data Deletion and Destruction Procedures**

Upon the expiration of the retention period for Personal Data in accordance with Clause 5.2, the Company shall proceed with the deletion or destruction of the Personal Data, or any non-identifiable information, in accordance with the Regulations of Bangkok Commercial Asset Management Public Company Limited concerning the storage, preservation, and destruction of Company documents.

## **6. Data Disclosure**

To achieve the purposes outlined in this Policy, the Company may disclose Employee Personal Data to third parties, including:

6.1 Government agencies, regulatory authorities, or other entities as prescribed by law, including officials exercising legal powers, such as the Enforcement Department, Police, Anti-Money Laundering Office, Revenue Department, Social Security Office, the Department of Labor Protection and Welfare, or any other authority with legal jurisdiction.

6.2 Agents, contractors/subcontractors, and/or service providers for various operations, including:

- Transportation, storage, and destruction services, publishing and marketing, and IT development services providers.
- Organizers of training programs, seminars, and job visits for Employee development activities.
- Auditors, lawyers, legal and tax advisors, and other consultants.

6.3 Transferees of the Company's rights and benefits, including their designated representatives, in cases such as organizational restructuring, mergers or acquisitions, and Employee transfers.

## **7. Personal Data Accuracy and Timeliness Management**

The Company shall make reasonable efforts to ensure that Employee Personal Information under its control is accurate and up-to-date. The Company shall update such data upon becoming aware of any changes, whether through Employee notifications or other sources, in order to comply with legal requirements.

## 8. Employee Data Subject Rights

The Company recognizes and upholds the rights of Employees as Data Subjects, emphasizing their ownership of personal data. These rights are outlined in the policies available at <https://www.bam.co.th/corporate/images/attachments/PDPA.pdf>. Employees may exercise their rights as Data Subjects through the Company's Human Resources Department.

Even after the termination of employment, former Employees retain their rights as Data Subjects and data owners. They may continue to exercise these rights by notifying the Company via the channels specified in the Personal Data Protection Policy.

Human Resources Group

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