

Privacy Policy

Symphony Communication Public Company Limited

In order to comply with the **Personal Data Protection Act B.E. 2562 (2019)**, the relevant secondary laws and any amended laws relating to the future protection of Personal Data (“**PDPA**”), **Symphony Communication Public Company Limited (the “Company”)** has created this notice to explain to you how the Company treat your Personal Data and to inform you of the processing purposes, the duration of your Personal Data retention, as well as your rights as the owner of your Personal Data. The details are as follows:

1. Definitions and meanings related to the protection of Personal Data

(A) “Personal Data” means information about a person which makes it possible to identify the person directly or indirectly, such as their first name, surname, age, gender, address, telephone number, date of birth, photo, etc., as well as “sensitive information” which means personal information about racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any data which may affect the data subject in the same manner, as prescribed by the PDPA Committee.

(B) “Personal Data Controller” means a person or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the Personal Data.

(C) “Personal Data Protection Law” means all applicable laws and regulations relating to personal data protection, including the Personal Data Protection Act B.E. 2562 (2019), and any subordinate legislation, rules, or notifications issued by the Office of the Personal Data Protection Committee, as currently in force and/or as may be amended, supplemented, or replaced from time to time.

(D) “Processing” means any operation or set of operations which is performed on Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

2. Personal Data Collected by the Company

- (1) Full name or nickname, or
- (2) Identification number, passport number, social security card number, driver’s license number, Tax ID, bank account number; or
- (3) Address, email, phone number; or
- (4) Device or tool information, such as IP address, MAC address, cookie ID; or
- (5) Biometric information such as face images, fingerprints, voice identity information; or
- (6) Identification information of the person’s property, such as car registration; and
- (7) Information that can be linked to the above information, such as date of birth, ethnicity, nationality, weight, height, location, medical information, educational information, financial information, employment information, etc.

3. Channels through which we collect your information

- (1) Personal Data you have provided directly to the Company to prepare contracts or other documents for the Company’s telecommunications services, Cloud Computing Services, and other legal activities with the Company, including Personal Data obtained by the Company from your use of such services.
- (2) Personal Data that the Company is required to collect for use, prepare or amend the Company’s shareholder registration as defined under the Public Limited Companies Act and the Civil and Commercial Code, as well as other laws relating to the storage of shareholder information of the Company at present and in the future.
- (3) Personal Data you have provided to us for future coordination.

- (4) Personal Data you have provided to the Company for the job
- (5) Personal Data You have provided to the Company as a Temporary Employee (Outsourcer), in the event that the Company hires you or hires your employer to perform the work employed or assigned from the Company, such as installing or maintaining the Company's telecommunications network, etc.
- (6) Personal Data that we collect from you automatically through channels such as cookies or other similar technologies or the storage of IP addresses, MAC addresses, and log file information.
- (7) Personal Data collected by recording images and/or audio via CCTV. Photographs, audio or conversations we have recorded, for the service or after-sale service propose, through the Company's Call Center.
- (8) Information you have provided to us to confirm your visitor's identity or to work in the Company's area, including for servicing to our customers.
- (9) We may obtain your Personal Data from third parties, such as the companies that recommends you to the Company or from other telecommunications service providers or other Internet service providers, or our partners or business partners, or public sources or government agencies, etc.

4. Legal Bases for Processing Personal Data

The Company may process your Personal Data based on one or more of the lawful bases permitted under the Personal Data Protection Law, as follows:

- (1) **Public Interest in Archiving, Research, or Statistics:** Processing that is necessary for achieving purposes relating to the establishment of historical or archival records for the public interest, or for scientific, historical, or statistical research purposes, provided that appropriate safeguards are implemented to protect your rights and freedoms.
- (2) **Vital Interests:** Processing that is necessary to prevent or suppress danger to the life, body, or health of the data subject or of another natural person.
- (3) **Contractual Necessity:** Processing that is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract.
- (4) **Public Task / Exercise of Official Authority:** Processing that is necessary for the performance of a task carried out in the public interest by the data controller, or in the exercise of official authority vested in the Company (if applicable).
- (5) **Legitimate Interests:** Processing that is necessary for the legitimate interests pursued by the Company or by a third party, except where such interests are overridden by your fundamental rights and freedoms in relation to your Personal Data.
- (6) **Legal Obligation:** Processing that is necessary for compliance with a legal obligation to which the Company is subject.
- (7) **Consent:** Processing that is carried out based on your explicit consent for one or more specific purposes. You have the right to withdraw your consent at any time, provided that such withdrawal shall not affect the lawfulness of processing carried out prior to the withdrawal.

In general, the Company relies on legal obligation, contractual necessity, and/or legitimate interests as the primary lawful bases for processing your Personal Data. Where processing does not fall under any of the aforementioned bases, the Company will obtain your consent prior to such processing. Certain processing activities may rely on more than one lawful basis, depending on the specific purpose.

5. Purpose of Processing of your Personal Data

- (1) To comply with the laws applicable to the Company, whether in relation to customers, business partners, employees, or other persons having legal relations with the Company, such as the Telecommunications Business Act, the Computer Crime Act, the Public Limited Companies Act, and the Labor Protection Act, etc.
- (2) For purposes relating to employment administration and personnel recruitment, including but not limited to the management of employee welfare and benefits, such as medical reimbursement schemes, employee discount programs, annual health check-ups, insurance arrangements, and insurance claim processing.
- (3) For the purposes of recruitment, including the receipt and consideration of job applications, candidate selection, interviews, and any other actions related to the employment application process.
- (4) For the purposes of recording working hours, processing payroll, salaries, bonuses, compensation, or any other benefits, as well as for compliance with applicable labor and employment laws, and with lawful orders of government agencies and competent authorities.
- (5) For the purpose of recording your work as a temporary or outsourced employee of the Company, including for the payment of remuneration (if any), and for compliance with applicable laws.
- (6) For the purposes of controlling access to the Company's premises and ensuring the security of the Company, its personnel, employees, visitors, property, and information located or stored within such premises.
- (7) As part of the process leading to the entering into, or potential entering into, a contract with you, as well as for the purpose of managing and performing such contract between you and the Company.
- (8) For communication and business coordination based on your relationship with the Company, or for the purpose of providing information about the Company or notifying you of activities or events organized by the Company in accordance with your prior consent or expressed interest.

6. Retention Period of Personal Data

The Company will retain your personal data for a period relevant to the nature of your relationship or legal relationship with the Company, and for a reasonable period thereafter as necessary. The retention period of personal data may vary depending on the purposes for which such data is processed.

In addition, the Company will retain personal data for the period prescribed by applicable laws (if any), taking into account the statutory limitation periods for potential legal proceedings arising from or relating to any documents or personal data collected by the Company, as well as the Company's internal practices and relevant industry standards applicable to each type of personal data.

Upon the expiration of the retention period mentioned above, the Company will delete or destroy such personal data from its systems and from the systems of any service providers engaged by the Company (if applicable), or will anonymize the data so that it can no longer identify you, unless the Company is permitted to continue retaining such data in accordance with the Personal Data Protection Law or other applicable laws.

7. Disclosure of actions Guidelines and Policies relating to Personal Data

- (1) Disclosure for legal purposes, including under the Telecommunications Business Act, Computer Crimes Act, the Labor Protection Act, and Public Limited Companies Act, etc.
- (2) Disclosure of orders or petitions from regulatory agencies, government agencies, or responsible agencies such as the Office of the Broadcasting Commission, television and telecommunications authorities, the Securities and Exchange Commission, the National Police

Headquarters, or any other person to whom the Company is required to disclose information under applicable laws or regulations, or in other circumstances.

- (3) Disclosure to data processors, cloud computing providers, and data center providers, as well as anyone else with whom the Company has a contractual or legal relationship (whether domestic or international). Experts and service providers in which the Company is a party or a legal person who obtains personal information for those people or legal entities to perform services to the Company or you in connection with the Company's services.
- (4) Disclosure to the Company's business partners, service providers, and Personal Data processors assigned or hired to handle or process Personal Data on behalf of the Company. Disclosure to Business partners who provide Company the services such as for health checks, services in information technology, records management service, payment processing service postal, parcel services, publishing services, health and insurance services, training services, data analysis service, research, marketing research, and other services that may benefit you or involve the Company's business activities, hospitals, life insurance firms, non-life insurance corporations, and other institutions are all involved.

8. Your rights regarding Personal Data

As a data subject, you have the rights under the law regarding the collection, use, or disclosure of your personal data as follows. (The Company reserves the right to consider your request application for your rights and act as required by the Law).

1. The right to access and request a copy of personal data.
2. The right to request correction of inaccurate or incomplete personal data.
3. The right to request deletion or destruction of personal data.
4. The right to request suspension of the use of personal data.
5. The right to object to the collection, use, or disclosure of personal data.
6. The right to withdraw consent for the collection, use, or disclosure of personal data, applicable only where the Company processes your personal data based on your consent.
7. The right to request the transfer or transmission of personal data (data portability).
8. The right to file a complaint if you believe that the Company has failed to comply with applicable personal data protection laws.

9. Data Security Measures regarding Personal Data

The Company has established appropriate security measures for the protection of personal data, covering three main aspects as follows:

- (1) **Technical Measures:** The Company uses technologies to prevent unauthorized access to personal data.
- (2) **Organizational Measures:** The Company has established clear policies and practices, such as limiting access to personal data only to authorized persons, assigning duties and responsibilities of employees involved in the processing and storage of personal data, providing training on personal data protection, and appointing a Data Protection Officer (DPO).
- (3) **Physical Measures:** The Company controls premises and equipment by restricting access to the data storage, preventing damage to storage devices, and implementing lock systems or detection systems to monitor and prevent unauthorized access to areas where personal data is stored.

The Company will regularly review and update these security measures to ensure their continued appropriateness and effectiveness in light of current circumstances and risks.

Access to your personal data is restricted only to authorized persons whom the Company has determined as necessary to access such data in order to perform their duties on behalf of the Company.



SYMPHONY

SYMPHONY COMMUNICATION
PUBLIC COMPANY LIMITED

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บริษัท ซิมโฟนี คอมมูนิเคชั่น จำกัด (มหาชน)

123 ชั้นทาวเวอร์ส อาคารบี ชั้น 35-36
ถนนวิภาวดีรังสิต แขวงจอมพล เขตจตุจักร
กรุงเทพฯ 10900

Those authorized persons are required to comply with the Company's instructions and are responsible for maintaining the confidentiality of the data.

In addition, the Company has procedures for handling cases where a personal data breach is suspected or occurs. In the event of a personal data breach, the Company will notify you and the relevant supervisory authority as required by law.

Contact Us

If you have any questions, concerns, or would like to exercise your rights relating to your Personal Data, please contact us or our Data Protection Officer at

Data Protection Officer

Email: dpo@symphony.net.th

Tel: 0-2101-1111

You can learn more from the Personal Data Protection Act B.E. 2562 (2019).

[http://www.ratchakitcha.soc.go.th/DATA/PDF/2562/A/069/T_0052.PDF]

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