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## **Privacy Policy/Privacy Notice**

### **Zeaquest Company Limited**

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#### **1. Introduction**

Zeaquest Company Limited (hereinafter referred to as “Company” or “Organization”) recognizes the importance of Personal Data and other data related to you (collectively referred to as “data”). In order to assure you that the Company is transparent and responsible in its collection, use or disclosure of your data pursuant to the Personal Data Protection Act, B.E. 2562 (2019) (“Personal Data Protection Laws”) and other applicable laws, this Privacy Policy/Privacy Notice (“Policy”) is created to clarify to you the details related to the collection, use or disclosure (collectively referred to as “processing”) of Personal Data carried out by the Company, including the officers and related personnel who act as representatives or on behalf of the Company. The details are as follows:

#### **2. Scope of Policy Enforcement**

This Policy is enforced on the Personal Data of persons currently connected to the Company and may in the future have connections to the Company which is processed by the Company, officers, contracted employees, business unit or other agency models operated by the Company, including contractual parties or third parties who process Personal Data on behalf or in the name of the Company (“Data Processor”) under various products and services such as websites, systems, applications, documents or other forms of services supervised by the Company (collectively referred to as “services”).

Persons connected to the Company in accordance with the first paragraph include the following:

- 1) Customers who are ordinary persons.
- 2) Officers or Operators, Employees
- 3) Trading partners and service providers who are ordinary persons.
- 4) Directors, authorized personnel, agents, representatives, shareholders, employees or other personnel with similar connections as a juristic person who has connections with the Company.
- 5) Users of the Company’s products or services.
- 6) Visitors or users of the website <http://www.zea-quest.com/> as well as systems, applications, devices or other communication channels controlled by the Company.



- 7) Other personnel whose Personal Data is collected by the Company such as job applicants, families of officers, guarantors, insurance beneficiary, etc.

Persons in Items 1) through 6) are collectively referred to as “you”.

Apart from this Policy, the Company may prescribe that there should be announcements related to privacy (“Notice”) for the Company’s products or services in order to inform Data Subjects who are service users about Personal Data being processed, purposes and legitimate reasons for the data processing, Personal Data retention periods and the rights to the Personal Data which the Data Subjects have in specific products or services.

In addition, if there are any major discrepancies between a Privacy Notice and this Policy, you are to defer to the Privacy Notice specific to each service.

### 3. Definition

- Company means Zeaquest Company Limited
- Personal Data means data about a natural person which makes it possible to identify the person, whether directly or indirectly, but not including data from a deceased person specifically.
- Sensitive Data means Personal Data as defined in Section 26 of the Personal Data Protection Act, B.E. 2562 (2019) as pertaining to 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 any data which may affect the Data Subject in the same manner as prescribed by the Personal Data Protection Commission.
- Data processing means any action carried out on Personal Data, e.g., collection, recording, copying, organization, storage, revision, modification, use, recovery, disclosure, transmission, distribution, transfer, gathering, erasure, destruction, etc.
- Data Subject means a natural person who is the owner of the Personal Data collected, used or disclosed by the Company.
- Data Controller means a person or juristic person with the authority to make decisions regarding the collection, use or disclosure of Personal Data.
- Data Processor means a person or juristic person who carries out operations related to the collection, use or disclosure of Personal Data in accordance with the instructions or on behalf of the Data Controller. The aforementioned person or juristic person is not the Data Controller.

### 4. Source of Personal Data Collected by the Company

The Company collects or obtains various types of Personal Data from the following data sources:

- 1) Personal Data collected by the Company directly from Data Subjects via various service provision channels such as job applications, job application registration, signing in contracts, documents and questionnaires or through the use of products and services or other service channels controlled by the Company or when the Data Subject communicates with the Company onsite or through other communication channels controlled by the Company, etc.
- 2) Data collected by the Company from when the Data Subject accesses the website, products or other services in accordance with a contract or obligation, i.e., the monitoring of website usage behavior and use of the Company's products or services by using cookies or from software on the Data Subject's device, etc.
- 3) Personal Data collected by the Company from sources other than the Data Subject where said data sources have the authority, legitimate reasons or consent from the Data Subject to disclose the data to the Company, i.e., connecting to digital services of government agencies to provide comprehensive public interest services to the Data Subject, receiving Personal Data from other government agencies as the Company is obliged by its mission to provide a data exchange center to support the operations of government agencies in providing services to the public through digital systems, as well as from the necessity to provide contractual services where Personal Data may be exchanged with the contractual parties.

In addition, this includes cases where you provide the Company with Personal Data of third parties as follows: You are responsible for clarifying the details in accordance with this Policy or the Notices of products or services, as the case may be, to the aforementioned person, as well as to obtain their consent, if consent is needed, for disclosure to the Company.

In the event that the Data Subject refuses to provide the data necessary in the provision of the Company's services, the Company may be unable to provide all or part of the service to the Data Subject.

## **5. Legal Basis for Personal Data Collection**

The Company considers establishing the legal bases for collecting your Personal Data according to suitability and in the context of providing services. Legal bases for Personal Data collection used by the Company consist of the following:

| Legal Basis for Personal Data Collection   | Description   |
|--|---|
| To perform legal duties.   | <p>To allow the Company to act in compliance with the laws governing the Company such as the following:</p> <ul style="list-style-type: none"> <li>- The collection of computer traffic data pursuant to the Computer Crimes Act, B.E. 2560 (2017).</li> <li>- Official Information Act, B.E. 2540 (1997), if the sent data has a level of official confidentiality.</li> <li>- Tax laws.</li> </ul> <p>In addition to actions taken in order to comply with court orders, etc.</p> |
| It is necessary for legitimate interests.  | For the legitimate interests of the Company which are no less important than the Data Subject's fundamental rights to the Personal Data, for example, for the security of the Company's premises or the processing of Personal Data for the internal affairs of the Company, etc.   |
| It is necessary to prevent or suppress a danger to the life, body or health of a person. | To prevent or suppress dangers to the life body or health of a person, for example, providing an application service to monitor an epidemic in accordance with government policy, etc.  |
| To act in accordance with contractual obligations.                                       | To enable the Company to perform its contractual duties or take actions necessary for entering into a contract to which you are a party to the Company, for example, employment and commissioning contracts, and the making of memorandums of cooperation or other forms of contracts, etc.   |
| For the preparation of important historical documents, research or statistics.           | To enable the Company to prepare or support the preparation of historical documents, research or statistics which may be assigned to the Company, for example, the preparation of a directory for persons who are in the position of director or board member, the preparation of statistics on the use of  |

| Legal Basis for Personal Data Collection | Description   |
|--|---|
|  | digital services in the public sector, monitoring the implementation of digital government policies, etc.   |
| Your consent.                            | For the collection, use or disclosure of Personal Data in cases where the Company needs your consent and had notify you about the purpose of the collection, use or disclosure of Personal Data prior to requesting consent, for example, the collection of Sensitive Data for purposes not in accordance with the exceptions of Section 24 or 26 of the Personal Data Protection Act, B.E. 2562 (2019) or the presentation of products and services of contractual parties or business partners to you, etc. |

In the event where it is necessary for the Company to collect your Personal Data for contractual obligation, compliance with legal duties or for the necessity of entering into a contract, if you refuse to provide Personal Data or object to the processing in accordance with the purpose of the activity, the Company may be unable to perform or provide all or part of the services requested by you.

## 6. Types of Personal Data Collected by the Company

The Company may collect or acquire the data below, which may include your Personal Data, depending on the services you use or the context of your relationship with the Company, as well as other considerations that apply to the collection of Personal Data. The types of data specified below represent the only the general collection framework of the Company, applicable only to the data related to the products or services you use or have connections with.

| Personal Data Type            | Description and Examples  |
|-------------------------------|---|
| Personally, Identifiable Data | Information about your name or information from official documents that can identify you, for example, name prefix, first-last name, middle name, nickname, signature, identification card number, nationality, driver's license number, passport number, house registration information, business certificate number, occupational license number (for |

| Personal Data Type                            | Description and Examples   |
|---|--|
|   | each profession), insurance identification number, Social Security number, etc.  |
| Data Related to Identity                      | Detailed information about you, such as date of birth, sex, height, weight, age, marital status, military status, photographs, spoken language, behavioral data, preferences, bankruptcy information, information on being incompetent or quasi-incompetent, etc.  |
| Contact Data                                  | Contact information such as your home phone number, mobile phone number, fax number, email address, home mailing address, social media username (Line ID, MS Teams), coordinates of residence, etc.  |
| Data Related to Work and Education            | Employment details including work and education history such as employment type, occupation, rank, position, duties, expertise, work permit status, reference person information, taxpayer identification number, tenure history, work history, salary information, employment start date, resignation date, assessment results, benefits and privileges, items in the operator's possession, work performance, bank account number, academic institution, academic qualifications, academic performance, graduation dates, etc. |
| Data Related to Insurance Policies            | Details about an operator's insurance policy, such as insurer, insured person, beneficiary, policy number, policy type, coverage limit, Information about claims, etc.   |
| Data Related to Social Connections            | Information about your social relationships, such as political status, political position, directorship, relationship with the Company's operators, information about contract employment at the Company, information about being a stakeholder in the affairs done with the Company, etc.   |
| Data Related to Use of the Company's Services | Details about the Company's products or services, such as user account name, password, PIN, Single Sign-On data (SSO ID), OTP, computer traffic data, coordinates, photos, videos, audio recordings, usage behavior data (websites maintained by the Company, such as www.dga.or.th or various applications), search history, cookies or similar   |

| Personal Data Type      | Description and Examples  |
|-------------------------|---|
|                         | technologies, device ID, device type, connection details, browser information, language in use, operating system in use, etc.   |
| Sensitive Personal Data | Your Sensitive Data such as your ethnicity, religious beliefs, disability, political opinions, criminal history, biometric data (facial simulation data), health data, etc. |

## 7. Cookies

The Company collects and uses cookies and other similar technologies on websites that are maintained by the Company, such as <http://www.zea-quest.com/>, or on your device, depending on the services you use for the security of the Company's services and to provide you, the user, with conveniences and a good experience using the Company's services. Moreover, this data will be used to improve the Company's website to better meet your needs. You can manually set or delete cookies from the settings in your web browser.

## 8. Personal Data of Minors, Incompetent Persons and Quasi-Incompetent Persons

If the Company is aware that there is Personal Data belonging to a Data Subject who is a minor, incompetent person or quasi-incompetent person which requires consent prior to collection, the Company shall not collect the Personal Data until consent from the legal representative of the minor or caregiver or guardian, depending on the case, so as to comply with the conditions prescribed by law.

If the Company was previously unaware that the Data Subject was a minor, incompetent person or quasi-incompetent person, and later discovered that the Company has collected the data of such Data Subjects without the consent of the legal representative of the minor or caregiver, or guardian, depending on the case, the Company shall erase said Personal Data promptly if the Company has no legitimate grounds other than consent to collect, use or disclose such information.

## 9. Purpose of Personal Data Collection

The Company collects your Personal Data for a number of purposes, depending mainly on the type of product or service or activity you use, as well as the nature of your relationship with the Company or considerations in each context. The purposes specified below are only the Company's general Personal Data usage framework. In addition, only the purposes related to the products or services you use or have a relationship with are applicable to your Personal Data.

- 1) To provide and manage the Company's services, either under contract with you or in accordance with the Company's mission.
- 2) To conduct Company transactions.
- 3) To control, use, monitor, inspect and manage the services to accommodate and comply with your needs.
- 4) To retain and update information about you, including documents that contain references to you.
- 5) To prepare a Personal Data processing record as required by law.
- 6) To analyze data and troubleshoot issues related to the Company's services.
- 7) To take necessary actions in organization's internal management, including employee recruitment, nomination of directors or position holders and qualification assessment.
- 8) To protect, detect, prevent and investigate fraud, security breaches or acts that are prohibited or illegal and may cause damage to both the Company and the Data Subject.
- 9) To verify identities, authenticate identities and verify information when you apply for the Company's services or contact the services or exercise your legal rights.
- 10) To improve and develop products and services in order to be up-to-date.
- 11) To assess and manage risks.
- 12) To send you notifications, order confirmations, communications and newsletters.
- 13) To prepare and deliver relevant and necessary documents or information.
- 14) To verify identities, prevent spam or prevent unauthorized or illegal actions
- 15) To check how the Data Subject accesses and uses the Company's services, both collectively and individually, and for research and analysis purposes.
- 16) To take actions necessary to perform the Company's duties to comply with controlling authorities, tax authorities, law enforcement or legal obligations.
- 17) To take actions necessary for the legitimate interests of the Company or of other persons or other juristic persons in connection with the Company's operations.
- 18) To prevent or suppress danger to the life, body or health of a person, including the monitoring of epidemics.
- 19) To prepare historical documents for the public interest, research or produce statistics that the Company is tasked with carrying out.
- 20) To comply with laws, announcements, applicable orders or litigation proceedings, proceedings related to information on subpoenas as well as the exercising of your data rights.

#### **10. Types of Personnel to Whom the Company Discloses Your Personal Data**

In accordance with the purposes specified in Section 9 above, the Company may disclose your Personal Data to the personnel listed below. The types of data recipients listed below are only the

Company's general framework for Personal Data disclosure, applicable only with the recipients of data related to the products or services you use or have a connection with.

| Types of Data Recipients   | Description   |
|--|---|
| Government agencies or authorities to whom the Company is required to disclose information for legal compliance purposes or other important purposes (e.g., operations for public interest). | Law enforcement agencies or agencies with controlling authority or other important purposes, such as Council of Ministers, acting ministers, Department of Local Administration, Revenue Department, Royal Thai Police, courts, Office of the Attorney General, Department of Disease Control, Ministry of Digital Economy and Society, Office of the Permanent Secretary to the Prime Minister's Office, Department of Consular Affairs, Student Loan Fund, etc.                               |
| Contractual parties that take actions related to the welfare of the Company's operators.   | Third parties that the Company commissions for welfare-related purposes, such as insurance companies, hospitals, payroll companies, banks, telephone service providers, etc.  |
| Business allies.   | The Company may disclose your information to persons who work with the Company for the purpose of providing services to you, such as service providers you contact through our services, marketing service providers, advertising media, financial institutions, platform service providers, telecommunications service providers, etc.   |
| Service providers.   | The Company may assign another person as a replacement service provider or to support the Company's operations, such as a data storage service provider (e.g., cloud, document warehouses), systems developer, software, applications, websites, couriers, payment service providers, Internet service providers, telephone service providers, digital ID providers, social media providers, risk management service providers, third-party consultants, transportation service providers, etc. |
| Other types of data recipients.  | The Company may disclose your information to other types of data recipients, such as contacts, companies, family members, non-profit foundations, temples, hospitals, academic institutions or other agencies, etc., in order to take actions   |

| Types of Data Recipients   | Description  |
|----------------------------|--|
|                            | related to the Company's services, training, awards, philanthropy, donations, etc.   |
| Public disclosure of data. | The Company may disclose your information to the public if necessary, such as to take actions which require the Company to be published in the Government Gazette or Cabinet resolutions, etc. |

## 11. Overseas Sending or Transfer of Personal Data

In some cases, the Company may need to send or transfer your Personal Data overseas for the purpose of providing services to you, for example, sending Personal Data to the cloud which has a platform or server located overseas (such as in Singapore or the United States, etc.) to support information technology systems located outside Thailand. This depends on the Company's services that you use or are involved in on a per-activity basis.

However, at the time of this Policy's preparation, the Personal Data Protection Commission has not yet announced a list of destination countries with adequate Personal Data protection standards. Hence, the Company shall take action to ensure that there are adequate Personal Data protection measures meeting international standards for the sent or transferred data or take steps to ensure compliance with the terms and conditions so that the data can be sent or transferred legally, for example:

- 1) The action complies with laws that require the Company to send or transfer Personal Data overseas.
- 2) You are notified and consent is obtained from you in the event that the destination country has inadequate Personal Data protection standards according to the list of countries announced by the Personal Data Protection Commission.
- 3) It is necessary to comply with a contract to which you and the Company are parties or to fulfill your requests prior to entering into such contract.
- 4) It is an act carried out to comply with the Company's contract with another person or juristic person for your benefit.
- 5) It is done to prevent or suppress danger to your or another person's life, body or health when you unable to give consent at that time.
- 6) It is necessary to carry out the mission for vital public interests.

## 12. Data Retention Period

The Company shall retain your Personal Data only for as long as necessary for the purposes for which it was collected and in accordance with the details specified in this Policy, Notices or applicable

laws. Upon expiration of the period and your Personal Data ceases to be necessary for such purposes, the Company will erase, destroy or anonymize your Personal Data in accordance with the forms and standards of Personal Data erasure and destruction that the Commission or the law will announce or in accordance with international standards. However, in the event of a dispute or lawsuit involving the exercising of your Personal Data rights, the Company reserves the right to retain such data until the dispute receives a court order or final judgement.

### **13. Service Provision by Third Parties or Subcontractors**

The Company may assign or commission third parties (Data Processors) to process Personal Data on behalf or in the name of the Company, where such third parties may offer services in various ways, such as hosting, outsourcing, cloud computing service/provider or other forms of outsourcing.

In assigning a third party to process Personal Data as a Data Processor, the Company shall create an agreement stating the rights and obligations of the Company as the Data Controller and those of the third party commissioned by the Company as the Data Processor. This includes defining the details of the types of Personal Data that the Company tasks the third party with processing, as well as the purposes and scope for processing and other related agreements. The Data Processor is responsible for processing Personal Data only within the scope specified in the agreement and according to the Company's instructions and the data cannot be processed for other purposes.

In the event that the Data Processor commissions a subcontractor (sub-processor) to process the Personal Data on behalf or in the name of the Data Processor, the Company shall direct the Data Processor to create an agreement between the Data Processor and the Sub-processor in a form and standard that is not lower than the agreement between the Company and the Data Processor.

### **14. Personal Data Security**

The Company has measures to protect Personal Data by restricting access to Personal Data to specific authorities or authorized persons or delegates who need to use such information for the purposes for which the Data Subject has been notified. Such persons must strictly adhere to and comply with the Company's Personal Data protection measures, as well as have a duty to maintain the confidentiality of Personal Data that they perceive from performing their duties. The Company has organizational and technical data protection measures that meet international standards and are compliant with the announcements of the Personal Data Protection Commission.

In addition, when the Company sends, transfer or discloses Personal Data to a third party, whether for the provision of services in accordance with its mission, contract or other forms of agreement, the Company will establish appropriate Personal Data protection measures and confidentiality measures in accordance with the law to ensure that the Personal Data collected by the Company is always secure.

## **15. Links to Third-party Websites or Services**

The Company's services may contain links to third-party websites or services. Such websites or services may be subject to privacy policy declarations containing material that differs from this Policy. The Company recommends that you consult the privacy policy of such websites or services in detail before accessing them. In any case, the Company has no authority and has no control over the Personal Data protection measures of such websites or services and cannot be held responsible for the content, damages or actions caused by third-party websites or services.

## **16. Data Protection Officer**

The Company has appointed a Data Protection Officer to monitor, supervise and advise on the collection, use or disclosure of Personal Data, as well as to coordinate and cooperate with the Office of the Personal Data Protection Commission in order to comply with the Personal Data Protection Act, B.E. 2562 (2019).

## **17. Your Rights under the Personal Data Protection Act, B.E. 2562 (2019)**

The Personal Data Protection Act, B.E. 2562 (2019), defines Data Subjects rights in several respects. Such rights shall come into effect once the laws regarding this section come into effect. The details regarding the rights consist of the following:

1) Right to Access: You have the right to request to access, obtain a copy and request the disclosure of the source of the Personal Data collected by the Company without your consent, unless the Company has the right to refuse your request for legal reasons or due to court orders, or where the exercise of your rights will have an impact that may damage the rights and freedoms of others.

2) Right to Rectification: If you find that your Personal Data is inaccurate, incomplete or outdated, you have the right to request the rectification of your data to ensure that it is accurate, up-to-date, complete and not misleading.

3) Right to Erasure or Destruction: You have the right to request that the Company erase or destroy or anonymize your Personal Data. The exercise of this right to erasure or destruction of Personal Data is subject to the conditions prescribed by law.

4) Right to Restrict Processing You have the right to request the restriction of the processing of your Personal Data in the following cases:

- a) During a period where the Company is conducting a verification process at an audit at the request of the Data Subject to rectify Personal Data to ensure that it is accurate, complete and up-to-date.
- b) The Personal Data of the Data Subject is unlawfully collected, used or disclosed.
- c) When it is no longer necessary to retain the Personal Data of the Data Subject for the purposes of collection as notified by the Company, but the Data Subject wishes for the Company to continue to retain that information for the exercise of legal rights.
- d) During a period where the Company is proving legitimate grounds for collecting the Personal Data of the Data Subject or checking the need to collect, use or disclose the Personal Data for public interests as a result of the Data Subject exercising the right to object to the collection, use or disclosure of Personal Data.

5) Right to Object to Processing: You have the right to object to the collection, use or disclose of Personal Data related to you, unless the Company has legitimate grounds for denying the request (i.e., the Company can demonstrate that the collection, use or disclosure of your Personal Data has greater legitimate grounds or it is for establishing a legal claim, compliance with or exercise of a legal claim or for the public interest of the Company).

6) Right to Withdraw Consent: In the event that you have given consent to the Company to collect, use or disclose Personal Data (regardless of whether that consent was provided before or after the Personal Data Protection Act B.E. 2562 (2019) came into force), you have the right to withdraw your consent at any time while your Personal Data is being retained by the Company, unless there is a limitation of legal rights requiring the Company to continue to retain the data or maintain a contract between you and the Company that provides you with benefits.

7) Right to Data Portability: You have the right to request to receive your Personal Data from the Company in a machine-readable or commonly used format that can be used or disclosed by automated means. In addition, you may request that the Company send or transfer the data in the aforementioned format to another Data Controller. The exercise of this right shall be subject to the conditions prescribed by law.

## **18. Penalties for Non-compliance with Privacy Policy**

Failure to comply with the Policy may result in an offence and disciplinary action in accordance with the Company's rules (for officers or operators of the Company) or in accordance with the Personal

Data processing agreement (for the Data Processor), depending on the case and your relationship with the Company. In addition, you may receive punishments as prescribed by the Personal Data Protection Act, B.E. 2562 (2019), as well as secondary laws, rules, regulations and related orders.

### **19. Complaints to Regulatory Authorities**

In the event that you find that the Company has not complied with the Personal Data Protection Law, you have the right to complain to the Personal Data Protection Commission or a regulatory authority appointed by the Personal Data Protection Commission or by law. Prior to submitting the complaint, the Company requests that you first contact the Company to give the Company an opportunity to be informed of the facts and to clarify the issues, as well as to address your concerns at the first opportunity.

### **20. Amendments to the Personal Data Protection Policy**

The Company may consider updating, amending or modifying this Policy as it deems appropriate and will notify you via the website <http://www.zea-quest.com/> with the effective date of each revision. However, the Company recommends that you regularly check to learn of new policies through the channels for each specific activity operated by the Company, especially before you disclose Personal Data to the Company.

Access to the Company's products or services after the enforcement of a new policy is considered an acknowledgement of the agreement in the new policy. Please cease to access the products or services if you disagree with the details of this Policy and please contact the Company for further clarification.

### **21. Inquiries or Exercise of Rights**

If you have any questions, suggestions or concerns about the Company's collection, use and disclosure of Personal Data or about this Policy, or you would like to exercise your rights under the Personal Data Protection Act, please contact us via the following channels:

- 1) Call Center: Tel. (+66) 2 255 3115
- 2) Data Protection Officer of Zeaquest Company Limited  
(email: [zequestdpo@zea-quest.com](mailto:zequestdpo@zea-quest.com))
- 3) Website of Zeaquest Company Limited: <https://http://www.zea-quest.com//>
- 4) No. 26/28-29, Floor. 12A, Orakarn Building, Soi Chidlom, Pleonchit Road, Lumpini Subdistrict, Pathumwan District, Bangkok 10330

This policy shall be effective from June 1<sup>st</sup>, 2022,  
onward

-signature-  
Mr. Thasaphich Thavornsuk  
Chief Executive Officer