

# **Privacy Notice of the Operation Excellence Training Center (OETC)**

The Operation Excellence Training Center (OETC) of SCG Chemicals Public Limited Company (“we”) respect the privacy of presenters and persons who participate or attend our training, seminars, site visits, and other activities (collectively, “you”). In order to ensure protection of your personal data, this Privacy Notice has been prepared to gather details pertaining to the collection, use and disclosure (collectively, “processing” or “process”) of your personal data, including erasure and destruction of your personal data online and through other channels as required by the Personal Data Protection Act (PDPA) as follows:

## **1. Purposes of Personal Data Processing**

1.1 If you participate or attend our training, seminars, site visits, and other activities (collectively, the “Events”), we process your personal data for the following purposes:

- (1) To coordinate with you or invite you to our Events;
- (2) To manage, prepare, arrange, organize, and facilitate the Events;
- (3) To summarize information and create history of your participation in the Events;
- (4) To produce receipts and certificates for the Events;
- (5) To assess, analyze, and improve organization of the Events;
- (6) To promote other Events that you might be interested in or that might interest you;
- (7) To publicize the Events;
- (8) To receive accreditations and assessments from organizations that oversee, certify, accredit, or improve managerial systems;
- (9) To fulfill requests prior to entering into a contract, or to perform obligations contained under a contract to which a third party is a party (e.g. when we are a party to a contract with your organization);

- (10) To strengthen relationship with you or your organization;
- (11) To ensure security (such as access to our premises, use of CCTV cameras), prevent damage, and protect legitimate interests of us and others;
- (12) To protect vital interests of you or of another person, for instance, to make contact in case of emergency and control and prevent disease;
- (13) To comply with legal obligations; for example, to comply with legal provisions, regulations and orders of legislative authorities;
- (14) To perform a task carried out in the public interest or in the exercise of official authority vested in us;
- (15) To process personal data in accordance with consent obtained from you, which we will inform you of purposes of such consent when or before we seek consent from you. Details about consent and consequences of not giving consent can be found in this Privacy Notice.

1.2 If you are a presenter, we process your personal data for the following purposes:

- (1) To coordinate with you or invite you to our Events;
- (2) To manage, prepare, arrange, organize, and facilitate the Events;
- (3) To pay remunerations and produce documents for the Events;
- (4) To assess, analyze, and improve organization of the Events;
- (5) To publicize the Events;
- (6) To receive accreditations and assessments from organizations that oversee, certify, accredit, or improve managerial systems;
- (7) To strengthen relationship with you or your organization;
- (8) To ensure security (such as access to our premises, use of CCTV cameras), prevent damage, and protect legitimate interests of us and others;
- (9) To protect vital interests of you or of another person, for instance, to make contact in case of emergency and control and prevent disease;

- (10) To comply with legal obligations; for example, to comply with legal provisions, regulations and orders of legislative authorities;
- (11) To perform a task carried out in the public interest or in the exercise of official authority vested in us;
- (12) To process personal data in accordance with consent obtained from you, which we will inform you of purposes of such consent when or before we seek consent from you. Details about consent and consequences of not giving consent can be found in this Privacy Notice.

1.3 If you enter into our premises, we process your personal data for the following purposes:

- (1) To ensure security, prevent damage, and protect legitimate interests of us and others;
- (2) To protect vital interests of you or of another person, for instance, to make contact in case of emergency and control and prevent disease;
- (3) To comply with legal obligations; for example, to comply with legal provisions, regulations and orders of legislative authorities

1.4 We do not process data concerning your religious belief. If we receive such information from a copy of your ID card or other documents, we will redact the data to protect your privacy.

1.5 We will ensure that we will try our best to provide adequate security measures to protect your special categories personal data.

## **2. Collection of Personal Data**

2.1 We collect your personal data from the following sources:

- (1) From yourself such as Information you indicated in a form, application, registration, questionnaire, business card, or other document given to us or through your conversations and communications with us;
- (2) From our affiliates e.g., our affiliates might introduce or refer you to us;
- (3) From organizations you work with or connected to you;

- (4) From other persons who disclose your personal data to us such as our business partners;
- (5) From public sources such as publicly accessible databases, your social media account that is available to the public, documents that you or your organization disclose to the public.

2.2 If you participate in or attend our Events, we collect your personal data as follows:

- (1) Identification information such as name, last name, 50 Cent number, date of birth, gender, age, nationality, marital status, passport number, signature, photograph, employee number;
- (2) Contact details such as address, telephone number, email address, chat history, social media account (Facebook, LINE, ID, IG, Twitter);
- (3) Information about your profession and education such as occupation, position, organization, work experience, educational background, training;
- (4) Information about training, seminars, or other activities such as scores, opinions, expectation, satisfaction;
- (5) Images, audio, and video recorded using video cameras or computer programs which can be used to identify you, however, we will notify you or display a sign to let you know when you are being recorded;
- (6) Other necessary personal data such as details of your payments and transactions relating to Events, information about your vehicles, information about your dietary requirements.

2.3 If you are a presenter, we collect your personal data as follows:

- (1) Identification information such as name, last name, 50 Cent number, date of birth, gender, age, nationality, marital status, passport number, signature, photograph, employee number;
- (2) Contact details such as address, telephone number, email address, chat history, social media account (Facebook, LINE, ID, IG, Twitter);
- (3) Information about your profession and education such as occupation, position, organization, work experience, educational background, training;

- (4) Images, audio, and video recorded using video cameras or computer programs which can be used to identify you, however, we will notify you or display a sign to let you know when you are being recorded;
- (5) Other necessary personal data such as details of your payments and transactions relating to Events, information about your vehicles, information about your dietary requirements

2.4 If you enter into our premises, we collect your personal data as follows:

- (1) Name, last name, Email address, information on your citizen card, identification documents given by you when entering into our premises or when you register to use our Wi-Fi network;
- (2) Images, audio, and video recorded using video cameras or computer programs which can be used to identify you, however, we will notify you or display a sign to let you know when you are being recorded;
- (3) Vehicle registration number and images of your vehicle that enters our premises.

2.5 Special categories of personal data

- (1) We might process your personal data relating to your food allergy, religious belief, and health which is special categories personal data pursuant to Section 26 of PDPA. However, we will process this data only when it benefits you (e.g. to prepare food that is safe for you, to provide rooms and religious facilities). We will inform you and comply with PDPA when processing such data.
- (2) We might need to process information about Covid-19 which include your special categories of personal data such as your symptoms, history of contact with Covid-19 patients, Covid-19 test results, and vaccination history to screen, control, and prevent the disease and to report to competent authorities, in which we will process with caution and in accordance with applicable personal data protection laws.

2.6 We collect your personal data when:

- (1) You contact us, apply for an Event, register to an Event, or send your personal data or documents containing your personal data; or
- (2) You attend our Event or enter into our premises.

2.7 If you disclose personal data of another person to us, you must ensure that you can legally disclose such data and inform the data subject of this Privacy Notice.

### **3. Cookies**

We use cookies to collect personal data as set forth in our [Cookie Policy](#).

### **4. Acquisition of Consent and Consequences of Withdrawal**

- 4.1 If we obtain your consent jointly with or on behalf of another controller, such as when we obtain your consent to receive marketing communications and special offers from our affiliates, you can see details about how your personal details processed by reading privacy notice of that controller.
- 4.2 Where we collect and process personal data upon your consent, you have the right to withdraw your consent at any time. This withdrawal of consent will not affect the collection, use, disclosure or processing of personal data for which you have earlier given your consent.
- 4.3 If you withdraw the consent you have given us, or refuse to provide certain information, such withdrawal or refusal may result in us being unable to fulfill some or all of the purposes outlined in this Privacy Notice.
- 4.4 We do not intend to provide website and application services to minors, incompetent persons, and incapacitated persons. If you are a minor, incompetent person, or incapacitated person and wish to consent to the processing of your personal data, you must ensure that the consent is given or authorized by your guardian or the holder of parental responsibility.
- 4.5 If you give consent to us on behalf of another person, you warrant that you are legally authorized to give the consent on behalf of that person at the time when the consent is given.

### **5. Retention Period for Personal Data**

- 5.1 We shall maintain your personal data for a period necessary to fulfill the purposes based on each type of personal data. For example, personal information of the contestants will

be retained for one year after the completion of the contest unless the law permits otherwise. In the event that the retention period of specific personal data is indeterminate, we shall retain the data for a period expectable on the basis of the standard of data collection (e.g., general prescription of up to 10 years).

- 5.2 We have in place an audit system for the deletion or destruction of personal data when the retention period expires, or is irrelevant, or beyond the necessity for the purpose for which personal data were collected.
- 5.3 In the event that we use your personal data upon your consent, we shall process such personal data until you withdraw your consent and we have satisfied your request. However, we shall continue collecting your personal data to the extent necessary for a historical record that you have withdrawn your consent so that we can respond to your requests in the future.

## **6. Disclosure of Personal Data to Third Parties**

6.1 We disclose and share your personal data to

- (1) SCGC affiliates (whose names are on the list attached to this Privacy Notice); and
- (2) Individuals and entities other than those specified in (1) (“**Third Parties**”) for the purpose of collecting and processing personal data as set forth in this Privacy Notice, such as our distributors, shipping service providers (such as post offices); third-party service providers, which cater services and perform obligations under our supervision such as engaging in transaction processing, product and service communications, provision of assistance and services; transaction and financial service providers (e.g., banks, payment facilitators); technological service providers (e.g., cloud, blockchain, SMS services, data analytics); providers of IT programs and systems, auditors, insurance companies, consultants, government entities (e.g., the Revenue Department, the Anti-Money Laundering Commission), and the likes, which enable us to conduct the business and provide services to you, as well as taking any further action for the purposes of collecting and processing personal data as set forth in this Privacy Notice.

- 6.2 The Third Parties to whom we disclose personal data may have a separate Privacy Notice. In such case, you can learn more about each specific Privacy Notice as announced by them.
- 6.3 In the event of restructuring, disposal or transfer of our business or assets, we may disclose your personal data to an assignee or acquirer, and/or the acquirer's advisor. However, we shall safeguard your personal data to the best of our ability. Such efforts include requiring the acquirer and/or its advisor to comply with the Personal Data Protection Act (PDPA) and this Privacy Notice.
- 6.4 We shall require the data recipient to have adequate measures in place to protect your data and process such personal data only as necessary, and prevent unauthorised use or disclosure of personal data.

## **7. International Transfers of Your Personal Data**

- 7.1 We may transmit or transfer your personal data to an affiliate or other parties overseas where it is necessary to fulfill obligations under a contract to which you are a party; to perform under a contract executed between us and another individual or juristic entity for your own benefits; to respond to your request prior to entering into a contract; to prevent and suppress life, physical and health threats against either you or others; to comply with applicable laws; or as necessary to carry out missions for public interest.
- 7.2 We may store your data on a computer server or cloud service provided by a third party and may use a third-party program or application in form of instant software and platform services to process your personal data. However, we shall not allow unauthorised parties to access personal data and shall require relevant third parties to have appropriate security measures in place.
- 7.3 In the event that your personal data are transferred abroad, we shall comply with the Personal Data Protection Act and undertake appropriate safeguards to ensure your personal data are protected and you can exercise the rights associated with your personal data in accordance with legal provisions, as well as having effective remedial measures as required by law. In addition, we shall require data recipients to take adequate measures to



protect your data and process such personal data only as necessary, and shall prevent unauthorised use or disclosure of personal data.

## **8. Security Measures for Personal Data**

8.1 The safety of your personal data is important to us; thus, we have adopted appropriate technical and administrative security standards to protect your personal data from loss, unauthorised access, use or disclosure abuse, modification and destruction, using technologies and security procedures such as encryption and access restrictions. This ensures that only authorised persons will have access to your personal data and that they have been trained and are aware of the importance of safeguarding personal data.

8.2 We have adequate security measures in place, including administrative safeguard, technical safeguard and physical safeguard to prevent unauthorised and unlawful loss, access, use, alteration, correction, disclosure of personal data; for instance, access control, user access management, etc. In addition, we also review such measures from time to time, whenever needed or technological changes applied, in order to ensure effective safeguards.

## **9. Rights Related to Your Personal Data**

9.1 You have rights under the Personal Data Protection Act, which can be summarised as follows:

- (1) To withdraw the consent for processing your personal data you have given to us;
- (2) To request to view and acquire a copy of your personal data, or request for a disclosure of the source from which your personal data were obtained;
- (3) To transmit or transfer personal data in an electronic form as required by the Personal Data Protection Act to other data controllers;
- (4) To object to the collection, use or disclosure of your personal data;
- (5) To delete, or destroy, or anonymise your personal data;

- (6) To suspend the use of your personal data;
- (7) To update your personal data to ensure the data remain accurate, up-to-date, complete and not misleading;
- (8) To file a complaint to the Personal Data Protection Committee in the event that we or our data processors, including our employees, or subcontractors, or data processors, violate or fail to comply with the Personal Data Protection Act.

We will consider and notify you of the result of your request without delay within 30 days from the date we receive the request. Also, the aforementioned rights are as prescribed by the Personal Data Protection Act.

9.2 You can exercise your rights by clicking [here](#) or go to <https://rb.gy/cvbdh1>.

## **10. Information about Data Controller and Data Protection Officer**

10.1 The company in SCG Chemicals that determines the purposes and means of the processing of your personal data is the data controller. Details of these data controllers are available in the [Annex](#).

10.2 If you have any question regarding the protection of your personal data, please contact [data.privacy@scg.com](mailto:data.privacy@scg.com).

In case of amendments, the revised Privacy Notice shall be posted on our website. You are kindly encouraged to review this Privacy Notice from time to time. In this regard, new versions of the Privacy Notice will become effective immediately once announced.