

## OUR PRIVACY POLICY

### 1. Purpose of this notice

This notice describes how we collect and use personal data about you, in accordance with the Personal Data Protection Act B.E. 2562 (PDPA), and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in Thailand ('Data Protection Legislation').

### 2. About us

PKF Holdings (Thailand) Ltd., a limited company in Thailand with registered number 0-1055-56167-16-7, whose registered office is at 98 Sathorn Square Office Tower, 28th Floor, Unit 2808 and 2812, North Sathorn Road, Silom Sub-District, Bangrak District, Bangkok 10500 and its subsidiary companies, including PKF Audit (Thailand) Ltd., PKF Business Solutions (Thailand) Ltd., PKF Tax and Consulting Services (Thailand) Ltd.

### 3. How we may collect your data

We obtain personal data about you, for example, when:

- you request a proposal from us in respect of the services we provide;
- our clients engage us to provide our services and also during the provision of those services;
- you contact us by email, telephone, post or social media (for example when you have a query about our services); or
- from third parties and/or publicly available resources (for example, from your employer or from Companies House).

### 4. The kind of information we hold about you

The information we hold about you may include the following:

- your personal details (Personal Data): such as your name, address, ID number, passport number, date of birth, nationality or other information relating to you which enables the identification of yourself whether directly or indirectly;
- your sensitive personal details (Sensitive Data): such as 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;
- details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- details of any services you have received from us;
- our correspondence and communications with you;
- information about any complaints and enquiries you make to us;
- information from research, surveys, and marketing activities; or
- information we receive from other sources, such as publicly available information, information provided by your employer or our clients or information from our member network firms.

### 5. How we use Personal Data we hold about you

We may process your Personal Data for the purposes necessary for the performance of our contract with our clients and to comply with our legal obligations. This may include processing your personal data where you are an employee, subcontractor, supplier, or customer of our client.

We may process your Personal Data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your Personal Data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your Personal Data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your Personal Data for more than one lawful basis depending on the specific purpose for which we are using your data.

We will not collect, process or use your Sensitive Data without the explicit consent from you, except where it is legally required to do so.

### ***Situations in which we will use your personal data***

We may use your personal data in order to:

- carry out our obligations arising from any agreements entered into between you, your employer or our clients and us (which will most usually be for the provision of our services);
- carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client.
- provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes;
- seek your thoughts and opinions on the services we provide; and
- notify you about any changes to our services.

In some circumstances we may anonymize or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

### ***Data retention***

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data;
- whether the purpose of the processing could reasonably be fulfilled by other means; and
- Professional or legal advice we may have received.

### ***Change of purpose***

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

## **6. Data sharing**

### ***Why might you share my personal data with third parties?***

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

### ***Which third-party service providers process my personal data?***

“Third parties” includes:

- government authorities in Thailand, which include but not limited to the Ministry of Commerce, Social Security Office, Revenue Department, Immigration Bureau, or Ministry of Labour;
- third-party service providers;
- other entities within the members of our firm’s network.

The following activities are carried out by third-party service providers: IT and cloud services, professional advisory services, administration services, marketing services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

### ***What about other third parties?***

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

## **7. Transferring personal data outside Thailand**

We may transfer the personal data we collect about you to countries outside of Thailand in order to perform our contract with you.

In these cases we require that any third party providers agree to use and protect data in a manner which is consistent with PDPA.

## **8. Data security**

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **9. Rights of access, correction, erasure, and restriction**

### ***Your duty to inform us of changes***

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

### ***Your rights in connection with personal data***

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

**If you want to exercise any of the above rights, please email our data protection point of contact [dpooffice.th@pkf.com](mailto:dpooffice.th@pkf.com).**

**We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.**

## **10. Right to withdraw consent**

You have the right to withdraw your consent at any time, unless there is a restriction of the withdrawal of consent by law, or the contract which gives benefits to the data owner. However, the withdrawal of consent shall not affect the collection, use, or disclosure of personal data that the data owner has already given consent legally. To withdraw your consent, please email our data protection point of contact at [dpooffice.th@pkf.com](mailto:dpooffice.th@pkf.com).

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **11. Changes to this notice**

Any changes we may make to our privacy notice in the future will be updated on our website. This privacy notice was last updated on 1 February 2021.