



## **Don Muang Tollway Public Company Limited**

ISO 9001, ISO 14001, ISO 45001 & ISO/IEC27001 CERTIFIED

### **Announcement No. 54/67**

#### **Office of the Managing Director**

#### **Privacy Notice for Activities**

Don Mueang Tollway Public Company Limited (the "Company") respects the rights to personal data of data subjects in accordance with the Personal Data Protection Act B.E. 2562 (2019). Therefore, this Privacy Notice has been created to explain how we protect and process the collection, use, disclosure, and/or processing ("Processing") of your personal data, with the following details:

#### **Section 1: To whom does this Privacy Notice apply?**

"Event Participant" includes representatives of customers or business partners, interested persons, prospective participants, former participants, or attendees of training, seminars, and various activities of the Company, which may take the form of meetings, discussions, training sessions, seminars, study trips, interviews, social gatherings, community relations events, questionnaires, or other formats.

Hereinafter collectively referred to as "**you**" or the "**Data Subject**".

#### **Section 2: Sources of Personal Data**

**2.1** The Company receives data directly from you, such as from communications and contract execution.

**2.2** The Company receives data from other sources, such as government agencies, affiliated companies, business partners, and data service providers.

**2.3** The Company receives data through automated systems, such as when you visit the Company's website, from Closed-Circuit Television (CCTV) systems, and from the Company's various applications.

#### **Section 3: Types of Personal Data**

Type of Personal Data	Details
1) Identity Data	e.g., Name, Surname, Facial Photograph, Gender, Date of Birth, Age, Nationality, Passport, National ID Card Number, or other identification numbers
2) Contact Information	e.g., Address, Phone number, Email, Document or invoice delivery address, Line Application ID
3) Financial Information	e.g., Bank account details, Documents for income tax filing, Personal data on invoices, tax invoices, receipts, and payment vouchers
4) Work-related Information	e.g., Position or status, Job title, Department, Occupation, Information appearing on a business card
5) Data Appearing in Transaction Documents	e.g., Personal data appearing on a National ID card, Passport, House Registration, various licenses.
6) Special Category Personal Data	e.g., Biometric data, Religion, Health data, Criminal record data
7) Recorded Data	e.g., Voice recordings of conversations, Closed-circuit television (CCTV) recordings
8) Technical Data	e.g., Computer traffic data (Log), IP Address, Geolocation data using positioning technology, Login Log data, Transaction Log data, Cookie data, or other similar technologies
9) Third-Party Data	e.g., Emergency contact information
10) Other Information	e.g., Service usage data, Opinions

#### Section 4: Necessity of Collecting Personal Data

In cases where the Company needs to collect your personal data as necessary for entering into a contract, fulfilling a contract, or complying with a legal duty, if you do not provide your personal

data to the Company, the Company may not be able to proceed with your request, as there could be legal impacts or penalties affecting the Company or you.

When the Company receives a copy of your national ID card or any other document for identity verification purposes in any transaction with the Company, the received document may contain special categories of personal data, such as religion or blood type. The Company has no policy to collect such data from you without a supporting legal basis. The Company will implement handling procedures according to its guidelines and as permitted by law, such as by blacking out or concealing the information.

The Company may receive third-party data that you provide to the Company, such as that of executives, coordinators, emergency contacts, etc. Please inform such third parties of this Privacy Notice and obtain consent from them if necessary, unless there is a legal provision allowing the disclosure of the third party's personal data to the Company without requiring consent.

## **Section 5: Legal Basis for Processing Personal Data**

### **5.1 For General Personal Data (Section 24)**

- (a) Consent (Sections 19 and 24)
- (b) Archival or Historical/Statistical/Research (Section 24 (1))
- (c) Vital Interest (Section 24 (2))
- (d) Contractual Necessity (Section 24 (3))
- (e) Public Interest (Section 24 (4))
- (f) Legitimate Interest (Section 24 (5))
- (g) Legal Obligation (Section 24 (6))

### **5.2 For Special Category Personal Data (Section 26)**

- (a) Explicit Consent (Sections 19 and 26)
- (b) Prevention or Suppression of Danger to Life (Vital Interest) (Section 26 (1))
- (c) Data Made Public with Explicit Consent of the Data Subject (Section 26 (3))
- (d) Establishment, Compliance, Exercise or Defense of Legal Claims (Section 26 (4))
- (e) Necessity to Comply with the Law to Achieve the Following Purposes:
  - Provision of health or social services (Section 26 (5) (a))
  - Public interest in public health (Section 26 (5) (b))
  - Labor protection and social security (Section 26 (5) (c))

- Scientific, historical, or statistical research, or other public interests (Section 26 (5) (d))
- Substantial public interest (Section 26 (5) (e))
- (f) Other bases as permitted by the personal data protection law.

## **Section 6: Purposes for Processing Personal Data**

The Company will process your personal data in accordance with legal bases for the following purposes:

**6.1 To fulfill a contract**, such as for operational performance, service provision, requesting payment, and creating proof of payment.

**6.2 For organizing training**, such as for communication, registration, identity verification, providing information to speakers and external consultants, and conducting community relations activities.

**6.3 For management**, such as handling complaints, feedback, questionnaires, opinion surveys, creating statistics, improving service quality, creating a member database system, and personnel development.

**6.4 To maintain the Company's security**, such as for crime prevention and monitoring for irregularities.

**6.5 For corporate management**, such as for communication, report preparation, performance analysis, strategic planning, setting corporate policies, operational oversight, and internal audits.

**6.6 For legitimate interests**, such as customer contact, identity verification, improving service quality, developing work standards, disclosing to relevant agencies in various competition projects the Company participates in, organizing various activities, public relations through various channels, marketing activities, receiving whistleblowing reports, exercising legal claims, dispute resolution, exercising rights in court, and legal enforcement.

**6.7 To comply with the law**, such as for anti-money laundering, tax management, personal data protection, management of occupational safety, health, and environment, as well as securities and exchange matters.

**6.8 To protect the life, body, or health of an individual**, such as transferring individuals to medical facilities, preventing epidemics, and providing insurance for tollway users.

**6.9 To carry out other purposes**, such as marketing activities, prize-drawing events, and managing your requests.

## **Section 7: Disclosure of Personal Data**

The Company discloses your personal data to third parties for lawful purposes, as follows:

**7.1 Government agencies**, such as the Securities and Exchange Commission, the Stock Exchange of Thailand, the Ministry of Commerce, the Ministry of Public Health and any other agencies related to public health and disease control, the Revenue Department, the Office of the Personal Data Protection Committee, the Royal Thai Police, courts, or agencies exercising legal authority.

**7.2 Private sector entities**, including but not limited to:

- (1) Affiliated companies
- (2) Service providers in various fields, such as logistics, security, marketing, applications, software, and cloud services.
- (3) Advisors, such as financial advisors and legal advisors.
- (4) Auditors, such as accounting auditors and ISO standard auditors.
- (5) Non-profit organizations, such as foundations and associations.
- (6) Business partners, such as insurance companies, financial institutions, and medical facilities.

The Company will have agreements or contracts regarding the sharing or processing of personal data and confidentiality agreements to protect your personal data.

## **Section 8: Retention Period of Your Personal Data**

The Company will retain your personal data for a period necessary to fulfill the purposes notified to you, in accordance with legal requirements or the standards applicable to the Company. For example, your personal data will be kept for 10 years according to the legal statute of limitations.

At the end of said period, the Company will proceed to delete, destroy, or render the data unidentifiable, unless there is a necessity or other exception under the law.

## **Section 9: Your Rights as a Data Subject**

You can exercise your rights by notifying the Company according to the contact details specified in this Privacy Notice. You have the following rights:

**9.1 Right to Withdraw Consent:** You have the right to withdraw the consent you have given to the Company at any time, unless the right is restricted by law or there is a contract that benefits you.

**9.2 Right to Access, Obtain a Copy, and Be Informed of the Processing of Your Personal Data.**

**9.3 Right to Data Portability** when the personal data is in a technical format that allows for transfer.

**9.4 Right to Object to the Processing of Personal Data** in the following cases:

When the Company processes for legitimate interests.

When the Company processes for public interest.

When the Company processes for direct marketing.

When the Company processes for research or statistical purposes.

**9.5 Right to Request Erasure of Personal Data.**

**9.6 Right to Request Restriction of Processing of Personal Data.**

**9.7 Right to Request Rectification of Personal Data** to be accurate, up-to-date, and not misleading.

Upon receiving your request to exercise your rights, the Company will respond to your request within the period prescribed by law. The Company may refuse to act on your request only in cases specified by law, such as the need to comply with the law or a court order, for the public interest, or if exercising the right might violate the rights and freedoms of others. If the Company denies the request, it will inform you of the reason for the denial.

**9.8 Right to Complain:** You can complain to the expert committee appointed by the Personal Data Protection Committee according to the rules and procedures prescribed by the Personal Data Protection Act (PDPA).

## **Section 10: Security Measures and Sending or Transferring Personal Data Abroad**

The Company will have measures to securely store your personal data, covering Organizational Measures, Technical Measures, and Physical Measures to prevent breaches of your personal data, in accordance with the criteria set by the Personal Data Protection Act (PDPA). The Company will regularly update these measures to be effective and compliant with the law.

In case of a necessity for the Company to send or transfer your personal data abroad, the Company will comply with the provisions of the Personal Data Protection Act (PDPA) and use

appropriate measures to ensure that your personal data is protected and that you can exercise your rights regarding your personal data as prescribed by law.

#### **Section 11: Contact Channels**

If you wish to contact, have questions, or want to inquire about the processing of personal data, including the rights and the exercise of the data subject's rights under this notice, you can contact the Company at:

**Data Protection Officer:** [dpo@tollway.co.th](mailto:dpo@tollway.co.th)

**Phone Number:** 02-792-6500 ext. 6331

**Don Mueang Tollway Public Company Limited** 40/40 Vibhavadi Rangsit Road, Sanambin Sub-district, Don Mueang District, Bangkok 10210

#### **Section 12: Changes to the Privacy Notice**

The Company may update or amend this Privacy Notice, in whole or in part, from time to time to align with changing guidelines and legal principles. Therefore, you should always keep track of this Privacy Notice.

Announced on July 17, 2024