

บริษัท ทางยกระดับดอนเมือง จำกัด (มหาชน)  
Don Muang Tollway Public Company Limited

40/40 ถนนวิภาวดีรังสิต แขวงสนามบิน  
เขตดอนเมือง กรุงเทพมหานคร 10210  
โทร : (66) (02) 792-6500  
โทรสาร : (66) (02) 552-8065  
เลขทะเบียน บมจ. 0107537001129



40/40 Viphavadi Rangsit Road,  
Sanambin, Don Muang, Bangkok 10210  
Tel. : (66) (02) 792-6500  
Fax. : (66) (02) 552-8065  
Plc Registration No. 0107537001129

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

No. DMT/P/PH/225/24

June 12, 2024

**Announcement No. 49/2024**  
**Office of Managing Director**  
**Privacy Notice for Personnel**

Don Muang Tollway Public Company Limited (“Company”) recognizes the importance of protecting your personal data according to the Personal Data Protection Act B.E. 2562 (PDPA). Therefore, the Company has issued this Privacy Notice to inform you about the methods of safeguarding and managing the collection, use, disclosure, and/or processing (“Processing”) of your personal data as follows:

**1. This Privacy Notice applies to whom**

**"Personnel"** refers to employees, job applicants, committee members, executives, permanent staff, security guards, service providers (outsourced), interns, trainees, or any individuals applying or being selected for employment, including temporary workers and all types of staff.

**"Related Persons"** refers to individuals related to the personnel, such as family members, emergency contacts, guarantors, or referees.

In this Privacy Notice, personnel will be referred to as “you” or “Data Subject.”

**2. Sources of Personal Data**

**2.1 Data provided directly by you:** For example, through the application process, interviews, and assessment of qualifications.

**2.2 Data obtained from other sources:** For example, from professors, consultants, third parties, recruiters, or public sources of information.

**2.3 Data collected automatically:** For example, when you visit the Company's website or through closed-circuit television (CCTV) systems.

### 3. Categories of Personal Data

The Company collects your personal data as follows:

Type of Personal Data	Details
1) Personal Identification Data	e.g., name, photo, gender, date of birth, age, nationality, ID card number, passport number, signature, and nickname.
2) Contact Information	e.g., address, location, phone number, email, Line ID.
3) Financial Information	e.g., bank account number, financial documents, payroll statements, tax filings, salary slips.
4) Background Information	e.g., educational records, family details, employment history, criminal records.
5) Business Operation Documents	e.g., employment contracts, agreements, internal memos, business documents, or other business-related documents.
6) Sensitive Personal Data	e.g., health information, medical records, criminal records, and biometric data.
7) Image and Audio Data	e.g., photo recordings, video recordings, CCTV footage.
8) Technology Data	e.g., computer system logs, device IP address, location data, login records, transaction logs, cookies, and similar technologies.
9) Related Persons' Data	e.g., family information, emergency contact information, and data of guardians or dependents.

### 4. Necessity of Collecting Personal Data

In some cases, the Company may need to collect your personal data for the purpose of entering into a contract, fulfilling contractual obligations, or complying with legal requirements. If you refuse to provide the necessary personal data, the Company may not

be able to proceed with the contract or fulfill its obligations, which may affect your employment or any contractual relationship with the Company.

In cases where the Company collects a copy of your identification card or other personal identification documents for the purpose of business transactions with the Company, if the documents contain sensitive personal data (Special Categories of Personal Data), such as religious beliefs or blood type, the Company has no policy to collect such data without your explicit consent unless required by law.

In the absence of legal grounds, the Company will define operational procedures in accordance with applicable legal requirements, such as obtaining your consent.

The Company may receive personal data indirectly from its employees providing data on behalf of other persons, such as spouses, parents, children, family members, emergency contacts, guarantors, or referees. In such cases, the Company assumes that the data subject has been properly informed and has given consent to the employee providing such data, unless legal provisions state otherwise.

## **5. Legal Bases for Processing Personal Data**

The Company processes your personal data based on the following legal bases:

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

- (a) Consent of the data subject according to Sections 19 and 24
- (b) Legal obligations/statistics or research purposes according to Section 24 (1)
- (c) Vital interests to prevent or suppress danger to life, body, or health according to Section 24 (2)
- (d) Necessity for entering into or performing a contract according to Section 24 (3)
- (e) Public interest according to Section 24 (4)
- (f) Legitimate interests according to Section 24 (5)
- (g) Other legal grounds according to Section 24 (6)

### **5.2 For Sensitive Personal Data (Section 26)**

- (a) Explicit consent of the data subject as specified in Sections 19 and 26
- (b) Prevention or suppression of danger to life, body, or health according to Section 26 (2)
- (c) Processing necessary for compliance with legal obligations or for substantial public interest, including:

- Providing public health services or social services
- Significant public interest

- Labor protection and social security
- Scientific, historical, statistical, or important public interest research purposes

- (d) Other legal bases as specified by the Personal Data Protection Act

## 6. Purposes of Personal Data Processing

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

**6.1 For recruitment purposes:** e.g., job advertisements, contact, interviews, assessments, evaluations, internship offers, and job offers.

**6.2 For background verification:** e.g., verification of educational history, criminal records, health checks, and professional competency checks.

**6.3 For contract execution:** e.g., onboarding, contract signing, employee data processing, communication, task assignments, payroll, and termination.

**6.4 For welfare and benefits management:** e.g., providing scholarships, financial aid, medical care, and other employee welfare and benefits.

**6.5 For internal administration:** e.g., internal audits, internal control, regulatory compliance, and operational development.

**6.6 For business benefits:** e.g., security management, customer and partner relationship management, network security, system monitoring, fraud detection, and legal claims.

**6.7 For public health benefits:** e.g., disease control, health monitoring, and contact tracing.

**6.8 For healthcare management:** e.g., medical check-ups, health insurance, and medical rights management.

**6.9 For personnel management:** e.g., training, performance appraisal, policy planning, organizational restructuring, promotions, and transfers.

**6.10 For security purposes:** e.g., access control, monitoring entry and exit, time attendance systems, and internal security monitoring.

**6.11 For legal compliance:** e.g., complying with labor laws, registering employees with authorities, security management, workplace safety, occupational health, internal investigations, audits, and compliance with regulatory authorities.

**6.12 To support company operations:** e.g., communication, job management, business planning, business development, and archiving.

**6.13 For event management:** e.g., award ceremonies, public relations, events, seminars, surveys, and feedback collection.

**6.14 For risk prevention and management:** e.g., financial audits, inspections, fraud prevention, internal investigations, and external inspections.

**6.15 For business transactions:** e.g., mergers, acquisitions, business transfers, or any other form of corporate restructuring involving customer or personnel data transfers.

## **7. Disclosure of Personal Data**

The Company may disclose your personal data to external parties for the purposes as permitted by law as follows:

**7.1 Government Agencies:** e.g., Revenue Department, Department of Welfare and Labor Protection, National Police Office, courts, Social Security Office, universities, or other agencies as authorized by law.

### **7.2 External Parties (including but not limited to):**

1. Affiliated companies
2. Service providers — e.g., transportation, training, marketing, application software, cloud services.
3. Consultants — e.g., legal consultants, human resources management consultants.
4. Auditors — e.g., accounting auditors, ISO auditors.
5. Non-profit organizations — e.g., foundations, associations.
6. Clients — e.g., customers and business partners.
7. Other parties — e.g., financial institutions, hospitals, business alliances.

The Company will enter into agreements or data protection contracts with external parties involved in personal data processing to ensure the protection of your personal data.

## **8. Personal Data Retention Period**

The Company will retain your personal data for a period necessary to fulfill the stated purposes or as required by applicable laws or standards enforced by the Company. For example, personal data may be retained for up to 10 years or as otherwise prescribed by law.

After the expiration of such period, the Company will proceed to delete, destroy, or anonymize the data unless retention is required by law.

## **9. Data Subject Rights**

You may exercise your rights by contacting the Company according to the contact details provided in this Privacy Notice. Your rights include:

**9.1 Right to Withdraw Consent:** You have the right to withdraw your consent at any time, unless there is a legal restriction or the contract still provides benefits to you.

**9.2 Right of Access:** You have the right to request access to and obtain a copy of your personal data.

**9.3 Right to Data Portability:** You have the right to request the transfer of your personal data in a structured, commonly used, and machine-readable format.

**9.4 Right to Object:** You have the right to object to the processing of your personal data in the following cases:

- the benefit of public interest or morality,
- the benefit of public health,
- direct marketing purposes, or
- educational, research, or statistical purposes.

**9.5 Right to Erasure (Right to be Forgotten):** You have the right to request the deletion or destruction of your personal data.

**9.6 Right to Restriction of Processing:** You have the right to request the suspension of processing your personal data.

**9.7 Right to Rectification:** You have the right to request that the Company correct your personal data to be accurate, current, complete, and not misleading.

However, these rights may be limited as required by law or court order for public interest, or for the exercise or defense of legal claims, or to protect the rights and freedoms of others. If the Company denies your request, it will inform you of the reason for the denial.

**9.8 Right to Lodge a Complaint:** You have the right to file a complaint with the Personal Data Protection Committee (PDPC) in accordance with the criteria and procedures specified by law.

## **10. Security Measures and Cross-Border Transfer of Personal Data**

The Company implements measures to secure your personal data, covering **Organizational Measures, Technical Measures, and Physical Measures** to prevent loss, unauthorized access, or disclosure of your personal data. These measures comply with the principles prescribed by the Personal Data Protection Act (PDPA) and are reviewed and improved regularly to ensure effectiveness and alignment with legal requirements.

In the event that it is necessary to transfer your personal data abroad, the Company will comply with the rules and procedures under the PDPA to ensure that the receiving country or

international organization provides adequate data protection standards, unless otherwise exempted by law.

## **11. Contact Channels**

If you wish to make contact, submit a request, have any inquiries, or exercise your rights regarding your personal data as described in this Privacy Notice, you may contact the Company at:

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

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

**Company:** Don Muang Tollway Public Company Limited

**Address:** 40/40 Vibhavadi Rangsit Road, Sanambin, Don Muang, Bangkok 10210

## **12. Changes to This Privacy Notice**

The Company may amend or update this Privacy Notice, either in whole or in part, from time to time to ensure compliance with relevant laws or regulations that may change. You will be notified of any significant changes through the communication channels announced by the Company.

Issued on June 12, 2024

Dr. Sakda Panwai

Managing Director