



PRTR Group Public Company Limited.

Privacy Policy.

	PRTR Group Public Company Limited Privacy Policy	Revision	04
		Date of	10 Nov 2025
		Approval date	
		Page	1 / 11

This Personal Data Protection Act (PDPA) Policy is the copyright of PRTR Group Public Company Limited (the 'Company'). It is established with a commitment to developing a corporate governance system that aligns with the principles of good corporate governance, best practices, as well as the laws, regulations, and requirements prescribed by official authorities and regulatory bodies.

The Board of Directors approved this Personal Data Protection Act (PDPA) Policy at Meeting No. 1/2021 on February 17, 2021, to serve as the fundamental principle and operational guideline for the Board of Directors, executives, employees, and relevant parties of the Company and its subsidiaries, effective from April 1, 2021, onwards.

To ensure that the Personal Data Protection Act (PDPA) Policy remains current and appropriate to prevailing situations and changes, a mandatory review of this Policy shall be conducted at least once a year. Any subsequent amendments or modifications must be strictly approved by the Board of Directors only.



(Mr. Niphon Bundechanan)
Acting Chairman of the Board of Directors.




	PRTR Group Public Company Limited Privacy Policy	Revision	04
		Date of	10 Nov 2025
		Approval date	
		Page	2 / 11

Table of Contents

1. Introduction	3
2. Objective	3
3. Scope	3
4. Definitions	3
Personal Data Protection Policy (PDPA)	
5. Personal Data Protection Guidelines	4
5.1 Personal Data Protection Governance Guidelines	4
5.2 Guidelines for Personal Data Collection and Processing	5
5.3 Guidelines for Personal Data Retention, Processing, and Destruction	6
5.4 Guidelines for Exercising Data Subject Rights	6
5.5 Guidelines for Maintaining the Security of Data Subjects	7
5.6 Guidelines for Compliance with Personal Data Protection Measures	7
6. Duties and Responsibilities	8
6.1 The Board of Directors shall have the following roles, duties, and responsibilities	8
6.2 Executives, working groups and data protection officers have the following roles, duties and responsibilities	8
6.3 The Company's employees have the following roles, duties and responsibilities	9
7. Contact Us	9
8. Penalties for Non-Compliance with the Company's Personal Data Protection Policy	10
9. Revision History	11

	PRTR Group Public Company Limited Privacy Policy	Revision	04
		Date of	10 Nov 2025
		Approval date	
		Page	3 / 11

1. Introduction

PRTR Group Public Company Limited (the 'Company') prioritizes the care and protection of personal data, as well as the respect for the privacy rights of its customers, business partners, employees, and/or other parties involved in the Company's business operations. To ensure that the personal data of such individuals receives full protection and rights in accordance with the Personal Data Protection Act B.E. 2562 (2019), the Company has established and promulgated this Personal Data Protection Policy for executives, employees, and relevant parties to strictly adhere to. This policy sets forth clear and appropriate criteria, oversight measures, and management practices for personal data.

2. Objective

To serve as a formal communication tool by providing a written Personal Data Protection Act (PDPA) Policy for the Company and its subsidiaries, establishing a unified standard of conduct for all personnel. This policy ensures full compliance with corporate regulations and relevant legal requirements, while safeguarding personal data against misuse and maintaining information security in accordance with international standards.

3. Scope

This policy applies to the Company and its subsidiaries, encompassing the core principles, policies, and operational guidelines.

4. Definitions

1. Refers to any information relating to an individual which enables the identification of such individual, whether directly or indirectly.

	PRTR Group Public Company Limited Privacy Policy	Revision	04
		Date of	10 Nov 2025
		Approval date	
		Page	4 / 11


2. Refers to a natural person who is the owner of the Personal Data.
3. Refers to an individual or a juristic person who has the authority and duty to make decisions regarding the collection, use, or disclosure of Personal Data.
4. Refers to an individual or a juristic person who operates in relation to the collection, use, or disclosure of Personal Data pursuant to the orders of, or on behalf of, the Company. Such individual or juristic person performing these operations is not a Data Controller.
5. Refers to any operation performed on Personal Data, including its collection, use, disclosure, restriction, erasure, or destruction.

5. Personal Data Protection Guidelines

To ensure that all operations are in full compliance with the Personal Data Protection Act B.E. 2562 (2019), the Company has established this Personal Data Protection Policy and the following operational guidelines for the Board of Directors, executives, employees, and relevant parties to strictly adhere to:

5.1 Personal Data Protection Governance Guidelines


- (1) Establish a clear organizational structure, defining the roles, missions, and responsibilities of relevant departments and personnel. This is to create a governance mechanism for oversight, control, accountability, operational execution, enforcement, and monitoring of personal data protection measures, ensuring full compliance with the law and the Company's Personal Data Protection Policy.
 - (2) Appoint a Data Protection Officer (DPO) for the Company, whose roles and duties shall be as prescribed in the Company's Personal Data Protection Policy.
-

	PRTR Group Public Company Limited Privacy Policy	Revision	04
		Date of	10 Nov 2025
		Approval date	
		Page	5 / 11

- (3) Develop policies, work instructions, and other relevant documentation pertaining to personal data protection, ensuring they are consistent with legal requirements and the Company’s Personal Data Protection Policy.
- (4) Provide regular training for employees, or at least once a year, to ensure they realize the importance of personal data protection. This is to guarantee that all relevant personnel undergo training, possess a thorough understanding of data protection, and strictly comply with the Company’s Personal Data Protection Policy.

5.2 Guidelines for Personal Data Collection and Processing

- (1) The Company shall collect, gather, and process personal data in its capacity as both a Data Controller and a Data Processor in a manner that is fair, lawful, and transparent to the Data Subject.
 - (2) The Company shall establish clear procedures for notifying the purposes of data collection and obtaining consent from the Data Subject in full compliance with the law.
 - (3) The Company shall implement operational and verification procedures to ensure that personal data is collected directly from the Data Subject. In cases where data is obtained from other sources, or relates to minors, incompetent persons, or quasi-incompetent persons, the Company shall ensure all actions strictly adhere to legal requirements.
 - (4) The Company shall collect personal data strictly in accordance with the notified purposes and prescribed legal bases, ensuring that such collection is limited only to what is necessary (Data Minimization).
-

	PRTR Group Public Company Limited Privacy Policy	Revision	04
		Date of	10 Nov 2025
		Approval date	
		Page	6 / 11


5.3 Guidelines for Personal Data Retention, Processing, and Destruction

- (1) The Company shall define the scope and purposes of personal data processing only to the extent necessary, ensuring alignment with lawful objectives and the Company’s operational guidelines.
- (2) The Company shall retain personal data for as long as necessary to achieve the specific purposes of its collection, in strict accordance with the Company’s prescribed personal data retention measures.
- (3) The Company shall maintain the confidentiality, integrity, and security of personal data through adequate and appropriate measures.
- (4) The Company shall not process personal data in a manner inconsistent with the purposes notified at the time of collection. Should the Company collect additional personal data or change the original purposes, it shall notify the Data Subject and proceed only in accordance with the requirements and methods prescribed by law.
- (5) The Company shall erase or destroy personal data that is no longer necessary for the notified purposes, upon the expiration of the retention period, or upon the Data Subject’s exercise of their rights. Such actions shall be performed in compliance with the law and the Company’s operational guidelines.

5.4 Guidelines for Exercising Data Subject Rights

The Company shall establish appropriate measures, communication channels, and procedures to enable Data Subjects to exercise their rights as prescribed by law. Furthermore, the Company shall maintain records of such requests and evaluate the effectiveness of its response to the Data Subjects' exercise of their rights.



	PRTR Group Public Company Limited Privacy Policy	Revision	04
		Date of	10 Nov 2025
		Approval date	
		Page	7 / 11


5.5 Guidelines for Maintaining the Security of Data Subjects

- (1) The Company shall implement adequate personal data security measures and take all necessary actions to prevent data breaches, leakages, or any unauthorized access and use of personal data.
- (2) The Company shall establish an incident management process and a response framework for any personal data breaches or irregularities. This is to ensure the timely identification, handling, and notification of such incidents to the relevant authorities and affected parties as prescribed by law.
- (3) The Company shall establish appropriate control processes for the storage, retention, erasure, and destruction of personal data.

5.6 Guidelines for Compliance with Personal Data Protection Measures

- (1) The Company shall establish a monitoring process to track any legislative or regulatory changes. It is committed to regularly updating its personal data protection measures to ensure they remain current and in full compliance with all relevant laws.
- (2) The Company shall conduct a mandatory review and update of its policies, work instructions, and other relevant documentation pertaining to personal data protection on a regular basis, at least once a year. This ensures that all frameworks remain modern and appropriate to the prevailing legal requirements and situational contexts of each period.



	PRTR Group Public Company Limited Privacy Policy	Revision	04
		Date of	10 Nov 2025
		Approval date	
		Page	8 / 11


6. Duties and Responsibilities

6.1 The Board of Directors shall have the following roles, duties, and responsibilities:

- To provide policy direction and support the establishment of a personal data governance structure and relevant internal controls within the Company, ensuring full compliance with the law and the Company’s Personal Data Protection Policy.
- To oversee the Company’s personal data protection operations, ensuring they are executed effectively and remain consistent with all legal requirements.
- To appoint a working group and a Data Protection Officer (DPO) for the Company to ensure efficient governance and oversight.
- To monitor and review, as well as ensure that all risks associated with personal data are properly managed and addressed through appropriate risk management frameworks.

6.2 Executives, working groups and data protection officers have the following roles, duties and responsibilities:

- To develop, review, and propose policies and various measures that prioritize personal data protection within the Company, ensuring alignment with legal requirements and best practice standards for the consideration of Executive Management and the Board of Directors.
 - To audit, monitor, and oversee the departments under their supervision to ensure full compliance with the law and the Company’s Personal Data Protection Policy, while consistently promoting awareness among personnel within those departments.
 - To provide advice and guidance to employees within their respective departments regarding compliance with the law and the Company’s Personal Data Protection Policy.
-

	PRTR Group Public Company Limited Privacy Policy	Revision	04
		Date of	10 Nov 2025
		Approval date	
		Page	9 / 11

- To report operational results and compliance status to Executive Management and the Working Group for collective acknowledgement and review.
- To notify any personal data breaches, and to coordinate and cooperate with the Office of the Personal Data Protection Commission (PDPC) and/or the Data Subjects without delay, as prescribed by law.

6.3 The Company's employees have the following roles, duties and responsibilities:

- To strictly adhere to the Personal Data Protection Act (PDPA), the Company’s Personal Data Protection Policy, operational regulations, and all relevant official announcements.
- To immediately report to their direct supervisor and/or the Data Protection Officer (DPO) upon discovering any data leakages, personal data breaches, irregularities, or any non-compliance with the law and the Company’s Personal Data Protection Policy.
- To undergo mandatory training to review and refresh their knowledge regarding personal data protection at least once a year.

7. Contact Us

Should the Data Subject wish to inquire about further details regarding this Privacy Notice or intend to exercise their personal data protection rights, please contact the Company’s Data Protection Officer (DPO) at:

PRTR Group Public Company Limited.

2034/83 New Phetchaburi Road, Bang Kapi Subdistrict, Huai Khwang District, Bangkok 10320,

Thailand

Email: DPO@prtr.com or Phone Number: 02-716-0000

	PRTR Group Public Company Limited Privacy Policy	Revision	04
		Date of	10 Nov 2025
		Approval date	
		Page	10 / 11

8. Penalties for Non-Compliance with the Company’s Personal Data Protection Policy

All personal data retained by the Company under this Policy shall be treated and safeguarded as if it were the Company’s own assets. It is strictly prohibited for any person to breach, disclose, access, exploit for personal gain, or destroy this data without prior authorization from the Data Controller. Any violator shall be subject to the maximum disciplinary action and the highest extent of legal proceedings, including full liability for all incurred damages as prescribed by law.

Appendix: List of Companies Subject to This Policy

This policy applies to **PRTR Group Public Company Limited**, as well as its subsidiaries under its direct or indirect control.

The companies within the scope of this policy include the following:

1. PRTR Recruitment Company Limited
2. PRTR Recruitment and Outsourcing (Eastern Seaboard) Company Limited
3. Nexmove Platform Recruitment Company Limited
4. The Blacksmith Company Limited
5. Pinno Solutions Company Limited
6. PRTR Global Recruitment Company Limited
7. Biz Resource Company Limited

Remarks:

- Newly established subsidiaries or subsequent investments shall automatically fall within the scope of this policy, unless otherwise specified.
- For companies not under the Company's control, this policy may be adopted and applied as appropriate.

Additional Note: This appendix shall be deemed an integral part of this policy and shall have the same full force and effect as the main policy in all respects.