

ABeam Thailand (“ABTH”) Privacy Policy for Clients and Third Parties (1.1)

Latest updated: 27 August 2024

Privacy Policy

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1. Purpose and scope

This Privacy Policy applies to all ABTH Clients and third parties. ABeam Consulting (Thailand) Limited (“ABTH”) mainly acts as the data controller under PDPA. Therefore, ABTH is committed to collect and process Clients’ and Third parties’ personal data in accordance with the purpose and scope of ABeam Consulting (Thailand) Limited specified herein this Privacy Policy.

Data Controller / Data Processor Contact Information	Data Protection Officer (DPO) Contact Information
ABeam Consulting (Thailand) Ltd. Q.House Lumpini Building,18th ,23rd Floor, 1 South Sathorn Rd, Thungmahamek, Sathorn, Bangkok 10120 Tel: 02-610-1100	Mr. Taro Matsumoto E-mail: tarmatsumoto@abeam.com

This Privacy Policy covers data subjects who are ABTH Clients and Third Parties including Employees’ Family Members, Prospective Clients, Event Participants, Job Applicants, Sub-Contractors, Visitors, and Housekeepers.

As used in this Privacy Policy, the following terms shall have the meanings set forth below:

‘Processing’ means anything done with ABTH Clients’ and Third Parties’ personal data, including collection, storage, use, disclosure and deletion.

‘Legal Bases’ means justifiable reasons to process personal data in accordance with Article 24 and Article 26 of PDPA.

This policy may be revised at any given time as notified to Clients and Third Parties through appropriate channels.

2. What personal data do we process?

ABTH processes these groups of personal data specified hereunder.

- Identity Data including but not limited to Name, Surname, Date of birth, Age, Gender, Nationality, National ID number, Signature, Educational background, Car Plate Number, and CV/Resume.
- Contact Data including but not limited to Mobile phone number, Work phone number, Home address, and Email address.
- Employment Data including but not limited to Position, Type of employment, Company Name and Working History.
- Financial Data including but not limited to Bank account number, Wage.
- Profile Data including but not limited to Photo, Video and CCTV recorded.
- Personal Interest Data including but not limited to Solution and Service preference
- Evidence including but not limited to Copy of ID Card, Copy of Household Registration, Copy of Passport, Marriage Certificate, Childbirth Certificate, Application Form and Receipt.

Apart from this, ABTH may also stores and processes sensitive data, including but not limited to:

- Fingerprint, Medical certificate, Preference and Dietary restrictions.

3. How do we collect your personal data?

In general, ABTH will directly collect Clients and Third Parties' personal data through these processes (or channels) including but not limited to:

Clients, Prospective clients, and Event participants

- Fill in Webinar registration or other marketing event form online platform such Zoom, MS Form, Google Form.
- Share via client's business card or client's preference communication channels such Email, Phone call, ABeam website, LinkedIn, and Facebook.
- Verbally inform to our employees or representatives.

Job Applicants

- Submit information via email or online job platform such LinkedIn, JobDBs or ABeam Website with attachments such CV/Resume.
- Referral Program

Sub-Contractors

- Submit information via email or online job platform such LinkedIn, JobDBs or ABeam Website with attachments such CV/Resume.

Employees' Family Members

- Fill in an activity-related form.
- Share evidences including but not limited to Copy of Passport, Marriage Certificate, Childbirth Certificate, Medical Certificate.

Housekeepers and Visitors

- Fill in an activity-related form.
- Verbally inform our employees or representatives.



However, Company may collect additional data through Third-party Organizations which include:

For Job Applicants

- Online job platform including but not limited to LinkedIn, JobDBs.
- Recruitment Agency including but not limited to Argyll Scott Recruitment, Pasona Recruitment, PRTR Recruitment, Manpower Professional and Executive Recruitment.

For Sub-Contractor

- Online job platform including but not limited to LinkedIn, JobDBs.
- Recruitment Agency including but not limited to Argyll Scott Recruitment, Pasona Recruitment, PRTR Recruitment, Manpower Professional and Executive Recruitment.

For Employees' Family Members

- Fill in by employees who is your family members.

For Event participants, Housekeepers, and Visitors

- Respective of your organization.

4. How does ABTH use your Personal Data?

ABTH uses Clients and Third Parties' personal data to carry out tasks per ABTH's scope and purpose of providing groups of activities, including but not limited to:

Group of Activities	Group of PII's	Legal Bases
Clients, Prospective Clients and Event Participants		
Webinar or Marketing Event [ROP ID: 2-1-1, 2-1-2, 2-1-3]	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Profile Data • Personal Interest Data 	<ul style="list-style-type: none"> • Consent
Marketing Mailer [ROP ID: 2-1-4]	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Profile Data • Personal Interest Data 	<ul style="list-style-type: none"> • Consent
Employee's Family Members		
Group Health Insurance [ROP ID: 1-2-5]	<ul style="list-style-type: none"> • Identity Data • Evidence • Sensitive Data 	<ul style="list-style-type: none"> • Performance of Contract • Consent
Company Activities [ROP ID: 4-1-7]	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data • Evidence • Sensitive Data 	<ul style="list-style-type: none"> • Legitimate Interest • Consent
Expat Visa and Work Permit [ROP ID: 5-1-1]	<ul style="list-style-type: none"> • Identity Data • Contact Data • Evidence 	<ul style="list-style-type: none"> • Legal Obligation
Job Applicants		
Recruitment [ROP ID: 1-1-1, 1-1-2]	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Evidence 	<ul style="list-style-type: none"> • Legitimate Interest (for general candidates) • Performance of Contract (for candidates who become employees)
Sub-Contractor		
Onboarding [ROP ID: 1-1-4, 1-1-6]	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Evidence 	<ul style="list-style-type: none"> • Performance of Contract
Payment Registration [ROP ID: 6-1-2, 6-1-3]	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Financial Data • Evidence 	<ul style="list-style-type: none"> • Performance of Contract
Contract Review [ROP ID: 1-1-7]	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data 	<ul style="list-style-type: none"> • Performance of Contract
Email Deactivation	<ul style="list-style-type: none"> • Identity Data 	<ul style="list-style-type: none"> • Performance of Contract

[ROP ID: 1-2-19]	<ul style="list-style-type: none"> • Contact Data • Employment Data 	
Visitors		
Temporary Building Access and Parking [ROP ID: 4-1-15, 4-1-17]	<ul style="list-style-type: none"> • Identity Data • Employment Data 	<ul style="list-style-type: none"> ● Legitimate Interest
Housekeepers		
Housekeeper Related Activity [ROP ID: 4-1-18]	<ul style="list-style-type: none"> • Identity Data • Employment Data • Sensitive Data 	<ul style="list-style-type: none"> ● Performance of Contract ● Consent

ABTH will process Clients and Third Parties’ personal data according to the stated purposes and scope. If there came upon a case where personal data were to be processed for other purposes unclarified above, ABTH would ask for new consent to process Clients and Third Parties’ personal data on such uses.

5. Usage of Personal Data with External Third-party Organization

ABTH may be required to exchange Customers’ and Third Parties’ personal data with external third-party organizations and process personal data in accordance with the contract or the legal obligation of ABTH. These organizations may include:

For Job Applicants

- Recruitment Agency including but not limited to Argyll Scott Recruitment, Pasona Recruitment, PRTR Recruitment, Manpower Professional and Executive Recruitment.
- Service Provider including but not limited to SAP.

For Employees’ Family Members

- Insurance Broker and Insurer including but not limited to TQM, Generali Thailand.
- Travel Agency including but not limited to H.I.S, World Surprise Thailand.
- Visa Agency including but not limited to Capital Relocation.

For the case where personal data is being passed on the external third-party organizations, ABTH will ensure that the minimum amount of personal data is being sent and consider anonymization and pseudonymization techniques for greater security. Nevertheless, external third-party organizations who will process Customers’ personal data for ABTH will be required to have an appropriate privacy policy. ABTH does not permit these external third-party organizations to use the Customers’ personal data in a way that diverge from the agreed scope and purpose.

6. Transferring Personal Data to Foreign Countries

ABTH may be required to pass on personal data to foreign countries, including, but not limited to

- Japan
- Hong Kong
- Malaysia
- Singapore
- South Korea
- US
- Australia
- EU

For these cases, ABTH will pass on Clients and Third Parties' personal data only when these requirements have been met. These include:

- Receiving foreign country has a substantial personal data regulation in place
- Receiving organization has a substantial privacy policy in place and certified by the Personal Data Committee
- Receiving organization is obligated to follow a substantial privacy policy with a sufficient remedial measure in accordance with the procedures identified by the Personal Data Committee (including, but not limited to, standard contract, vendor process agreement)
- A necessary task to exercise legal rights
- Consent has been received from appropriate individuals agreeing to the pass on of Customers' personal data to a foreign country that does not have a substantial privacy policy
- A necessary task to carry out contractual agreements of the Customers
- A necessary task to carry out under a contractual agreement between two entities for the benefit of the Customers
- To ensure the safety or limit further damage to an individual's health who cannot give consent at the current time
- A necessary task for the good of the public

7. Security Measures for Personal Data Protection

ABTH has implemented security measures to ensure the security of Clients and Third Parties' personal data. External third-party organizations must carry out the processing of personal data in accordance with ABTH's policy and agrees to ensure the security of Clients and Third Parties' personal data.

(More details are available at "ABeam Global Policy on Information Security").

8. Time Period of Personal Data Storage

ABTH will store Clients and Third Parties' personal data throughout for the appropriate period according to ABTH's scope and purpose including other important matters such as legal requirements, financing and auditing purposes

(More details are available at "ABeam's Data Retention Schedule").

9. Customers' Personal Data Rights

Your personal data rights include:

- Right of Access – you have the right to request a copy of all your personal data and assess if the company is processing your personal data in accordance with the law or not
- Right to Data Portability – for the case where a company has an automated platform allowing you to access your personal data automatically:
 - o You have the right to ask for your personal data to be transferred automatically to other organizations
 - o You have the right to ask for your personal data to be directly transferred to other organization, with the exceptions of cases where there is a technological limitation
- Right to Object – you have the right to object to any data process activity of your personal data for the legal bases, including:
 - o Legitimate Interest
 - o Direct Marketing Purposes
- Right to Erasure – you have the right to request data deletion or anonymization, in accordance to the following cases:
 - o Expiration of data processing required terms
 - o Consent has been withheld
 - o Objections raised on the data processing activity
 - o The processing activity is not in accordance with the law
- Right to restrict processing – you have the rights to restrict any data processing activities, in accordance with the following cases:
 - o During the process of personal data assessment as requested
 - o For cases related to personal data which has initially asked for deletion and erasure but was followed by an additional request of processing restriction instead
 - o For cases when the data processing terms have passed, but you have requested for processing restriction due to legal reasons
 - o During the process of personal data processing objection verification
- Right to Rectification – You have the right to edit your personal data to be correct and concurrent to the present. If any mistake was detected, the company might not edit this themselves.

In the cases where ABTH may not be able to carry out and exercise your rights, including, but not limited to, the cases where a legal process is taking place, you will continue to have the rights to retract your consent by emailing to all related parties. ABTH will be required to terminate all processes as soon as possible. However, the retraction only is carried out to all data processing after the retraction. Any data process activity carried out before the retraction will not be reversed.

Please be informed that ABTH does record all requests to ensure all issues are resolved. For any queries regarding your personal data protection and rights, more details are available at: [Thailand Data Protection Guidelines](#).

In the case where you have the intention to exercise your personal data protection rights, please contact ABTH's DPO (contact details given above). ABTH will process this request in a secure and timely manner. Also, in case that ABTH fails to preserve your rights under PDPA, you can file complaint to Office of the Personal Data Protection Commission ('PDPC')

10. Policy Revision

This Privacy Policy applies to all ABTH Clients and Third Parties and was last updated on 16/09/2021. ABTH holds the rights to review and edit the policy as the company sees fit. Any revision made will be notified to all related parties regarding the changes in data processing activity procedures.