

Privacy policy for Employees/ Associates

Applicable as from 30th May 2018

Version 1.0

Applicable as from 15th April 2022

Version 2.0

Applicable as from 1st May 2024

Version 3.0

Approved by:

Piotr Sadowski, Management Board member 01.05.2024

Justyna Polańska-Stenka, proxy 01.05.2024

Protection of privacy is important to us. We make every effort to secure your personal data and show you how we use them in a transparent manner. Some of the personal data listed in this Privacy Policy (“**Privacy Policy**”) are necessary to establish an employment relationship with you and result from the provisions of labour law. At the same time, we would like to inform you that your consent to the processing of your image is completely voluntary. Lack of your consent to the processing of your image will not be a basis for unfavourable treatment of you, and will not cause any negative consequences.

Since 25th May 2018 apply the European provisions on protection of data in the form of Regulation of the European Parliament and of the Council (EC) No 2016/679 dated 27th April 2016 on the protection of natural persons in relation to the processing of personal data and free flow of such data and revoking Directive no. 95/46/EC (General Data Protection Regulation) (Office Journal EU L 119 dated 4th May 2016, p.1) (“**GDPR**”).

Therefore, we want to inform you about the processing of your personal data and rules of processing them within the Company.

This Privacy Policy prepared by Thai Union Poland Sp. z o.o. with headquarters in Strzebielinek 22, 84-250, Gniewino, Poland (hereinafter referred to as the “**Administrator**” or “**we**”, “**us**”, or “**Company**” is directed are employees and associates of the Company, as well as former employees and associates of the Company. In addition, to a limited extent, it also applies to persons assigned to the Administrator in order to perform specific tasks by third parties (“**Third party personnel**”).

Your personal data and the image recorded on photography / monitoring, in particular the one provided by you or made during a photo session with us (“**Image**”), will be processed by the Administrator in accordance with the current provisions on the protection of personal data and the following rules.

1. Who is responsible for your personal data? (Administrator)

The Administrator of your personal data is Thai Union Poland Sp. z o.o. registered in the Register of Entrepreneurs of the National Court Register kept by the Gdańsk-Północ District Court in Gdańsk, 7th Commercial Division of the National Court Register, under KRS number 0000528505, NIP no. 5252598554.

2. How can you contact the Administrator?

On matters concerning the processing of your personal data by the Administrator you can contact us by e-mail to address rodo.kingoscar@thaiunion.com or via telephone number +48 58 670 65 00.

3. On the basis and for what purpose we process your personal data?

Personal data will be processed by us for the following purposes and on the following grounds:

- a. correct implementation of the employment contract or cooperation agreement concluded between us, i.e. on the basis of Art. 6(1) (b) of GDPR (**Contract**);
- b. fulfilment of our obligations under the provisions of labour law and social security, i.e. on the basis of Art. 6(1)(c) of GDPR (**Our obligation**);
- c. payment of benefits or intermediation in the payment of benefits not arising directly from the Contract, i.e. on the basis of Art. 6(1)(b) of GDPR (**Protection of your vital interests**);
- d. possible pursuit of claims under the Agreement or defence against such claims, i.e. on the basis of Art. 6(1)(f) of GDPR (**Our legitimate interest**); Our legitimate interest is to ensure the possibility of taking effective action in order to possibly pursue our claims against you, possible defense against claims that you may refer to us, as well as ensuring high quality of work by, for example, directing you for additional training, useful for a given position, as well as the need to manage, plan and organize work, including the functioning of the ticket or hotel reservation system for business trips, evaluation of employees' work, ensuring the safety of the workplace, including employees, protection of the Company's assets, ensuring the confidentiality of the Company's information;
- e. in order to execute legitimate interest of the Administrator, which consists of proper performance of contracts with third parties who send Personnel to us - on the basis of Art. 6(1)(f) of GDPR (legitimate interest);

- f. in the remaining scope, personal data may be processed on the basis of your consent, i.e. on the basis of Art. 6(1)(a) of GDPR; if you consent to the processing of your personal data, the content of this consent will define the purpose for which we will process your personal data; the above applies in particular to consent to the processing of the Image, unless its processing consists in recording by industrial cameras around and inside the Administrator's buildings on the basis of our legitimate interest.

In addition, in the case of special categories of personal data, in particular your health data, personal data will be processed by us for the following purposes and on the following grounds:

- a. to fulfil obligations and exercise specific rights in the field of labour law, social security and social protection, i.e. on the basis of Art. 9(2)(b) of GDPR;
- b. to establish, investigate or defend claims or in the course of administering justice by courts, i.e. on the basis of Art. 9(2)(f);
- c. in the remaining scope, personal data may be processed on the basis of your consent, i.e. on the basis of Art. 9(2)(a) of GDPR; if you consent to the processing of specific categories of your personal data, the content of this consent will define the purpose for which we will process your personal data.

If personal data is collected not directly from you, the Administrator receives them from entities directing you to the Administrator, and processes them in the following categories of data: identification data (including names, surname), data on the tasks performed by you (type, time) , data enabling verification of your ability to perform the entrusted tasks, and in the case of foreigners - data on the legality of employment.

4. What are your rights towards personal data?

You have the right to request access to your personal data, rectify and delete them, and also to request processing restrictions and data transfer.

You also have the right to object - for reasons related to your particular situation - to the processing necessary for the purposes of our legitimate interest.

In terms of data processed on the basis of consent, you have the right to withdraw your consent at any time, but the withdrawal of consent does not affect the lawfulness of the processing which was carried out on the basis of your consent before its withdrawal.

5. Provision of personal data

If you wish to establish a legal relationship directly linking you with the Company, providing your personal data is necessary to establish, shape and implement this legal relationship, and in the scope relating to the employment relationship specified in Art. 221 of the Labour Code and specific provisions it is the employee's obligation.

We can also receive data of individual persons from entities with whom we cooperate, and which entities refer you to the Administrator to perform tasks.

In the remaining scope, providing personal data is voluntary.

In addition, we may ask for optional data that do not affect the conclusion of the Agreement (however, in this case, the execution of the Agreement may be difficult, e.g. due to the lack of full contact details).

During the term of the Agreement, we come into possession of your other data (e.g. personnel data (years of service, salary rate), data on working time, awards granted, deductions, account numbers for bank transfers but also referring to health issues).

Their appearance with us is a consequence of the proper performance of the Agreement, including gaining new professional experience by you, and payment of additional benefits as well as performing legal duties or the need of protecting life and/or health of employees or other people or protection of property. We may receive some information, including health information, from other entities, e.g. entities providing occupational medicine services to us, from the Social Insurance Institution.

Providing your personal data in the form of an Image is voluntary. Failure to provide it may, in some situations of work / cooperation with Thai Union Poland Sp. z o.o. make internal communication and work organization difficult for us.

6. Do I have the right to lodge a complaint?

Should you believe that the processing of personal data is inconsistent with the provisions of the GDPR, you may lodge a complaint with the President of the Personal Data Protection Office.

7. Who do we share your personal data with?

We may share your personal data with the following recipients or categories of data recipients:

- a) Service providers providing services in connection with contracts concluded with us. In our contracts with such service providers, we require compliance with applicable data protection regulations. These are:
 - entities from the Company's group;
 - entities providing services in the field of medicine, including occupational medicine;
 - entities providing insurance and recreational services and security services;
 - entities providing banking services;
 - companies providing and servicing IT systems needed to ensure optimal operation and production in the Company.
 - if you are our representatives in relations with contractors (e.g. sales), your basic data, the so-called business data (name, surname, business telephone number, business e-mail address) are also made available to our contractors, in particular directly by you or your superiors.
- b) If such an obligation results from mandatory provisions of law, the Administrator may also disclose your personal data to third parties, in particular authorised state authorities.

8. How long do we store your personal data?

Personal data will be kept for the duration of the Agreement, as well as after its termination - until our obligation to archive documents related to the conclusion or performance of the Agreement or contract with a third party sending Personnel to us ceases, or until the limitation of mutual claims (depending on, which of the indicated circumstances will arise later). The data processed on the basis of consent will be stored until the consent is withdrawn, the Agreement is terminated or there is another reason indicated when giving consent.

9. Forwarding of personal data to third countries

In connection with your employment and the exchange of information between the Administrator and its final owner, i.e. Thai Union Group PLC (“TUG”), the data may be transferred outside the European Economic Area, i.e. to:

- Thailand (Bangkok) - due to global management, including human resources, by TUG;
- Singapore and Hong Kong (China) - due to the IT infrastructure possessed in these countries by the above-mentioned TUG;
- India - due to the functioning of the global employee accounting system for the needs of TUG.

The Administrator will forward them using mechanisms pursuant with the applicable Law, which include the EU Standard Contractual Clauses applied between the Administrator and TUG.

More information about existing securities implemented by the Administrator in order to ensure the processing of personal data according to appropriate provisions and about abilities to acquire the copies of data or place of data sharing can be acquired by contacting us in a way indicated in pt. 2 above.

At the moment, we do not plan to transfer your personal data to any other extent outside the European Economic Area. If something in this matter should change, the current information will be available on the Administrator's website.

10. Automated decision making

The Administrator does not perform automated decision making, including profiling based on personal data forwarded by you.

11. Fulfilment of the information obligation towards family members

Whenever you provide us with personal data of other persons, e.g. family members for the purpose of using social benefits, other benefits, you undertake to inform them about the above-mentioned. information, in particular, who is the administrator of their data, what data you have provided to us and for what purpose. The basis for the processing of this data by us will be the vital interest of that person. Please do not forget to also inform about the data indicated in the last two points.

Annexes:

1. Annex 1: Confirmation of getting acquainted with the Privacy Policy for employees / associates
2. Annex 2: Consent to the image use

Annex 1:

Confirmation of getting acquainted with the Privacy Policy for Employees/Associates

I hereby confirm that Thai Union Poland, when obtaining my personal data, provided me with all the information contained in the Privacy Policy for Employees/Associates, I have read and accepted them.

Date, employee's/associate's signature

Annex 2:

Consent to the image use

.....

(Name and surname)

.....

(date of statement)

STATEMENT

I consent to the free recording, unlimited with respect to territory and time use and dissemination of my image (Image) recorded in multimedia materials (e.g. photos, films) by Thai Union Poland Sp. z o.o. (Company) or entities associated with the Company for the purposes of external communication in advertising and/or industry publications (both electronic and paper) available in the form of brochures, leaflets, newspapers, presentations, films, for external communication in press publications, in the electronic media and on official websites or social media profiles of the Company or entities associated with the Company. The consent is expressed on the basis of the act on copyright and related rights.

.....

(Name and surname)

I declare that I acknowledge all information provided to me about the processing of my personal data, in particular the fact that Thai Union Poland Sp. z o.o. is the administrator of personal data in the form of my Image, which it processes:

- on the basis of Art. 6(1)(f) of the General Data Protection Regulation (GDPR), i.e. based on the legitimate interest of the administrator, which is the need to manage, plan and organise work by using the Image in internal communication, i.e. in the internal e-mail address book; for the purposes of internal communication in the materials published in company newsletters, materials from company events, i.e. integration meetings, occasional meetings and sports competitions; for communication purposes and work organisation in the internal company network -

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intranet available for employees/persons cooperating with Thai Union Poland Sp. z o.o.;

- on the basis of Art. 6(1)(a) of GDPR, i.e. based on the consent granted for external communication in advertising and/or industry publications (both electronic and paper) available in the form of brochures, leaflets, newspapers, presentations, films, for external communication in press publications, in electronic media and on official websites or social media profiles of the Company or entities related to the Company; which I hereby consent to. Consent is given on the basis of the GDPR.

.....

(Name and surname)

Information on data processing:

- the administrator of personal data is Thai Union Poland Sp. z o.o. (PDA);
- personal data in the form of an Image will be processed by PDA only for the purposes specified above in the statement;
- data recipients may be entities providing PDA with marketing services, online platforms through which such services are performed, entities using the same marketing services together with PDA, entities related to PDA personally or by capital;
- in the case of data processed on the basis of Art.6 (1) (f) of GDPR, you have the right to object, and in the case of the basis of Art.6 (1) (a) - withdrawal of consent at any time (while the withdrawal of consent does not affect for the lawfulness of processing, which was carried out on the basis of consent expressed before its withdrawal), and in any case, the right to request access to your personal data, rectify and delete them, and also to request restriction of processing and their transfer;
- data processed on the basis of consent will be stored until the consent is withdrawn, and on the basis of the legitimate interest of the administrator - until the end of the legitimate interest;
- other information on the processing and protection of personal data can be found in the Privacy Policy for Employees/Associates in force at PDA.