**Workplace Privacy Policy**

## Scope and purpose

* + 1. We value your privacy and want to be accountable and fair to you as well as transparent with you with regard to our collection and use of your personal data. Workplace is an online platform created by Facebook that allows you as a user to collaborate and share information at work. The Workplace platform includes the Workplace Premium websites, apps and related online services (below together the "**Service**").
    2. This privacy policy ("**Privacy Policy**") describes how your information is collected, used and shared when you use the Service and applies to the processing of your personal data conducted in relation to the use of the Service.
    3. The Service is provided to you by your employer [*Securitas Security Guard (Thailand) Ltd.*].If you act as a consultant on behalf of [*Securitas Security Guard (Thailand) Ltd.*], the Service is provided to you by [*Securitas Security Guard (Thailand) Ltd.*] that has authorised your access to, and use of the Service.
    4. [*Securitas Security Guard (Thailand) Ltd.*] ("**Securitas**", "**we**" or "**us**") is the data controller of the personal data processed about you in relation to your use of the Service. Please see further contact details below.
    5. Please note that the Service is separate from other Facebook services that you may use, such other Facebook services are provided to you by Facebook and are governed by their own terms. For the avoidance of doubt, this Privacy Policy is not applicable to any such services.

## What kind of information is collected about you

Securitas may collect and process the following kinds of information when you, your colleagues or other users within Securitas Group access the Service:

* your contact information, such as full name and email address;
* your username and password;
* your work title, department information and other information related to your work or Securitas;
* the content, communications and other information that you provide when you use the Service, including when you sign up for an account, create or share content, and message or communicate with others. This can include information in or about the content that you provide (e.g. metadata), such as the location of a photo or the date a file was created;
* content, communications and information that other people provide when they use the Service. This can include information about you, such as when they share or comment on a photo of you, send a message to you or upload, sync or import your contact information;
* all communications with other users of the Service;
* user communications, feedback, suggestions and ideas sent to Securitas;
* billing related information (i.e. whether your account has been active the last month) ; and
* information that you provide when you or Securitas contact or engage platform support regarding the Service.

## How we use your personal data

We use your personal data for the following purposes and based on the following legal basis:

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| 1. **Purpose of the processing** | 1. **Legal basis for the processing** |
| 1. Your personal data is processed in order for Securitas to be able to provide you with a user account, give you access to the Service and administrate your user account in the Service. | Consent |
| 1. Securitas may also use your personal data in order to control, prevent, investigate or carry out other measures in connection with misuse of the Service or violations against the terms of use for Workplace, the Acceptable Use Policy or this Privacy Policy or in connection with legal measures, suspicion of fraud or potential threats against Securitas' or third party rights. | The processing is carried out on the basis of legitimate interest after a balancing of interests where Securitas has pursued the following legitimate interests:Securitas' interest of investigating any suspicion of misuse of the Service and taking measures against any misuse of the Service or any violation against the terms of use for Workplace, the Acceptable Use Policy or this Privacy Policy;Securitas' interest of investigating and producing evidence regarding criminal activity or threat against its interests;a third party's interest of investigating and proving criminal activity or threat against its interests; and/or[*Thailand*] or foreign authority's interest of conducting law enforcement activities and collecting evidence for such purposes. |

## Sharing of your personal data

We share your personal data with the following categories of recipients under the following circumstances and for the following reasons:

Employees of [*Securitas Security Guard (Thailand) Ltd.*]: Our employees will only process your personal data if it is necessary in order for them to carry out their tasks and such employees only process your personal data on our instructions and in accordance with this Privacy Policy.

Third party service providers: We share your personal data with third party service providers who assists Securitas by providing certain services in relation to Securitas business and therefore processes personal data on Securitas' behalf. This will include:

* IT infrastructure providers, developers and hosting providers;
* IT support service providers; and
* other third party service providers such as software providers and service providers, which facilitates or provides certain services to us in order for us to be able to provide you with access to the Service.

These third party service providers are authorised to use your personal data only as necessary to provide its services to us and they do not have any independent right to process or share your personal data.

Securitas will, furthermore, share your personal data that Securitas collects with Facebook, as ultimate provider of the Service, in order to provide and support the Service, and in accordance with any other instructions received. Examples of such use include:

* communicating with users and administrators regarding their use of the Service;
* enhancing the security and safety of the Service for Securitas and other users, such as by investigating suspicious activity or breaches of applicable terms or policies;
* personalising your and Securitas' experiences as part of the provision of the Service;
* developing new tools, products or services within the Service for Securitas;
* associating activity on the Service across different devices operated by the same individual to improve the overall operation of the Service;
* to identify and fix bugs that may be present; and
* conducting data and system analytics, including research to improve the Service.

Group companies: We share your personal data with our subsidiaries or affiliated companies who process your personal data on our behalf. These parties are required to only process such personal data based on our instructions and in accordance with this Privacy Policy. They do not have any independent right to process or share your personal data.

Other users: Your personal data may be available to other users of the Service. Such data will only be shared with other users within your company and within Securitas Group.

## Transfer of your personal data outside the EU/EEA

The personal data that we collect from you may be transferred to and processed in a country outside the EU/EEA (i.e. a so-called third country), including countries which the EU Commission does not consider to have an adequate level of protection for personal data. In such case we will take all necessary steps required under applicable law in order for such transfer of your personal data across borders to be compliant with applicable law. We will only transfer your personal data to a country outside the EU/EEA where; (i) the EU Commission has decided that the third country ensures an adequate level of protection, (ii) the transfer is being safeguarded by the use of EU model clauses (under Article 46.2 in the General Data Protection Regulation (2016/679) ("**GDPR**")) or (iii) the recipient is certified under the US-EU Privacy Shield Framework (under Article 45 in the GDPR). You can find further information about the rules on data transfers outside the EU/EEA, including the mechanisms that we rely upon, on the European Commission website which you can visit by clicking [here](https://ec.europa.eu/info/law/law-topic/data-protection_en).

## Third party links and content

The Service may include links to websites and services provided and maintained by third parties. Such third party websites and/or services may have their own terms of use and privacy policies and your use of such websites and/or services will be governed by and subject to such terms of use and privacy policies. You should review the terms of use and privacy policy for each website and/or service that you visit/use. You understand and agree that Securitas does not endorse and is not responsible for the behaviour, features or content of any such third party websites and/or services or for any transaction you may enter into with the provider of any such websites and/or services.

## Retention

* + 1. Your personal data is saved for as long as you have a user account in the Service. Securitas will not save your personal data after your user account have been deactivated or terminated, unless saving the data is required to comply with legislation or to protect the legal interests of Securitas (e.g. in connection to an ongoing legal process) and in such event only as long as it is necessary to fulfil the purpose with the continued processing.
    2. Please note that content you create and share on the Service is owned by Securitas and may remain on the Service and be accessible even if Securitas deactivates or terminates your user account (i.e. content that you provide on the Service is similar to other types of content (such as presentations or memos) that you may generate in the course of your work).

## Your rights

* + 1. You may access, correct or delete information that you have uploaded to the Service using the tools within the Service (for example, editing your profile information or via the activity log). If you are not able to do so using the tools provided in the Service, please see further details of your rights below and contact us directly if you want to exercise any of your rights.
    2. You have the right to access the personal data processed by us about you and receive a copy of the personal data we process about you by requesting a so-called register extract. Please note that if we receive an access request from you we might request further information from you to ensure an efficient handling of your request and to ensure that the information is provided to the right person.
    3. You have the right to, without undue delay, get incorrect personal data that we process about you corrected. This also includes the right to, taking into account the purpose(s) of the processing, supplement potential incomplete personal data we process about you.
    4. You have the right to have your personal data deleted without undue delay and Securitas is obliged to delete your personal data without undue delay if, for example the personal data is no longer necessary in relation to the purpose for which they were collected or otherwise processed, or if you withdraw consent on which the processing is based and where there is no other legal ground for the processing. Please note that we are not obliged to delete the personal data if we can show that the processing is necessary, for example, for compliance with a legal obligation to which Securitas is subject or the establishment, exercise or defence of a legal claim, or when there are other legitimate grounds to keep the data.
    5. Furthermore, you have the right to request that Securitas restricts the processing of your personal data under certain conditions, for example if you contest the accuracy of the personal data, the processing may be restricted for a period enabling Securitas to verify the accuracy of the personal data or if Securitas no longer needs the personal data for the purposes of the processing but you require the personal data for the establishment, exercise or defence of legal claims.
    6. You have the right to object, on grounds relating to your particular situation, at any time to Securitas' processing of your personal data if the processing is based on, for example, legitimate interests. If you object to such processing, Securitas will no longer be entitled to process your personal data based on such legal basis, unless Securitas can demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedom or if it is conducted for the establishment, exercise or defence of a legal claim.
    7. You have, under certain conditions, the right to receive the personal data concerning you and which you have provided to Securitas, in a structured, commonly used and machine-readable format and have the right to transmit such personal data to another data controller without Securitas trying to prevent this, where Securitas' processing of your personal data is based on your consent or on a contract and the processing is carried out by automated means. You have in such case the right to request that the personal data from Securitas shall be transmitted directly to another data controller, where technically feasible.
    8. You also have the right to, at any time, withdraw your consent given to Securitas for the processing of your personal data by [*insert description of the process on how consent is to be withdrawn*]. If you withdraw your consent, please note that this does not affect the lawfulness of the processing based on your consent before its withdrawal and that Securitas may, under certain circumstances, have another legal ground for the processing and therefore may be entitled to continue the processing. Please bear in mind that if you withdraw your consent, Securitas may not be able to provide you with access to your user account in the Service and it may not be possible for you to use the Service.
    9. You have the right to lodge a complaint with a competent supervisory data protection authority in your country of residence, the country you work in or in the country where the alleged infringement has occurred if you believe we have processed your personal data in contrary to applicable data protection legislation.
    10. If you wish to receive a copy of the personal data we process about you, or if you want to exercise any of the above mentioned rights, please contact us (please see contact information below).

## Changes to this Privacy Policy

Securitas reserves the right to make changes to this Privacy Policy. Securitas will, prior to making any material changes to this Privacy Policy provide you with prominent notice as appropriate under the circumstances, e.g. by displaying a prominent notice in the Service.

## Contact information

If you have any questions regarding the processing of your personal data, this Privacy Policy or otherwise have comments on Securitas' processing of your personal data, please contact us or contact our data protection officer on:

Securitas Security Guard (Thailand) Ltd.

29/1 Piyaplace Langsuan Building, Unit 2AB, 2nd Floor, Ploenchit Road, Lumpini, Pathumwan, Bangkok 10330

E-mail: info@securitas.co.th

Contact our data protection officer on:

Securitas Security Guard (Thailand) Ltd.

Att: Data Protection Officer

29/1 Piyaplace Langsuan Building, Unit 2AB, 2nd Floor, Ploenchit Road, Lumpini, Pathumwan, Bangkok 10330

E-mail: info@securitas.co.th