



# **Personal Data Retention Policy**

**PRIMO SERVICE SOLUTIONS PUBLIC COMPANY LIMITED**

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## Table of Contents

1. Introduction .....	3
2. Objective .....	3
3. Definitions .....	3
4. Scope .....	5
5. Data Storage Locations .....	6
6. Document Protection .....	6
7. Document Disposal .....	6
8. Retention and Retention Period of Personal Data .....	7



## 1. Introduction

Primo Service Solutions Public Company Limited (“the Company”) recognizes the importance of personal data protection, as safeguarding personal data is an integral part of the Company's corporate social responsibility and serves as a foundation for building trustworthy business relationships with its customers. The Company is therefore committed to complying with the Personal Data Protection Act, applicable regulations, guidelines, ministerial regulations, and other relevant laws.

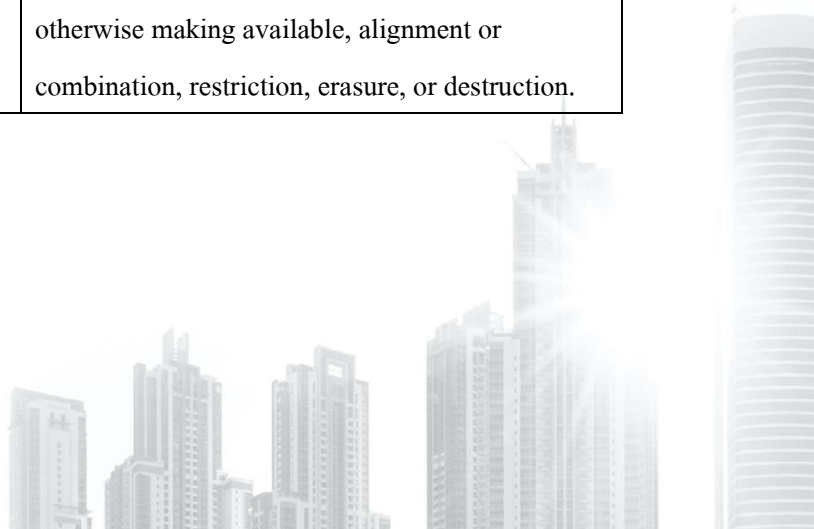
The purpose of this Policy is to establish procedures for the storage of documents containing personal data, ensuring that personal data within the Company is protected in accordance with the Personal Data Protection Act B.E. 2562 (2019), including the determination of appropriate retention periods for documents containing personal data.

## 2. Objective

The objective of this Policy is to establish guidelines for the storage of documents containing the Company's personal data to ensure that such documents are retained only for as long as necessary and are stored in accordance with business requirements and the Personal Data Protection Act B.E. 2562 (2019).

## 3. Definitions

<p>Personal Data Processing</p>	<p>Any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, including collection, recording, organization, structuring, storage, alteration or modification, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.</p>
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Data Erasure/Destruction	The process of permanently deleting or destroying personal data so that it cannot be recovered, reconstructed, or restored by any means, whether performed by the data subject, the data controller, or the data processor.
Personal Data Protection Law	The Personal Data Protection Act B.E. 2562 (2019), including any amendments thereto, as well as all applicable regulations, rules, notifications, and related orders.
Data	Information in any form, whether electronic or non-electronic, that is received from or held by the data subject, the Company's business partners, or third parties.
Personal Data	Any information relating to an individual that enables the identification of such individual, either directly or indirectly, excluding information relating to deceased persons, as defined under Section 6 of the Personal Data Protection Act B.E. 2562 (2019). Examples include a person's name, surname, email address, fingerprint, and national identification number, which can directly identify an individual, as well as location data and cookie data, which may indirectly identify an individual.
Data Subject	A natural person who can be identified, directly or indirectly, by reference to personal data.
The Company	Refers to the group of companies under Primo Service Solutions Public Company Limited as of July 2022, comprising Passion Realtor Co., Ltd., Primo Management Co., Ltd., Crown Residence

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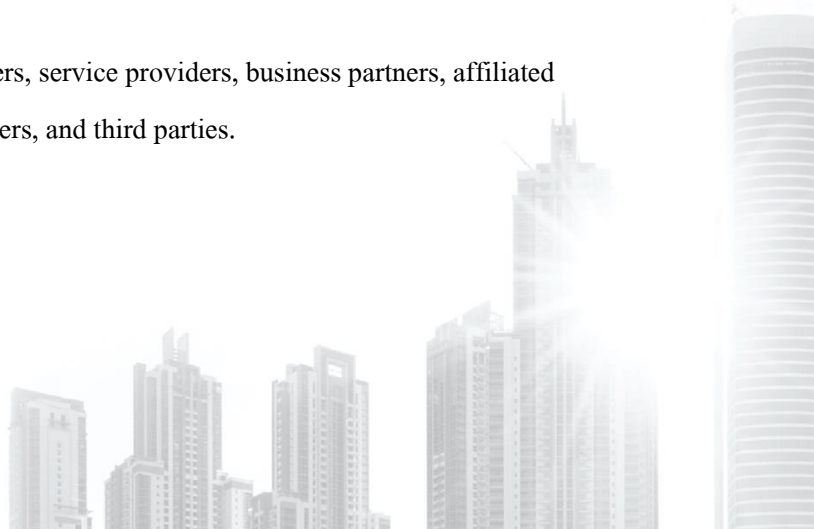
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	Co., Ltd., WYDE Interior Co., Ltd., UNO Service Co., Ltd., United Project Management Co., Ltd., UPM Design Studio Co., Ltd., and Hampton Hotel and Residence Management Co., Ltd.
Third Party	Any natural person, juristic person, government office, government agency, or other entity other than the data subject, the Company, the data processor, or any person authorized by the Company or the data processor to directly process personal data.
Data Processor	A person or entity that processes personal data by collecting, using, or disclosing such data on behalf of, or under the instructions of, the data controller.
Document	Any document containing personal data that is created, collected, stored, or otherwise processed by the Company, whether in electronic form (soft copy) or paper form (hard copy). This includes copies of documents, such as paper photocopies, as well as electronic copies, including images, scanned documents, or other electronic file formats.

#### 4. Scope

This Personal Data Retention Policy applies to:

- Employees, consultants, contractors, workers, service providers, business partners, affiliated organizations, employees of business partners, and third parties.



- All documents containing personal data that are created, collected, stored, or processed by the Company, whether in electronic form (soft copy) or paper form (hard copy).

## **5. Data Storage Locations**

### ***5.1 Electronic Documents, Emails, and Multimedia Records***

All electronic documents, emails, and multimedia records shall be stored in appropriate locations to ensure that security measures are implemented in accordance with the requirements of the Personal Data Protection Law, as well as other applicable laws, regulations, guidelines, and related orders.

### ***5.2 Paper Documents***

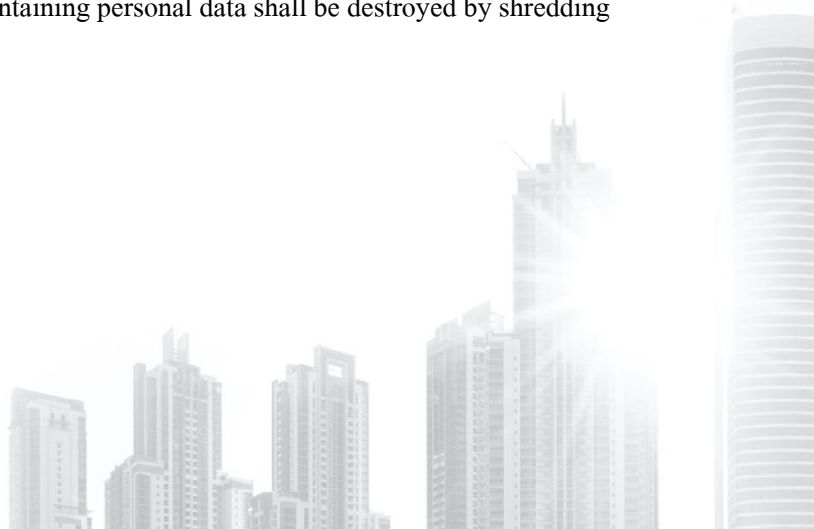
Paper documents required for day-to-day business operations shall be stored in filing cabinets or desk drawers when not in use. Employees are required to lock filing cabinets and desk drawers containing documents with personal data at the end of each working day.

## **6. Document Protection**

The Company is committed to protecting documents containing personal data under its control from loss, unauthorized access, use, alteration, modification, or disclosure. Documents containing personal data, whether in paper or electronic form, shall be securely stored until they are destroyed. The Company shall implement appropriate technologies and processes, which are regularly reviewed, to ensure the security and protection of personal data.

## **7. Document Disposal**

Upon the expiration of the personal data retention period or when the personal data is no longer necessary for the purposes of processing, paper documents containing personal data shall be destroyed by shredding by personnel authorized to perform such tasks.



Personal data stored electronically shall be permanently deleted from storage media, or the storage media (such as hard disk drives) shall be physically destroyed or erased using methods that prevent data recovery. Such disposal shall be carried out only by authorized personnel.

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

The Company shall establish clear retention periods for the collection and storage of personal data in accordance with the purposes for which the personal data was collected and processed. Such retention periods may be determined based on applicable laws, business practices, or recognized processing standards.

The Company shall implement procedures to review and delete or destroy personal data upon the expiration of the applicable retention period, upon the exercise of data subject rights under the Personal Data Protection Law, or where otherwise required by law or in accordance with the Company's Personal Data Disposal Policy.

This Policy shall be effective from 26 July 2022 onwards.

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(Mr. Maroj Wananan)

Chairman of the Board of Directors

Primo Service Solutions Public Company Limited