

# Privacy Policy

## 1. Introduction

- 1.1 Puumsoft Company Limited is committed to safeguarding the privacy of Puumsoft COACH applications software ("**COACH**") users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of COACH; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We do not own the data that is collected by COACH, and therefore, do not possess the right to further process the personnel data collected, except for use by the application for human resources management purposes only. Use of the data is controlled by the corporate licensee of the COACH.
- 1.4 COACH incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify who gains access to personnel data and their rights to process that data with COACH functions. Under no circumstances will Puumsoft publish user data or make use of such data without the written permission of the corporate licensee of COACH.

## 2. How We Use Your Personal Data

- 2.1 COACH may process personnel data of corporate employees that also contains personal information ("**personal profile data**") that may include birth date, national identification number, tax identification number, gender, photos, home address, marital status, number of off-springs, interests and hobbies, educational details, salary history, health information, etc. The personal profile data is used for the purpose of keeping employee/personnel records and for human resources management within the corporation where the employee works. This process is under the control of the corporate licensee of COACH, not Puumsoft.
- 2.2 COACH may collect information on your use of COACH ("**usage data**"). The usage data may include information about the timing, frequency and pattern of your service use. This usage data may be processed for the purposes of analysing the use of COACH. The legal basis for this processing is employee consent via employment contract or the corporate licensee's and Puumsoft's legitimate interests, namely, monitoring and improving COACH.
- 2.3 COACH may process your account data ("**account data**"). The account data may include your name and email address. The account data may be processed for the purposes of operating COACH, providing COACH services, ensuring the security of COACH, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is employee consent via employment contract or the corporate licensee's and Puumsoft's legitimate interests, namely, providing services of COACH and monitoring and improving COACH.

- 2.4 COACH may process your personal data that is provided in the course of the use of COACH ("**service data**"). The service data may include personal profile data, salary levels, time attendance, benefit details, hiring and firing, income deductions and extras, etc. The source of the service data is you or your employer. The service data may be processed for the purposes of operating COACH, ensuring the security of COACH, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is employee consent via employment contract or the corporate licensee's and Puumsoft's legitimate interests, namely, providing services of COACH and monitoring and improving COACH.

### **3. Providing Your Personal Data to Others**

Puumsoft will not disclose, publish or provide your personal data to others without the written consent of or direction by our corporate licensee of COACH, to others. You understand that privacy cannot be guaranteed if personal user data is published by your corporate office.

### **4. Changing, Retaining and Deleting Personal Data**

- 4.1 Personal data that COACH processes for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.2 If you would like to change any personal information in COACH, please contact your personnel department in your corporate offices. Puumsoft does not change personal information in COACH without the written permission of and direction from our corporate licensee of COACH.
- 4.3 COACH will retain your personal data as long as dictated by the retention (e.g. archiving) policy of our corporate licensee of COACH. Puumsoft does not retain or delete user personal data.

### **5. Amendments**

We may update this policy from time to time by publishing a new version on our website ([www.puumsoft.co.th](http://www.puumsoft.co.th)).

### **6. Security and Inquiry**

Puumsoft takes security of user data very seriously. If there is a breach in security of data or you have an inquiry with data management in COACH, please report the breach or inquiry to your IT department in your corporate offices or directly to Puumsoft.