



(Translation)

CCTV Privacy Notice

Bangkok Commercial Asset Management Public Company Limited (hereinafter called “the Company”) is in preparation for using closed-circuit television (CCTV) for surveillance of the areas in and around the Company’s office building (areas) to protect life, health and properties. The Company has collected personal data of its employees, work operators, customers, contract employees, contractors, visitors or any persons (hereinafter collectively called “you”/“your”) who enter the areas through the use of CCTV surveillance equipment.

This CCTV Privacy Notice (“Notice”) provides the information on the compilation, use or disclosure of data which can be used to identify you (“personal data”) and your rights as follows:

1. Legal Bases for Personal Data Processing

The Company collects your personal data on the legal bases for the Company’s lawful interests or those of other persons and such interests are no inferior to the basic rights of your personal data.

2. Purposes of Personal Data Compilation

The Company compiles your personal data for the following purposes:

1. To protect your personal health and safety as well as your properties.
2. To protect the Company’s building, facilities and properties from damage, obstruction or destruction of properties, or other crimes.
3. To support relevant agencies in law enforcement to suspend, prevent, search and take legal actions.
4. To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
5. To assist in the investigation or complaint handling proceedings.
6. To assist in the proceedings concerning initiation or prevention of civil lawsuits including, but not limited to, legal prosecution in connection with employment.

3. Personal Data Compiled and Used by the Company

According to the purposes described in Clause 2, the Company has installed CCTVs in visible locations and placed signages to alert that CCTVs are in operation at the entrance and exit as well as in the areas deemed appropriate by the Company to be under surveillance in order to collect your personal data when you enter the areas as follows:

List of Collected Personal Data
<ul style="list-style-type: none">● Picture● Moving picture● Voice● Picture of your properties such as vehicle, bag, hat, outfit, etc.

However, there are no CCTVs installed in the areas that may unreasonably violate your basic rights, i.e. coffee-break room, toilet, shower room or relaxation areas for work operators.

4. Disclosure of Your Personal Data

The Company keeps confidential the data from the CCTVs which is related to you and will not disclose it unless in case necessary to enable the Company to achieve the surveillance purpose as stated in this Notice. The Company may disclose the CCTV-recorded data to the following types of persons or juristic entities:

1. Agencies having the authority prescribed by law to assist and support the law enforcement or to conduct the investigation, interrogation or legal prosecution.
2. Service providers that are external parties due to necessity to build confidence in the protection or suppression of danger to your life, body, health and properties and those of others.

5. Your Rights under Personal Data Protection Act B.E. 2562 (2019)

The Personal Data Protection Act B.E. 2562 (2019) is aimed to enable you to have more control over your personal data. You may exercise your rights under the Personal Data Protection Act B.E. 2562 (2019) upon the effectiveness of the provisions concerning the rights of personal data owners, of which details are as follows:

1. Right of access to data: The data owner may request to see his/her personal data in the Company's possession and to obtain a copy of such data.
2. Right of rectification: The data owner may notify the Company to rectify his/her personal data if such data is found to be incorrect or incomplete.

3. Right of erasure: The data owner may request the Company to erase his/her personal data if it is found to be no longer needed for use.
4. Right to prohibit processing of personal data or right to object processing of personal data: The data owner may request the Company to stop or suspend the processing of his/her personal data.
5. Right to withdraw consent: If the data owner has consented to the Company's processing of personal data in any subjects, the data owner may withdraw such consent at any time.
6. Right of data portability: The data owner may request the Company to send a copy of his/her personal data in the Company's possession to another personal data controller in a structured form of common usage and computer readability.

Use of the above-mentioned rights of the personal data owner may be restricted by the relevant laws and, in some cases, when it is necessary for the Company to reject or be unable to fulfill the request to exercise your rights mentioned above, such as for compliance with the law or court order, public benefits, use of rights which may violate the rights or freedom of others, etc. To reject such request, the Company must notify the personal data owner of the reasons for the rejection.

In case the personal data owner is notified of such rejection to the request to exercise the rights or it is viewed that the Company breaches or fails to comply with the Act, the personal data owner may lodge a complaint to complaint-receiving unit of the Company or regulatory authorities under the law.

6. Personal Data Storage Period

To achieve the surveillance purpose with the use of CCTVs under this Notice, the Company retains CCTV-recorded personal data related to you for a period of no longer than 90 days from the date you enter the Company's building or premises or after the end of the legal prosecution period. Upon the end of the storage period, the CCTV-recorded data will be erased or destroyed accordingly.

7. Personal Data Security Protection

The Company has in place appropriate security measures in both technical and management terms to protect your personal data and prevent data loss or unauthorized access, erasure, destruction, use, alteration or disclosure of personal data in accordance with the Company's information and cyber security policy and procedure.

In addition, the Company has formulated and announced organization-wide the personal data protection policy and procedure in order to ensure security in the compilation, use or disclosure of personal data and to

maintain confidentiality, integrity and availability of personal data. Review of such policy and this Notice is performed periodically as appropriate.

8. Responsibility of Personal Data Controller

The Company allows only the concerned officers who are authorized to collect, use or disclose of personal data for this processing activity to access your personal data. The Company also manages to ensure the officers' strict compliance with this Notice.

9. Amendment of Privacy Notice

With regard to improvement or amendment of this Notice, the Company may consider an amendment as deemed appropriate and will keep you informed via the Company's website with the date of the latest version indicated at the bottom part. However, you are recommended to check the update of the Notice on a regular basis and in particular before entering the Company's premises.

Your entry into the Company's premises is regarded as acceptance of the agreement in this Notice. Please suspend your entry if you disagree with the agreement in this Notice. If you still enter the Company's areas after this Notice has been amended and publicized via the afore-mentioned channel, you are assumed to have already acknowledged such amendment.

10. Contact and Enquiries

Contact and enquiries regarding this Notice can be made through:

1. Data Controller

- Name: Bangkok Commercial Asset Management Public Company Limited
- Address: 99 Surasak Road, Silom Sub-district, Bangrak District, Bangkok 10500 or branch offices
- Channels: Tel. 0-2630-0700 Ext. General Administration Department/Offices

2. Data Protection Officer (DPO)

- Address: 99 Surasak Road, Silom Sub-district, Bangrak District, Bangkok 10500
- Contact: E-mail: dpo@bam.co.th

Given on February 7, 2022.