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**CCTV PRIVACY POLICY OF
KAMKOONG PROPERTY CO., LTD.**

We, Kamkoong Property Co., Ltd. (the “**Company**”), use CCTV for monitoring both the area inside and surrounding areas outside the buildings and premises of the Company and of BTS Group of Companies (the “**Buildings and Premises**”) in order to protect life, health and property. We collect the personal data of customers, staff, directors, service providers, employees, visitors, and other person who access the Buildings and Premises (collectively “**you**”) through CCTV. This privacy policy (the “**Privacy Policy**”) explains how we collect, use and/or disclose information which can be used to identify an individual (the “**Personal Data**”).

From time to time, we may adjust and/or updated this Privacy Policy which we will provide additional notification if there is a significant adjustment and/or update. The date of the latest adjustment and/or update will be specified at the top of the Privacy Policy. We encourage you to carefully read this Privacy Policy and regularly check the Privacy Policy to review any adjustment and/or update we might make in accordance with the terms of this Privacy Policy.

1. WHAT PERSONAL DATA WE COLLECT

We collect images or motion pictures and images of your property, such as your vehicle, once you access the areas, building and premises under surveillance through the CCTV (“**CCTV Information**”).

2. THE PURPOSE FOR COLLECTION, USE, AND/OR DISCLOSURE OF YOUR PERSONAL DATA

2.1. We may collect, use, disclose, transfer and process, including ,but not limited to, record, hold, adjust, change, modify, destroy, erase, recover, compile, copy, deliver, store, separate, improve, or add information from CCTV and other Personal Data relating to you for **the purposes of setting up the CCTV** as follows:

- a) For protection of your health and safety, including your properties;
- b) For protection of the Buildings and Premises and properties from damage, difficulty, destruction and other crime;
- c) For government agency support relating to the enforcement of the laws for obstruction, prevention, and detection of crime, including prosecution once a crime occurs;
- d) For effective dispute resolution relating to dispute which arises during disciplinary process or complaint process;
- e) For inquiry or proceedings relating to complaints or whistleblowing; and/or
- f) For creation of rights, dispute of rights, or exercise of rights against civil proceeding, including, but not limited to labour case proceedings.

2.2. We will set up CCTV in areas that are easy to be seen, in addition, we will not set up CCTV in office of staff, changing room, restroom, bathroom, or other areas which are indicated as resting areas for staff.

2.3. The Company’s CCTV will operate 24 hours every day without audio record.

- 2.4. We will display billboard at the entrance, exit, and other areas under surveillance by the CCTV in order to inform you that there is an operating CCTV in the area.

3. LEGAL BASIS FOR COLLECTION, USE, AND/OR DISCLOSURE OF YOUR PERSONAL DATA

We will not collect, use, disclose, transfer and/or process, including ,but not limited to, record, hold, adjust, change, modify, destroy, erase, recover, compile, copy, deliver, store, separate, improve, or add information from CCTV and other Personal Data relating to you without your consent except:

- a) **For protection of vital interest:** as necessary for protecting or preventing danger towards life, body or health of a person;
- b) **For legitimate interests:** as necessary for the Company's legitimate interests in safeguarding your health and safety, including your properties, our buildings, premises, and properties and to process any other proceedings pursuant to the purposes of the setting up of the CCTV. We will balance our legitimate interests with legitimate interests of relevant third parties as the case may be, including your fundamental rights of data protection relating to data from CCTV relating to you. In addition, we will try to find steps and measures for acquiring the said balance as appropriate;
- c) **For legal obligations:** we have the duty to comply with applicable laws, including, but not limited to, laws relating to safety and work environment. We view that the use of CCTV is a necessary measure in order for us to comply with the said obligation.

4. TO WHOM WE DISCLOSE YOUR PERSONAL DATA

- 4.1. We will keep data relating to you from CCTV in secret and will not disclose or transfer such data to any person, except for the BTS Group of Companies, third party carefully selected, both at present or in the future, to perform service as we request, assignee, partner of joint venture, and/or service provider pursuant to the purposes of the setting up of the CCTV as specified in this Privacy Policy.
- 4.2. A third party which we may disclose data from CCTV and other Personal Data relating to you include the followings:
 - a) **BTS Group of Companies:** we may disclose or transfer data from CCTV other Personal Data relating to you to the BTS Group of Companies (please see the list of the BTS Group Companies at <https://www.rabbitholdings.co.th/th/corporate-governance/personal-data-protection-policies> for the legitimate interests of the Companies and BTS Group of Companies pursuant to the purposes of the setting up of the CCTV as specified in this Privacy Policy.
 - b) **Government agency and/or law enforcement agency:** we may disclose data from CCTV other Personal Data relating to you for compliance with laws or legitimate order of court, regulatory agency, government agency and/or state enterprise including any third party as stipulated by laws.
 - c) **Outside service provider:** we may disclose or transfer data from CCTV other Personal Data relating to you to outside service provider for necessary process in order to protect your health, safety and properties including other purposes as specified herein.

5. CROSS-BORDER TRANSFER OF PERSONAL DATA

- 5.1. We may disclose or transfer your data from CCTV to outside service provider located overseas, in order to proceed with necessary steps for the protection of your safety, health and properties including other purposes as specified herein. We will take steps and measures to ensure that such transfer of Personal Data is secure and the receiver of such data has appropriate personal data protection standards and such transfer of Personal Data is legal and permitted by laws.
- 5.2. In case your data from CCTV are transferred to a destination country with inadequate data protection standards as stipulated by the personal data protection laws of Thailand, we will take steps as necessary to protect the transferred Personal Data so that it is protected at the same level as we protect your data from CCTV in accordance with the applicable personal data protection laws at that time.

6. HOW LONG WILL WE RETAIN YOUR PERSONAL DATA

We will retain your data from CCTV in our system for as long as is reasonably necessary to fulfil purposes of the setting up of the CCTV as specified in this Privacy Policy. Once we are no longer permitted by laws to retaining your data from CCTV, we will erase your data from our system and record. However, if there is any legal or disciplinary proceedings, your data from CCTV may be retained until such proceedings is final, including an appeal period, after that the data will be permanently erased or stored in accordance with applicable laws.

7. DATA SECURITY

- 7.1. As a way to protect personal privacy of your Personal Data, we maintain appropriate security measures, which include administrative, technical and physical safeguards in relation to access or access control, to protect the confidentiality, integrity, and availability of the Personal Data against any accidental or unlawful or unauthorized loss, alteration, correction, use, disclosure or access, in compliance with the applicable laws.

In particular, we have implemented access control measures and storage and processing equipment measures which are secured and suitable for our collection, use, and/or disclosure of the Personal Data. We restrict access to the Personal Data as well as storage and processing equipment by imposing access rights or permission, access management to limit access to the Personal Data to only authorized persons, and implement user responsibilities to prevent unauthorized access, disclosure, perception, unlawful duplication of the Personal Data or theft of equipment used to store and process the Personal Data; This also includes measures that enabling the re-examination of access, alteration, erasure, or transfer of the Personal Data which is suitable for the method and means of collecting, using and/or disclosing of the Personal Data.

- 7.2. We will, from time to time, examine and improve our security measures as necessary or once a relevant technology is developed to ensure that our security measures is effective, suitable, and in compliance with minimum legal specification as determined by relevant government agency.

8. RIGHTS AS A DATA SUBJECT

Subject to applicable laws and exceptions thereof, a data subject may have the following rights to:

- a) **Access:** data subjects may have the right to access or request a copy of the Personal Data collected, used and/or disclosed by us. For privacy and security of the data subject, we may require the verification of the data subject's identity before providing the requested Personal Data;
- b) **Rectification:** data subjects may have the right to have incomplete, inaccurate, misleading or outdated Personal Data collected, used and/or disclosed by us be rectified;
- c) **Data Portability:** data subjects may have the right to obtain the Personal Data relating to them in a structured and electronic readable format, and to send or transfer such data to another data controller, provided that they are (a) Personal Data which you have provided to us or (b) if the Personal Data were collected, used and/or disclosed by us on the consent basis or to perform our contractual obligations with the data subject;
- d) **Objection:** data subjects may have the right to object to the collection, use and/or disclosure of the Personal Data;
- e) **Restriction:** data subjects may have the right to restrict our use of the Personal Data if the data subject believes that such Personal Data are inaccurate, our collection, use and/or disclosure is unlawful or such Personal Data are no longer necessary for a particular purpose;
- f) **Consent Withdrawal:** for the purposes the data subjects have consented to our collection, use and/or disclosure of the Personal Data, data subjects may have the right to withdraw consent at any time;
- g) **Deletion or Destruction:** data subjects may have the right to request that we delete, destroy or anonymize the Personal Data collected, used, and/or disclosed by us unless our retention of such Personal Data is required in order to comply with a legal obligation or to establish, exercise or defend legal claims; and
- h) **Complaints:** data subjects may have the right to lodge a complaint to relevant government authority relating to the protection of the Personal Data if the data subjects believe that our collection, use and/or disclosure of the Personal Data is unlawful or in compliance with applicable data protection laws.

9. OUR CONTACT DETAILS

If you have any question or query or wish to exercise the rights relating to your personal data, please contact us or our Data Protection Officer (DPO) at:

- **By Email**

Data Protection Officer	Area	Email
Ms. Jaruwan Kantaubon	Eastin Grand Phayathai and Retail (Managed) The Unicorn	cdof@eastingrandphayathai.com
Ms. Ekanong Kaenhom	Offices Public Areas and Third-Party Retail The Unicorn	jpmgr@theunicornbangkok.com
Ms. Chalermwan Rittikason	Area 22 Building	chalermwan.r@tpm.co.th

- **By Postal**

ATTN: Data Protection Officer
Kamkoong Property Company
21 TST Tower, Viphavadi-Rangsit Road,
Chomphon Sub-district, Chatuchak District, Bangkok 10900

This Privacy Policy shall become effective as from 23 August 2023.

-Signed-

(Ms. Soraya Satiangoset)
Director