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## **PRIVACY POLICY FOR BUSINESS PARTNER OF KAMKOONG PROPERTY COMPANY LIMITED**

**Kamkoong Property Company Limited** (the “**Company**”, “**we**”, “**us**”, or “**our**”) recognizes the importance of the protection of personal data. Therefore, we will follow security measures when there is a collection, use, and/ or disclosure of the Personal Data (as defined below).

This privacy policy for business partner (“**Privacy Policy**”) explains how we collect, use and/or disclose the Personal Data of the business partner’s personnel, authorized persons, authorized signatories, directors, shareholders and other contact persons (collectively referred to as “**you**”, or “**your**”) and informs you the rights relating to the Personal Data protection.

“**Business Partner**”, according to this Privacy Policy, includes, without limitation, business partners, distributors, suppliers, vendors, service providers, construction contractors, investors, analysts, shops, billboard tenants, independent advisors, securities companies, insurance companies, insurance brokers, insurance agents, banks, joint venture partners, and third parties, e.g. third parties requesting to enter the area, contractor’s sub-contractors, related persons according to the rules of the Securities and Exchange Commission (e.g. spouse, child under the age of 20), and other business partners.

The Company collects, uses and/or discloses your Personal Data because we currently have business relationship with you or may have business relationship with you in the future, or because you work for, represent, or act on behalf of our business partners, e.g. companies which supplies products or provide services to the Company, or which we have business communication with which you may have involved.

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**

For the purposes of this Privacy Policy, “**Personal Data**” means any directly or indirectly identified or identifiable information as listed below.

We may directly or indirectly collect your Personal Data from other sources. For example, we may directly collect your Personal Data (such as when you do business with the Company or sign a contract or fill out a form when you interact with the Company, including having interactions through the Company's online platform, the Company’s website, mobile application, communication via email, telephone, questionnaire, business card, postage, communication during meetings and events, scheduling meetings with you or from a source in a system, central drive system/central database of the Company or transport software system and/or electronic files).

In addition, we may indirectly collect your Personal Data, e.g. from business partner or service provider you work for, act on its behalf, or represent, the BTS Group of Companies (as defined in “**TO WHOM WE MAY DISCLOSE YOUR PERSONAL DATA**” section below), public sources (e.g. social media and websites of third parties or relevant government agencies), other third parties (e.g. other business partners of the Company, reference persons and complainants). The Personal Data to be collected will depend on your relationship with the Company or the BTS Group of Companies. The followings are examples of the Personal Data which may be collected:

- **Personal details**, such as name - surname, title, age, gender, photo, video, CCTV record, geographic location, date of birth, nationality, marital status, financial status, educational and professional information (e.g. position, division, division code, occupation, information contained in a job application, company that you worked for or past employer, certification of employment, salary confirmation letter, professional license, work permit, visa, training information, income and salary, first date of work), information on government-issued document (e.g. identification card number, passport number, taxpayer identification number, driving license number, house registration number), vehicle-related information (e.g. vehicle identification number or vehicle registration number), signature (including electronic signature), business partner's identification number (including type of business partner, type of business, area of business), business partner's information (e.g. evaluation score of business partner/service provider, merchant identification number, business partner registration date), bank account and payment information (e.g. bank account name, bank name, bank account type and number, beneficiary account name, payment date, payment method, payment currency and payment account, domestic and cross-border transfer details), credit card details (e.g. credit card number, cardholder name, expiration date), including information relating to pricing strategy, discount rate, sales volume, disbursement items, disbursement amount, details relating to lands owned by you (e.g. land rights certificate number), number of shares, securities holder registration number, number of securities and dividend amount);
- **Contact details**, such as phone number, mobile phone number, facsimile number, address, place of establishment, email address, postal code, social media account information (e.g. LINE ID, Facebook account and available time) and other similar information;
- **Information relating to the relationship between the Company and the business partner**, such as information that you have given to the Company (as appeared in an agreement, form or survey), transactional information between you and the Company (e.g. lease agreement or sale and purchase agreement, contractor agreement, consultancy agreement, tendering or bidding document), information relating to sale and purchase transaction with related person/third party, product type, budget type, disbursement budget, expense details, traveling expense, date of purchasing product/service, amount of products/services purchased price, number of disbursement items, budget, headquarter number, document number, project name, registered company, creditors, branch, area and payment terms, computer data (e.g. IP address or cookies), vendor and service provider status inspection result, including information from the terms of reference or scope of tendering/bidding/procurement, report of interests, incident report, litigation information, details of quotation in procurement project, annual vendor/service provider evaluation report, CCTV record and construction details for each project;
- **Information of your related person**, such as identified information of your spouse or child, employee information of a company related to you;
- **Sensitive data**, such as health data, Sensitive Data from identification card (e.g. nationality and religion) or Sensitive Data which can be used in litigation.

If you provide the Personal Data of any third party (such as spouse, child, parents, authorized person) to us, you represent and warrant that you have the authority to do so by (1) informing such third party about this Privacy Policy; and (2) obtaining consents (as required by law or as necessary) so that the Company can use such Personal Data in accordance with this Privacy Policy.

We have no intention to collect sensitive data (“**Sensitive Data**”), however, in case that we do, we will only collect, use, and/or disclose Sensitive Data on the basis of your explicit consent or as permitted by law.

We only collect the Personal Data of minor, quasi-incompetent person and incompetent person after obtaining the consent of their parents or guardian. We have no intention to collect the Personal Data from persons under the age of 20 without the consent of their parents or guardian as required by law, or from quasi-incompetent person and incompetent person without the consent of their guardian or curator (as the case may be) as required by law. In the event that we learn that we have collected the Personal Data from anyone under the age of 20 without the consent of their parents or guardian as required by law or from quasi-incompetent person and incompetent person without the consent of their guardian or curator (as the case may be) as required by law, we will immediately delete such Personal Data or only collect, use and/or disclose such Personal Data if we can rely on other legal bases other than the consent basis or as permitted by law.

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

We collect, use and/or disclose Personal Data for the following purposes:

### **2.1. THE PURPOSES OF WHICH WE RELY ON CONSENT**

We may rely on consent for the collection, use, and/or disclosure of the Personal Data and/or Sensitive Data for the following purposes:

- **Health data:** for food preparation and facilitation.

If we rely on your consent for the collection, use and/or disclosure of the Personal Data, you have the right to withdraw your consent by contacting us (as specified herein under “**OUR CONTACT DETAILS**”). The withdrawal of your consent will not affect the legality of the collection, use and/or disclosure of the Personal Data and Sensitive Data that was based on your consent prior to such withdrawal. However, if you do not give consent for Sensitive Data, do not provide us your Sensitive Data or later withdraw your consent, we may not be able to continue the employment, or the performance of our obligations under the service agreement which we have entered into with you or your employer. The Company may request your consent directly from you or through the BTS Group of Companies, business partners and/or other juristic persons.

### **2.2. THE PURPOSE THAT WE MAY RELY ON LEGAL BASES FOR COLLECTION, USE, AND/OR DISCLOSURE OF PERSONAL DATA**

We may also rely on (1) contractual basis, for our initiation, entering into or fulfilment of a contract with a data subject; (2) legal obligation basis, for the fulfilment of our legal obligations; (3) legitimate interests basis, for the purpose of our legitimate interests and the legitimate interests of third parties in proportion to your benefits and fundamental rights in relation to the protection of your Personal Data; (4) vital interests basis, for preventing or suppressing a danger to a person’s life, body or health; or other legal bases permitted under applicable data protection law (as the case may be). Depending on your relationship with us, we may collect, use and/ or disclose the Personal Data for the following purposes:

- (1) **For business purposes**, such as to proceed business transactions with business partners and fulfil our duties and/or requests from business partners, to contact business partners regarding products, services and projects of the Company or the business partners (e.g. to respond to questions or requests);
- (2) **For selection of business partners**, such as to verify your identity and status of business partners, to check status of business or to perform other background checks and to screen you

and business partners, to assess your and business partners' suitability and qualifications, to assess your and business partners' risks (including the verification of public information from law enforcement agencies and/or the Company's blacklist record), to prepare quotations or bidding offer, to enter into agreements, purchase orders or purchase requests with you or business partners and to evaluate your and business partners' management;

- (3) **For relationship management**, such as to keep your Personal Data up-to-date, to maintain the accuracy of the Personal Data, to retain agreements, relating documents, agreement's reference documents and evidence of the work of business partners which may mention you, to plan, operate and manage (contractual) relationships and rights with business partners (e.g. to appoint, cancel or authorize business partners to engage in transaction and order of products or services, process payment, to conduct activities relating to accountancy, audit, invoice issuance, management of product and service delivery), to manage your requests or complaints, to improve, support, monitor, and record;
- (4) **For business communications**, such as communication with business partners about products, services and projects of the Company or business partners (e.g. communication via document, response to questions, requests or operational progress report);
- (5) **For marketing purposes**, such as to inform you about news and public information which may be useful, including activities, new product and service offers, product and service price negotiation and survey, as well as to analyze and consider providing financial aid (e.g. financial loan) to you or business partners;
- (6) **For internal management and communication within the organization**, such as to organize internal public relations activities and to comply with appropriate business codes of conduct, including, but not limited to, procurement, disbursement, internal management, training, inspection, report, document delivery or management, data processing, risk control or management, trend and statistical analysis and planning, and other similar or relating activities;
- (7) **For business analysis and improvement**, such as to research, analyse data, estimate, survey and evaluate and prepare report relating to our products and services and your or business partners' performance, including to develop and improve our marketing strategy, and our products and services;
- (8) **For registration and authentication**, such as for your registration, verification, identification and authentication;
- (9) **For IT systems and IT support systems**, such as to provide IT support and support departments, to administrate system access in which the Company has granted an access right to you, to delete unused accounts, to implement business control measures for the continuation of business, and for the Company to be able to identify and solve problems in the Company's IT systems, and to safeguard the security of the Company's systems, to develop, implement, operate and manage the IT systems;
- (10) **For business partner information management**, such as to compile list of business partners, record data in the recovery system and update the list and directory of business partners (which includes your Personal Data), as well as to store and manage agreements and relating documents which may contain your name;
- (11) **For system monitoring and security**, such as to control access, monitor systems, equipment and internet, and safeguard IT security;
- (12) **For dispute management**, such as to resolve dispute, enforce the Company's agreements, establish, exercise, or raising legal claims, including to grant authorization;

- (13) **For investigation, complaint and/or crime and fraud prevention;**
- (14) **For compliance with internal policy and relating/applicable laws,** rules, regulations, guidelines such as to apply for business licences as required by law and to coordinate or communicate with government agencies, courts or relevant agencies (e.g. the Revenue Department, the Royal Thai Police Headquarter and the State Audit Office) including to investigate, complain and/or prevent crime and fraud;
- (15) **For danger prevention towards life, body or health of a person,** such as to control contagious disease or epidemic;
- (16) **For organizing corporate social and environmental responsibility**

In case we are required to collect the Personal Data to comply with the laws or our contractual obligations or to enter into an agreement with you, we may not be able to achieve the abovementioned purposes if we do not receive the Personal Data as we request.

### **3. TO WHOM WE MAY DISCLOSE YOUR PERSONAL DATA**

We may disclose or transfer your Personal Data to the following third parties who collect, use, and/or disclose the Personal Data in accordance with the purposes under this Privacy Policy. These third parties may be located inside or outside Thailand. You can read their privacy policy to learn more on how they collect, use and/or disclose Personal Data since you will also be subject to their privacy policies.

#### **3.1. BTS Group of Companies**

As we are part of the BTS Group of Companies which all may collaborate, e.g. we may assign or recommend you to the BTS Group of Companies, or partially share systems, e.g. service system, website related system and/or our database, we may need to transfer your Personal Data to, or otherwise allow such Personal Data to be accessible by, other companies within the BTS Group of Companies for the purposes set out herein. In this regard, other companies within the BTS Group of Companies could also rely on the consent obtained by us to use your Personal Data. Please see the list of the BTS Group Companies at <https://www.rabbitholdings.co.th/th/corporate-governance/personal-data-protection-policies>

#### **3.2. Our service providers**

We may engage other companies, agents or contractors to perform services on our behalf or to assist us in conducting business with you. We may disclose the Personal Data to the third parties, including, but not limited to, (1) software developers, IT and website service providers; (2) marketing, advertisement, design, creative advertising and communication service providers; (3) hospitals; (4) data storage and cloud service providers; (5) banks and financial institutions; (6) insurance companies, sub-insurance companies, insurance brokers, insurance agents, lost adjustors and risk surveyors; (7) logistics and transportation service providers; (8) payment and payment system service providers; (9) registration and vote counting system service providers; (10) analysts; (11) travel service agencies; (12) garages and auto parts stores; (13) booking system service providers; (14) outsource internal operation service providers; (15) printing houses; and (16) surveying service providers.

In the course of providing such services, the service providers may have access to your Personal Data. However, we will provide your Personal Data only to the extent that it is necessary for them to perform the services, and we ask them not to use the Personal Data for any other purposes. We will ensure that all service providers we work with will keep your Personal Data secure.

### **3.3. Our business partners**

We may transfer the Personal Data to our business partners to conduct business and provide services, including, but not limited to, business partners, project owners, contract party, securities companies, stores, construction contractors, joint venture partners, companies that we invest in, co-brand partners and third parties that we share marketing or promotional campaigns for our business operation and service provision insofar as the receiving business partner shall agree to treat your Personal Data in a manner consistent with this Privacy Policy.

### **3.4. Third parties stipulated by law**

In certain circumstances, we may be required to disclose or share your Personal Data to third parties in order to comply with a legal or regulatory obligation. Such third parties may include any government agency, court, embassy, consulate, regulator, government officials, or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety; or to detect, prevent, or address fraud or to provide security.

### **3.5. Expert advisors**

We may have to disclose your Personal Data to our expert advisors including, but not limited to, (1) independent advisors; (2) legal advisors who assist us in our business operations and provide litigation services whether for defending or initiating legal actions; (3) external advisors; (4) project advisors; (5) financial advisors; and (6) auditors who provide accounting services or conduct financial audit for the Company.

### **3.6. Third parties connected with business transfer**

We may disclose or transfer your Personal Data to our business partners, investors, major shareholders, assignors or assignees in the event of any organizational restructuring, rehabilitation, amalgamation, business transfer, whether in whole or in part, sale and purchase, joint venture, assignment of rights, transfer or disposal of our business, assets or shares, whether in whole or in part, or any similar transaction. In case that such event happens, we will cause the receiving party, as the transferee, to comply with this Privacy Policy to protect your Personal Data.

## **4. CROSS-BORDER TRANSFERS OF YOUR PERSONAL DATA**

We may disclose or transfer your Personal Data to third parties or servers located overseas, which the destination countries may or may not have the equivalent data protection standards such as when we store your Personal Data on cloud platform or server located outside Thailand or to receive IT support services. We will take steps and measures to ensure that your Personal Data are securely transferred, the receiving parties have in place suitable data protection standard, and the transfer is permitted under the applicable laws.

## **5. HOW LONG DO WE KEEP YOUR PERSONAL DATA**

We will retain your Personal Data for as long as it is reasonably necessary to fulfil purposes for which we obtained them and to comply with relevant laws and regulations. However, we may have to retain your Personal Data for a longer duration, as required by the applicable laws.

## **6. COOKIES AND HOW THEY ARE USED**

If you visit our websites, we will gather certain information automatically from you by using tracking tools and cookies (including, but not limited to, Google Tag Manager, Google Analytics, Hotjar, Matomo, Zendesk, Facebook Pixel Analytics, Facebook Ad Manager, and Google Cloud). Cookies are tracking technologies which are used for analyzing trends, administering our websites, tracking users' movements around the websites, or to remember users' settings. Some cookies are necessary because otherwise the site will be unable to function properly while other cookies are for the visitors' convenient such as cookies which remember your username in a secure way as well as your language preferences.

Usually, most internet browsers allow you to set whether or not to accept cookies. If you reject cookies, it might affect your use of the websites and without cookies the ability to use some or all of the features or areas of the websites may be limited. Please see our "**Cookie Policy**" for more details at <https://www.rabbitholdings.co.th/th/corporate-governance/personal-data-protection-policies>

## **7. DATA SECURITY**

As a mean to protects personal privacy of your Personal Data, we have provided appropriate security measures, which includes administrative, technical and physical safeguards in relation to the access or the access control, to maintain the confidentiality, correctness and availability of the Personal Data against any illegal or unauthorized loss, alteration, correction, use, disclosure or access to the Personal Data in compliance with the applicable laws.

In particular, we have implemented access control measures which are secured and suitable for our collection, use, and disclosure of the Personal Data. We also restrict access to the Personal Data as well as the use of storage and processing equipment by imposing access rights and rights to grant permission to access the Personal Data, manage the access to limit only authorized persons can access to the Personal Data and implement user responsibilities to prevent unauthorized access, disclosure, perception, unlawful duplication of the Personal Data or theft of device used to store or process the Personal Data. This also includes measures that enables the re-examination of unauthorized 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.

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

## **8. RIGHTS AS A DATA SUBJECT**

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

- 1) **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;
- 2) **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;
- 3) **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 and (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;
- 4) **Objection:** Data subjects may have the right to object to the collection, use and/or disclosure of the Personal Data in accordance with the applicable laws;
- 5) **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;
- 6) **Withdraw Consent:** 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;
- 7) **Deletion:** 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
- 8) **Lodge a complaint:** Data subjects may have the right to lodge a complaint to 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 wish to contact us to exercise the rights relating to your Personal Data or if there is any queries about your Personal Data under this Privacy Policy, please contact our Data Protection Officer (DPO) at:

- **By Email**

<b>Data Protection Officer</b>	<b>Area</b>	<b>Email</b>
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