

## Privacy Notice

In order to ensure the compliance with the Personal Data Protection Act B.E. 2562, Thai SECOM Security Company Limited (hereunder referred to as the “**Data Controller**”) would like to notify You of the collection, retention, use, disclosure and transfer (collective referred to as the “**Personal Data Processing**”) of all of your personal data (hereinafter referred to as the “**Personal Data**”).

### 1. Personal Data

Personal Data shall include without limitation the following data and all other data relating to you that the Data Controller may obtain from the entry into the security service agreement (whether or not in the written form) and the communication, negotiation, transaction or any actions undertaken prior to the entry into such agreement (hereinafter referred to as the “**Security Service Agreement**”) that relates to the provision of the security officer, the provision of the maintenance and reparation services of the security appliances; and the provision of the relevant services, either in whole or in part, as well as the provisions of other products or services of SECOM for the similar purposes (hereinafter referred to as the “**Security Services**”).

Example of the Personal Data being collected:

- (1) Contact information, including full name, nickname, address, domicile address, telephone number and email address;
- (2) Necessary information for the identity verification and the relevant copy thereof, for instance, copy of the identification card, copy of passport or facial image;
- (3) Necessary information for the assessment of identity and certain qualifications, for instance, date of birth, gender or nationality;
- (4) Emergency contact;
- (5) Details of the bank account, including bank account number, bank account number, name of the commercial bank or account-opening branch and credit card information or other similar information;
- (6) Information relating to the location where the Security Services will be provided, including map, location point, building layout, etc.;
- (7) Appearance, behavior, voice, words, conversation, actions, movement, physical movement or any activities that You undertake, as well as any patterns or forms of the abovementioned, including sound created from those movement, to the extent that may be collected with the CCTV or voice recorder installed by the Data Controller.

In addition, You may obtain specific request for consent from the Data Controller to process some of your Personal Data in some circumstances. In such cases, You shall be entitled to give or not give consent to the Data Controller and such decision of You shall not cause any impact to the Security Services from to be delivered the Data Controller to You.

2. Purposes for the Collection, Use or Disclosure of the Personal Data

The Data Controller shall process your Personal Data as defined in this Notice, either in whole or in part, for the following purposes:

- (1) To determine in the entry into the Security Service Agreement with You;
- (2) To design and assess the appropriate service fee and consideration for the Security Services to be performed;
- (3) To determine and manage the Security Service resources allocation, in particular to determine the personnel needed for the provision of the Security Services that match with the premises where the Security Services will be provided;
- (4) To source material, equipment and appliances needed to provide the Security Services;
- (5) To communicate between the Data Controller and You relating to the Security Services; and to report the security movement and status;
- (6) To notify You of the service fee; to demand repayment of any outstanding debt; and notify You of any other relevant matters;
- (7) To communicate with third party that is necessary for the business operation of the Data Controller, for instance, contractor, business partner and others;
- (8) To use the Personal Data for the improvement of Security Services;
- (9) To manage the security of the premises and the employee of the Data Controller;
- (10) To advertise the products and services as well as other information relating to the Data Controller;
- (11) To perform any legal obligations that the Data Controller is subject to.

3. Recipient of the Personal Data Disclosure and Transfer

The Data Controller shall be entitled to disclose or transfer the Personal Data to any person or legal entity, including the following persons or legal entities for the purposes defined in Clause 2 above:

- (1) Data Controller's directors, employees and consultant;

- (2) Accounting firm, law firm, banks, logistic service provider, postal office and other service providers being engaged by the Data Controller;
- (3) Data Controller’s parent company, subsidiary, group company or affiliates; and the persons defined in (1) and (2) of the Data Controller’s subsidiary and affiliates;
- (4) Data Controller’s customer and business partner; and government authorities, police officers, fire fighter, hospital or other third party or legal entities that it necessary for the Data Controller to coordinate with in their business operation.

4. Retention Period

The Data Controller shall collect and retain the Personal Data defined hereunder throughout the term of the Security Service Agreement and for the period of 10 years after the termination thereof, except for the retention of the Personal Data for the improvement of the Security Services, where the Personal Data will be retained to the minimum extent within the period of time that such data is necessary.

5. Contact Information of the Data Controller

Data Controller	Thai SECOM Security Company Limited  Address: No. 87/2, 14 <sup>th</sup> Floor, CWC Tower All Seasons Building, Witthayu Road, Lumpini Sub-district, Pathumwan District, Bangkok 10330  Telephone Number: 02-685-3999  หมายเลขติดต่อ 02-685-3999  E-Mail : secomth_dpo@secom.co.th
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6. Cross-border Transfer of Personal Data

During the process of the Personal Data, the Data Controller may transfer the Personal Data defined hereunder to Japan where the Data Controller’s headquarter is located or to other destination countries outside of Thailand. It should be noted that the Personal Data protection of the country where the recipient of the Personal Data is located in some circumstances may not meet the standard defined by the governing authority under the Personal Data Protection Law.

## 7. Your Rights

You shall be entitled to exercise the following rights that relates to your Personal Data as defined hereunder pursuant to the Personal Data Protection Act B.E. 2562 (the hereunder referred to as the “**Personal Data Protection Law**”):

(1) Right to withdraw consent:

You shall be entitled to withdraw consent that has been given to the Data Controller to process their Personal Data at any time during the time that the Data Controller is collecting and retaining such Personal Data;

(2) Right to request for Access

You shall be entitled to request for access and copy of the Personal Data in the Data Controller’s possession. In addition, if any Personal Data is processed without any consent, You shall be entitled to request the Data Controller to disclose the information relating to such process;

(3) Right to Data Portability

You shall be entitled to request to the Data Controller to transfer the Personal Data to other data controller;

(4) Right to Object to the Personal Data Processing

You shall be entitled to raise objection to the Personal Data Processing undertaken by the Data Controller;

(5) Right to Delete or De-identify their Personal Data

You shall be entitled to request the Data Controller to delete, destroy or de-identify the Personal Data as defined under this Policy to become anonymized;

(6) Right to Suspend the Personal Data Processing

You shall be entitled to request the Data Controller to suspend the process of any Personal Data;

(7) Right to Rectify the Personal Data

You shall be entitled to request the Data Controller to rectify any Personal Data to ensure the correctness, up-to-date and completeness of such information;

(8) Right to Make any Complaint

You shall be entitled to make complaint in case that the Data Controller, the Employee or the contractors of the Data Controller violates the Personal Data Protection Law;

Pursuant to the applicable law, the Data Controller may reject certain rights that the Data Subject or the authorized person is exercising to the extent not contradicting with those applicable laws. In case that You exercise the unreasonable rights, it should be noted that such action may impede the achievement of the purposes defined in Clause

2 and Clause 8, either in whole or in part, and may subsequently, impact the Data Controller's decision to entry into or renew the Security Service Agreement with You and disable the Data Controller to provide the Security Services to You to the full capacity.

8. Remarks:

Data Controller shall be entitled to collect, use, disclose and transfer certain types of the Personal Data without obtaining your consent for the following purposes as permitted under the Personal Data Law:

- (a) To protect the life essence or prevent the life, body or health damages of any person;
- (b) To process the Personal Data necessary for the performance of the Data Controller's contractual obligations that You are the contracting party or for the process your request made prior to the entry into the agreement, in particular the purposes defined in Clause 2 (1) to (7) above;
- (c) To process the Personal Data necessary for the legitimate interest of the Data Controller, persons or legal entities that is not the Data Controller, except in case that the legitimate interest claimed is less important than your fundamental rights, in particular the purposes defined in Clause 2 (8) and (9) above;
- (d) To perform the legal obligations that the Data Controller is subject to, for instance, for the performance of any action pursuant to the instruction given by the government authority governing the Personal Data Protection Law or other applicable laws; and the court decision or judgment;
- (e) To process the Personal Data necessary for the performance of the Data Controller's duties as a part of the public interest task or public tasks specifically delegated by the relevant government authority to the Data Controller;
- (f) To achieve the objective of conducting the archives, research and statistics; provided that the Data Controller shall implement appropriate measures to protect your rights and freedom, in particular as defined by the government authority governing the Personal Data Protection Law;
- (g) Other circumstances that would not need consent as defined under the Personal Data Protection Law.

Thai SECOM Security Company Limited