

## **Privacy Notice for Closed Circuit Television (CCTV)**

This privacy notice ("Privacy Notice") describes how **Puratos (Thailand) Company Limited** (hereinafter referred to as "company", "we", "us", or "our") is in the process of closed-circuit television ("CCTV") devices installation to monitor within or around our premise, factory, office, or other areas ("areas"), in order to protect life, health and property. We collect personal data of all employees, directors, contractors, workers, visitors, customers, or any individuals entering the monitored space within our areas (collectively referred to as "you" or "your") through the use of CCTV devices. This Privacy Notice provides information on our collection, use, disclosure, and/ or cross-border transfer of individually identifiable information ("Personal Data") about you as follows:

### **1. Collection of your Personal Data**

The Company collects still images or motion pictures, sounds and images of objects (such as your vehicle) when you enter an indoor surveillance area through closed-circuit television cameras. In some cases, the Company may collect, use or disclose your sensitive personal data (such as your facial recognition data) only with your explicit consent or when permitted by law

### **2. Collection, Uses or Disclosure of Personal Data**

2.1 The Company may collect, use, disclose, transfer, and perform any act including, without limitation, recording, holding, modifying, modifying, destroying, deleting, recovering, merging, copying, transmitting, storing, extracting, updating or adding to closed-circuit television cameras and personal data and other related to you for the following purposes

- (a) To monitor health care and safety including your property;
- (b) To monitor buildings, premises and property against damage, disruption, destruction and other crimes;

- (c) To support law enforcement agencies in the prevention, prevention and detection of crime, including prosecution in the event of a crime;
- (d) To support effective resolution of disputes arising during disciplinary or grievance proceedings;
- (e) To support investigations or proceedings related to whistleblowing;
- (f) To advocate for the establishment of rights or to lift up civil proceedings; This includes, but is not limited to, labor cases; and
- (g) To verify your identity and to comply with applicable law;

2.2 The Company will install closed circuit television cameras in places that can be easily seen. Area where the Company closed-circuit television cameras will not be installed, such as staff rooms, changing rooms, toilets, shower rooms, or other areas designated as rest areas for employees, except for the rest area of the employee, it will be an area where there is a risk that requires special supervision of employees.

2.3 Closed-circuit television cameras operate 24 hours a day and may also have a sound recording.

2.4 The company will install signs at the entrance and exit points and in areas that are monitored by closed-circuit television cameras to let you know that there are closed circuit television cameras in the area.

### **3. Lawful Basis for Data Processing**

The Company will not collect, use, disclose, process, transfer and perform any act including but not limited to saving, holding, modifying, modifying, destroying, deleting, recovering, merging, copying, transmitting, storing, splitting, replacing or adding to the data from the CCTV and other personal data related to you without your consent except in the following cases;

3.1 For vital interest, as to maintain the benefits that are essential to life It is necessary to prevent or suppress a danger to a person's life, body or health;

3.2 For legitimate interest of the Company, as to protect your health and safety including your assets, buildings, premises and the Company's assets and doing any other actions in order to comply with the objectives of installing CCTV. The Company will try to balance the legitimate interests of the Company and third parties involved, as the case may be, including your fundamental freedoms to protect information from closed-circuit television cameras related to you as appropriate.

3.3 For legal obligation, the Company is obliged to comply with applicable laws, including but not limited to Laws related to safety and working environment, the Company considers that the use of closed-circuit television cameras is a necessary measure to enable the Company to able to perform such duties

#### **4. Disclosure and/or Transferring of Personal Data**

4.1 The Company will keep confidential information from CCTV related to you and will not disclose or transfer such information to anyone who is a third party unless the Company has carefully selected for both the present and the future for the purpose of installing closed circuit television cameras specified in this Privacy Notice.

4.2 The Company may disclose your personal data collected from CCTV and other of your personal data to third parties at including;

4.2.1 The Company may disclose or transfer information from closed-circuit television cameras and other personal information about you to other companies in our group of companies. for the legitimate interests of the Company To follow the purpose of installing closed circuit television cameras

4.2.2 Governmental agencies and/or law enforcement agencies: the Company may disclose information from CCTV and other of your personal data in order to comply with the law,

or to support or assist law enforcement in an investigation or proceeding in a civil or criminal case.

4.2.3 Third Party Service Providers: the Company may disclose or transfer information from CCTV and other personal data about you to third party service providers in order to take the necessary steps to protect your health, safety and property.

## **5. Transferring of Personal Data to a Foreign Country**

5.1 The Company may disclose or transfer your personal data from closed-circuit television cameras to third-party service providers outside Thailand. To take the necessary steps to protect your health, safety and property. Such disclosure or transferring of your personal data will only be made with your consent. Unless there are other important legal bases (for example, to perform a contract between the Company and others for your benefit) as required by applicable law.

5.2 If your personal data from closed-circuit television cameras are transferred to a destination country where the data protection standards are insufficient as required by the data protection laws of Thailand, The Company will take necessary steps to protect personal data transferred to other parties abroad, to ensure that personal data is protected at the same level that the Company protects your personal data from closed-circuit television cameras in accordance with the law on personal data protection in force at that time and perform any other acts that the data protection laws of Thailand have stipulated in its entirety.

## **6. Retention Period for your Personal Data**

The Company will keep your personal data from closed-circuit television cameras in the Company's system. For the period necessary for the performance of duties to achieve the objectives of installing closed-circuit television cameras specified in this announcement. If the Company is no longer legally permitted to collect your personal data from closed-circuit television

cameras, The Company will delete the information from the Company's system and records. In the event of judicial or disciplinary action, your personal data from closed-circuit television cameras may be kept until the end of the said process. including the possible length of time for filing an appeal, thereafter, the data will be deleted or archived as required by applicable law.

## **7. Security for your Personal Data**

We have furnished the appropriate security measures covering the administrative safeguards, technical safeguards as well as physical safeguards in the purpose to protect loss of personal data or control the access of personal data to protect from loss, unauthorized access, alteration, modification, or disclosure without authorization in accordance with our Information Security Policy and Practice.

Additionally, with the purpose of retention your personal data as a confidentiality, integrity, and availability, we have also publicly established Privacy Notice in accompany with guidelines for security in the collection, use or disclosure of personal data, which will be reviewed from time to time suitably. In this regard, we will consider upon and abide by the Laws on Personal Data Protection, the Announcement of the Ministry of Digital Economy and Society concerning the Requirements for Personal Data Security Standards B.E. 2563 and the Announcement of the Ministry of Digital Economy and Society concerning the Requirements for Personal Data Security Standards (No.2) B.E. 2564, as well as other announcements or orders of the Office of the Personal Data Protection Commission.

## **8. The Right of Personal Data Subject**

You are entitled to exercise the rights of data subject in accordance with the laws on Personal Data Protection, whereby the Company will respect your rights and proceed complying with the law, statute or regulation relating to the processing of your personal data under certain circumstances promptly. You have the rights to process your personal data as follows:

#### 8.1 Right to withdraw consent

In the event that the company processes your personal data pursuing to your consent, you have the right to withdraw your consent for processing your personal data to the company at any time. The company may however continue to process your personal data on the ground of another lawful basis.

#### 8.2 Right of access

You have right to request for a copy of your personal data from the company.

#### 8.3 Right to rectification;

You have right to rectify your personal data to be accurate, up-to-date and complete.

#### 8.4 Right to erasure

You have the right to request the company to delete, destroy, or anonymize your personal data in the circumstances that there is no reasonable reason for the company to continue processing your personal data. In addition, you can require the company to delete as well as exercise the right to object where is stipulated in the next Article. Nonetheless, the exercise of right hereof shall not be for the purpose of erasure all personal data, and the company shall carefully consider each request by the laws on processing your personal data.

#### 8.5 Right to object

You have the right to raise an objection to the processing of your personal data in certain circumstances prescribed under the laws on personal data protection. Besides, you have the right to object to the processing of your personal data in the case that the company processes your personal data for marketing purposes, recording and analyzing the psychological and behavioral characteristics of individuals (Profiling).

#### 8.6 Right to restriction

You have the right to request the company to restrict of processing of your personal data temporarily, for instance, when you wish the company to correct your personal data or when you request the company to justifying the lawful basis for processing under the laws on personal data processing.

#### 8.7 Right to data portability

In some cases, you may request the company to transfer or transmit your general personal data to other data processor via electronics. However, this right is particularly in the case of your personal data submitted to the company by consent basis, or where such personal data is required to be processed in order to fulfil the obligation under the contract.

#### 8.8 Right to lodge a complaint

You have the right to lodge a complaint to the governmental agencies as well as the Personal Data Protection Committee in the case that you believe that the Company, its employees, or service provider violates or fails to comply with the law on personal data protection or other announcements issued by the virtue of such a law.

At any time, you may exercise your rights by contact the company following information provided in Article 8. of this privacy notice.

The Company may request some certain information from you to verify your identity and ensure your right to access personal data (or to exercise any other rights) to observe the security measures ensuring that your personal data will not be disclosed to any person, who is not entitled to access such information

The Company will endeavor responding to all legitimate requests within 30 days. In some cases, the Company may take more than 30 days if your request is complicated, or you are submitting more than a request. Following to such event, the Company will notify and keep you posted the status of your request at all the times.

## 9. Contact us

If you need to exercise your personal rights in relation to your personal data or having questions about your personal data under this Privacy Notice, please contact us at

### **PDPA Implementation Working Group**

Puratos (Thailand) Company Limited

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