

## CCTV Notice

Double A (1991) Public Company Limited ("**Company**", "**we**", "**us**", or "**our**") uses closed-circuit television devices (CCTV) to monitor the areas inside and around the premises to protect life, health, and property. The Company collects the Personal Data of all customers, business partners, employees, directors, shareholders, contractors, workers, visitors, or any other persons who enter the areas under the surveillance of the CCTV devices, including inside vehicles, buildings and other places (collectively referred to as "**you**" or "**your**") through the use of CCTV devices. This CCTV Notice ("**CCTV Notice**") provides information on our collection, use, disclosure, and transfer of individually identifiable information ("**Personal Data**") about you. We may amend this CCTV Notice at any time and will notify you of the amendments, where possible.

### 1. What Personal Data we collect

We collect your moving or still images, voice recordings, and pictures of your belongings (e.g. your vehicles), when entering monitored spaces in our vehicles, buildings and facilities through the CCTV devices ("**CCTV Data**"). In certain cases, we may collect, use, or disclose your sensitive Personal Data (e.g. facial recognition data), but only on the basis of your explicit consent or where permitted by law.

### 2. How we collect, use, or disclose your Personal Data

2.1 We may collect, use, disclose, transfer, and carry out any operation, including but not limited to recording, holding, adapting, altering, modifying, destroying, deleting, retrieving, combining, copying, transmitting, storing, extracting, amending, or adding, related to your CCTV Data and other Personal Data concerning you, for the following purposes ("**CCTV Monitoring Purposes**"):

- a) To protect your health and personal safety, including your belongings;
- b) To protect the legitimate interests of the Company and/or our affiliates, such as to protect the safety and integrity of the business of the Company and/or our affiliates, to analyze, assess, manage, and handle risks, to exercise the Company's rights and protect the interests of the Company and/or our affiliates where it is necessary and lawful (such as to detect, prevent, and take measures against any corruption, complaint related to intellectual property infringement, or violation of law), to ensure compliance with any agreements and investigations in case of a breach of any agreement, to detect and prevent any misconduct in vehicles, areas where the Company's business operation takes place, or at the Company's and/or our affiliates' facilities (such as using CCTV devices) and report the misconduct, to undertake management work, the preparation of reports and internal policies within the scope of the Company's operation, the remedies for or mitigation of potential damage to the Company and/or our affiliates, the Company's and/or our affiliates' establishment, exercise, or defense of legal claims, and/or taking any other actions to protect customers, employees, other persons, data, trade secrets, rights, and properties of the Company and/or our affiliates, or to use as evidence to support insurance claims.
- c) To protect vehicles, buildings, facilities, and properties from any damage, defect, destruction, and crime.
- d) To support law enforcement agencies in the deterrence, prevention, detection, and prosecution of crime.
- e) To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance resolution proceedings.
- f) To assist in the investigation or proceedings concerning a whistleblowing complaint.
- g) To assist in the establishment or defense of any legal action, including but not limited to civil, criminal, and labour cases.
- h) To verify identity and to comply with applicable laws.

2.2 We will install CCTV devices in plain sight. The areas in which we will not install CCTV devices are staff rooms, changing rooms, toilets, shower rooms, or any other areas designated as staff rest areas.

2.3 Our CCTV devices are in operation 24 hours a day every day, and will capture audio recordings.

2.4 We will place signage at the entrance and exit points, and within the monitored areas to alert you that CCTV devices are in use.

### 3. Legal bases

We will not collect, use, disclose, process, transfer, and carry out any operation, including but not limited to recording, holding, adapting, altering, modifying, destroying, deleting, retrieving, combining, copying, transmitting, storing, extracting, amending, or adding, related to your CCTV Data and other Personal Data concerning you, without consent except for the following:

- a) **Vital interest.** It is necessary for our prevention or suppression of a danger to a person's life, body, or health;
- b) **Legitimate interest.** It is in our legitimate interest to protect your health and personal safety, as well as your belongings, our vehicles, buildings, facilities and assets, and to carry out any other acts to achieve the CCTV Monitoring Purposes. We will endeavor on a continuing basis to balance our legitimate interests, and those of any relevant third parties as the case maybe, and your fundamental rights and freedoms related to the protection of the CCTV Data concerning you. In addition, we will also endeavor to identify any steps required to achieve the right balance as appropriate;
- c) **Legal obligations.** We owe a duty to comply with the legal obligations prescribed under the applicable laws, including but not limited to the laws regarding safety and environment in the workplace. We consider the use of CCTV devices as a necessary measure to enable us to meet those obligations.

### 4. To whom we disclose and/or transfer your Personal Data

4.1 We will keep CCTV Data concerning you confidential and will not disclose or transfer it except to our subsidiaries, affiliates and other carefully selected third parties now or in the future, licensees, joint venture partners, and/or service providers, to achieve the CCTV Monitoring Purposes provided in this CCTV Notice.

4.2 Third parties to which we may disclose CCTV Data and other Personal Data concerning you include:

- a) **Affiliates and subsidiaries:** We may disclose or transfer CCTV Data and other Personal Data concerning you to our affiliates and subsidiaries, as part of our legitimate interest and our affiliates and subsidiaries' interest to achieve the CCTV Monitoring Purposes.
- b) **Governmental and/or regulatory organizations:** We may disclose or transfer CCTV Data and other Personal Data concerning you to comply with legal obligations, or to support or assist law enforcement organizations with regard to the investigation and prosecution of civil or criminal proceedings.
- c) **Third-party service providers:** We may disclose or transfer CCTV Data and other Personal Data concerning you as our necessary steps to ensure our protection of your health, personal safety, and belongings.

### 5. Security measures

For your Personal Data collected through CCTV devices, the Company has put appropriate security measures in place as required by the applicable laws, including the laws on Personal Data protection that cover the collection, use, and disclosure of Personal Data in hard copy, electronic, and/or

any other formats. These security measures include organizational, technical, and physical measures, covering the elements of the information system relating to the processing of Personal Data. These measures will take safety and security into account, as required under the Personal Data protection law, for the purposes of maintaining appropriate confidentiality, accuracy, and availability of Personal Data, in accordance with the risk level, characteristics, purposes of the processing of Personal Data, and the risks and effects of data breach incidents. Our data security measures include restricting access to Personal Data and key elements of the information system; appropriate user access management; assigning duties and responsibilities of users; ensuring that any access to and modification and deletion of Personal Data would be retrospectively traceable; ensuring that threats and data breach incidents are monitored and inspected; ensuring that threats and data breach incidents will be responded to when they are discovered; and having damage caused by a threat or data breach incident remedied. We also raise awareness and understanding about Personal Data protection and security among our staff members in order to prevent the unauthorized or unlawful loss, access to, use, alteration, correction or disclosure of your Personal Data.

## 6. Period of retention

We will retain your CCTV Data in our system as long as necessary to fulfil our duties to achieve the CCTV Monitoring Purposes prescribed in this CCTV Notice. When we are no longer permitted by the applicable laws to store your CCTV Data, we will remove it from our systems and records. In the event that judicial or disciplinary action is initiated, CCTV Data concerning you may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived as permitted by the applicable laws.

## 7. Your legal rights

7.1 If you believe that your Personal Data has been recorded by our CCTV devices, you have the following rights pursuant to the applicable laws and exceptions thereof:

- a) **Right to access.** You have the right to access and request a copy of CCTV Data concerning you, or request us to disclose CCTV Data concerning you acquired without your consent. The request must be in writing and sent to IT Department. Your request will be processed within 30 days from the date we receive your request. We may refuse your request following our legal rights or court orders, and where such access and request of copy of the CCTV Data concerning you could affect the rights and freedom of the others. If it is decided that your request is to be refused, we will inform you stating the reasons in writing and send it to you within the period required by law;
- b) **Right to rectification.** You may have the right to have incomplete, inaccurate, misleading, or out-of-date Personal Data that we collect, use or disclose about you rectified.
- c) **Right to objection.** You have the right to object to the collection, use, or disclosure of your CCTV Data and Personal Data if it is for the purpose of achieving our legitimate interests and/or those of other persons. Your request will be processed as soon as possible upon receiving your request. We may refuse your request if we can prove there are more important legal grounds to collect, use, or disclose your CCTV Data, or such collection, use, or disclosure is for establishing claims, performing with or exercising legal claims, defending legal claims, or complying with the law. If it is decided that your request is to be refused, we will inform you stating the reasons in writing and send it to you within the period required by law.
- d) **Right to withdraw consent.** For the purposes you have consented to our collection, use, or disclosure of your CCTV Data, you have the right to withdraw your consent at any time.
- e) **Right to deletion.** You have the right to request us to delete your CCTV Data or to render your CCTV Data to be unidentifiable to the extent applicable under the law, except for where we may need to collect your CCTV Data as applicable under the law,

such as establishing claims, performing with or exercising legal claims, defending legal claims, or complying with the law.

- f) **Right to data portability.** You may have the right to obtain your CCTV Data which we hold, in a structured, electronic format, and transmit such data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) if we are processing that data on the basis of your consent.
- g) **Right to restrict.** You have the right to request us to temporarily restrict your CCTV Data which we no longer have the right to retain, or if you need to use it for establishing claims, performing with or exercising legal claims, defending legal claims, or complying with the laws.
- h) **Right to lodge a complaint.** You have the right to lodge a complaint to competent authority if we breach or do not comply with the provisions under the applicable data protection laws which are in effect in Thailand, including our other policies or regulations.

## 8. Our contact details

If you have concerns or questions regarding this CCTV Notice or if you would like to exercise your rights in relation to your CCTV Data, please contact IT Department or our data protection officers at :

### **DOUBLE A (1991) PUBLIC COMPANY LIMITED**

Address : Double A Business Park 187/3 Moo 1, Bangna-Trad km.42 Road,  
Bangwua District, Amphur Bangpakong, Chachoengsao, 24180 Thailand  
Phone number : : Call Center 1759 or 02-6591234 or 085-835-1558 (IT)

### **Data Protection Officer: DPO**

Phone number : 085-835-3274 or 085-835-4869  
Email address : dpo@doublea1991.com