



Notification of Energy Complex Company Limited

No. PS/0017/65

CCTV Policy

Energy Complex Co., Ltd. (“**Company**”) uses closed-circuit television (CCTV) and a drone to monitor the internal and surrounding area to protect lives, health, and properties. The company collects the personal data of customers, employees, directors, contractors, workers, visitors, or anyone who accesses the monitoring area inside the building and surrounding areas via the CCTV (collectively called “you.”) The personal data protection policy for CCTV use provides information about data collection, use, disclosure, and transmit that can identify the person, your “**personal data.**” The company may revise this policy at any time. Please keep up-to-date by accessing this policy regularly. The company shall inform significant changes in this policy if practical.

No. 1 Collected data

When entering the monitoring areas inside the building, the company collects CCTV data, including the images of slides, motion pictures, pictures of things like vehicles, and visitors' pictures captured through electronic devices or drones. Sometimes, the company may collect, use, or disclose your sensitive data (such as the facial scan) without your consent or the law allows.

No. 2 Objectives of data collection, use, or disclosure

The company may collect, use, disclose, transmit, and process, including but not limited to recording, possessing, adjusting, rectifying, destroying, erasing, recovering, copying, sending, storing, separating, improving, or adding data from the CCTV and other personal data related to you for “**the purpose of CCTV installation**” as follows.

- (a) To protect your health, safety, and properties.
- (b) To prevent the buildings, premises, and properties from damage, disruption, destruction, and other crimes.
- (c) To support the law enforcement authority to distrust, prevent, and detect crimes and to accuse in case of crime.
- (d) To efficiently support dispute resolution during the disciplinary or complaint process.
- (e) To support the investigation or consideration procedure concerning the whistle-blowing.
- (f) To support rights establishment in civil proceedings, including but not limited to labor cases.
- (g) To authenticate the person and to comply with the practical laws.
- (h) To survey the satisfaction toward the estate management.

The company installed the CCTV at visible locations. The areas without CCTV are [the changing rooms, toilets, shower rooms, or other areas designated as resting areas and with privacy as the company deems appropriate.]

The CCTV operates 24 hours daily, and the voice is recorded in some designated areas.

The company puts up signs at the entrance, exit, and monitoring areas so you know there is CCTV.

No. 3 Legal base

The company shall not collect, use, disclose, process, transmit, or take any actions, including but not limited to recording, possessing, adjusting, rectifying, destroying, erasing, recovering, combining, copying, sending, storing, separating, improving, or adding the data from the CCTV and other personal data related to you without your consent **except** the following cases.

(a) To protect the vital interests, it is necessary to prevent or suspend the harm to the person's life, body, or health.

(b) For legitimate interests, it is necessary for the company to protect your health and safety, including your properties, buildings, premises, and company's properties, and any other actions to follow the purpose of CCTV installation. The company is trying to balance the company's lawful benefits and relevant person as the case may be your basic right and liberty on CCTV data protection. Moreover, the company shall try to determine the method of setting the balance as appropriate.

(c) To perform legal obligation, the company must follow the applicable law, including but not limited to the laws related to work safety and environment. The company regards the necessity of using CCTV to perform such duties.

(d) To operate with consent, the company must sometimes collect personal data with the data subject's consent. The company shall request consent and store the data as necessary to achieve the relevant purposes only.

No. 4 Person to share and disclose your data with

The company is committed to keeping your data from the CCTV confidential. It will not disclose or transmit the data to anyone unless it is necessary for fair benefit. The company will disclose or transmit the data to current or potential selected third parties, eligible persons, partners and/or service providers in such cases. This is to ensure that the objective of the CCTV installation as prescribed in this policy is followed.

The outsiders that the company might disclose CCTV data and other personal data include:

(a) Subsidiary. The company may disclose or transmit CCTV data and other relevant personal data to a subsidiary of the company and the subsidiary's legitimate benefits from following the objective of CCTV installation.

(b) Government authorities and/or law enforcement authority The company may disclose CCTV data and other relevant personal data to comply with the law or to support and aid the law enforcement authority in an investigation or juridical proceedings of civil and criminal cases.

(c) Outsider service providers. The company may disclose or transmit CCTV and other relevant personal data to an outside service provider to process the necessary procedure to protect your health, safety, and properties.

No. 5 Transmitting data abroad

The company may disclose or transmit CCTV data abroad to process the necessary procedures to protect your health, safety, and properties. The disclosure or transmit of data shall be executed after receiving your consent unless there is another legal base (such as following the contract between the company and other persons for your benefit) as prescribed by laws.

Suppose CCTV footage is transmitted to a foreign country where the data protection standard is insufficient, as prescribed by data protection laws in Thailand; the company will ensure that the enforced law protects your data. We will follow the necessary procedures to protect the transmitted data abroad at the same level as we protect your CCTV footage so that your privacy is never compromised.

No. 6 Security measures

The company implements the appropriate organizational, technical, physical, and management measures to protect your CCTV data from destruction, loss, access, use, modification, or disclosure without intention, unlawfully, or without approval. This includes the access or control of access to the CCTV data to maintain the confidentiality, accuracy, completion, and availability of the CCTV data under the company's control in compliance with the minimum regulation prescribed by law.

The company sets the secure and appropriate control measures to access CCTV data and use storage and processing devices to collect, use, and disclose CCTV data. Moreover, the company sets the access and use limitation measure for the storage and processing device by setting the access authorization to the user, the right of permitting the assigned employee to access the data, and the user's responsibilities and duties to prevent the access without permission, disclosure, cognition, illegal data copying, or stealing the storage and processing device. Furthermore, the company sets the retrospective inspection measure for the CCTV data's access, change, deletion, or transmit.

No. 7 Retention period for personal data

The company shall retain your CCTV data as long as the operation achieves the objection of the CCTV installation prescribed in this policy. If the law does not allow the company to retain your CCTV data, the company shall delete the data from the company's system and record. However, in the case of court or disciplinary proceedings, your CCTV data may be retained until the end of the proceedings, including the tentative appeal period. Then, the data will be deleted or retained permanently as prescribed by the enforced law.

No. 8 Rights of the Data Subject

You have the following rights according to the relevant laws and statutory exceptions.

(a) Right to access data. You have the right to access and request a copy of your CCTV data or request the company to disclose your CCTV data obtained without consent. The company shall process your request within 30 days after receiving your request. The company may reject your request according to the legal right or court order or if the request to access and copy the CCTV data may adversely affect other's rights and freedoms.

(b) Right to rectification. You have the right to request the company to rectify, improve, or rectify your CCTV data to be up-to-date, complete, and accurate.

(c) Right to erasure. You have the right to request the company to delete your CCTV data or make it anonymous unless the law prescribes the company to collect your CCTV data, such as for establishing the claims, following or using the right to claim, or pretension, or complying with the law.

(d) Right to data portability. You have the right to get your CCTV data given to the company in case the company can give the readable or usable data by the tool or automated device. You may request the company transmit the CCTV data to another person when it is processed automatically. The company may charge the operational fee as allowed by law.

(e) Right to objection. You have the right to object to the collection, use, or disclosure of CCTV data according to the basic right for your case. You may not have the right to object if the processing of the CCTV data is a necessary case for a contract or complying with a contract.

(f) Right to restriction. You have the right to request the company to suspend the use of your CCTV data. In such cases, your requesting data will be identified as suspended, and the company may process the data in some cases.

(g) Right to withdraw the consent. You have the right to withdraw your consent to collect, use, disclose, send, and/or transmit your CCTV data at any time by informing the company via the contact channel unless it is the case that the law or beneficial contract limits the right to withdraw the consent, or unless the company implements another legal base to process the CCTV data.

(h) Right to lodge a complaint. You have the right to lodge a complaint to the authorized government authority if the company violates or does not comply with the provision of law regarding personal data protection that is effective in Thailand, including the violation or non-compliance with the company regulation.

No. 9 Contact channel

If you see that the processing of your data is non-confirming with the Personal Data Protection Act 2019 (B.E. 2562), you have the right to lodge a complaint to the personal data protection officer.

Energy Complex Company Limited

Location: Energy Complex Company Limited 555/1 Vibhavadi Rangsit Road,
Chatuchak Sub-district, Chatuchak District, Bangkok 10900
Tel: 0-2140-1234
E-mail: callcenter@energycomplex.co.th

Data Protection Officer

Location: Energy Complex Company Limited 555/1 Vibhavadi Rangsit Road,
Chatuchak Sub-district, Chatuchak District, Bangkok 10900
Tel: 0-2140-1148
E-mail: pdpa@energycomplex.co.th

No. 10 Applicable laws

The personal data protection policy for CCTV use is under enforcement and interpretation according to Thai laws, and the Thai court has authority for any potential dispute consideration.

Announced on 19 May 2022.

Sirasak Chandrema
President