

Personal Data Protection Policy for the Use of Closed-Circuit Television (CCTV)

Ornsirin Holding Public Company Limited and its subsidiaries (collectively referred to as the “Ornsirin Group” or “we”) use closed-circuit television (CCTV) systems to monitor areas within and around our premises for the protection of life, health, and property. We collect personal data of customers, employees, directors, contractors, workers, visitors, or any individuals entering areas under surveillance, both inside and surrounding the premises via CCTV (collectively referred to as “you”). This Personal Data Protection Policy for the Use of closed-circuit television (CCTV (“Policy”)) provides information on how we collect, use, disclose, and/or transfer information that can identify an individual (“personal data”) of you. The Ornsirin Group may amend this Policy at any time. Please review this Policy regularly for any updates. We will notify you of any material changes where feasible.

1. Data We Collect

We collect still images, moving images, and images of property (such as your vehicles) when you enter areas under surveillance within buildings and premises through CCTV (“CCTV Data”).

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

The Ornsirin Group may collect, use, disclose, transfer, and/or process any data, including but not limited to recording, holding, adjusting, altering, modifying, destroying, deleting, retrieving, combining, copying, transmitting, storing, separating, improving, or adding CCTV Data and other related personal data of you for the “CCTV purposes” as follows:

- (a) to protect your health and safety, including your property;
- (b) to protect buildings, premises, and property from damage, disruption, vandalism, and other crimes;
- (c) to support law enforcement authorities in deterring, preventing, and detecting crimes, including prosecution;
- (d) to support dispute resolution in disciplinary or complaint processes effectively;
- (e) to support investigations or proceedings related to whistleblowing;
- (f) to support the establishment or defense of legal claims in civil proceedings, including but not limited to labor cases; and
- (g) to verify identity and comply with applicable laws.

The Ornsirin Group will install CCTV in visible areas. Areas where CCTV will not be installed include sales offices and employee workspaces, as deemed appropriate by the Ornsirin Group.

CCTV operates 24 hours a day and does not record audio.

The Ornsirin Group will install signage at entry and exit points and in areas under CCTV surveillance to inform you that CCTV is in operation in such areas.

3. Legal Basis

The Ornsirin Group will not collect, use, disclose, process, transfer, and/or carry out any actions, including but not limited to recording, holding, adjusting, altering, modifying, destroying, deleting, retrieving, combining, copying, transmitting, storing, separating, changing, or adding CCTV Data and other related personal data of you without your consent, except in the following cases:

(a) Vital interests: where it is necessary to protect vital interests, including preventing or suppressing danger to life, body, or health of a person;

(b) Legitimate interests: where it is necessary for the legitimate interests of the Ornsirin Group in protecting your health and safety, including your property, as well as our buildings, premises, and assets, and for carrying out any actions in accordance with the purposes of CCTV installation.

We will endeavor to balance our legitimate interests and those of relevant third parties, as the case may be, with your fundamental rights and freedoms in relation to the protection of your CCTV Data. In addition, we will make efforts to identify appropriate methods to achieve such balance;

(c) Legal obligation: where it is necessary for compliance with applicable laws, including but not limited to laws relating to safety and working environment. We consider the use of CCTV as a necessary measure to enable us to fulfill such obligations.

4. Persons to Whom We Disclose and Share Your Personal Data

The Ornsirin Group will keep your CCTV Data confidential and will not disclose or transfer such data to any person, except to companies within the Ornsirin Group, carefully selected third parties (both present and future), assignees, joint venture partners, and/or service providers, in order to fulfill the purposes of CCTV installation as specified in this Policy.

Third parties to whom the Company may disclose CCTV Data and other related personal data of you include:

(a) Companies within the Ornsirin Group: We may disclose or transfer your CCTV Data and other related personal data to companies within the Ornsirin Group for our legitimate interests and those of such companies in carrying out the purposes of CCTV installation;

(b) Government Agencies and/or law enforcement authorities: We may disclose your CCTV Data and other related personal data to comply with applicable laws or to support or assist law enforcement authorities in investigations or legal proceedings, whether civil or criminal;

(c) External service providers: We may disclose or transfer your CCTV Data and other related personal data to external service providers to carry out necessary processes for the protection of your health, safety, and property.

5. Cross-Border Transfer

The Ornsirin Group may disclose or transfer your personal data obtained from CCTV to foreign countries in order to carry out necessary procedures for the protection of your health, safety, and property. Such disclosure or transfer will be made only upon obtaining your consent, unless there are other applicable legal bases (e.g., for compliance with a contract between the Ornsirin Group and another person for your benefit) as permitted by applicable laws.

If your personal data obtained from CCTV is transferred to a destination country that does not have adequate data protection standards as required by Thailand's personal data protection laws, we will implement necessary measures to protect such personal data transferred to overseas recipients, ensuring that it is protected at a level equivalent to the protection we provide to your CCTV Data in accordance with the applicable personal data protection laws in force at that time.

6. Security Measures

We implement appropriate organizational, technical, physical, and administrative measures to safeguard your personal data obtained from CCTV against destruction, loss, access, use, alteration, modification, or disclosure, whether accidental, unlawful, or unauthorized. These measures include access control or restriction to CCTV Data to maintain the confidentiality, integrity, and availability of such personal data under our control, in accordance with the minimum legal requirements.

We have established access control measures for CCTV Data and secure systems for storing and processing such personal data, appropriate to the collection, use, and disclosure of CCTV Data. We also impose restrictions on access to CCTV Data and the use of storage and processing systems by defining user access rights, authorization for designated personnel, and user responsibilities to prevent unauthorized access, disclosure, awareness, copying of personal data, or theft of storage or processing devices. In addition, we have implemented measures for audit trails regarding access, modification, deletion, or transfer of your CCTV Data.

7. Retention Period of Your Personal Data

The Ornsirin Group will retain your personal data obtained from CCTV within our systems for as long as necessary to carry out our duties in order to fulfill the purposes of CCTV installation as specified in this Policy. When we are no longer permitted by law to retain your personal data obtained from CCTV, we will delete such data from our systems and records. However, in the event of legal or disciplinary proceedings, your personal data obtained from CCTV may be retained until the completion of such proceedings, including any possible appeal period. Thereafter, the data will be deleted or archived in accordance with applicable laws.

8. Your Rights as a Data Subject

Once personal data protection laws become effective in Thailand, if you believe that your personal data has been recorded by our CCTV, you may have the following rights under applicable laws and legal exceptions:

(a) Right to withdraw consent: You have the right to withdraw your consent previously given to the Ornsirin Group for the collection, use, disclosure, transfer, and/or processing of your personal data obtained from CCTV at any time by notifying us through our contact channels, unless such withdrawal is restricted by law or contractual obligations for your benefit, or where we rely on other legal bases for processing.

(b) Right of access and to obtain a copy: You have the right to access and obtain a copy of your personal data obtained from CCTV, or to request disclosure of your personal data obtained without your consent. We will respond to your request within 30 days from the date of receipt. The Ornsirin Group may refuse your request where permitted by law or court order, or where such access or copy may affect the rights and freedoms of others.

(c) Right to rectification: You have the right to request that the Ornsirin Group correct, update, and ensure that your personal data is accurate, current, complete, and not misleading.

(d) Right to data portability: You have the right to receive your personal data obtained from CCTV that you have provided to the Ornsirin Group in a format that can be read or used by automated tools or devices. You may request that the Ornsirin Group transfer such data to another party where technically feasible. The Ornsirin Group may charge a fee for exercising this right as permitted by law.

(e) Right to object: You have the right to object to the collection, use, or disclosure of your personal data obtained from CCTV based on legal grounds applicable to your situation. However, you may not have the right to object where the processing is necessary for entering into or performing a contract.

(f) Right to erasure: You have the right to request that the Ornsirin Group delete your personal data obtained from CCTV or anonymize such data, unless retention is required by law, such as for the establishment, compliance with, exercise, or defense of legal claims, or compliance with legal obligations.

(g) Right to restriction of processing: You have the right to request that we restrict the use of your personal data obtained from CCTV. In such cases, the data will be marked as restricted and may only be processed in limited circumstances.

(h) Right to lodge a complaint: You have the right to file a complaint with the competent authority if you believe that the collection, use, and/or disclosure of your personal data is unlawful or not in compliance with applicable personal data protection laws.

9. Contact Channels

For inquiries regarding personal data, submission of suggestions, or requests to exercise data subject rights, please contact:

Ornsirin Group:

79 Moo 8, San Pu Loei Subdistrict, Doi Saket District, Chiang Mai

Tel: 053-295-709 or visit www.ornsirin.co.th

You may find further details regarding the personal data protection policy for customers and business partners on the Company's website. You may also contact the Data Protection Officer of the Ornsirin Group as follows:

Data Protection Officer: Ms. Nongnuch Kasorn Tel: 053-295709 ext. 102

Effective from 15 November 2024 onwards