CCTV Privacy Notice

Last update: Mar 2022

CN INTERCON. COMPANY LIMITED ("**we**", "**our**", "**us**") is using closed circuit television (CCTV) devices for monitoring our designated space within and around our facilities to protect person's life, health and property. We collect personal data of all customers, visitors, employees, contractors or any individuals and vehicles entering the monitored space within and around our facilitates ("**you**", "**your**" or "**yourself**") through the use of CCTV devices.

This CCTV Privacy Notice, including any updates thereof (the "Notice") describes how we collect, store, use, disclose, transfer, and otherwise process your personal data, including your data protection rights and covers our treatment of personal data that we collect, store, use and disclose.

We may update this Notice from time to time and such update will become effective upon uploaded. We recommend you regularly check and review this link to see when this Notice is latest updated. In case of any significant update, we will provide additional notice to you.

1. What type of personal data do we collect from you?

We collect your moving or still images, voice and picture of your property, including vehicles when entering the monitored space through the CCTV devices ("**CCTV Data**"). In certain cases, we may collect, use or disclose your sensitive personal data (i.e. facial recognition data) only on the basis of your explicit consent or where permitted by law.

2. Why do we collect and process your personal data?

2.1 We may collect, use, disclose, transfer, and carry on any actions which shall include, but not limited to, recording, holding, altering, modifying, possessing, adjusting, amending, destroying, deleting, retrieving, combining, compiling, copying, sending, transmitting, storing, extracting, amending, sorting, updating or adding CCTV Data and other personal data related to you for the purposes of CCTVs installation per below:

- To protect your health and personal security including your belongings and properties;
- To protect our facilities and assest from damage, disruption, vandalism, failure, destruction, and other crimes;
- To support government agencies on law enforcement in order to deter, suppress, prevent, detect and prosecure crimes including lawsuit arising from crimes;
- To effectively support dispute resolution during disciplinary procedure or complaint lodging;
- To support investigation or proceeding regarding complaints or whistleblowing;
- To support establishment and exercise of civil claims which shall include, but not limited to, labor claims; and
- To verify identity and to comply with applicable laws and regulations.

2.2 We shall install CCTVs at prominent places, and do not install them at rest and private locations, such as staff room, changing room, restroom, shower room, or any other places determined as resting spaces for staffs.
2.3 Our CCTV devices are in operation 24 hours a day and 7 days a week.
2.4 We shall install indication signs at every entrance and exit points, and CCTV monitored areas so that you are notified that there are CCTVs installed in such area.
2.5 We do not collect, store, use and disclose your personal data under this Notice without your consent, except in the following cases:

- **Vital interest:** It is necessary for our prevention or suppression of a danger to a person's life, body, or health;
- **Legitimate interest:** It is in our legitimate interest to protect your health and personal safety, as well as your belongings and properties, our facilities and assets, and to carry out any other operation. We will endeavor on the continuing basis to balance our legitimate interest and that 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. We will also endeavor to identify any steps required to achieve the right balance as appropriate;
- **Legal obligations:** We owe a duty to comply with the legal obligations prescribed by the applicable laws, including but not limited to the laws regarding safety and environment in the workplace. We consider the use of the CCTV as a necessary measure to enable us to meet those obligations.

4. To whom do we disclose and/or transfer your personal data? Where necessary, we may disclose or transfer your personal data with third parties, which may be located in Thailand or overseas, in the following situations:

- **Our group companies**, including those located in Indonesia, Singapore, Malaysia and China primarily for the purposes of coordinating and liaising with relevant persons in relation to the manufacture of our products, logistics management, payment process and related activities;
- **Third parties providers** that provide services in support of our business operation, including advertising outlets and advertising companies, logistic service providers, payment service providers, campaign and event organizers, and IT services providers (e.g. local data analytics tools provider and etc.);
- **Regulators and governmental agencies** where your personal data is legally required to be disclosed to regulators, law enforcement agency, court or other government authorities; and
- **Prospective buyers** – in case where we sell all or part of our businesses, undergo a merger, enter into a partnership, or if we go out of business or enter bankruptcy.

We require any person or entity to whom we disclose your information to respect the confidentiality and security of your personal data and to treat it in accordance with applicable laws and regulations. We do not allow such recipients of your personal data to use it for their own purposes, and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. Cross-border transfer of your personal data We regularly transfers your personal data to our group companies, and in certain circumstances, to third parties (e.g. service providers), located outside Thailand, which may have different data protection standards to those prescribed by the data protection authority in Thailand. In addition, most of our servers, which we use to process and store your personal data for the purposes prescribed in this Notice, are located outside Thailand. Notwithstanding that, we ensure that we will protect your personal data by implementing adequate personal data protection standards for the transfer of your personal data outside Thailand. We shall also ensure that any third parties to whom your personal data will be disclosed or transferred, shall implement adequate personal data protection standards, and where your personal data will be transferred to our group companies, we shall use data transfer mechanisms, i.e. binding corporate rules.

6. Security Measures We implement and maintain appropriate personal data security measures, which include administrative, technical and physical safeguards in relation to access control, to protect the confidentiality, integrity, and availability of personal data against any unlawful or unauthorized loss, access, use, alteration, correction or disclosure, in compliance with the applicable laws. In order to ensure efficiency of our security measures, we examine and adjust our security measures from time to time as necessary or when there is relevant technology development to ensure that our security measures are efficient and appropriate and in accordance with minimum legal requirements as required by the relevant government agencies.

6. For how long do we retain your personal data? *(Note: Kept original numbering from source)* We will retain your personal data as long as it is necessary for the purpose of processing, and complying with our legal and regulatory obligations, as well as our and your legal rights and obligations. Nonetheless, your personal data will generally be kept for a maximum period of ten (10) years after the end of your provision of goods and/or services or otherwise for a longer period if it is required by applicable laws, following which certain information may continue to be stored in an aggregated and anonymised format.

7. What are your rights in relation to your personal data? Under certain circumstances and subject to certain exemptions under applicable data protection laws, you are entitled to the following rights:

- **Right to access** – to request access to and obtain a copy of your personal data, or to request the disclosure of the acquisition of your personal data;
- **Right to data portability** – where we have carried out the processing by automated means, to receive a copy of your personal data in the format which is readable or commonly used by ways of automatic tools or equipment, and can be used or disclosed by automated means;
- **Right to object** – to object any processing of your personal data by us based on our legitimate interests, unless (i) we can demonstrate an overriding legitimate ground; or (ii) the processing is for the establishment, exercise or defence of legal claims. In any case, you may at any time object to our processing of data for direct marketing purposes;

- **Right to be forgotten** – to request us to delete or anonymise your personal data where (i) the personal data is no longer necessary for the processing purposes; (ii) you withdraw the consent given to us and we do not have other legal ground for processing; (iii) you object the processing of your personal data by us based on our legitimate interests and we do not have an overriding legitimate ground for the processing; and (iv) your personal data is unlawfully processed;
- **Right to restrict processing** – you have the right to restrict our processing of your personal data where (i) you believe such data to be inaccurate; (ii) our processing is unlawful but you want us to retain such data; and (iii) the personal data is no longer necessary for the processing purposes but you want us to retain such personal data for the establishment, exercise or defense of legal claims and (iv) you have objected to the processing your personal data based on our legitimate interest and we are considering the request;
- **Right to rectification** – to request us to correct or update any inaccuracy of your personal data;
- **Right to withdraw consent** – where you have provided us with your consent to process your personal data, to withdraw your consent at any time; and
- **Right to lodge a complaint** – to lodge a complaint to relevant authority in case that we process your personal data unlawfully or not in compliance with applicable laws.

The exercise of your rights is subject to the limitations prescribed by law. Where applicable and unless otherwise specified herein, you are entitled to exercise your rights set out above by contacting us using the contact details below. We will process your request according to our obligations under the law. Please note that in certain circumstances, where permitted by law, we may not be able to fulfil your request. You will be notified accordingly.

8. Our contact details In case you have any question with regard to this Notice, please contact us at our contact details below:

CN INTERCON. COMPANY LIMITED
Email: information@cnintercon.co.th
Telephone: (+66) 02-190-4487