

## CCTV PRIVACY POLICY

### ROCTEC GLOBAL PUBLIC COMPANY LIMITED

**Roctec Global Public Company Limited** and the Roctec's Group Companies include Master and More Company Limited, Eye on Ads Company Limited, Green Ad Company Limited, and Gold Star Group Company Limited. (the "**Company**", "**we**", "**us**", or "**our**") uses CCTV to monitor inside and surrounding of buildings and premises, including within the computer network room areas of the Company and BTS Group Companies<sup>1</sup> ("**Buildings and Premises**") to protect life, health, and asset. We collect Personal Data of customers, employees, directors, contractors, workers, visitors, and any other person entering the monitored areas whether inside buildings or surrounding areas (collectively, "**you**", or "**your**") through CCTV. This privacy policy ("**Privacy Policy**") provides information regarding the collection, use, and/or disclosure of your identifiable data ("**Personal Data**") by the Company. From time to time, we may change and/or update this Privacy Policy. We will provide additional notice of significant changes and/or updates. We will post the date on which our Privacy Policy was last updated at the top of the Privacy Policy. We encourage you to read this Privacy Policy carefully and to check Privacy Policy regularly to review any changes and/or updates we might take in accordance with the terms of this Privacy Policy.

#### 1. PERSONAL DATA WE COLLECT

We collect stills or motion pictures and pictures of your asset (e.g., your vehicle) when you enter monitored areas whether inside buildings or surrounding areas through CCTV ("**CCTV Details**").

#### 2. PURPOSES AND LEGAL BASES WHICH WE RELY ON FOR THE COLLECTION, USE AND/OR DISCLOSURE OF YOUR PERSONAL DATA

2.1 We may collect, use, disclose, transfer, and carry on any actions which shall include but not limited to recording, possessing, adjusting, amending, destroying, deleting, retrieving, compiling, copying, sending, storing, sorting, updating or adding CCTV Details and other Personal Data related to you for "**The Purposes of CCTVs Installation**" per below:

- (a) To protect health and security including your asset;
- (b) To protect buildings, premises, and asset from damages, failure, destruction, and other crimes;
- (c) To support government agencies on law enforcement in order to suppress, prevent, detect crimes including lawsuit arising from crimes;

---

<sup>1</sup> Please see the list of BTS Group Companies at <https://www.btsgroup.co.th/en/about/subsidiaries-and-associated>

- (d) To effectively support dispute resolution during disciplinary procedure or complaint lodging;
  - (e) To support investigation or proceeding regarding complaints or whistleblowing;
  - (f) To support establishment and exercise of civil claims which shall include but not limited to labor claims.
- 2.2 We install CCTVs at prominent places, and do not install them at places such as staff room, changing room, restroom, shower room, or any other places determined as resting spaces for employees.
- 2.3 CCTVs run 24 hours every day and record no sound.
- 2.4 We install indication signs at every entrance and exit and CCTV monitored areas so that you are notified that there are CCTVs installed in such area.

### 3. LEGAL BASES WHICH WE RELY ON FOR COLLECTION, USE, AND/OR DISCLOSURE OF YOUR PERSONAL DATA

We will not collect, use, disclose, process, transfer, and carry on any actions which shall include but not limited to recording, possessing, adjusting, amending, destroying, deleting, retrieving, compiling, copying, sending, storing, separating, updating or adding CCTV Details and other Personal Data related to you without your consent except in the following cases:

- (a) **Vital Interest**, for preventing or suppressing a danger to a person's life, body or health;
- (b) **Legitimate Interest**, for the purpose of our legitimate interests in protecting your health and security including your asset, buildings, premises, and our asset and any other actions according to the purposes of CCTVs installation. We will balance the legitimate interest pursued by us and any relevant third party (as the case may be) with your interest and fundamental rights and freedoms in relation to the protection of your CCTV Details. In addition, we put an effort to seek for ways to achieve such balance as appropriate;
- (c) **Legal Compliance**, for fulfillment of our legal obligations under the applicable laws including but not limited to safety and working environment law. We believe that the installation of CCTVs is a necessary measure for us to achieve such purpose.

### 4. DISCLOSURE OR TRANSFER OF YOUR PERSONAL DATA TO THIRD PARTIES

- 4.1 We will keep your CCTV Details related to you confidential and will not disclose or transfer such data to any person except the BTS Group Companies, third parties which we carefully select at present and in the future to proceed as requested by us, licensees, partners in joint ventures, and/or service providers to be in accordance with the purposes of CCTVs installation.

4.2 Third parties to whom CCTV Details and other Personal Data related to you will be disclosed include:

- (a) **BTS Group Companies**, we may disclose or transfer CCTV Details and other Personal Data related to you to the Roctec<sup>2</sup> Group Companies and the BTS Group Companies for the purpose of our legitimate interests and legitimate interests of the BTS Group Companies to comply with **the purposes of CCTVs installation**.
- (b) **Government agencies and/or law enforcement agencies**, we may disclose CCTV Details and other Personal Data related you for the purpose of legal compliances and compliance with legitimate orders of the court, regulatory bodies, government agencies, and/or government organizations.
- (c) **Third-party service providers**, we may disclose or transfer CCTV Details and other Personal Data related to you to third-party service providers to follow necessary measures in order to protect your health, safety and asset, as well as other purposes stated herein.

## 5. CROSS-BORDER TRANSFERS OF PERSONAL DATA

5.1 We may disclose or transfer your CCTV Details to third-party service providers located overseas in order to follow necessary measures to protect your health, safety and asset, as well as the purposes stated herein. We take steps and measures to ensure that Personal Data is securely transferred, that the receiving parties have in place suitable data protection standard and that the transfer is permitted under the law.

5.2 In the case where your CCTV Details are transferred to the destination countries which do not have the same data protection standards as required by Thailand's Personal Data protection law, we take necessary measures to protect Personal Data transferred to third parties in such countries to ensure that such Personal Data is protected at the same level as we do to your CCTV Details according to the applicable Personal Data protection law.

## 6. HOW LONG DO WE KEEP YOUR PERSONAL DATA

We retain your CCTV Details for as long as is reasonably necessary to fulfil the purposes of CCTVs installation as described in this Privacy Policy. In the event that we are no longer legally permitted to retain your CCTV Details, we will delete your data from our systems and records. Nevertheless, in the case where there are any court or disciplinary proceedings, your CCTV Details may be retained until such proceedings have been completed including possible appealing process. After such process, the data will be permanently deleted or stored as required by the applicable laws.

---

<sup>2</sup> Please see the list of ROCTEC Group Companies at <https://www.roctecglobal.co.th/en/about-us/structure>

## 7. SECURITY MEASURES

7.1 We 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.

We have implemented access control measures and utilization of storage and processing devices measures for the collection and processing of Personal Data which are secured and suitable for our collection, use, and/or disclosure of Personal Data. We restrict access to Personal Data as well as storage and processing devices by imposing access rights or permission, access management to limit access to Personal Data to only authorized persons, and implement user responsibilities to prevent unauthorized access, disclosure, perception, unlawful duplication of Personal Data or theft of device used to store and process Personal Data; This also includes methods that enabling the re-examination of access, alteration, erasure, or transfer of Personal Data which is suitable for the method and means of collecting, using and/or disclosing of Personal Data.

7.2 We, from time to time, examine and adjust our security measures 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.

## 8. YOUR RIGHTS AS A DATA SUBJECT

Subject to applicable laws and exceptions thereof, a data subject may have the following rights to:

- (a) Access:** Data subjects may have the right to access or request a copy of the Personal Data we are collecting, using and/or disclosing. For privacy and security, we may require proof of the data subject's identity before providing the requested Personal Data;
- (b) Rectification:** Data subjects may have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data that we collect, use and/or disclose rectified;
- (c) Data Portability:** Data subjects may have the right to obtain Personal Data we hold about that data subject, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) if we are collecting, using and/or disclosing that data on the basis of data subject's consent or to perform a contract with the data subject;
- (d) Objection:** Data subjects may have the right to object to certain collection, use and/or disclosure of Personal Data subject to the applicable law;

- (e) **Restriction:** Data subjects may have the right to restrict our use of Personal Data where the data subject believes such Personal Data to be inaccurate, that our collection, use and/or disclosure is unlawful, or that we no longer need such Personal Data for a particular purpose;
- (f) **Withdraw consent:** For the purposes the data subjects have consented to our collection, use and/or disclosure of Personal Data, data subjects may have the right to withdraw consent at any time;
- (g) **Deletion:** Data subjects may have the right to request that we delete, destroy or anonymize Personal Data that we collect, use, and/or disclose, except we are not obligated to do so if we need to retain such Personal Data in order to comply with a legal obligation or to establish, exercise or defend legal claims; and
- (h) **Lodge a complaint:** Data subjects may have the right to lodge a complaint to the competent authority where the data subject believes our collection, use and/or disclosure of Personal Data is unlawful or non-compliance with applicable data protection law.

## 9. OUR CONTACT DETAILS

If there are any concerns or queries about this Privacy Policy or if you wish to exercise the rights relating to your CCTV Details, please contact our Data Protection Officer (DPO) at:

- (1) Roctec Global Public Company Limited
- (2) Office: 1000/9 BTS Visionary Park - South Tower, 18th Floor, Unit No. 1801 – 1807  
Phahonyothin Road, Chomphon Sub-district, Chatuchak District, Bangkok 10900
- (3) Telephone: +662-938-3388, Monday to Friday, 9.00 a.m. – 6.00 p.m.
- (4) Email: [dpo@roctecglobal.co.th](mailto:dpo@roctecglobal.co.th)

This Privacy Policy is effective as of April 1<sup>st</sup>, 2025, onwards.

Mr. Weng Sam Lam  
Chief Executive Officer