

CCTV PRIVACY POLICY - BILLBOARD AND OTHER AREA

ROCTEC GLOBAL PUBLIC COMPANY LIMITED

1 July 2024

Roctec Global Public Company Limited and More Company Limited (the “Company”, “we”, “us”, or “our”) installs Closed-Circuit Television (CCTV) inside and surrounding of area where the Company’s billboard are installed, Sky walk at Chong Nonsi station, area where the Company has received concessions from the public and private sectors, area where the company has received concessions from companies in the BTS group, area where the company has received management rights, and other areas where the Company is permitted to manage (“**Area**”) to protect the Company’s asset, the assets of contracting parties, the assets granted management rights, and maintain security in the such area. We collect Personal Data of any other person entering the monitored areas whether inside areas 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 surrounding areas through CCTV. Including relevant details such as the date and time you passed through the area. (“**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, destroying, deleting, retrieving, compiling, copying, sending or storing, (collectively, “**Processing**”) 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 and of the Company;
- (b) To protect areas, 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;
- (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, criminal claims, or legal proceedings.

2.2 CCTVs run 24 hours every day and record no sound.

2.3 We install indication signs at CCTV monitored areas so that you are notified that there are CCTVs installed in such area.

3. LEGAL BASES WHICH WE RELY ON FOR PROCESSING OF YOUR PERSONAL DATA

We will not processing CCTV Details and other Personal Data related to you based on the following lawful basis:

- (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 CCTV installation. We will ensure that your fundamental rights and freedoms, and privacy are properly protected and proportionate to those legitimate interests.
- (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;
- (d) **Public Interest**, it is necessary for the public interest that the company has a duty to act according to relevant laws or as assigned by an authorized government agency. The Company will provide appropriate measures to protect your fundamental rights and interests.

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

To achieve the purposes of CCTV installation. The Company shares information from CCTV with companies in the ROCTEC group for data management and may disclose information from CCTV to third parties to whom CCTV details and other personal data related to you will be disclosed. The Company will take steps to ensure that any third party or agency that receives Personal Data from the Company will comply with this Privacy Policy in order to strictly protect Personal Data.

4.1 ROCTEC Group Companies, we has provided installation and maintenance of CCTV by Master and More Co., Ltd. and Trans. Ad Solution Co., Ltd. (please see the list of ROCTEC Group Companies at <https://www.roctecglobal.co.th/en/about-us/structure> where some resources and systems may be shared. Therefore, CCTV data may be managed between the Company and ROCTEC group companies to comply with the purposes of CCTVs installation.

4.2 BTS Group Companies, we may disclose or transfer CCTV Details and other Personal Data related to you to the BTS Group Companies (please see the list of BTS Group Companies at <https://www.btsgroup.co.th/en/about/subsidiaries-and-associated>) to comply with the purposes of CCTVs installation.

4.3 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, as well as any other third party specified by law who are involved in areas such as the Bangkok Metropolitan Administration (BMA) including Investigative Officers in the case of legal proceedings.

4.4 Third party or service providers, we may disclose or transfer CCTV Details and other Personal Data related to you to third party include; maintenance technician, subcontractors of the contracting party to follow necessary measures in order to protect your health, safety and asset, as well as other purposes stated herein.

However, we will only provide Personal Data to third party or our service providers to the extent necessary to provide the service and will ensure that all service providers we work with keep Personal Data secure and do not use your Personal Data for purposes other than the scope of operations of the service provider in any way.

5. CROSS-BOARDER TRANSFERS OF PERSONAL DATA

We have no policy of disclosing or transferring Personal Data collected and recorded from this CCTV to transferees located overseas.

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.

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

This Privacy Policy is effective as of April 1st, 2025, onwards.

Mr. Weng Sam Lam
Chief Executive Officer