



Plan B Media Public Company Limited

1700, Plan B Tower, New Petchburi Road, Makkasan, Ratchathewi, Bangkok 10400
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CUSTOMER CCTV NOTICE

Plan B Media Public Company Limited (the “PLANB”, “Company”, “we”, “us”, or “our”) uses CCTV to monitor inside and surrounding area of the buildings and premises to protect life, health, and asset. We collect personal data of customers, staff, directors, contractors, employees, visitors, and any other persons entering the monitored areas whether inside the buildings or the surrounding areas (collectively, “you”, or “your”) through CCTV. This privacy policy provides information regarding the collection, use, and/or disclosure of your personal identifiable information (“personal data”) by the Company.

We may at any time update this privacy policy. We will provide additional notice of updates through the specified channels.

1. PERSONAL DATA WE COLLECT

We collect stills or motion pictures, and pictures of your asset (e.g., your vehicle) when you enter the monitored areas whether inside the buildings or the 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:

- To protect health and security including your asset;
- To protect buildings, premises, and asset from damage, failure, destruction, and other crimes;
- To support government agencies on law enforcement in order to suppress, prevent, detect 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.

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

2.3. We shall 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 ON WHICH WE RELY 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:

- **vital interest**, for preventing or suppressing a danger to a person's life, body or health;
- **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;
- **legal compliance**, for fulfillment of our legal obligations under the applicable laws, including, but not limited to, laws concerning safety and working environment. 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 **Companies under PLANB**, 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 may be disclosed include:

- **Companies in PLANB**, we may disclose or transfer CCTV Details and other personal data related to you to the Companies under PLANB for the purpose of our legitimate interests and legitimate interests of the Companies under PLANB to comply with the purposes of CCTVs installation.
- **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.
- **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.

5. CROSS-BOARDER 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. Such disclosure or transfer would not be done unless your consent has been obtained, except in the case where there are other significant legal bases (e.g., contractual obligations between us and other third parties for your interest) according to the applicable laws.

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 shall 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 then applicable laws concerning personal data protection.



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6. SECURITY MEASURES

- 6.1. 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.
- 6.2. 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.

7. 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.

8. YOUR RIGHTS AS A DATA SUBJECT

Subject to the applicable laws and our rights administrative procedures, you may have the following rights to:

- 8.1. **Access:** You may have the right to access or request a copy of the personal data we are collecting, using and/or disclosing;
- 8.2. **Rectification:** You may have the right to have incomplete, not up-to-date, inaccurate or misleading personal data that we collect, use and/or disclose rectified;
- 8.3. **Data portability:** You may have the right to obtain personal data we hold, 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 if we are collecting, using and/or disclosing that data on the basis of your consent or to perform a contract with you. If your exercise of right violates any right or freedom of any other person or we have to use your personal data for the purposes of public interest or legal compliance, we may reject your request;
- 8.4. **Objection:** You may have the right to object to certain collection, use and/or disclosure of personal data subject to the applicable law;
- 8.5. **Restriction:** You may have the right to restrict our use of personal data in certain cases;
- 8.6. **Withdraw consent:** For the purposes you have consented to our collection, use and/or disclosure of personal data, you may have the right to withdraw consent in certain cases;
- 8.7. **Deletion:** You may have the right to request that we delete, destroy or anonymize the 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
- 8.8. **Lodge a complaint:** You may have the right to lodge a complaint to the competent authority where you believe that we are not in compliance with applicable data protection law.

9. OUR CONTACT DETAIL

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: Plan B Tower, 1700 Phetchaburi Rd, Bang Kapi, Huai Khwang, Bangkok 10310, Thailand. Email: anan.c@planbmedia.co.th

- *Pinijsorn Luechaikajohnpan* -
(Pinijsorn Luechaikajohnpan, Ph.D.)
Authorized Director