

Privacy Notice on CCTV Use

Erawan Hotel Public Company Limited ("Erawan" "we," "us," or "our") uses closed-circuit television (CCTV) devices for monitoring our designated areas within and around our buildings and facilities to protect life, health, and property. We collect personal data of all directors, employees, contractors, workers, visitors, or any individuals entering the monitored space within our buildings and facilities (collectively referred to as "you" or "your") through the use of CCTV devices.

This privacy notice provides information on our collection, use, disclosure, and transfer of individually identifiable information ("Personal Data") about you. We may amend this notice at any time and will notify you of the amendments, where possible.

1. INFORMATION WE COLLECTED

We collect your moving or still images and belongings e.g., vehicles, when entering the monitored space in our buildings and facilities through the CCTV devices ("CCTV Data").

2. HOW WE PROCESS YOUR PERSONAL DATA

We may collect, use, disclose, transfer, and carry out any operation, including but not limited to recording, holding, adapting, altering, modifying, destroying, deleting, retrieving, combining, copying, transmitting, storing, extracting, amending, or adding, related to your CCTV Data and other Personal Data concerning you, for the "CCTV Monitoring Purposes" as listed below:

- to protect your health and personal safety, including your belongings;
- to protect our buildings, facilities and assets from damage, disruption, vandalism, and other crime;
- to support law enforcement organizations in the deterrent, prevention, detection, and prosecution of crime;
- to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- to assist in the investigation or proceedings concerning a whistleblowing complaint; and
- to assist in the establishment or defense of any civil litigation, including but not limited to employment proceedings.

Our CCTV devices are in operation 24 hours a day and 365 days a year.

We will place signage at the entrance and exit points, and the monitored areas to alert you that a CCTV installation is in use.

3. LEGAL BASES

We will not collect, use, disclose process, transfer, and carry out any operation, including but not limited to recording, holding, adapting, altering, modifying, destroying, deleting, retrieving, combining, copying, transmitting, storing, extracting, amending, or

adding, related to your CCTV Data and other Personal Data concerning you, without consent except for the following:

- **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, our buildings, facilities and assets, and to carry out any other acts to achieve the CCTV Monitoring Purposes. 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. WHO WE DISCLOSE AND/OR TRANSFER YOUR PERSONAL DATA TO

We will keep CCTV Data concerning you confidential and will not disclose or transfer it except to our affiliates and other carefully selected third parties now or in the future, e.g. joint venture partners, and/or service providers, who may be located overseas, to achieve the CCTV Monitoring Purposes provided in this notice.

Third parties to which we may disclose CCTV Data and other Personal Data concerning you include:

- **Our affiliates.** We may disclose or transfer CCTV Data and other Personal Data concerning you to our affiliated companies, as part of our legitimate interest and our affiliates' interest to achieve the CCTV Monitoring Purposes.
- **Governmental and/or regulatory organizations.** We may disclose or transfer CCTV Data and other Personal Data concerning you to comply with legal obligations, or to support or assist law enforcement organizations with regard to the investigation and prosecution of civil or criminal proceedings.
- **Third-party service providers.** We may disclose or transfer CCTV Data and other Personal Data concerning you as our necessary steps to ensure our protection of your health and personal safety, and belongings.

5. CROSS-BORDER TRANSFER

We may disclose or transfer your CCTV Data as part of necessary steps to ensure your health, personal safety, and belongings, to third-party service providers that are outside of Thailand. Such disclosure or transfer may only be done by obtaining your consent, unless there are any other compelling legitimate grounds (e.g. to perform the contract terms between us and other persons for your benefit) as permitted by applicable laws.

If your CCTV Data is transferred to destination countries where the standard of protection available is not sufficient under the applicable laws on data protection in Thailand, we will take steps necessary to protect the Personal Data transferred to other persons internationally to reach the same level of protection as we provide with respect

to your CCTV Data, and in compliance with the applicable laws on data protection which is in effect at that time.

6. SECURITY MEASURES

We use reasonable organizational, technical, and administrative security measures to protect CCTV Data and Personal Data concerning you from accidental, unlawful, or unauthorized destruction, loss, access, use, alteration, or disclosure.

We will from time to time review and update our security measures as necessary or upon development of the concerning technology to ensure effective and appropriate security measures, and in line with minimum legal requirements as prescribed by the relevant governmental organizations.

7. PERIOD OF RETENTION

We will retain your CCTV Data in our system for the period necessary to fulfil our duties to achieve the CCTV Monitoring Purposes prescribed in this notice. When we are no longer permitted by the applicable laws to store your CCTV Data, we will remove it from our systems and records. In the event a judicial or disciplinary action is initiated, your CCTV Data may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived as permitted by the applicable laws.

8. YOUR LEGAL RIGHTS

If you believe that you have been recorded by our CCTV devices, you may have the rights pursuant to the laws and exception thereof as follow:

- **Right of access.** You have the right to access and request a copy of CCTV Data concerning you, or request us to disclose your CCTV data acquired without your consent. The request must be in writing with the police report and an attached identification document such as a copy of Thai National ID Card, a copy of passport or a copy of driving license and sent to Building Management Department. Your request will be processed within 30 days from the date we receive your request. We may refuse your request following our legal rights or the court orders, and where such access and request of copy of the CCTV Data concerning you could affect the rights and freedom of the others. If it is decided that your request is to be refused, we will inform you stating the reasons in writing and send it to you within the period required by law;
- **Rectification.** You may have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data that we process about you rectified.
- **Right of objection.** You have the right to object to the collection, use, or disclosure of your CCTV Data and Personal Data if it is for the purpose of achieving our legitimate interest and/or that of other persons. Your request will be processed as soon as possible upon we receive your request. We may refuse your request if we can prove there are more important legal grounds to collect, use, or disclose your CCTV Data, or such collection, use, or disclosure is for establishing claims, performing with or exercising legal claims, defending legal claims, or complying with the laws. If it is decided that your request is to be refused, we will inform you stating the reasons in writing and send it to you within the period required by law.

- **Right of deletion.** You have the right to request us to delete your CCTV Data or to render your CCTV Data to be unidentifiable to the extent applicable under the laws, except for the case that we may need to collect your CCTV Data as applicable under the laws, such as establishing claims, performing with or exercising legal claims, defending legal claims, or complying with the laws.
- **Right of temporary suspension.** You have the right to request us to temporarily suspend your CCTV Data which we no longer have the right to retain, if you need to use it for establishing claims, performing with or exercising legal claims, defending legal claims, or complying with the laws.
- **Right of compliant.** You have the right to file a complaint against us to competent government agencies if we breach or do not comply with the provisions under the applicable data protection laws which are in effect in Thailand, including our other policies or regulations.

9. CONTACT US

If you have concerns or questions regarding this privacy notice or if you would like to exercise your rights in relation to your CCTV Data, please contact:

Erawan Hotel Public Company Limited

494 Ploenchit Road,

Kwang Lumpini, Khet Pathumwan, Bangkok 10330 Thailand

Telephone: 66 (0) 2257-4588

Fax: 66 (0) 2257-4577

The responsible person for CCTV Data : Building Management Department at email address : erawan.bangkok@nmc.co.th