

## Customer, Partner, Contractor, Service Recipient, and Business Partner Privacy Notice

Major Development Estate Company Limited is strongly devoted to protecting everyone's Personal Data and is aware of its obligations under the Personal Data Protection Act of B.E. 2562, which places significance on upholding privacy rights. This Privacy Notice applies to Personal Data of customers, partners, contractors, service recipients, business partners in order to inform and explain that; How does the Company collect your Personal Data? What data does the Company collect? What is the purpose of data processing? How is your data disclosed? What safeguards are in place to secure your data? In particular, your legal rights as the data subject which are specifies below.

### 1. Effectiveness of the announcement

This Privacy Notice applies to Personal Data of customer, partners, contractors, service recipients, business partners, including, the individual acting on behalf of juristic person which is the owner of the Personal Data such as directors, advisors, executives, employee, representatives, and other persons related to the above-mentioned persons which hereinafter referred to as "you".

### 2. Definition

The definitions and meanings table:

Definition	Meaning
The Company	Major Development Estate Company Limited and its subsidiary companies.
The Subsidiary Company	A company or legal partnership that has relationship with any other entity that Major Development Estate Company Limited controls, is controlled by, or that is under its overall direction which might have the same group of majorities of directors or shareholders.
Customer	Persons who are the targets of the Company's operations or services and includes participants in the Company's campaigns or marketing activities, persons interested in the Company's products or services through various channels and/or users of the Company's services through various online and electronic media, as the case may be, including attorneys-in-fact, person authorized to act on behalf of the customer according to law, as the case may be such as those exercising parental authority over minors, guardian of the incapacitated, protector of quasi-incompetent person, etc.
Partners, contractors, service recipients and business partners	Proponents/sellers of land, property, products, contractors and/or service providers or any person having business relationships with the Company, both juristic persons and

Definition	Meaning
	natural persons, including subcontractors of product sellers, contractors and/or service providers.
The Individual	Only individual, not including juristic person.
Data Subject	The Individual who can be identified by the information.
Personal Data	Information about a person that can be used to identify them, either directly or indirectly, but excludes details on a specific deceased individual.
Sensitive Personal Data	Information about an individual's nationality, ethnicity, political views, creeds, religion, or philosophy, sexual orientation, behavior, criminal record, health, disability, trade union membership, genetic information, biological information, or any other personal information that could affect the owner of the Personal Data in a similar manner as specified by PDPC.
Processing of Personal Data	Collect, use or disclose Personal Data
Data Controller	The individual or juristic person who have the authority to make decisions regarding the collection, use, or disclosure of Personal Data.
Data Processor	The individual or juristic person who carries out the collection, use, or disclosure of Personal Data in accordance with the order or on behalf of the Personal Data controller. However, the individual or juristic person who performs such action is not the Personal Data controller.
Non-Personal Data	Various information that does not identify an individual, such as company registration numbers and business contact information that does not identify an individual, such as phone numbers, working email, company email, office address, anonymous data, and information about the deceased.
Transaction	Any action related to civil and commercial activities.
Electronic transactions	Transactions carried out using all or part of electronic means.

### 3. The Company's Collection of Personal Data

Your Personal Data is kept on file by the Company as needed. The Company retains the customer' Personal Data. The table below lists the categories of Personal Data that the Company retains.

Personal Data collection table:

Types of Personal Data	Details
Basic Personal Data	Identity Data such as first name, last name, ID card number, passport number, date of birth, gender, age, nationality, signature, photograph, professional license identification number and membership number.
Sensitive Personal Data	Such as fingerprints, facial features, health data, specific food allergy data with your express consent or as permitted by law.
Contact Data	Such as address, copy of house registration, telephone number, email, geolocation, emergency contact, social media account and LINE ID, including workplace information such as name of workplace, office address, telephone number, email, position and, etc.
Third Party Data	If you give the Company any Personal Data of any third parties, including executives, authorized persons, attorneys, directors, employee information, representatives, and proxies, as well as information about other individuals who are not directly connected to the Company but have connections to it through other relationships.
Communication Data	Such as type of product or service you choose, your request to apply for the product or service, booking details and any other information in the evidence you have provided to the Company.
The Service Data	Such as type of product or service you choose, your request to apply for the product or service, booking details and any other information contained in the evidence you have provided to the Company.
Transaction Data	Details of transactions from or to you, contract details, contract/transaction documents, requests and claims, details of various agreements and other data related to transactions.
Electronic Transaction Data	Such as electronic transaction data via Website, Application Lifescape, Application ICM and, etc.
Financial Data	Such as bank account data, credit/debit card data, money transfer details, and bank loan application data and, etc.
The Company's Electronic Systems Usage Data	Such as username, information about application usage, browsing information, website visiting history, IP address, cookies, log file and, etc.
Receiving Services Data	Such as booking services - receiving services of the village or condominium juristic person, vehicle registration

Types of Personal Data	Details
	information, motorcycle, pet information, postage, parcels, repair reports and, etc.
Property Data	Such as vehicle data, pet data, postal, parcel data and, etc.
Meetings, Seminars and Activities Data	Such as information on participating in meetings, seminars, activities, or other projects organized by the Company that may include still images, moving images, and/or sound during such meetings, trainings, seminars, or activities.
Risk Consideration Data	Such as information for background checks, evaluating suitability or considering risks before deciding to enter into a transaction, including for legal proceedings or enforcement, such as marital status, information about property, etc.
Safety Data	CCTV images, vehicle data, license plate data, date and time data for entering and exiting Company premises.
Suggested Data	Such as comments, suggestions and complaints.
Public Data	Public data available online and offline channels, publicly available data, such as first name, last name, alias, photos, posts, location, friends list, interests and pages you follow.
Communication Data	Such as conversations, email and various communications.
Data about Your Interests	Such as lifestyle, travel, relaxation, pets, products and services, preferences, interests and, etc.
Other Data	Other Personal Data for necessary convenience, etc.

#### 4. The Source of Personal Data

The Company collects Personal Data from the following sources:

##### 4.1 Personal Data Received Directly from You

From contacting, customer registration, creating an account through the application, making a reservation, entering into a purchase or sale contract, requesting to rent space or request your various services or from the recruitment process business operator, providing information or filling out the quotation (Offer Form), supporting documents for store consideration, documents for requesting various services, bidding, submitting bidding envelopes, participating in marketing activities, participating in promotional activities through various channels, both physical or with information technology, including information and updates to your information while you are a customer, partner, contractor, service recipient, etc.

#### **4.2 Personal Data Received from Other Sources**

The Company may collect your Personal Data from other sources such as your broker, website, employees or officials, or that the Company receives from a third party that is involved in collecting, using, or disclosing Personal Data as ordered by or on behalf of the Company or from the request of the Company or from other sources as necessary as permitted by law.

#### **4.3 Third Party's Personal Data**

The Company may receive third parties' Personal Data who are related to you of which you are the person providing information to the Company, such as contacts, employees, staff, contractors, agents, or other persons whose information is used by the Company to enter into contracts, or for compliance with contractual requirements, to provide services to you or contact you in an emergency or to reference information that is useful to you. Please provide this Privacy Notice to such third parties to be informed of the Company's Privacy Notice and obtain consent from that person if necessary unless there is another legal requirement by law to disclose Personal Data of third parties to the Company without having to ask for consent.

#### **4.4 Personal Data of Minor, the Quasi-Incompetent Persons, and the Incapacitated**

The Company collects Personal Data of minors, virtually incapacitated person and incapacitated persons only with the consent of their parents, guardians, or guardians. The Company does not intend to collect Personal Data from persons under 20 (twenty) years of age without parental consent as required by law or from a quasi-incompetent person and an incompetent person without the consent of the legal guardian or guardian, as the case may be. In the event that the Company knows that it has collected Personal Data from any person under 20 (twenty) years of age without parental consent as required by law or from a quasi-incompetent person and an incompetent person without the consent of the legal guardian or guardian, as the case may be, inadvertently, the Company will immediately delete that Personal Data or will collect, use and/or disclose Personal Data only if there is a legal basis other than consent or as permitted by law.

#### **4.5 Cookies Personal Data**

When you visit the Company's website, this information helps the Company provides a better, faster, safer service and for your privacy when you use the service and/or enter the platform.

### **5. Basis for Processing Personal Data**

The Company may collect, use, or disclose your Personal Data with the purposes under the following data processing basis:

#### **5.1 Contractual Basis**

For the performance of a contract to which you are a party, such as a space rental contract, space service contract, central service contract, contract for making things,

contract for various services or any other contract in order to perform the contract or before entering into the contract, as the case may be.

### 5.2 Legal Obligation

To perform duties as required by law, such as Revenue Code, Computer Crime Act B.E. 2550 and other related laws that the Company is required to comply.

### 5.3 Legitimate Interest

For legitimate interest of the Company without going over your fundamental rights and freedoms rights that may be reasonably expected by you.

### 5.4 Consent

In case where your consent is required by law or the Company does not have a need to process your Personal Data using the aforementioned legal basis, the Company will request for your consent.

## 6. The Purpose of Collecting, Using and Disclosing Personal Data (Processing Personal Data)

The Company collects, uses, or discloses your Personal Data for the following purposes:

The purposes of processing Personal Data's table:

The Purposes of Processing Personal Data	Data Processing Basis
To consider the qualifications of individuals/juristic persons before entering into various contracts, including considering hiring services.	- Contractual Basis or processing of requests before entering into the contract - Legitimate Interest
To verify and confirm the person's identification	- Contractual Basis - Legitimate Interest - Legal Obligation
To carry out transactions, contracts, registration at the Land Office, inspection of contract performance, evaluation of work and notification of evaluation results.	- Contractual Basis - Legitimate Interest
To conduct electronic transactions	- Contractual Basis - Legitimate Interest
To transfer of ownership, delivery of possession of house, building, condominium unit, office, property belonging, etc.	- Contractual Basis - Legitimate Interest
To manage work between the reservation contract and the purchase and sale contract in order to facilitate various aspects such as installments, outstanding items, payment amounts and so on.	- Contractual Basis - Legitimate Interest

The Purposes of Processing Personal Data	Data Processing Basis
To be utilized for processing payment data, issuing and distributing tax invoices, bills, receipts, and statement data, collecting money or making payments, including for accounting purposes and accounting management, business auditing, and debt collection.	<ul style="list-style-type: none"> <li>- Contractual Basis</li> <li>- Legitimate Interest</li> <li>- Legal Obligation</li> </ul>
To transfer rights, duties and any benefits according to the contract.	<ul style="list-style-type: none"> <li>- Contractual Basis</li> <li>- Legitimate Interest</li> </ul>
To communicate, notify, and/or receive coordinated data regarding the Company, paying costs, providing associated papers, or different changes that have taken place, including notice of data, news, or developments pertaining to your connection with the Company. To operate and manage the customer's membership and loyalty account and provide vouchers or gift certificates as requested by the customer.	<ul style="list-style-type: none"> <li>- Contractual Basis</li> <li>- Legitimate Interest</li> </ul>
To keep up contacts with the Company, including answering questions, conducting surveys, and evaluating suggestions. To fulfill customer demands for residential developments in accordance with their preferences.	<ul style="list-style-type: none"> <li>- Legitimate Interest</li> <li>- Consent</li> </ul>
To manage operations and after-sales care.	<ul style="list-style-type: none"> <li>- Legitimate Interest</li> <li>- Consent</li> </ul>
To abide by the law, to respond to demands, and to fulfill legal duties, including by legally required transmission of data to the appropriate authorities.	<ul style="list-style-type: none"> <li>- Legal Obligation</li> </ul>
To establish legal claims, give and accept powers of attorney, comply with or exercise legal claims, bring legal claims, exercise court rights, and adhere to court rulings, proceedings in various situations as well as actions to enforce the law.	<ul style="list-style-type: none"> <li>- Contractual Basis</li> <li>- Legal Obligation</li> <li>- Legitimate Interest</li> </ul>
To comply to legal requirements. To conform to the conditions of the relevant laws, rules, regulations, agreements, and policies set out by government regulatory bodies, organizations in charge of implementing laws that control the Company's operations.	<ul style="list-style-type: none"> <li>- Legal Obligation</li> </ul>
To detect, prevent, investigate, fraudulent operations, money laundering, terrorism	<ul style="list-style-type: none"> <li>- Contractual Basis</li> <li>- Legal Obligation</li> </ul>

The Purposes of Processing Personal Data	Data Processing Basis
financing, criminal acts, immigration, and any action that may violate the law. To prevent risk in the event that there is reason to suspect or believe that there may be fraud, money laundering, or other illegal acts or that may affect the safety of life, health, or body of another person.	- Legitimate Interest
To maintain security within the Company's building or premises, including utilizing cards to access the office area and employing CCTV to record photos of those who interact with the Company.	- Legitimate Interest
To manage the organization's planning, reporting, business forecasting, risk management, auditing, supervision, and management, including the use of data as proof when requesting certification under various management system standards.	- Legitimate Interest
To manage advertising and public relations, conduct marketing campaigns, analyze, design goods, and get in touch with consumers to offer advice or present items, as well as managing advertising and public relations media for which you are a presenter or wholly or partially appear in business advertising media.	- Consent
To analyze data to improve service quality by analyzing the overall data that does not identify the data owner.	- Legitimate Interest
To disclose data about contractors, subcontractors or company representative to you according to the contract or disclose your data to the persons mentioned above.	- Contractual Basis or processing of requests before entering into the contract
To develop the Company's service channels to ensure that the Company provides you with high-quality service.	- Legitimate Interest
To manage data technology for the purposes of document creation, storage, processing Personal Data, and troubleshooting unforeseen technological issues.	<ul style="list-style-type: none"> <li>- Contractual Basis</li> <li>- Legal Obligation</li> <li>- Legitimate Interest</li> <li>- Consent</li> </ul>
To provide work systems, websites, or various applications.	<ul style="list-style-type: none"> <li>- Contractual Basis</li> <li>- Legal Obligation</li> <li>- Legitimate Interest</li> <li>- Consent</li> </ul>



<b>The Purposes of Processing Personal Data</b>	<b>Data Processing Basis</b>
To manage management, risk management, file disputes, lawsuits and enforce cases.	- Contractual Basis - Legal Obligation - Legitimate Interest
To achieve results of customer transactions with banks or financial institutions.	- Contractual Basis - Consent
To provide Call Center services. To verify and confirm your identity. To consider processing requests or inquiries.	- Contractual Basis - Legitimate Interest
To update your data up to date from filling in your data, collecting, recording your database management including other related records for use in providing the Company's services, updating historical data, your data It is current, accurate and complete.	- Legal Obligation - Legitimate Interest
To offer products, services, marketing promotions, targeted marketing, sales promotions and promotions that are consistent with your needs.	- Consent
To document consumers in pictures or videos while they are in stores or at events, then post those pictures or videos online or on other platforms with the company's permission. To make facilities like food and/or drinks.	- Consent
Legal duties	- Legal Obligation

## 7. Disclosure of Personal Data

To accomplish the purposes specified in this Privacy Notice. The following divisions within the Company, the Subsidiary Company, the individual, or other organizations may receive disclosures or emails containing your Personal Data:

### 7.1 Inside the Company

Any departments within the Company may receive or be disclosed of your Personal Data. Your Personal Data will only be disclosed to those who are relevant and necessary to perform their work within the purpose such as IT/ computer department, administrative department, legal department, accounting department will be given permission as required and appropriate.

### 7.2 Outside the Company

The following are examples of outside organizations to whom your Personal Data could be given or disclosed.

**7.2.1** Governmental, regulatory, or other organizations as required by law such as Revenue Department, Legal Execution Department, or other agencies by virtue of laws.

**7.2.2** The Subsidiary Company, agents, contractors/subcontractors, financial institutions, prospective investors, service providers such as legal service, outside auditor, IT service who provide advises in various field, juristic person management, mail/package delivery service, the Company's representatives or the Individuals who is responsible to act on behalf of the Company, including Data Processor of the Company. However, when the Company employs outside agencies for services, the Company is responsible for ensuring that these service providers adhere to legal requirements and that your Personal Data is safeguarded with appropriate measures.

## **8. Transferring or Sending Personal Data Abroad**

As part of the Company's business operations, the Company may be required to communicate or transfer your Personal Data to other recipients, such as sending or transferring Personal Data to be held on servers or Cloud systems abroad. The Company will take legal requirements for Personal Data protection into account when determining whether the destination nation meets such criteria.

## **9. Your Personal Data Retention and Length of Retention**

Your Personal Data will be kept on file by the Company as long as you are customers, partners, contractors, service recipients, business partners, or as long as it takes to accomplish the specified goals as outlined in this Privacy Notice. If necessary or authorized by law, the Company may be compelled to keep it beyond that, for example, for a period of ten (10) years following the conclusion of the contract to demonstrate government inspection in the event that the government demands payment for taxes.

When it is no longer required or at the end of the specified term, the Company will delete, erase, or otherwise render non-personally identifiable data of your Personal Data.

## **10. The Safeguarding of Your Personal Data**

The Company will procure appropriate safeguard measure in order to protect the loss, unauthorized or illegal access, use, change, modify or disclose your Personal Data and ensure appropriate confidentiality, integrity, availability of your Personal Data. The Company has put in place protective measures for safeguarding, organizational measures, technical measures, physical measures for maintaining appropriate safeguard Personal Data processing. As required and appropriate, the Company has revised these policies, rules, and standards on a regular basis. Furthermore, it is the responsibility of executives, employees, contractors, agents, consultants, and other people who receive information from the Company to uphold the Personal Data in accordance with the Company's established measures.

## **11. The Data Owner's Rights**

The rights listed in this section apply to the legal rights you have in relation to your Personal Data. You may exercise these rights in consultation with the Company in accordance with the terms of applicable legislation and the rights management procedure of the Company.

### **11.1 The Right to Withdraw Consent**

If you have authorized the Company to collect, use, and disclose your Personal Data (whether the authorization was made prior to the Personal Data Protection Law's enforcement date or after). Unless this right is prohibited by law or there is a contract in your favor, you have the right to withdraw your permission at any time throughout the duration that your Personal Data is stored by the Company.

### **11.2 The Right to Access Personal Data**

You have the right to access your Personal Data held by the Company and a copy of that information for yourself, as well as the right to ask the Company to explain how it came into possession of your Personal Data without your consent.

### **11.3 The Right to Transfer Personal Data**

If a corporation has stored your Personal Data in a format that may be read or generally used by instruments or devices that operate automatically and can use or disclose Personal Data by automated means, you have the right to seek that information. The right to request Personal Data that the Company sends or transfers Personal Data in such a form directly to other Personal Data controllers, unless it is impossible to do so for technical reasons, and the right to request that the Company sends or transfers Personal Data in such a form to another data controller when this can be done automatically.

### **11.4 The Right to Protest Data Processing**

If the Company, another party, or the accomplishment of a public interest purpose requires the collection, use, or disclosure of your Personal Data, you have the right to protest at any time. In the event that you raise a concern, the Company will stop collecting, using, and disclosing your Personal Data unless and until it can prove that doing so is legally required, is necessary to uphold the law, or is necessary to defend against legal claims.

### **11.5 The Right to Request Deletion or Destruction of Personal Data**

If you think your Personal Data has been obtained, used, or disclosed in violation of applicable laws, and you believe the Company has used all reasonable efforts to keep your information after you have exercised your right to withdraw consent or your right to object as described above, you have the right to request that the Company delete or destroy your Personal Data or render it non-personally identifiable.

### **11.6 The Right to Request the Suspension of Personal Data**

You have the right to request a temporary suspension using your Personal Data while it investigates your request for Personal Data correction, your objections, or any other situation in which the Company no longer needs your Personal Data and is required to delete or otherwise dispose of it by law.

### **11.7 The Right to Update Personal Data**

You have the right to request the Company to update your Personal Data to be accurate, current, complete and not misleading. If you are current customers, partners, contractors, service recipients, business partners of the Company, you can update your Personal Data according to the Company's procedures.

### **11.8 The Right to Complain**

If you believe that the collection, gathering, use, and disclosure of your Personal Data violates or doesn't comply with applicable laws, you have the right to file a complaint with the appropriate authorities. Section 13 provides information on how to get in touch with the Personal Data Protection Committee (PDPC).

## **12. The Changing of the Privacy Notice**

This Privacy Notice is periodically reviewed by the Company to ensure that it complies with all guidelines, regulations and legislation. In the event that the Privacy Notice is altered, the Company will inform you by publishing the information on its website.

## **13. The Appropriate Authority**

If you have a complaint to make or believe the Company hasn't handled your issue satisfactorily, you may contact and/or make a complain to The Office of the Personal Data Protection Committee (PDPC) using the information provided below:

Phone number	02 141 6996 or 02 142 1033
Email	saraban@pdpc.or.th
Website	<a href="https://www.pdpc.or.th">https://www.pdpc.or.th</a>
Address	The Office of the Personal Data Protection Committee 120 Moo 3, Rattaprasasanabhakti Building (Building B), Chaengwattana Government Complex, Chaengwattana Road, Thung Song Hong Subdistrict, Lak Si District, Bangkok 10210

## **14. The Company Contact**

If you have any recommendations or questions concerning the collection, use, and dissemination of your Personal Data, you may also ask to exercise your legal options in accordance with this privacy notice. The following methods are available for contacting the Company:

Data Protection Officer: DPO

E-mail [dpo@major.co.th](mailto:dpo@major.co.th)

Website <https://www.major.co.th/>

Address 141 Soi Sukhumvit 63 (Ekkamai), Sukhumvit Road,  
Klong Tan Nuea Subdistrict, Watthana District, Bangkok

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