

MAJOR DEVELOPMENT COMMERCIAL COMPANY LIMITED
CCTV Privacy Notice

Major Development Commercial Co., Ltd. (hereinafter referred to as "the Company") is implementing the use of closed-circuit television system (CCTV) for surveillance in and around the building Major Tower Thonglor and Major Tower Rama 9 - Ramkumhang (hereinafter referred to as the "Area") in order to protect life, health, and property. Through the deployment of CCTV equipment, the Company gathers Personal Data from officers, operators, employees, customers, workers, contractors, visitors, and any other individuals (hereinafter referred to as "you") who entered the Area.

This CCTV privacy notice ("Privacy Notice") provides information on how we collect, use, and disclose your personally identifiable information ("Personal Data") including your rights as follows:

1. Legal Basis for Personal Data Processing

The Company collects your Personal Data under the following legal basis:

- 1.1 Necessary to prevent or avoid risk to your and others' life, body and health.
- 1.2 Necessary for the Company's or other person's legitimate interests, if such interests are equally important to your fundamental rights to Personal Data.
- 1.3 Necessary to abide applicable rules that controls working environment and safety as well as Company's property

2. Purpose of Personal Data Collection

The Company collects your Personal Data for the following purposes:

- 2.1 To prevent your property as well as your own health and personal security.
- 2.2 To protect Company's buildings, facilities and assets from damage, deterrent, vandalism or other crimes.
- 2.3 To support relevant organizations for legal enforcement to legally detain, prevent, search and prosecute.
- 2.4 To assist in the dispute resolution process which occurs during the disciplinary or grievance process.
- 2.5 To provide assistance in the investigation process or process for submitting complaints.
- 2.6 To assist in the initiation or defense of civil litigation, which is not limited to employment-related legal actions.

3. The Company's Collected and Used Personal Data

The Company installs CCTV cameras for the reason outlined in section 2 in the visible positions and posts signs alerting people that they are being used at entrances and exits, as well as in Areas it deems necessary to be hotspots that must be watched for collecting your Personal Data when you enter the Area, which has a list of Personal Data collected as follows:

- Slide
- Animation
- Sound

Pictures of your property such as vehicles, bags, hats, clothing and etc.

The Company will not install CCTV in Areas that may unreasonably infringe on your fundamental rights, such as inside bathrooms and dressing rooms, etc.

4. Duration of Personal Data Retention

To achieve the objective of surveillance by using CCTV equipment as specified in this Privacy Notice. The Company will retain Personal Data on CCTV related to you for a period of 30 (thirty) days from the date of recording. However, after that period has elapsed, the Company will further delete and destruct your Personal Data.

5. The Disclosure of Your Personal Data

The Company will keep the information in the CCTV regarding you confidential and will not disclose it unless it is necessary for the Company to achieve the objectives of surveillance and observation as specified in this Privacy Notice. The Company may disclose information on CCTV to the following types of the Individual or juristic person:

- 5.1 When the Company determines it is essential to share such Personal Data for the aforementioned objectives, it may do so to the subsidiary company and service partners.
- 5.2 Organizations having the legal authority and responsibility to conduct investigations, pursue prosecutions, or assist in legal enforcement.
- 5.3 Third-party security service providers are required to ensure the suppression or prevention of threats to your life, body, health, and property, as well as the property of other people.
- 5.4 Distributor and/or supplier of maintenance services CCTV system to fix flaws or damage to the CCTV, which is done in accordance with the purposes outlined in section 2 above.

6. The Rights of Personal Data Protection Act B.E. 2562

Personal Data Protection Act B.E. 2562 has an objective to give you more control over your Personal Data. When the provisions relating the data subject's rights take effect, you can exercise your rights under the Personal Data Protection Act B.E. 2562, details as follows:

- 6.1 The right to withdraw consent for the Company to process your data that you have given to the Company.
- 6.2 Unless the Company is prohibited from doing so by law or court order, or if doing so would jeopardize the rights and freedoms of others, you have the right to access, obtain a copy of, and request disclosure of the source of the Personal Data that the Company collects about you.
- 6.3 The right to transfer Personal Data, you may be entitled to ask the Company for your Personal Data. If the Personal Data can be used or disclosed automatically and is accessible in a manner that can be read by an automated tool or device (only those that are automatically able to be done). Unless it is impossible due to technical limitations, transfer the Personal Data to another data controller.

- 6.4 The right to protest to the collection, use, or disclosure of your Personal Data unless the Company has good reason to deny your request (for instance, the Company can show that the collection, use, or disclosure of your Personal Data has more legal grounds, for the establishment of legal claims, compliance with or exercise of legal claims, and public interest in accordance with the Company's mission).
- 6.5 You have the right to request the Company to delete, destruct and make your Personal Data non-personally identifiable.
- 6.6 The right to request to suspension of your Personal Data in any of the following cases:
 - 6.6.1 During the period when the Company is investigating your request to correct your Personal Data to be accurate, complete and up-to-date.
 - 6.6.2 Your Personal Data has been collected, used or disclosed unlawfully.
 - 6.6.3 When the Company no longer needs to keep your Personal Data for the purposes it stated when collecting it, but you still need the Company to preserve it so you may exercise your legal rights.
 - 6.6.4 When you take your right to protest to the Company's collection, use, or disclosure of your Personal Data, the Company must demonstrate to you its legal justifications for doing so while also determining whether doing so is necessary for the benefit of the public.
- 6.7 The right to request correction of your Personal Data that is inaccurate or incomplete so that it is accurate, current, complete, and not misleading.
- 6.8 In the case that the Company breaches or disobeys the Act or any announcements made pursuant to the Act, you have the right to file a complaint (section 10).

7. Personal Data Security

The Company has put in place the appropriate safeguards to protect the security of your Personal Data. In line with the Company's information security policy, it is done both technically and administratively to prevent data loss or unauthorized access, deletion, destruction, use, alteration, modification, or disclosure of Personal Data.

In addition, the Company has established a Personal Data Protection Policy which has been announced throughout the organization along with guidelines to ensure security in collecting, using, or disclosing Personal Data. The Company maintains confidentiality, integrity and availability of Personal Data. Additionally, the Company offers organizational security measures. The Company has taken organizational, technological, and physical steps to ensure adequate security in the processing of Personal Data, and has done so in a timely manner as it reviews this policy and this Privacy Notice.

8. The responsibilities of the Personal Data Controller

The Company has designated only those officials who have authority and duties involved in collecting, using, or disclosing Personal Data in this processing activity to have access to your Personal Data. The Company will ensure that officials strictly comply with this Privacy Notice.

9. The Adaptation of the Privacy Notice

The Company may decide to update or adapt this Privacy Notice as it sees appropriate and will inform you an announcement via <https://www.major.co.th/th/policy>. However, the Company requests that you check frequently to obtain the latest information, particularly before visiting the Company's location.

The provisions of this Privacy Notice are acknowledged by you when entering into the Area. If you do not agree with the conditions of this Privacy Notice, kindly do not enter the Area. It will be assumed that you are aware of the change if you keep visiting the Area after the Privacy Notice has been updated and broadcast on the aforementioned channels.

10. 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	https://www.pdpc.or.th
Address	The Office of the Personal Data Protection Complex 120 Moo 3, Rattaprasasanabhakti Building (Building B), Chaengwattana Government Complex, Chaengwattana Road, Thung Song Hong Subdistrict, Lak Si District, Bangkok 10210.

11. The Company Contact

You can inquire about this CCTV Privacy Notice here:

Data Protection Officer (DPO)

Email	dpo@major.co.th
Website	https://www.major.co.th/th/policy
Address	Major Development Commercial Company Limited 141 Soi Sukhumvit 63 (Ekkamai), Sukhumvit Road, Klong Tan Nuea Subdistrict, Watthana District, Bangkok

Updated on 11.10.2023

Published on 11.10.2023