

## Privacy Notice on the use of CCTV

### Asia Plus Group Holdings Public Company Limited and its Subsidiaries

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Asia Plus Group Holdings Public Company Limited and its group companies which includes the following entities:

1. Asia Plus Securities Company Limited;
2. Asia Plus Advisory Company Limited;
3. Asset Plus Fund Management Company Limited

(collectively, the "**Company**," "**we**," "**us**," or "**our**") are using Closed-Circuit Television ("**CCTV**") for surveillance of our area at 175 Sathorn City Tower, floor 3, 11 and 17, South Sathorn Road, Sathorn, Bangkok and our branch offices (collectively, the "**area**") for protection of life, health and property. We collect personal data of employees, customers, suppliers, visitors and any person (collectively, "**you**" or "**your**") who enters our area, through the use of CCTV.

This Privacy Notice on the use of CCTV ("**notice**") informs you regarding information on our collection, use, and disclosure ("**process**") of your identifiable personal information ("**personal data**") that we collect and your rights as follows:

### Purpose of Utilizing CCTV

We process your personal data through the use of CCTV to capture your images for the following purposes:

- (a) to protect individuals' life, health and well-being, personal safety, and properties;
- (b) to protect and prevent our premises, facilities and assets from damages and other criminal acts;
- (c) to support law enforcement agencies in the prevention, detection, and prosecution of crimes and to act as deterrent against crimes;
- (d) to assist in the resolution of disputes from disciplinary proceeding or complaint;
- (e) to assist in the investigation or proceedings of whistleblowing and inquiry process;
- (f) to support and maintain health, safety and environment standards in the workplace

### Legal Bases

We may process your personal data base on any of the following legal basis:

- (a) Vital Interest. The processing is necessary for the prevention or suppression of danger to a person's life, body, or health.
- (b) Legitimate Interest. It is in our legitimate interest to process your personal data to achieve the purposes described above.

- (c) Legal Obligations. We have duty to comply with relevant law and government requirements, including but not limited to workplace safety, health and environment.

## **CCTV Installation**

The CCTV cameras are installed at our area as follows:

- at 175 Sathorn City Tower, floor 3, 11 and 17, South Sathorn Road, Sathorn, Bangkok; and
- our branch offices as specified in: <https://inv4.asiaplus.co.th/asps/contact-us.php>

We place appropriate sign in the monitored area to inform you that CCTV operation is in use and your personal data is being recorded.

## **Personal Data Retention Period**

We may retain your personal data no longer than 30 days or as necessary to achieve the purposes described in this notice or as required by applicable laws. We may need to retain your personal data for as long as it is necessary for any disputes or legal proceedings.

The CCTV will record movement of all person within the proximity to the CCTV cameras in our premises at all times (24 hours).

If we no longer need to retain your personal data, we may destroy, delete, remove or anonymize your personal data.

## **Safety Measures**

The Company will manage the retention of personal data with appropriate organizational and technical measures to protect and secure your personal data, this includes storing your personal data in a secured facility with authorized access.

The following steps are required in case our personnel request access to inspect or access to information from the CCTV footage:

- A. For Asia Plus Group Holdings Public Company Limited, Asia Plus Securities Company Limited and Asia Plus Advisory Company Limited:
  1. Request data/information from the CCTV via Company's Workflow (K2);
  2. Submit the request to FMD for approval from the department manager;
  3. In the case the request is authorized, there must be a security officer present in the CCTV Control Room along with the authorized personnel while viewing data/information from the CCTV footage.
  4. A log of personnel who access and view CCTV footage must be kept along with conclusion/findings from viewing the CCTV. This log must be provided to the manager in charge of security and requestor's supervisor for acknowledgement and record keeping.
- B. For Asset Plus Fund Management Company Limited:
  1. Submit the request to MIS for approval from the department manager;

2. In the case the request is authorized, there must be a security officer present in the CCTV Control Room along with the authorized personnel while viewing data/information from the CCTV footage.
3. A log of personnel who access and view CCTV footage must be kept along with conclusion/findings from viewing the CCTV. This log must be provided to the manager in charge of security and requestor's supervisor for acknowledgement and record keeping.

In the event of a request for information from third parties or government officers, approval from Legal Department is required.

## **Disclosure of your Personal Data to Third Parties**

We may share information from CCTV footage with government officials, for example, upon written request from government officials for the investigative process or for litigation in court proceedings.

We may allow the CCTV service provider (if any) to access our CCTV system for maintenance purpose whereby authorization from us is required. The service provider must access the system with appropriate security measures and on confidential basis.

## **Your rights**

Subject to the applicable laws and exceptions thereto, you may have the following rights regarding your Personal Data:

- (a) Access: you may have the right to access or request a copy of the Personal Data we are processing about you;
- (b) Data Portability: you may have the right to obtain Personal Data hold about you, in a structured, electronic format, and to transmit this data to another data controller;
- (c) Objection: in some circumstances, you may have the right to object to how we process your Personal Data in certain activities which specified in this Policy;
- (d) Deletion: you may have the right to request that we delete, destroy, or de-identify your Personal Data that we process about you, e.g. if the data is no longer necessary for the purposes of processing;
- (e) Restriction: you may have the right to restrict our processing of your Personal Data if you believe such data to be inaccurate, that our processing is unlawful, or that we no longer need to process this data for a particular purpose;
- (f) Rectification: you may have the right to have Personal Data that is incomplete, inaccurate, misleading, or out-of-date rectified;
- (g) Consent withdrawal: If you have consented to our collection, use, or disclosure of your personal data, you have the right to withdraw that consent at any time.; and
- (h) Lodge a complaint: you may have the right to lodge a complaint to the competent authority if you believe our processing of your Personal Data is unlawful or non-compliance with applicable data protection law.

## Contacting Us

If you wish to contact us to exercise the rights relating to your Personal Data or if you have any queries or complaints about your Personal Data under this Privacy Policy, please contact us or our Data Protection Officer at:

### A. Asia Plus Group Holdings

- **Asia Plus Group Holdings Company Limited**

175 Sathorn City Tower Building, 3 / 1 Floor, South Sathorn Road, Tung Mahamek, Sathorn, Bangkok 10120

Telephone : 0-2680-1111

e-mail: support@asiaplus.co.th

- **Asia Plus Securities Company Limited**

175 Sathorn City Tower Building, 3 / 1 Floor, South Sathorn Road, Tung Mahamek, Sathorn, Bangkok 10120

Telephone : 0-2680-1000

e-mail: support@asiaplus.co.th

- **Asia Plus Advisory Company Limited**

175 Sathorn City Tower Building, 11 Floor, South Sathorn Road, Tung Mahamek, Sathorn, Bangkok 10120

Telephone : 0-2680-4002-3

e-mail: ib@asiaplus.co.th

- **Asset Plus Fund Management Company Limited**

175 Sathorn City Tower Building, 17 Floor, South Sathorn Road, Tung Mahamek, Sathorn, Bangkok 10120

Telephone : 0-2672-1111

e-mail: customercare@assetfund.co.th

### B. Data Protection Officer (DPO)

175 Sathorn City Tower Building, 3 / 1 Floor, South Sathorn Road, Tung Mahamek, Sathorn, Bangkok 10120

Telephone : 0-2680-1567

e-mail: dpo@asiaplus.co.th