

## **Privacy Policy on CCTV Usage**

This Privacy Policy (“Policy”) describes the use of CCTV devices (“CCTV”) by Lion Corporation (Thailand) Limited and the subsidiaries (hereinafter referred to as “Company” or “of the Company”) along with other systems to monitor specific internal areas and the surrounding areas of the premises and any other areas to protect the life, health and property, which comprises personal data of employees, directors, partners, operators, visitors, or any persons (collectively referred to as “you” or “your”) entering the monitored areas within the premises. In addition, this Privacy Policy describes the methods of collection, use and disclosure or transmission or transfer of personal data which can identify you (“Personal Data”) and indicates the methods of managing or using CCTV of the Company. The Company may revise this Privacy Policy at any time and you will be notified of the revision to the possible extent.

### **1. What types of personal data are collected by the Company?**

The Company shall collect the videos or images in which you and your belongings, such as vehicles, are easily recognized upon entering the monitored areas in the Company’s premises through CCTV system and equipment (“CCTV Data”).

### **2. What are the reasons for the Company’s collection, use and disclosure of your personal data?**

2.1 The Company may collect, use, disclose, transfer, and do anything, including but not limited to recording, storing the records, modification, correction, alteration, destruction, deletion, restoration, merge, copying, transmission, retention, withdrawal, improvement, addition of CCTV data relating to you and other personal data relating to you. “The purposes of verification by CCT” in accordance with the list below shall be done on the basis of legitimate interest, for the benefit of life, for compliance with the law, for the public benefits, in accordance with the obtained consent, or any other basis permitted by the applicable laws in Thailand (provided that the said benefits shall not breach the rights and interests of any persons) which can be considered as follows:

- To protect life, body, personal safety and health, and/or your personal belongings
- To control access to the building and ensure security of the building, personnel, employees, and visitors, as well as the property and data of the Company located in or stored at the place
- To prevent/protect the premises, areas and the property of the Company from damage, interruption, destruction, and other crimes
- To assist the resolution of disputes that occur during the imposition of disciplinary punishment or to consider complaints
- To assist the investigation and actions relating to complaint and whistleblowing
- To be implemented in verifying or defending in civil cases, including but not limited to labor case proceeding
- To comply with the Company’s legal requirements and/or to collaborate with the court, supervisory agencies, state agencies, and regulatory agencies for exercise of the legal powers, including but not limited to occupational health safety and work environment as the Company is aware that CCTV is an essential measure that enables the Company to perform its obligations
- To exercise the rights of the Company or protect the legitimate interest of the Company, if necessary, to prevent, suppress, and detect misconduct, crime, or breach of the law, monitor to prevent and report misconduct or crime in the Company’s shops and to ensure security and stability of the Company’s business. The Company shall continuously attempt to create the balance between the legitimate interest of the Company and the third party and your fundamental rights and freedom relating to protection of CCTV data relating to you, as the case may be. The Company shall indicate the necessary steps to ensure appropriate actions.

2.2 The Company shall install CCTVs at the important points within the premises of the Company, except some areas such as toilets and bathrooms (adult).

2.3 The Company's CCTV system works 24 hours a day, and there are security officers monitoring through the devices, except the case of the equipment breakdown and/or maintenance.

2.4 The Company shall put up signs as deemed appropriate at the places where CCTVs are implemented.

### **3. To whom could your personal data be disclosed?**

3.1 The Company shall collect your personal data in CCTV system confidential and shall disclose or transfer your personal data only to the subsidiaries, affiliated companies, other third parties which shall be carefully selected at the present or in the future, authorized persons, business partners, and/or service providers (who may be located overseas) to achieve the purposes of verification by CCTV as prescribed herein.

3.2 The third parties to whom the Company may disclose the CCTV data and your other personal data, including disclosure to the Company's subsidiaries (as part of the legitimate interest of the Company and the subsidiaries to achieve the purposes of verification by CCTV), state agencies and/or supervisory agencies (to comply with the legal requirements or to support or assist the regulatory agencies in investigation and civil or criminal case proceeding), and the third-party service providers (in accordance with the Company's essential steps to ensure that the company provides protection to your health and personal safety and property). However, access to or disclosure of CCTV data shall be on a need-to-know basis to deal with the incidents, which is included in one of the purposes in Clause 3.2 hereof or to respond to the legal request of the persons under Clause 2.1.

### **4. Delivery or transfer of your personal data to other countries**

The Company may disclose or transfer your personal data from CCTV system (which is part of the essential steps to ensure your health, personal safety and property) to the third-party service providers outside Thailand. The said disclosure and transfer shall be made only upon your consent or there is a legal basis requiring such action as permitted by the law (e.g., to comply with the provisions of the contract between the Company and the third-party service providers for your benefit) provided that the destination countries may or may not have the privacy protection policy similar to Thailand. However, the Company shall make sure that your personal data transfer is made in accordance with the law on personal data law prior to transfer it.

### **5. Security measures**

5.1 The Company shall implement technical system and arrange appropriate security measures to prevent CCTV data and your personal data from unintentionally, illegal or unauthorized destruction, loss, access, change, or disclosure.

5.2 The Company shall review and revise its security measures from time to time as deemed appropriate or upon improvement of the relevant technology to ensure that the security measures are effective and appropriate and align with the minimum legal requirements as determined by the relevant state agencies.

## **6. Period of the Company's retention of your personal data**

The Company shall retain your personal data obtained from CCTV system in the Company's system for the necessary period to achieve the purposes for verification by CCTV. If the Company is not permitted by the applicable law to retain your personal data from CCTV, such data shall be deleted from the system and the Company's record. However, the Company may retain your CCTV data for a longer period such as retaining it until the end of the legal action or when the law permitted the longer period of retention or when some CCTV data is required to be retained for some actions, or to address the claims from any person who exercises the legal rights.

## **7. Your rights concerning your personal data**

Subject to the relevant legal provisions and legislations, you may request access and/or receipt of copy, transfer, correction, erasure, destruction, or making some types of your personal data unidentifiable to you, suspend or object to some activities held and used by the Company. In the case that any actions of the Company under your consent, you may withdraw your consent, yet it may cause the Company unable to provide you with full services. You may request the Company to disclose how your personal data has been acquired without your consent and may file complaints to the competent authorities under the applicable law.

## **8. Contact details**

In case of any inquiries or questions regarding CCTV data or if you exercise any rights in CCTV data, please contact Personal Data Protection Officer:

Lion Corporation (Thailand) Limited

Head office: No. 666 Rama 3 Road, Bang Phong Phang Sub-district, Yan Nawa District, Bangkok Metropolis 10120

Tel. 02-682-1821 Contact during work hours from Mondays to Fridays at 08.00-17.00 hr.

Email: [dpo@lion.co.th](mailto:dpo@lion.co.th)