

CCTV Privacy Notice

HaadThip Pcl., and its subsidiaries (hereafter called “the company”) set up and employ CCTV to monitor situations in and around the companies, including buildings, facilities, carparks, premises in the company’s territory in order to protect life, health and properties. The company has collected and stored personal data of officers, operators, customers, employees, contractor, visitors or any others (hereafter called “you” as a whole) who entered the territory through the use of such CCTV devices.

This CCTV Privacy Notice provides data on storage or disclosure proceedings, enabling to identify your identity (Personal Data), including your rights by the following:

1. The company collects your personal data under the company’s legitimate interests and other related law as follows:
 - Necessity to protect or suppress danger of life, body or your health and of others.
 - Necessity for the benefits of the company’s legitimate interests or others and such benefits are not of less importance than the basic rights of your personal data.
 - Necessity to comply with the related law which looks after the company’s safety, working environment and properties.

2. Objectives of Your Personal Data

The company collects your personal data for the following objectives.

- 2.1 To protect your health and safety as well as properties.
- 2.2 To secure buildings, facilities and properties of the company from damages, disruption, destruction of properties or other crimes.
- 2.3 To support related agencies regarding legal compliance to stop, protect, investigate and prosecute as well as to assist in dispute resolution and investigation process, complaint submission or petition process.
- 2.4 To assist in a process of initiating or stopping civil litigation which includes but does not limit to legal actions against employment.
- 2.5 For other objectives which may occur in the future and be of legitimate interests.

3. Personal Data Stored and Utilized by the Company

In accordance with the objectives stated in the above (2), the company has installed CCTV in the visible positions with relevant notices provided at the entrances and exits as well as territory the company deems appropriate to take extra care for your personal data once you enter the territory.

- Details of the collected personal data.
- Photos or video clips recorded.
- Body Temperature via Thermal Scan.
- Others (If any)

The company shall not install CCTV in areas that may infringe on your fundamental rights, namely recreation room, rest rooms, bathroom or private lobby.

4. Disclosure of Your Personal Data

The company shall store and keep your personal data stored in the CCTV as confidential and shall not disclose the data except in case the company has a requirement to achieve the objective of surveillance observation as stated in this notice. The company may disclose the data in the CCTV to the following types of person or juristic person.

- 4.1 Legally authorized agency to help, support law enforcement or investigation or any other legal actions.
- 4.2 External service provider required to build confidence regarding protection or suspension of danger of life, body, health as well as properties of yours or others.
- 4.3 Others (If any)

5. Your Rights in accordance to Personal Data Protection Act 2019

The Personal Data Protection Act 2019 has an objective of making your personal data more controllable, enabling you to exercise your rights according to the Personal Data Protection Act 2019 once the legislation related to the rights of the personal data owner takes effect. Details are as follows.

- 5.1 Right to access, obtain copies and request to have sources of personal data stored by the company disclosed except in the case that the company has legal rights to turn down your request or in the case that your request shall have an effect, resulting in damages to rights and freedoms of others.
- 5.2 Right to rectify your personal data that is incorrect or incomplete to make it correct, up to date, complete and does not lead to any misunderstandings.
- 5.3 Right to withhold your personal data in one case or another. They are as follows.
 - 5.3.1 During duration in which the company is investigating your request to rectify your personal data so as to make it correct, complete and up to date.
 - 5.3.2 Your stored personal data is illegally utilized or disclosed.

- 5.3.3 Your personal data is no longer required for storage as per the company's objective notified but you still wish the company to further store the data to support exercise of your legal rights.
- 5.3.4 During duration in which the company is proving to you lawfully storage, utilization or disclosure of your personal data or investigation of requirement for storage, utilization or disclosure.
- 5.3.5 Your personal data for public interests as a result of your objection to store, utilize or disclose your personal data.

5.4 Right to object storage, utilization or disclosure of your personal data except in case the company has a legitimate ground to object your request (i.e. the company can prove that the storage, utilization or disclosure of your personal data has more legitimate ground or set up of legal right demand, legal compliance or exercise of your legal right or for public interests as per the company's mission)

6. Duration of Personal Data Storage

The company shall store your personal data for no longer than 90 days from the day you entered the company's building or territory or after the prescription of the legal prosecution is expired. Once expired, the recorded photos via CCTV will automatically be deleted.

7. Maintenance of Stability and Security of Your Personal Data

The company has an appropriate measure of maintaining the Stability and Security of Your Personal Data in terms of technics and management in order to protect losses of data, disallowed access, deletion, termination, utilization, alteration or disclosure of personal data. This is in accordance with the company's Information Security Policy and Guidance.

Furthermore, the company has prepared Personal Data Protection Policy and this has been announced throughout the organization, including a guidance to create stability and security of storage, utilization or disclosure of personal data, maintaining Confidentiality, Integrity and Availability of personal data. The company has reviewed such policy as well as this notice at an appropriate duration.

8. Responsibilities of the Personal Data Officer

The company has specified that only specific officer with authorization to store, utilize or disclose personal data of this evaluation activity, shall have access to your personal data. The company shall demand that the officer strictly complies with this notice.

9. Changes in Privacy Notification

- In improving or changing this notice, the company may consider making a change as deemed appropriate and shall notify you through point guard and website channels of the company with the date of the latest notice controlled at the end. However, the company advises you to regularly check and learn of the new notice especially before you pay a visit to the company's territory.
- Your entry to the territory means that you are aware of the agreements in this notice. Please withhold your entry if you disagree with the agreements in this notice. If you continue to enter the company's territory after this notice has been altered and announced through the aforementioned channels, the company shall deem that you are already aware of the changes.

10. Contact for Inquiries

The company has appointed a Personal Protection Officer to assist you in managing your personal data. If you have any inquiries or recommendations regarding the company's method of personal data management or wish to exercise your rights as the personal data owner, you can contact the company via:

1) Human Resources Manager, HaadThip PCL.

Hatyai Factory: Tel. No. 074 210008 Ext. 284

Punpin Pin Factory: Tel. No. 077 357385 Ext. 162

E-mail: personnel@haadthip.com

2) Data Protection Officer

- Tel. No. 074 210008 Ext.1188
- E-mail at dpo@haadthip.com
- Post to 87/1 Karnjanavanich Rd., T.Banpru Hatyai, Songkhla 90250 Thailand
- Online Channel at www.haadthip.com (Contact us)