

# CCTV Privacy Policy

Thai Optical Group Public Company Limited and the subsidiary companies installs and uses Closed-Circuit-Television (CCTV) devices in order for preventing life, body and property. This CCTV Privacy Policy explains our practices regarding the collection, use or disclosure of personal data collected from CCTV including other rights of the Data Subjects in accordance with the Personal Data Protection Act B.E. 2562 (2019).

## Collection of Personal Data

We will collect your personal data obtained by CCTV devices. The CCTV systems operate to record as images, video, and voice within our controlled area.

### Storage of Data

We store your personal data as hard copy and soft copy.

We store your personal data by using the following systems:

- Our server in Thailand
- Our server outside Thailand

### Use of Data

We use the collected data for the following purposes:

- To prevent damage to your life, body, health and property
- To support law enforcement authorities in preventing and suppressing of crimes
- To assist in the investigation or legal proceedings of dispute resolution, disciplinary and grievance
- To establish, compliance, exercise, and defense of any legal claims
- To carry out any other acts to achieve the purposes of CCTV system

The legal basis for personal data processing are

- (1) for preventing or suppressing a danger to a person's life, body or health
- (2) for our legitimate interests and
- (3) for compliance with the law on occupational safety, health and environment.

## Disclosure of Personal Data

We may disclose your personal data to the following parties in certain circumstances:

### Organization

We may disclose your personal data within our organization for the purpose of this CCTV Privacy Policy. The personal data will be securely stored and only authorised personnel will have access to them.

## Third Party

We may disclose your personal data to third parties which may include our affiliates, service providers, business partners. To the extent necessary to prevent damage to your life, body and property for the purposes specified in this CCTV Privacy Policy.

## Business Transfer

In connection with any reorganization, restructuring, merger or acquisition, or other transfer of assets, we will transfer information, including certain your personal data, provided that the receiving party agrees to respect your personal data in a manner that is consistent with this CCTV Privacy Policy and the Personal Data Protection Laws.

## Law Enforcement

Under certain circumstances, we may be required to disclose your personal data if required to do so by law or in response to valid requests by government authority such as courts, public prosecutors, or police, etc.

## Data Retention

We will retain your personal data within 30 days, or for as long as necessary in connection with the purposes set out in this CCTV Privacy Policy, unless law requires or permits a longer retention period. We will erase, destroy or anonymize your personal data when it is no longer necessary or when the period lapses.

## Data Subject Rights

Subject to the Personal Data Protection Laws thereof, you may exercise any of these rights in the following:

**Withdrawal of consent:** If you have given consent us to collect, use or disclose your personal data whether before or after the effective date of the Personal Data Protection Laws, you have the right to withdraw such consent at any time throughout the period your personal data available to us, unless it is restricted by laws or you are still under beneficial contract.

**Data access:** You have the right to access your personal data that is under the company's responsibility; to request us to make a copy of such data for you; and to request us to reveal as to how we obtain your personal data.

**Data portability:** You have the right to obtain your personal data if we organize such personal data in automatic machine-readable or usable format and can be processed or disclosed by automatic means; to request us to send or transfer the personal data in such format directly to other data controllers if doable by automatic means; and to request to obtain the personal data in such format sent or transferred by us directly to other data controller unless not technically feasible.

**Objection:** You have the right to object to collection, use or disclosure of your personal data at any time if such doing is conducted for legitimate interests of us, corporation or individual which is within your reasonable expectation; or for carrying out public tasks.

**Data erasure or destruction:** You have the right to request us to erase, destroy or anonymize your personal data if you believe that the collection, use or disclosure of your personal data is against relevant laws; or retention of the data by us is no longer necessary in connection with related purposes under this CCTV Privacy Policy ; or when you request to withdraw your consent or to object to the processing as earlier described.

**Suspension:** You have the right to request us to suspend processing your personal data during the period where we examine your rectification or objection request; or when it is no longer necessary and we must erase or destroy your personal data pursuant to relevant laws but you instead request us to suspend the processing.

**Rectification:** You have the right to rectify your personal data to be updated, complete and not misleading.

**Complaint lodging:** You have the right to complain to competent authorities pursuant to relevant laws if you believe that the collection, use or disclosure of your personal data is violating or not in compliance with relevant laws.

You can exercise these rights as the Data Subject by contacting our Data Protection Officer as mentioned below. We will notify the result of your request within 30 days upon receipt of such request. If we deny the request, we will inform you of the reason via SMS, email, telephone, registered mail (if applicable).

## Data Security

We endeavor to protect your personal data by establishing security measures in accordance with the principles of confidentiality, integrity, and availability to prevent loss, unauthorized or unlawful access, destruction, use, alteration, or disclosure including administrative safeguard, technical safeguard, physical safeguard and access controls.

## Data Breach Notification

We will notify the Office of the Personal Data Protection Committee without delay and, where feasible, within 72 hours after having become aware of it, unless such personal data breach is unlikely to result in a risk to the rights and freedoms of you. If the personal data breach is likely to result in a high risk to the rights and freedoms of you, we will also notify the personal data breach and the remedial measures to you without delay by our website, SMS, email, telephone call or registered mail if applicable.

## Changes to this CCTV Privacy Policy

We may change this CCTV Privacy Policy from time to time. Any changes of this CCTV Privacy Policy, we encourage you to frequently check on our website.

This CCTV Privacy Policy was last updated and effective on 15th November 2021

## Links to other site

The purpose of this CCTV Privacy Policy is for all employees, customers, visitors, or any individuals. Any websites from other domains found on our site is subject to their Privacy Policy which is not related to us.

## Contact Information

If you have any questions about this CCTV Privacy Policy or would like to exercise your rights, you can contact us by using the following details:

### Data Controller

Thai Optical Group Public Company Limited and the subsidiary companies

15/5 Moo6 Bangbuathong-Suphanburi Road, Lahan, Bang Bua Thong, Nonthaburi, 11110

### Data Protection Officer

email: [data.privacy@thaiopticalgroup.com](mailto:data.privacy@thaiopticalgroup.com)