

Privacy Notice

For CCTV Use

Last updated on 1 December 2021

Sri Trang Agro-Industry Public Company Limited, Sri Trang Gloves (Thailand) Public Company Limited and Sri Trang Agro-Industry Public Company Limited group companies (as listed in the appendix) (collectively referred to as "we," "our," "us", "Sritrang", or the "Company") is using closed-circuit television (CCTV) devices for monitoring our designated space within and around our buildings and facilities to protect life, health, and property. We collect personal data of all customer, employees, directors, contractors, workers, visitors or any individuals entering the monitored space within and around our buildings and facilities (collectively referred to as "you" or "your") through the use of CCTV devices. This Privacy notice for CCTV use (referred to as the "Privacy Notice") provides information on our collection, use, disclosure, and transfer of individually identifiable information (referred to as "Personal Data").

We may amend or modify this Privacy Notice from time to time. We encourage you to read this Privacy Notice periodically for any recent changes. Any amendment or modification to this Privacy Notice will take effect once published on www.sritranguroup.com and www.sritranggloves.com. We will notify you (or obtain your consent if consent is required) of any substantial changes or any legally required changes which are substantial to this Privacy Notice.

1. Personal data we collect

We collect your moving or still images, and picture of your belongings e.g., vehicles, when entering the monitored space in our buildings and facilities through the CCTV devices ("CCTV Data"). In certain cases, we may collect, use or disclose your sensitive Personal Data (e.g. facial recognition data) only on the basis of your explicit consent or where permitted by law.

2. Purposes of our collection, use, or disclosure of personal data

We may collect, use, disclose, transfer and carry out any operation, including but not limited to recording, holding, adapting, altering, modifying, destroying, deleting, retrieving, combining, copying, transmitting, storing, extracting, amending or adding, related to your CCTV Data and other Personal Data concerning you, for the "CCTV Monitoring Purposes" as listed below

- a) to protect your health and personal safety, including your belongings;
- b) to protect our buildings, facilities and assets from damage, disruption, vandalism, and other crime;
- c) to support law enforcement organizations in the deterrent, prevention, detection, and prosecution of crime;
- d) to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- e) to assist in the investigation or proceedings concerning a whistleblowing complaint;
- f) to assist in the establishment or defense of any civil litigation, including but not limited to employment proceedings; and
- g) to verify identity and to comply with applicable laws.

We will install CCTV devices in plain sight. The areas we will not install the CCTV devices are in changing rooms, toilets, shower rooms, or any other areas designated as staff high privacy rest areas as we consider appropriate.

Our CCTV devices are in operation 24 hours a day and 365/366 days a year, and no audio recordings.

We will place signage at the entrance and exit points, and the monitored areas to alert you that a CCTV installation is in use.

3. Legal bases

We will not collect, use, disclose process, transfer, and carry out any operation, including but not limited to recording, holding, adapting, altering, modifying, destroying, deleting, retrieving, combining, copying, transmitting, storing, extracting, amending or adding, related to your CCTV Data and other Personal Data concerning you, without consent except for the following:

- a) **Vital interest.** It is necessary for our prevention or suppression of a danger to a person's life, body, or health;
- b) **Legitimate interest.** It is in our legitimate interest to protect your health and personal safety, as well as your belongings, our buildings, facilities and assets, and to carry out any other acts to achieve the CCTV Monitoring Purposes. We will endeavor on the continuing basis to balance our legitimate interest and that of any relevant third parties, as the case maybe, and your fundamental rights and freedoms related to the protection of the CCTV Data concerning you. We will also endeavor to identify any steps required to achieve the right balance as appropriate;
- c) **Legal obligations.** We owe a duty to comply with the legal obligations prescribed by the applicable laws, including but not limited to the laws regarding safety and environment in the workplace. We consider the use of the CCTV as a necessary measure to enable us to meet those obligations.

4. Persons or entities to whom we disclose or transfer your personal data

We will keep CCTV Data concerning you confidential and will not disclose or transfer it except to our affiliates and subsidiaries within Sritrang group ("Sritrang GROUP") and other carefully selected third parties now or in the future, licensees, joint venture partners, and/or service providers, to achieve the CCTV Monitoring Purposes provided in this policy.

Third parties to which we may disclose CCTV Data and other Personal Data concerning you include:

- a) **Sritrang GROUP.** We may disclose or transfer CCTV Data and other Personal Data concerning you to Sritrang GROUP, as part of our legitimate interest and Sritrang GROUP's interest to achieve the CCTV Monitoring Purposes.
- b) **Governmental and/or regulatory organizations.** We may disclose or transfer CCTV Data and other Personal Data concerning you to comply with legal obligations, or to support or assist law enforcement organizations with regard to the investigation and prosecution of civil or criminal proceedings.
- c) **Third-party service providers.** We may disclose or transfer CCTV Data and other Personal Data concerning you as our necessary steps to ensure our protection of your health and personal safety, and belongings, to third-party service providers.

5. Security Measures

We use measures, which cover administrative, technical, physical and management to protect the confidentiality, integrity, and availability of CCTV Data and Personal Data concerning you against any

accidental or unlawful or unauthorized damage, loss, access, use, alteration, correction or disclosure of Personal Data, in compliance with the applicable laws.

We have implemented measures on controlling access and use of devices for storing and processing Personal Data from CCTV which are secured and suitable for our collection, use and disclosure of Personal Data from CCTV. We also have measures on restricting access to Personal Data from CCTV and the use of storage and processing equipment by imposing users' access rights, users' permission rights to the authorized personnel, and users' duties and responsibilities to prevent unauthorized access, disclosure, perception or unlawful duplication of Personal Data, or theft of device used to store and process Personal Data. This includes measures on the re-examination in relation to access, alteration, erasure, or transfer of Personal Data from CCTV.

6. Retention period

We will retain your CCTV Data in our system for the period necessary to fulfil our duties to achieve the CCTV Monitoring Purposes prescribed in this policy. When we are no longer permitted by the applicable laws to store your CCTV Data, we will remove it from our systems and records. In the event a judicial or disciplinary action is initiated, your CCTV Data may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived as permitted by the applicable laws.

7. Your rights as the data subject

Since the enforcement of Thailand Personal Data Protection Act, if you believe that you have been recorded by our CCTV devices. Subject to the conditions prescribed by applicable laws and our data subject rights management procedures, you may have the following rights.

- a) **Access.** You may have the right to access or request a copy of CCTV Data concerning you that we collect, use, or disclose.
- b) **Rectification.** You may have the right to request the personal data that we collect, use, and/or disclose about you is corrected, updated, completed, and not misleading.
- c) **Data Portability.** You may have the right to obtain your CCTV Data which we hold, in a structured, readable electronic format, and transmit such data to another data controller.
- d) **Objection.** You may have the right to object to certain collection, use, and/or disclosure of your CCTV Data and personal data to the extent permitted under applicable laws.
- e) **Restriction.** You may have the right to restrict our use of your personal data in some cases.
- f) **Withdrawal of consent.** For the purposes you have consented to our collection, use, and/or disclosure of your CCTV Data, you may have the right to withdraw your consent at any time except in case of the law or any contract clause which is beneficial to you has a limitation for withdrawal of consent, or we can rely on other legal bases apart from consent.
- g) **Deletion.** You may have the right to request us to delete, destroy, or anonymize your personal data that we collected, used, or disclosed. You have the right to request us to delete your CCTV Data or to render your CCTV Data to be unidentifiable to the extent applicable under the laws, except for the case that we may need to collect your CCTV Data as applicable under the laws, such as establishing claims, performing with or exercising legal claims, defending legal claims, or complying with the laws.
- h) **Complaints.** You have the right to lodge a complaint to the competent authority where you believe that the Company fails to comply with personal data protection laws.

If you wish to exercise any of the aforementioned rights, please contact us using the contact information provided in the "Contact Us" section below.

Your request for exercising any of the aforementioned rights may be limited by applicable laws and exceptions. There may be certain cases where we can reasonably and lawfully reject your requests, for

example, due to our legal obligations or court orders. If we reject your requests, we will notify you of our reason.

8. Contact us

If you wish to contact us or if you have any questions about your personal data as described in this Privacy Notice, you may contact us at:

Data Protection Officer (DPO)

Sri Trang Agro-Industry Public Company Limited, Sri Trang Gloves (Thailand) Public Company Limited, and Sri Trang Agro-Industry Public Company Limited group companies:

- Unit 1701, and 1707-1712, 17th Floor, Park Venture Ecoplex
57 Wireless Road, Lumpini, Pathumwan, Bangkok 10330
- Email: dpo@sritranggroup.com Telephone number: +662 207 4500

Appendix

Sri Trang Agro-Industry Public Company Limited Group Companies

1. Sri Trang Gloves (Thailand) Public Company Limited
2. Rubberland Products Company Limited
3. Nam Hua Rubber Company Limited
4. Anwar Parawood Company Limited
5. Premier System Engineering Company Limited
6. Starlight Express Transport Company Limited
7. Sadao P.S. Rubber Company Limited
8. Startech Rubber Company Limited
9. Semperflex Asia Corporation Limited
10. Sri Trang Rubber & Plantation Company Limited
11. Sri Trang IBC Company Limited