

CCTV PRIVACY POLICY

26 December 2023

Super Turtle Public Company Limited (the “**Company**”, “**we**”, “**us**”, or “**our**”) uses CCTV to monitor the Company's business areas, both within the office and retail shops under the Turtle brand (including Turtle shop's warehouse) to protect life, health, and assets. We collect Personal Data of customers, employees, directors, contractors, staffs, visitors, and any other person entering the monitored areas through CCTV (collectively, “**you**”, or “**your**”). This privacy policy (“**Privacy Policy**”) provides information regarding the collection, use, and/or disclosure of your identifiable data (“**Personal Data**”) by the Company.

The Company may change and/or update this Privacy Policy from time to time. The Company will notify you regarding changes and/or updates through the channels specified by the Company. The Company encourages you to read this Privacy Policy carefully and to check Privacy Policy regularly to review any changes and/or updates the Company might take in accordance with the terms of this Privacy Policy.

1. PERSONAL DATA THE COMPANY COLLECT

The Company collects stills or motion pictures and pictures of your asset when you enter monitored areas through CCTV (“**CCTV Details**”).

2. PURPOSE OF THE COLLECTION, USE AND/OR DISCLOSURE OF YOUR PERSONAL DATA

2.1 The Company may collect, use, disclose, transfer, and carry on any actions which shall include but not limited to recording, possessing, adjusting, amending, destroying, deleting, retrieving, compiling, copying, sending, storing, sorting, updating or adding CCTV Details and other Personal Data related to you for “**the Purposes of CCTVs Installation**” per below:

- (a) To protect health and security including your assets;
- (b) To protect the business area, and assets from damages, failure, destruction, and other crimes;
- (c) To support government agencies on law enforcement in order to suppress, prevent, detect crimes including lawsuit arising from crimes;
- (d) To effectively support dispute resolution during disciplinary procedure or complaint lodging;
- (e) To support investigation or proceeding regarding complaints or whistleblowing;
- (f) To support establishment, contest and exercise of claims in litigation.

2.2 The Company shall install CCTVs at prominent places, and do not install them at places such as restroom and shower room.

2.3 CCTVs run 24 hours every day and record no sound.

2.4 The Company shall install indication signs in business areas or CCTV monitored areas so that you are notified that there are CCTVs installed in such area.

3. LEGAL BASES WHICH WE RELY ON FOR COLLECTION, USE, AND/OR DISCLOSURE OF YOUR PERSONAL DATA

The Company will not collect, use, disclose, process, transfer, and/or carry on any actions which shall include but not limited to recording, possessing, adjusting, amending, destroying, deleting, retrieving, compiling, copying, sending, storing, separating, updating or adding CCTV Details and other Personal Data related to you without your consent except in the following cases:

- (a) for preventing or suppressing a danger to a person's life, body or health;
- (b) for the purpose of our legitimate interests in protecting your health and security including your business area, and our assets and any other actions according to the Purposes of CCTVs Installation. The Company will balance the legitimate interest pursued by the Company and any relevant third party (as the case may be) with your interest and fundamental rights and freedoms in relation to the protection of your CCTV Details. In addition, the Company put an effort to seek for ways to achieve such balance as appropriate;
- (c) for fulfillment of our legal obligations under the applicable laws including but not limited to safety and working environment law. The Company believe that the installation of CCTVs is a necessary measure for us to achieve such purpose.

4. DISCLOSURE OR TRANSFER OF YOUR PERSONAL DATA TO THIRD PARTIES

4.1 The Company will keep your CCTV Details related to you confidential and will not disclose or transfer such data to any person except the third parties which the Company carefully select at present and in the future to proceed as requested by us, licensees, partners in joint ventures, and/or service providers to be in accordance with the Purposes of CCTVs Installation.

4.2 Third parties to whom CCTV Details and other Personal Data related to you will be disclosed include:

- (a) **The building owner/location** where the Company's business operates, including both the office area and/or Turtle Shops. The Company may disclose, or transfer CCTV Details and other Personal Data related to you to the area owner for the purpose of our legitimate interests and legitimate interests of the area owner to comply with the Purposes of CCTVs Installation.
- (b) **Government agencies and/or law enforcement agencies**, the Company may disclose CCTV Details and other Personal Data related you for the purpose of legal compliances and compliance with legitimate orders of the court, regulatory bodies, government agencies, and/or government organizations.
- (c) **Third-party service providers**, the Company may disclose, or transfer CCTV Details and other Personal Data related to you to third-party service providers to follow necessary measures in order to protect your health, safety and assets.

5. CROSS-BOARDER TRANSFERS OF PERSONAL DATA

5.1 The Company may disclose or transfer your CCTV Details to third-party service providers located overseas in order to follow necessary measures to protect your health, safety and assets. Such disclosure or transfer would not be done unless your consent has been obtained, except in the case where there are other significant legal bases (e.g., contractual obligations between us and other

third parties for your interest) according to the applicable laws. The Company will take steps and measures to ensure that Personal Data is securely transferred, that the receiving parties have in place suitable data protection standard and that the transfer is permitted under the law.

- 5.2 In the case where your CCTV Details are transferred to the destination countries which do not have the same data protection standards as required by Thailand's Personal Data protection law, the Company will take necessary measures to protect Personal Data transferred to third parties in such countries to ensure that such Personal Data is protected at the same level as we do to your CCTV Details according to the applicable personal data protection laws.

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA

The Company will retain your CCTV Details for as long as is reasonably necessary to fulfil the Purposes of CCTVs Installation as described in this Privacy Policy. In the event that the Company are no longer legally permitted to retain your CCTV Details, the Company will delete your data from our systems and records. Nevertheless, in the case where there are any court or disciplinary proceedings, your CCTV Details may be retained until such proceedings have been completed including possible appealing process. After such process, the data will be permanently deleted or stored as required by the applicable laws.

7. SECURITY MEASURES

- 7.1 The Company maintain appropriate Personal Data security measures, which include administrative, technical and physical safeguards in relation to access control, to protect the confidentiality, integrity, and availability of Personal Data against any unlawful or unauthorized loss, access, use, alteration, correction or disclosure, in compliance with the applicable laws.

The Company has implemented access control measures and utilization of storage and processing devices measures for the collection and processing of Personal Data which are secured and suitable for our collection, use, and/or disclosure of Personal Data. The Company restricts access to Personal Data as well as storage and processing devices by imposing access rights or permission, access management to limit access to Personal Data to only authorized persons, and implement user responsibilities to prevent unauthorized access, disclosure, perception, unlawful duplication of Personal Data or theft of device used to store and process Personal Data. This also includes methods that enabling the re-examination of access, alteration, erasure, or transfer of Personal Data which is suitable for the method and means of collecting, using and/or disclosing of Personal Data.

- 7.2 The Company, from time to time, examine and adjust our security measures as necessary or when there is relevant technology development to ensure that our security measures are efficient and appropriate and in accordance with minimum legal requirements as required by the relevant government agencies.

8. YOUR RIGHTS AS A DATA SUBJECT

Subject to the applicable laws and exceptions thereof, you may have the following rights to:

- (a) **Access:** You may have the right to access or request a copy of the Personal Data that we have collected, used and/or disclosed. For privacy and security, the Company may require proof of your identity before providing the requested Personal Data;

- (b) **Rectification:** You may have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data that we collect, use and/or disclose rectified;
- (c) **Data Portability:** You may have the right to obtain Personal Data the Company hold, in a structured, electronic format or another form that is appropriate to the case and feasible, and to transmit such data to another data controller with your consent, where this is (a) Personal Data which you have provided to us, and (b) if we are collecting, using and/or disclosing that data on the basis of your consent or to perform a contract with you. If your exercise of right violates any right or freedom of any other person or we have to use your Personal Data for the purposes of public interest or legal compliance, we may reject your request;
- (d) **Objection:** You may have the right to object to certain collection, use and/or disclosure of Personal Data subject to the applicable law;
- (e) **Restriction:** You may have the right to restrict our use of Personal Data in certain cases subject to the applicable law;
- (f) **Withdraw consent:** For the purposes you have consented to our collection, use and/or disclosure of Personal Data, you may have the right to withdraw consent in certain cases;
- (g) **Deletion:** You may have the right to request that we delete, destroy or anonymize the Personal Data that we collect, use, and/or disclose, except we are not obligated to do so if we need to retain such Personal Data in order to comply with a legal obligation or to establish, exercise or defend legal claims; and
- (h) **Lodge a complaint:** You may have the right to lodge a complaint to the competent authority where you believe that we are not in compliance with applicable data protection law.

9. OUR CONTACT DETAILS

If there are any concerns or queries about this Privacy Policy or if you wish to exercise the rights relating to your CCTV Details, please contact the Company at:

Super Turtle Public Company Limited
 333 Lao Peng Nguan 1 Tower, 24th Floor, Soi Choeiphuang,
 Vibhavadi-Rangsit Road, Chomphon, Chatuchak, Bangkok 10900
 Email: legal@superturtle.co.th

This Privacy Policy has been revised and become effective since 26 December 2023.

- Signature -

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(Mr. Chaiwat Atsawintarangkun)

Chairman of the Board of Directors

Super Turtle Public Company Limited