

Personal Data Protection Policy
For the Use of Closed-circuit Television Cameras of
Carabao Group Public Company Limited and Subsidiaries

Carabao Group Public Company Limited and its subsidiaries (“**the Companies**”) have closed-circuit television (CCTV) cameras equipped for the use of surveillance and observation in the premises and surrounding areas for the safety of lives and property. Therefore, the Companies have publicized this policy (“**the Policy**”) for protecting personal data in the use of closed-circuit television cameras. The objective of the collection, use and/or disclosure of data is to identify person(s) (“**Personal Data**”) who are potential customers, business allies, trade partners or parties contracting with **the Companies** (as specified in Clause 3), employees, executives, directors, contractors, employees, visitors or anyone who enter the buildings and areas under surveillance and observation by closed circuit television cameras. This policy elaborates the processes for personal data protection and provides guidelines for properly handling data in compliance with the Personal Data Protection Act B.E. 2562 (2019) (including additional revisions) (“**the Act**”).

1. Personal Data Collected, Used and/or Disclosed by the Companies

The Companies collect still photograph, video, audio, and object content such as your behavior and vehicle when you enter areas under surveillance and observation inside the Companies’ building and sites by closed-circuit television cameras (“**Data from Closed Circuit Television Cameras**”).

2. Collection, Use and/or Disclosure of Personal Data from Closed-circuit Television Cameras Under Legal Bases

The Companies will not collect, use, disclose, process, transfer and take any action including but not limited to recording, possessing, editing, revising, destroying, deleting, recovering, copying, sending, storing, sorting, changing or adding your personal data taken from closed-circuit television cameras without your consent except in the following cases: (1) when data collection is necessary to prevent or stop any perils harmful to lives, bodies or health of individuals; (2) when data collection is lawfully necessary for the benefits of the Companies and affiliates in protecting your health, your safety and your property, including buildings, facilities and property of the Companies and affiliates in relation to any actions in compliance with objectives of the closed-circuit television camera installation. The Companies will strive a balance between lawful benefits of Companies, affiliates and other person(s) involved, including your rights and freedoms in personal data protection through the installation and use of closed-circuit television cameras. Furthermore, the Companies will exercise efforts

toward finding appropriate procedures and processes for achieving the aforementioned balance; and (3) when data collection is the fulfillment of legal obligations. The Companies are obligated to comply with relevant laws including occupational and environmental safety laws, and when the Companies deems the use of closed-circuit television cameras is necessary for the Companies to fulfill the obligations for the following “**objectives in installing closed-circuit television cameras**”:

- 1) To collect data, monitor, observe and analyze statistics on entries, exits, movement and traffic in buildings and facilities of the Companies and affiliates.
- 2) To protect health and safety including your property.
- 3) To protect buildings, facilities and properties from damage, malfunction, destruction and other crimes.
- 4) To support law enforcement agencies in criminal obstruction, prevention detection and prosecution.
- 5) To facilitate dispute resolution in disciplinary process or any other complaint resolution processes effectively.
- 6) To facilitate investigations or whistleblowing process.
- 7) To support the right claims or arguments in any legal actions including and not limited to civil cases and labor cases.
- 8) To analyze your personal data in order to analyze, assess, modify and improve goods, services and store locations of the Companies and affiliates in order to meet needs and wants of customers.

In doing so, the Companies install closed-circuit television cameras in areas designated for monitoring and surveillance. The Companies' closed-circuit television cameras operate 24 hours a day. The Companies will install signs at entrances, exits and areas to be monitored and under surveillance by closed-circuit television cameras in order to have you informed that the area has closed-circuit television cameras installed.

3. Disclosure and/or Transfer of Your Personal Data

The affiliates to which the Companies may disclose your personal data, are companies in the Carabao Group, namely, Carabao Group Public Company Limited and subsidiaries, companies in the CJ Group, namely, C.J. Express Group Company Limited and subsidiaries, companies in the TD Group, namely, TD Tawandang Company Limited and subsidiaries, and companies in the Tawandang Group, namely, Tawandang 1999 Company Limited and subsidiaries (“**affiliates**”) for the lawful benefits of the Companies and affiliates and to be in consistent with objectives for installing closed-circuit television cameras specified in this policy.

If required, the Companies may disclose your personal data to government agencies or any other agencies pursuant to the law in order to comply with laws or support and assist law enforcement agencies in investigations or civil or criminal proceedings.

The Companies may be required to disclose your personal data derived from closed circuit cameras to the outside persons involved such as the Companies' service providers in order to follow steps necessary for protecting your health, safety and property.

In some cases, the Companies may be required to disclose or provide your data from closed-circuit television cameras to investors, shareholders, recipients of rights transfers, persons who will receive rights transfers, transferred recipients or persons who will become transferred recipients when the Companies have a corporate restructuring, debt restructuring, business merging, business acquisition, sale, purchase, joint ventures, rights transfers, discontinuation of business or any other similar events and having the Companies' business, assets or shares transferred or distributed whether in whole or in part.

4. Transfer of Your Personal Data Abroad

The Companies may disclose or transfer your personal data abroad to other persons or servers in destined countries which may or may not have equivalent personal data protection standards. The Companies will follow steps and measures to ensure personal data is transferred safely and the recipient has suitable personal data protection standards, and such personal data transfers are legally permitted by law.

5. Personal Data Storage, Storage Times and Security Measures

The Companies will store your data from closed-circuit television cameras as necessary as to perform duties to achieve the objectives of closed-circuit television camera installation stated in this policy. When the Companies are no longer permitted by law to store your data from closed-circuit television cameras, the Companies will delete the data from the Companies' systems and records. The Companies may continue to store the aforementioned data for the period necessary for legal compliance, for the right establishment or for the right claims in pursuant to the law or legal prescription.

The Companies will secure your data from closed-circuit television cameras by providing appropriate security measures to protect data from closed-circuit television cameras including administrative safeguards, technical safeguards and physical safeguards in relation to access control for the use of data from closed-circuit television cameras including appropriate modifications and revisions of measures to prevent loss, illegal access, use, edition, revision or disclosure of data from closed-circuit television cameras without legal authority in order to ensure security of your personal data, confidentiality, integrity and availability.

In particular, the Companies limit access and use technology to maintain safety of your data from closed-circuit television cameras by requiring permissions or rights to access data with user access management allowing only authorized persons to access data from closed-circuit television cameras and user responsibilities designation to prevent unauthorized access, disclosure, reveal, smuggling, copies of data or theft of stored data from closed-circuit television cameras or processing devices. Moreover, the Companies arrange methods to enable retrospective tracing of data accession from closed-circuit television cameras in relation to access,

change, deletion or transfer of data from closed-circuit television cameras. When your data from closed-circuit television cameras has been disclosed to outside persons that process data or data processors, the Companies will oversee to ensure that such persons have taken appropriate actions in compliance with the Companies' directives.

The Companies will delete or destroy data from closed-circuit television cameras within 30 days from the end date of the storage period for data from closed-circuit television cameras.

6. Your Rights as the Data Owner

As the data owner, you have the right to withdraw your consent granted to the Companies at any time, except in cases where consent withdrawal is limited by laws or contracts that benefit you. Consent withdrawal does not have effects on processing of personal data of which you previously and legally granted to the Companies.

You have the right to request access or copies of personal data collected, used and/or disclosed by the Companies. You have the right to request transfer of your data organized by the Companies in electronically readable format and you have the right to request the Companies to send your personal data to other people as you intend.

You have the right to object the collection, use and/or disclosure of personal data in cases specified by law. You have the right to request the Companies to erase or destroy or make your personal data anonymous by any means as well as the right to suspend the use of your personal data, except in cases where there are legal limitations.

The Companies will use best efforts to keep your personal data accurate and up to date for the completion and not cause misunderstandings. You have the right to request revisions and changes your personal data. When you revise or change your personal data or if you see the data possessed by the Companies is incomplete or inaccurate, this may cause misunderstandings or data may not be up to date.

Exercise of your rights specified above must be in compliance with the law and the Companies may refuse your abovementioned rights based on legal limitations.

You have the right to file complaints with authorized officials pursuant to the Act if you are of the view that the Companies or other persons working on behalf of the Companies to collect, use and/or disclose your personal data do not comply with the Act. Nevertheless, the Companies would like you to inform the Companies of your concerns to resolve it before contacting the agencies involved.

When submitting a request to exercise your rights, you can contact the Data Protection Officer (DPO) or the person with the duty and responsibility for personal data protection using contact channels specified in this policy. The Companies will consider and notify you of the results of the consideration within 30 days from the date of receiving your request. In cases where the Companies deny your rights, the Companies will inform you the reasons of the denial in a due time.

7. Policy Changes

The Companies may review and revise this policy to be consistent with any changed rules and regulations. If the Companies modified, changed, or made revisions to this policy, the Companies will publicize the revision through appropriate channels such as notifications on the Companies' website, etc. Please check this policy periodically to see revisions or modifications made. The Companies will remind you if the revision have significantly affected you, the Companies will request your re-consent on the necessity and when legally required to do so.

8. Contact Channels

If you have concerns or questions about this policy, or you wish to exercise your rights concerning your data from closed-circuit television cameras, please contact:

Data Protection Officer (DPO)

Carabao Group Public Company Limited and Subsidiaries

393, 393 Silom Building 7th - 10th floor, Silom Road, Silom, Bangrak, Bangkok, 10500

Contact Channels: Tel. 02-636-6111

Email: PDPA@carabao.co.th.