Privacy Notice for the Use of Closed-Circuit Television (CCTV)

1. General Information

Asia Cement Public Company Limited and its affiliated companies, namely Asia Cement Products Company Limited, Jalaprathan Cement Public Company Limited, Asia Cement Energy Conservation Company Limited, and Jalaprathan Concrete Company Limited (collectively, the "**Company**") have installed and operate closed-circuit television (CCTV) within and around the Company's premises for the purpose of security management at the Company's premises. This Privacy Notice has been prepared to inform you in detail of how the Company collects, uses, and/or discloses the Personal Data obtained from CCTV, the purposes of processing, the retention period, your rights under personal data protection laws, and how you may contact the Company should you have any questions or wish to exercise your rights.

This Privacy Notice applies to all persons who enter the Company's premises, whether employees, visitors, event participants, suppliers, contractors, customers, or any other persons, whose images may be recorded by CCTV when you enter the Company's premises.

2. Definition of Personal Data

"**Personal Data**" under this Privacy Notice refers to any information relating to an identified or identifiable natural person, whether directly or indirectly, including your name, surname, contact details, facial image, national identification number, and other information relating to your entry to or participation in the Company's activities. In particular, for the purposes of this Privacy Notice, Personal Data includes still or moving images recorded by CCTV, as well as your physical appearance, attire, behavior, and movements within areas where the Company has installed cameras. Such Personal Data may be stored in physical documents or in electronic formats within the Company's information systems.

3. Personal Data Collected by the Company

To maintain security at the Company's premises, the Company needs to collect your Personal Data through CCTV, including but not limited to:

a. Still or moving images of you captured by CCTV when you enter the Company's premises;
b. Your physical appearance, attire, behavior, and movements within areas where cameras are installed;
c. The date, time, and location of the camera that recorded your image, as well as your vehicle registration number where you bring a vehicle into the premises.

The Company does not intend to collect Sensitive Personal Data through CCTV. However, recorded images may incidentally reveal information that may be regarded as Sensitive Personal Data (such as race, religion, or disability discernible from the image), which the Company will process only as necessary for security purposes.

4. Sources of Personal Data

The Company collects your image data automatically through its security system, namely CCTV, when you enter or pass through areas of the Company where cameras are installed. The Company will display signs or symbols notifying you that CCTV recording is in progress in such areas.

5. Purposes of collecting, using and/or disclosing Personal Data

The Company collects, uses, and/or discloses your CCTV image data only as necessary for the following purposes: maintaining security and good order at the Company's premises; verifying and controlling entry to and exit from the premises; preventing and investigating incidents that may cause damage to the life, body, or property, or to the safety of persons and the Company's property; and retaining evidence where necessary in connection with legal claims or disputes.

6. Lawful basis of collecting, using and/or disclosing Personal Data

In collecting, using, and/or disclosing your CCTV image data, the Company shall act only to the extent necessary and in compliance with applicable personal data protection laws. In general, the Company will collect, use, and/or disclose your data where there is a lawful basis, as follows:

a. **Legitimate Interests**: necessary for the Company's legitimate interests, such as maintaining security at the Company's premises through CCTV, except where such interests are overridden by your fundamental rights in your Personal Data;
b. **Legal Obligation**: necessary for compliance with applicable laws, such as occupational safety, health, and working environment laws, court orders, or orders of government authorities with legal authority;
c. **Vital Interests**: necessary to prevent or suppress a danger to the life, body, or health of you or another person, such as in the event of an accident or emergency at the Company's premises;
d. **Consent**: for cases where no other lawful basis above is available, such as publishing CCTV footage or images taken during activities for public relations purposes beyond your reasonable expectations.

For CCTV footage, which is a security measure generally applied throughout the Company's premises, the Company relies on Legitimate Interests, and appropriate signage will notify you that CCTV recording is in progress in such areas. Where Sensitive Personal Data is processed, the Company will do so only where consent has been obtained or where otherwise permitted by law.

7. Disclosure of Personal Data

The Company may disclose your CCTV footage only to the extent necessary to affiliated companies, security service providers, information system service providers, government authorities, and other persons with legal authority for the purposes set out in this Privacy Notice. The Company will ensure that such recipients collect, use, and/or disclose your Personal Data only within the scope and purposes specified in this Privacy Notice.

8. Storage and Transfer of Personal Data

The Company stores, uses, and/or processes your CCTV image data primarily on systems located in Thailand. However, the Company may transfer such data to Affiliated Companies or other persons in other countries where necessary pursuant to a contract between the Company and another person or juristic person, to prevent or suppress a danger to life, body, or health, to comply with applicable laws, or for significant public interest, including where the Company uses cloud-based information systems or servers located overseas for the storage or processing of CCTV footage. In such cases, the Company will ensure that the destination country has adequate personal data protection standards, or that appropriate safeguards are in place, and will require the data recipient to maintain adequate data protection measures in accordance with the standards prescribed by law and to execute appropriate agreements with relevant third parties.

For the purposes of this Privacy Notice, "**Affiliated Companies**" includes the companies specified in Section 1, as well as any other juristic person that controls, is controlled by, or is under common control with the Company, whether directly or indirectly. "**Control**" means (1) the holding of more than fifty percent (50%) of the total voting rights; (2) the ability to control the majority of votes at a shareholders' meeting; or (3) the power to appoint or remove at least half of all directors.

9. Duration of Personal Data Retention

The Company will retain CCTV footage for no more than 30 days, unless a longer retention period is necessary for investigation, inquiry, or legal proceedings, or where requested by the data subject, in which case the Company may retain the data beyond 30 days and will delete it securely once the purpose is fulfilled.

10. Your Rights Regarding Personal Data

You are entitled to rights under personal data protection laws, including the right to withdraw consent, access and obtain a copy of your data, request data portability, object to collection, use, or disclosure, request erasure or destruction, request restriction of use, request rectification, and lodge a complaint with the Expert Committee. These rights may be exercised subject to the conditions prescribed by law.

11. Measures for the Security of Personal Data

The Company has implemented security measures in accordance with Section 37 of the Personal Data Protection Act B.E. 2562 (2019) and related notifications of the Personal Data Protection Committee, to prevent the loss, unauthorized or unlawful access, use, alteration, modification, or disclosure of Personal Data. Further details are set out in the Company's PDPA Policy.

12. Contact Information of the Company

If you have any questions regarding the collection, use, and/or disclosure of your CCTV image data, or if you wish to exercise your rights, you may contact the Company through the following channels:

Email: LegalandCompliance@acc.co.th

Name: Miss Pannaree Piboonpanya

Telephone: 02-641-5600 Ext.1382

Address: Sathorn City Tower, 8/1 Floor, 175 South Sathorn Road, Tungmahamek, Sathorn, Bangkok 10120

13. Updates to the Privacy Notice

This Privacy Notice is subject to regular review and revision. It may therefore be updated from time to time to reflect changes in the collection, use, or disclosure of Personal Data, and to ensure fairness and transparency for data subjects. When updates are made, the Company will notify you through appropriate channels.