

Bank of China (Thai) Public Company Limited

CCTV Privacy Policy

This CCTV privacy policy (“**Policy**”) is issued by Bank of China (Thai) Public Company Limited (hereafter “**Company**”, “**we**”, “**our**” or “**us**”) is to establish the policies and practices in protecting Personal Data privacy in accordance with the use of CCTV under the applicable laws. We highly value personal privacy and strictly obey the confidentiality and security obligations with respect to the Personal Data (as defined below) of which the Company may collect, use, and/or disclose with respect to the respective data subjects (as defined below) in regards to the use of closed-circuit television (CCTV) devices to monitor within or around our premise, building, other of our facilities and/or event areas relating to the Company's business.

For the purpose of this Policy “**data subject(s)**” comprises of the following categories of individuals: prospective customers; individual customers or personnel of corporate customers, including but not limited to, representatives, directors, authorized persons and/or shareholders; the relevant non-customers such as counterparties, guarantors, and/or witnesses; and our employees, directors, contractors, workers, visitors, or any individuals entering the monitored space within our buildings and facilities (hereafter, collectively referred as “**you**” or “**your**”).

This Policy applies to the Personal Data that we (and/or other authorized persons or entities, acting on our behalf) collect from both online and offline communication channels (“**Channels**”).

Please read this Policy carefully to understand the Company's views and practices in regards to the processing of Personal Data, in relation to the use of CCTV devices.

This Policy was last updated on February 27, 2023. In order to ensure this Policy effectively reflects our business operation and/or in compliance of any legal requirement, the Company reserves the right, in our sole discretion, to make changes or amend this Policy at any time we deem appropriate. In the case where significant modification was made to this Policy, the Company will use reasonable efforts in order to notify you (e.g. by posting the update on our sites and/or emailing you the revised policy). If any changes made to this Policy requires your consent under the applicable laws, we will notify you and obtain your consent again.

1. COLLECTED PERSONAL DATA

For the purpose of this Policy, “**Personal Data**” means any identified or identifiable information about you and relate to you or other individuals.

We collect your still and moving footages, images, voice, and picture which may include your acquaintance and/or your belonging (e.g., property, vehicles, and/or other identifiable sources of information as observable by the CCTV footage) (hereafter, collectively referred to as “**CCTV Data**”), when entering the monitored space.

2. THE PURPOSE OF WHICH WE COLLECT, USE, AND/OR DISCLOSE PERSONAL DATA

We may collect, use, disclose and/or carry out any operation, including, but not limited to, recording, holding, adapting, altering, modifying, deleting, retrieving, combining, copying, transmitting, storing, extracting, amending, or adding, related to your CCTV Data and other Personal Data connecting you, for the "**CCTV Monitoring Purposes**". We will not process (collect, use, and/or disclose) your CCTV Data without your consent, except where we can rely on other legal bases. The purposes and legal basis are as follow:

- **Vital Interest:** to prevent, protect and/or suppress a danger to person's life, body and health, such as to protect your health and personal safety, and also your belonging;
- **Legitimate Interest:** it is in our legitimate interest: (1) to protect your health and personal safety, as well as your belonging, our facilities and assets from or against damage or disruption of any kind; (2) to assist on the dispute resolution procedure; (3) to assist in the investigation or proceeding concerning a whistleblowing complaint; (4) to assist in the establishment or defence of any civil litigation, including, but is not limited to, employment proceeding; and (5) to carry out any other acts in order to achieve the CCTV Monitoring Purposes and/or other purposes as set forth in this Policy.

Where we rely on legitimate interest as our legal basis, we will balance, as appropriate, our legitimate interest and that of any relevant third parties, as the case may be, with your fundamental rights and freedoms related to the protection of the Personal Data concerning you; and/or

- **Legal Obligation:** It is to comply with applicable legal obligation, cooperating with governmental authorities, governmental agency, and law enforcement authority.

We will install CCTV devices in designated monitored area, please also look for the CCTV in operation signage, to be informed that such area is the CCTV monitored area. Such CCTV devices are in operation 24 hours a day and 365 days a year.

3. DISCLOSURE OF YOUR PERSONAL DATA

We will keep your CCTV Data confidential and will not disclose or transfer it except to BOC Group, subsidiaries and affiliates, and other carefully selected third parties now or in the future, joint venture partners, and/or service providers, who may be located overseas, to achieve the CCTV Monitoring Purposes provided in this Policy.

We will keep your CCTV Data confidential and will not disclose or transfer it. However, we may disclose your CCTV Data and/or other Personal Data in order to achieve CCTV Monitoring Purposes set forth in this Policy. The parties to which we may disclose your CCTV Data and/or Personal Data to includes, but is not limited to the following:

3.1 Service Providers: We may disclose or transfer CCTV Data and other Personal Data concerning you, as we deem necessary to ensure our protection of your health and personal safety, and belongings;

3.2 Governmental Authorities or other Regulatory Organizations: We will 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 regards to the investigation and prosecution of civil and/or criminal proceedings.

4. RETENTION PERIOD OF YOUR PERSONAL DATA

We will store your CCTV Data for 90 days or as explained in this Policy and 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.

5. YOUR RIGHTS

The rights listed in this section are your legal rights, where you may request to exercise these rights under the condition as prescribed by law and our right management procedure. These rights are as follows:

- **Right to Access:** you may request the access, or obtain a copy of your Personal Data, or to disclose the source of acquisition of your Personal Data that is obtained without your consent.
- **Right to Rectify:** in the case where your Personal Data may be inaccurate, not up-to-date or is incomplete, you may request to have such Personal Data be amended or modified accordingly.
- **Right to Erasure:** you may request the deletion, destruction or anonymization of your Personal Data to the extent permitted by law.
- **Right to Restrict:** you may request the restriction to processing of your Personal Data.
- **Right to Object:** you may object to the processing of your Personal Data in particular situation.
- **Right to Withdraw Consent:** where you have given your consent for the processing of Personal Data, you have the right to withdraw such consent at any time.
- **Right to Portability:** where legally applicable, you have the right to request us to provide your Personal Data in a structured, commonly used and machine-readable format, and transmit it to another organizations; and
- **Right to Lodge a Complaint:** you may lodge a complaint with the competent authority, if you believe that our processing of your Personal Data is not done in accordance to the applicable data protection law.

6. CONTACT DETAILS

If you wish to exercise your rights as set out above, or if you have any questions or comments about your Personal Data, you may reach us or our Data Protection Officer (DPO) at:

Bank of China (Thai) Public Company Limited

- Address: 179/4 Bangkok City Tower, South Sathorn Road, Tungmahamek, Sathorn, Bangkok 10120, Thailand
- Contact Details:
 - Phone number: 02 679 5566 (Monday – Friday (excluding public holidays) at 8:30 AM – 5:30 PM)
 - Email address: callcenter.th@bankofchina.com

Data Protection Officer (DPO)

- Address: 179/4 Bangkok City Tower, South Sathorn Road, Tungmahamek, Sathorn, Bangkok 10120, Thailand
- Email address: dpo.th@bankofchina.co.th