

Privacy Policy for Visitors and Community Relations

Bangkok Cable Company Limited

Bangkok Cable Company Limited (“the Company” or “BCC”) strictly respects your personal privacy and concerned about the importance of your personal data for being your precious activities. Therefore, your personal data is protected under the Personal Data Protection Act B.E. 2562 (2019) (“PDPA”).

As the data controller, the Company has formulated this privacy policy to inform you of how the Company collect, use or disclose your personal data, including your legal rights. We assure you that we shall comply with the law to protect your personal data.

1. Definition of Personal Data

Personal Data can be classified into two types as below:

- **Personal Data (General)**

Personal Data means any information relating to a person, which enables the identification of such person, whether directly or indirectly, for example, name, surname, address, e-mail address, identification number, license plate, etc.

- **Sensitive Personal Data**

Sensitive Data means personal data which is specifically determined by law and needs to protect, carefully collect, use or disclose the personal data, for example, racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, and biometric data.

2. Personal Data Collected by the Company

BCC may collect your personal data as you have directly provided to the Company such as registration, job application, training attendance, contact for entrance & exit to the Company's premises, exchange of access card, participation in the Company's activities, contact for service or support from the Company, including the Company may obtain your personal data via the foundation, association, non-profit organization, academic institution, government agency in need of support or from other reference persons, etc., as following details.

2.1 **Collecting the Personal Data of Visitor** or someone who enters around the area where is BCC's responsibility, your personal data shall be collected, used or disclosed by the Company, which may include but not limited to:

- 1) Personal Data such as name- surname, name title, gender, national identification number, photograph;
- 2) Contact Data such as address, telephone number, mobile phone number, e-mail;
- 3) Other personal data such as driver's license number, license plate, detail of vehicles, contact details, and information from CCTV recording.

Remarks: BCC shall not collect your sensitive data such as religious, blood group, etc. If BCC needs a copy of your identification card or a card issued by a relevant authority for your identity authentication, BCC shall delete your sensitive data found on those cards except obtaining your consent or BCC already informed you or can depend on other legal bases for falling within the exceptions to request your consent.

2.2 **Collecting the Personal Data of Community Relations**, in a case that you are a person participating in any social activities or projects or other activities organized by the BCC or activities in which BCC has been involved, including the foundation, association, non-profit organization or a person living in the community who is supported and assisted by BCC or any other persons grouped that not mentioned in this policy. BCC may collect, use or disclose your personal data that include but not limited to the types listed below:

- 1) Personal Data such as name-surname, name title, gender, date of birth, national identification number, age, occupation, position, education background, work experience, name of agency or office, and academic institution;
- 2) Contact Data such as address, telephone number, mobile phone number, e-mail, and LINE official account;
- 3) Financial Data such as bank account number, income, subsidy, details of awarding and receiving a scholarship or funds/items supported such as funeral money, and details of employment remuneration;
- 4) Other personal data such as CCTV recording, photo and video recording of the activities being organized, voice recordings from various meetings, your work performance, data on the use of IT system and internal websites of BCC.

3. Purpose of Collection, Use and Disclosure of Personal Data

BCC shall collect, use or disclose your personal data for a variety of purposes under legal basis as follows:

3.1 Contract basis: For the necessity to comply with the contract or agreement made by you with us or in response to your request prior to entering into a contract or agreement to perform the following activities.

- 1) To contact for sales and purchase of products or services, to receive or provide services

3.2 Legitimate interest basis: By taking into consideration the proportionality and your expectation whereby the benefits derived must be well balanced with your basic rights concerning personal data protection in order to achieve the following objectives.

- 1) For making the access card for entering into the BCC's premises, parking pass/ticket/permit, the monitoring and supervision of working schedule in the BCC's areas;

- 2) For considering qualification in providing support and assistance upon request, including request for academic funding;
- 3) For maintaining the security in the building areas or premises from CCTV recording and exchange of the access card, and for preventing any dangers or emergency incidents within the area in order to disclose and report your personal data to the authorities required by law;
- 4) For demonstrating photos from activities or event atmospheres of such activities or projects organized or supported by the Company;
- 5) For the objectives of audit and identity authentication or confirmation of qualification;
- 6) For analyzing the individual attitude of people in the community through behavior observation in order to improve and develop relationship;
- 7) For an audit from a government agency or relevant agencies, investigation, inquiry, request for advice to constitute legal claim or legal prove or use as an evidence in legal procedures.

3.3 Legal obligation basis: For the necessity to comply with relevant law or to achieve the purposes as stipulated by law to perform the following activities.

- 1) For the necessity to constitute a legal claim to achieve the objectives of an audit and identity authentication in order to prevent corrupt behavior in exercising the right or complying with relevant law and to use as an evidence in the defense of legal claim;
- 2) For the objectives relating to preventive medicine or occupational medicine, efficiency assessment or to achieve the objective concerning the diagnosis, health or social services, medical treatment, health management and social work services;
- 3) For medical welfare of a legitimate person or social protection;

4) For disclosure and report of your personal data to the agency specified by law.

3.4 Consent basis: For the collection, use or disclosure of sensitive data such as health data, religious data, disability, including other sensitive personal data, for identity authentication and enabling us to give you the proper assistance or support.

The Company may process your personal data on more than one lawful basis that depending on the specific purpose for which we are using your data.

4. Disclosing or Sharing the Personal Data

BCC shall not disclose your personal data to any external parties except when it deems necessary to disclose or to report your personal data to the regulatory bodies, government agencies and other agencies as stipulated by law.

In addition, BCC may be required to disclose your personal data to relevant external parties according to the objectives mentioned above and to proceed with activities or projects, community services, audit, request for legal advice, inspection, assessment, litigation, and any other proceedings as deemed necessary.

5. Retention Policy and Retention Period of the Personal Data

BCC shall maintain your personal data in the BCC's IT storage system and provide standard security measures for maintaining the BCC's IT storage system and using your personal data securely with the measures as follows:

- Limit access to the personal data which may be accessed by employees, agents, contractors and any external parties. They can only access the personal data specified or instructed, and they are the ones responsible for keeping confidentiality and maintaining the privacy and security of the personal data;
- Provide technological methods to prevent an unauthorized access to computer systems;

- Destroy your personal data for security purposes when such information is no longer needed for legal and business purposes;
- Set off the procedures in case of any personal data violated and breach and inform a regulator (Office of the Personal Data Protection Committee -PDPC) of a breach where we are legally required to do so.

Retention Period of the Personal Data

- BCC shall maintain your personal data for as long as necessary to fulfill the purposes we collected it for, and accordance with the period stipulated by accounting standards, legal standards, and other relevant regulatory requirements.
- In determining the retention period, BCC shall consider the volume of information, usage, purpose of providing services, sensitivity of personal data, and risks that may arise from misuse of personal data and the period stipulated by relevant laws.
- BCC obtains your personal data from cookies when you visit BCC's website. We shall collect your personal data for no more than 13 months or as required by relevant laws.

6. Rights of the Data Subject

You can exercise your rights as the data subject, through the channels prescribed by the Company as follows:

6.1 Right to Withdraw Consent: You have the right to withdraw any consent on data processing of your personal data previously given to the Company throughout the period that your personal data is kept with the Company.

6.2 Right to Access: You have the right to access to and obtain a copy of your personal data, including asking the Company to reveal how it obtained your personal data of which you did not give consent to the Company.

6.3 Right to Rectification: You have the right to request the Company to rectify any incorrect personal data or add any incomplete personal data.

6.4 Right to Erasure: You have the right to request the Company to delete your personal data for certain reasons.

6.5 Right to Restriction of Processing: You have the right to request the Company to restrict the use of your personal data under certain circumstances.

6.6 Right to Data Portability: You have the right to request the Company to transfer the personal data provided to the Company to any other controllers or the data subject yourselves for certain reasons.

6.7 Right to Object: You have the right to object to the collection, use or disclosure of your personal data for certain reasons.

You can contact the data protection officer (as described in Item 8) in order to request your exercise above the rights.

7. Using of Personal Data for Original Purposes

BCC is entitled to continue collecting and using your personal data, which has previously been collected by us before the effectiveness of the PDPA in relation to the collection, use and disclosure of personal data, in accordance with the original purposes. If you do not wish us to continue collecting and using your personal data, you may notify us to withdraw your consent at any time.

8. Data Controller's Information

Detail of the Data Controller

- **SAMUT PRAKAN FACTORY**

Name: Mr. Suchart Bosri

Contact Address: 93 Moo 11, Suksawat Road, Nai Khlong Bang Pla Kot,
Phra Samut Chedi, Samut Prakan 10290

Tel: +66 2425-0441-3

Fax: +66 2815-6296

E-mail: suchart.b@bangkokcable.com

- **CHACHOENGSAO FACTORY**

Name: Mr. Suttira Ditnuy

Contact Address: 39/1 Moo 1, Bang Pakong-Chachoengsao Rd.,
Saen Phu Dat, Ban Pho, Chachoengsao 24140

Tel: +66 3857 7266-9 ext. 277

Fax: +66 3857 7270-1

E-mail: suttira.d@bangkokcable.com

Data Protection Officer (DPO)

Name: Mr. Pornthep Noppakart

Contact Address: 39/1 Moo 1, Bang Pakong-Chachoengsao Road,
Saen Phu Dat, Ban Pho, Chachoengsao 24140

Tel: +66 3857 7266-9 ext. 453, 419, 156

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