

*(English Translation)*

## Privacy Notice for CCTV

Kiatnakin Phatra Bank Public Company Limited, Kiatnakin Phatra Securities Public Company Limited, Kiatnakin Phatra Asset Management Company Limited, KKP Dime Securities Company Limited, KKP Capital Public Company Limited, and KKP Tower Company Limited (collectively referred to as the “Kiatnakin Phatra Financial Group,” “we,” or “us”) operate closed-circuit television (“CCTV”) systems within and around our office buildings, branches, or any areas under our supervision and control (“Areas”). Through the use of these CCTV devices, we collect Personal Data of employees, workers, customers, contractors, visitors, or any other individuals (collectively referred to as “you”) who enter the Areas. We have therefore issued this Privacy Notice to inform you about our practices regarding the protection of your Personal Data, to explain the purposes and methods by which we collect, use, or disclose your Personal Data, and to describe your rights in relation to your Personal Data.

This Privacy Notice is prepared in Thai, with an English translation provided. In the event of any inconsistency, the Thai version shall prevail.

### 1. What Personal Data We Collect

We install CCTV cameras in visible locations and place warning signs indicating that CCTV is in operation in those areas, including any additional areas that we consider appropriate as clearly noticeable points. These CCTV systems collect your Personal Data when you enter the Areas.

For the purposes of this Privacy Notice, “Personal Data” refers to any information relating to an individual that enables the identification of such individual, whether directly or indirectly, as described below:

- a) Your images and video recordings
- b) Your audio recordings
- c) Images of your property, such as your vehicle, clothing, or belongings that you bring into the

Areas

### 2. What are our purposes of the collection, use, and/or disclosure of your Personal Data

We collect, use, or disclose your Personal Data to achieve the purposes described below. In doing so, we rely on the lawful basis for processing as provided under the Personal Data Protection Act B.E. 2562 (2019):

- To protect your health and personal safety, including the protection of your property.
- To protect our buildings, facilities, and assets from damage, obstruction, destruction, or other criminal activities.
- To support relevant authorities in law enforcement, including the prevention, deterrence, investigation, and prosecution of legal violations.
- To assist in resolving disputes that arise during disciplinary proceedings or grievance processes.
- To assist in investigations or proceedings relating to complaints or related matters.
- To support the initiation or defense of civil claims, including but not limited to legal proceedings relating to employment.
- To analyze your data for service and product development, as well as to offer our services and products including our partners that may be interest to you; such analyses will be performed in a manner that does not identify you.

We will not install CCTV cameras in areas where unreasonably infringe upon your fundamental rights, such as restrooms, shower rooms, or private staff resting areas.

Moreover, we may process your Personal Data for the above purposes by using technologies that exist today or may be developed in the future, including but not limited to Artificial Intelligence (AI), Cloud Computing, Blockchain, and biometric identity comparison technologies.

### 3. Lawful Basis We Rely On for Processing Your Personal Data

We collect, use, and disclose your Personal Data based on the following legal bases:

- **Vital Interest:** where it is necessary to prevent or mitigate danger to your life, body, or health, or that of another person.
- **Legitimate Interest:** where it is necessary for our legitimate interests or those of a third party, provided that such interests are not overridden by your fundamental rights in relation to your Personal Data.
- **Legal Obligation:** where it is necessary for us to comply with applicable laws governing workplace health and safety, security, and the protection of our assets.

### 4. Who we will share your Personal Data with

We will keep your CCTV-related Personal Data confidential and will not disclose it unless necessary to fulfill the purposes described in this Privacy Notice. We may disclose CCTV data to the following categories of persons or entities:

- 4.1 **Companies in the Kiatnakin Phatra Financial Group**, such as Kiatnakin Phatra Bank Public Company Limited, Kiatnakin Phatra Securities Public Company Limited, Kiatnakin Phatra Asset Management Company Limited, KKP Dime Securities Company Limited, KKP Capital Public Company Limited and KKP Tower Company Limited.
- 4.2 **Competent Authorities / Authorities empowered by law** for the purpose of supporting and facilitating law enforcement, investigations, inquiries, or legal proceedings, such as police stations and courts.
- 4.3 **External Service Providers**, where necessary to help ensure the prevention or mitigation of danger to the life, body, health, or property of you or others.
- 4.4 **Other Third Parties**, any other persons or entities where we are legally authorized and have a lawful basis to process and disclose such data.

## 5. Your Rights Regarding Your Personal Data

You have the right to exercise the following rights:

### 5.1 Right to Access

You have the right to request access to and obtain a copy of your Personal Data that is under our responsibility, as well as the right to request that we disclose how we obtained your Personal Data in cases you did not provide consent to us.

### 5.2 Right to Rectification

You have the right to request that we rectify your Personal Data so that it becomes accurate, up-to-date, and does not cause misunderstanding.

### 5.3 Right to Erasure

You have the right to request that we delete, destroy, or anonymize your Personal Data so that it can no longer identify you, in any of the following circumstances:

- The Personal Data is no longer necessary for the purposes for which it was collected, used, or disclosed.
- You have withdrawn your consent and we can no longer rely on any other legal basis to collect, use, or disclose such Personal Data.
- You have objected to the processing and we are unable to reject such request.
- You have objected to the processing for direct marketing purposes.
- The collection, use, or disclosure of Personal Data is unlawful.

#### 5.4 Right to Restriction of Processing

You have the right to request that we temporarily suspend the processing of your Personal Data under the following conditions:

- The processing is no longer necessary, but retention is still required for the establishment of legal claims.
- The processing is unlawful, but you request restriction instead of deletion.
- Your Personal Data is under verification for accuracy as requested by you.
- We are in the process of proving the grounds for rejecting your objection request.

#### 5.5 Right to Data Portability

You have the right to receive your Personal Data from us in a format that is readable or usable by automated tools or devices and can be used or disclosed automatically. You also have the right to (a) request that we send or transfer such data to another data controller, where technically feasible; or (b) request to receive the data directly from us for transfer to another data controller, unless technically impossible.

#### 5.6 Right to Object

You have the right to object to the collection, use, or disclosure of your Personal Data in the following cases:

- When your Personal Data is processed for direct marketing purposes.
- When your Personal Data is processed for scientific, historical, or statistical research purposes, unless such processing is necessary for our public interest mission.
- When your Personal Data is processed for tasks carried out in the public interest or for our legitimate interests, unless we can demonstrate compelling legitimate grounds or such processing is for the establishment, exercise, or defense of legal claims.

#### 5.7 Right to Lodge a Complaint

You have the right to lodge a complaint with a competent authority if you believe that we process your Personal Data unlawfully or in a manner that is inconsistent with applicable Personal Data protection laws.

However, we kindly ask that you first allow us the opportunity to investigate and resolve the matter for you.

Your rights above may be subject to certain conditions. In some cases, we may not be able to proceed with your request if we still have a legal duty or obligation to collect, use, or disclose your Personal Data. We may also be unable to proceed if the nature or context of the processing makes it impossible - for example, where we must retain your data for legally required periods.

If you wish to exercise your rights, you may contact us to request the Data Subject Rights Request Form at any KKP branch, the KKP Contact Center, or via the provided link ([Click here](#)). Completed forms may be submitted at any KKP branch, the KKP Contact Center, or via email at [DPO@kkpfg.com](mailto:DPO@kkpfg.com), or through other channels specified for each transaction. We will review and respond to your request within 30 days from the date of receipt. We may extend the period once for up to an additional 30 days, unless otherwise required by law.

## **6. How We Protect Your Personal Data**

We implement technical, physical, and administrative security measures designed to provide appropriate protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. These measures include firewalls, data encryption, physical access controls when entering our data centers, and authorization controls for accessing information. While we maintain the security of our systems and services, you are responsible for maintaining the confidentiality and security of your passwords and account information, as well as ensuring that the Personal Data we hold about you is accurate and up-to-date.

We establish internal policies, guidelines, and minimum standards for managing Personal Data, such as information technology security standards, and we update such policies, guidelines, and minimum standards periodically as required by applicable laws.

In addition, employees, personnel, business partners, and external service providers are required to maintain the confidentiality of Personal Data under confidentiality agreements they have signed with us.

## **7. Cross Border Transfer of Your Personal Data**

We may disclose or transfer your Personal Data to external parties or to servers located in other countries, where the destination country may or may not have the same level of Personal Data protection standards as those in Thailand, for the purposes described in this Privacy Notice. We have implemented various procedures and measures to ensure that the transfer of your Personal Data is carried out securely, and that the recipient of the data maintains an appropriate level of Personal Data protection. Such transfers will be conducted lawfully and in reliance on the permitted legal exceptions applicable to cross-border data transfers.

## 8. How We Store Your Personal Data and For How Long

We will retain your Personal Data for as long as it is reasonably necessary to fulfill the purposes outlined in this Privacy Notice and to comply with our legal obligations and regulatory requirements. However, we may retain your Personal Data for a longer period if it is necessary for the establishment, exercise, or defense of legal claims. Once the retention period has expired and your Personal Data is no longer necessary for the specified purposes, we will delete, destroy, or anonymize your Personal Data in accordance with the methods and standards for Personal Data destruction prescribed by the Personal Data Protection Committee, applicable laws, or international standards.

## 9. Changes to This Privacy Notice

To improve the effectiveness of our Personal Data handling practices, we reserve the right to amend this Privacy Notice as we deem appropriate. The version of the Privacy Notice published on our website shall be deemed the most current version. We will inform you of any changes if such changes have a significant impact on the processing of your Personal Data.

Your entry into the Area shall be deemed as your acknowledgment and acceptance of the terms of this Privacy Notice. If you do not agree with the terms set out in this Privacy Notice, please refrain from entering the Area. If you continue to enter the Area after any amendments to this Privacy Notice have been made and published through the aforementioned channels, such continued entry shall be deemed as your acknowledgment of the updated terms.

## 10. Contact Us

If you have any questions or suggestions regarding our guidelines on protecting your Personal Data or if you wish to exercise your rights in accordance with the laws, please contact us through the following channel:

<p style="text-align: center;"><b>Group Data Protection Officer</b> Kiatnakin Phatra Financial Group, 209 KKP Tower, Sukhumvit 21 (Asoke), Klong Toey Nua, Wattana, Bangkok 10110 or DPO@kkpfg.com</p>
--