

Privacy Notice on CCTV Use

Safety is our first priority. Gulf Energy Development Public Company Limited (“we”, “us”, or “our”) is using closed-circuit television (CCTV) devices for monitoring our designated areas within and around our buildings and facilities to protect life, health, and property. We collect personal data of all directors, employees, contractors, workers, visitors, or any individuals entering the monitored space within our buildings, sites, and facilities (collectively referred to as “you” or “your”) through the use of CCTV devices. This privacy notice provides information on our collection, use, disclosure, and transfer of individually identifiable information (“**Personal Data**”) about you. We may amend this notice at any time and will notify you of the amendments, where possible.

1. INFORMATION WE COLLECTED

We collect your moving or still images, and belongings e.g., vehicles, when entering the monitored space in our buildings, sites, and facilities through the CCTV devices (“**CCTV Data**”).

2. HOW WE COLLECT, USE, DISCLOSE, AND TRANSFER YOUR PERSONAL DATA

2.1 We may collect, use, disclose, transfer, and carry out any operation, including but not limited to recording, holding, adapting, altering, modifying, destroying, deleting, retrieving, combining, copying, transmitting, storing, extracting, amending, or adding, related to your CCTV Data and other Personal Data concerning you, for the “**CCTV Monitoring Purposes**” as listed below:

- (a) to protect your health and personal safety, including your belongings;
- (b) to protect our buildings, sites, facilities and assets from damage, disruption, vandalism, and other crime;
- (c) to support law enforcement organizations in the deterrent, prevention, detection, and prosecution of crime;
- (d) to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- (e) to assist in the investigation or proceedings concerning a whistleblowing complaint; and
- (f) to assist in the establishment or defense of any civil litigation, including but not limited to employment proceedings.

2.2 Our CCTV devices are in operation 24 hours a day and 365 days a year.

2.3 We will place signage at the entrance and exit points, and the monitored areas to alert you that a CCTV installation is in use.

3. LEGAL BASES

We will not collect, use, disclose, transfer, and carry out any operation, including but not limited to recording, holding, adapting, altering, modifying, destroying, deleting, retrieving,

combining, copying, transmitting, storing, extracting, amending, or adding, related to your CCTV Data and other Personal Data concerning you, without consent **except** for the following:

- (a) **Vital interests.** It is necessary for our prevention or suppression of a danger to a person's life, body, or health;
- (b) **Legitimate interests.** It is in our legitimate interests to protect your health and personal safety, as well as your belongings, our buildings, sites, facilities and assets, and to carry out any other acts to achieve the CCTV Monitoring Purposes. We will endeavor on the continuing basis to balance our legitimate interests and that of any relevant third parties, as the case maybe, and your fundamental rights and freedoms related to the protection of the CCTV Data concerning you. We will also endeavor to identify any steps required to achieve the right balance as appropriate;
- (c) **Legal obligations.** We owe a duty to comply with the legal obligations prescribed by the applicable laws, including but not limited to the laws regarding safety and environment in the workplace. We consider the use of the CCTV as a necessary measure to enable us to meet those obligations.

4. WHO WE DISCLOSE AND/OR TRANSFER YOUR PERSONAL DATA TO

4.1 We will keep CCTV Data confidential and will not disclose or transfer it except to our affiliates and other carefully selected third parties now or in the future, e.g. joint venture partners, and/or third-party service providers, who may be located overseas, to achieve the CCTV Monitoring Purposes provided in this notice.

4.2 Third parties to which we may disclose CCTV Data and other Personal Data concerning you include:

- (a) **Our affiliates.** We may disclose or transfer CCTV Data and other Personal Data concerning you to our affiliated companies, as part of our legitimate interests and our affiliates' interests to achieve the CCTV Monitoring Purposes.
- (b) **Governmental and/or regulatory organizations.** We may 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 regard to the investigation and prosecution of civil or criminal proceedings.
- (c) **Third-party service providers.** We may disclose or transfer CCTV Data and other Personal Data concerning you as our necessary steps to ensure our protection of your health and personal safety, and belongings.

5. CROSS-BORDER TRANSFER

5.1 We may disclose or transfer your CCTV Data as part of necessary steps to ensure your health, personal safety, and belongings, to third-party service providers that are outside of Thailand.

5.2 When it is necessary for us to transfer your CCTV Data to a country with a level of data protection standards not equivalent to Thailand, we will ensure that an adequate degree of protection is afforded to the transferred CCTV Data, or the transfer is otherwise permitted in accordance with the applicable data protection law. We may, for example, obtain contractual

assurances from any third party given access to the transferred CCTV Data that such data will be protected by data protection standards which are equivalent to those required in Thailand.

6. SECURITY MEASURES

- 6.1 We use reasonable organizational, technical, and administrative security measures to protect CCTV Data and Personal Data concerning you from accidental, unlawful, or unauthorized destruction, loss, access, use, alteration, or disclosure.
- 6.2 We will from time to time review and update our security measures as necessary or upon development of the concerning technology to ensure effective and appropriate security measures, and in line with minimum legal requirements as prescribed by the relevant governmental organizations.

7. PERIOD OF RETENTION

We will retain your CCTV Data in our system for the period necessary to fulfil our duties to achieve the CCTV Monitoring Purposes prescribed in this notice. When we are no longer permitted by the applicable laws to store your CCTV Data, 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.

8. YOUR LEGAL RIGHTS

- 8.1 Subject to the applicable laws in Thailand, you may have rights regarding the collection, use, disclosure and/or transfer of your CCTV data, including:
- (a) **Access.** You have the right to access and request a copy of CCTV Data concerning you, or request us of the disclosure of the acquisition of your CCTV data acquired without your consent;
 - (b) **Rectification.** You may have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data that we collect, use, disclose and transfer about you rectified;
 - (c) **Objection.** You have the right to object to the collection, use, or disclosure of your CCTV Data and Personal Data, on grounds relating to your particular situation;
 - (d) **Deletion.** You have the right to request us to delete, destruct or anonymize your CCTV Data to the extent applicable under the laws, except for the case that we may need to collect your CCTV Data as applicable under the laws, such as establishing claims, performing with or exercising legal claims, defending legal claims, or complying with the laws;
 - (e) **Data portability.** Where legally applicable, you have the right to request your CCTV Data in a structured, commonly used and machine-readable format, and transmit it to another organization;
 - (f) **Restriction.** You have the right to request us to restrict the use of your CCTV Data;
 - (g) **Consent withdrawal.** Where you have given your consent for the collection, use, or disclosure of your CCTV Data, you have the right to withdraw your consent at any time;
 - (h) **Complaint.** You have the right to file a complaint with the competent authority regarding the collection, use, and/or disclosure of your CCTV Data by us or on our

behalf. We would, however, appreciate the chance to deal with your concerns before you approach the competent authority, so please contact us in the first instance.

To exercise any of these rights in this section, you may contact us at the address in “CONTACT US” section below.

Your request for exercising any of the above rights may be limited by the applicable laws. There may be certain cases where we can reasonably and lawfully decline your request, for example, due to our legal obligation or court order.

9. CONTACT US

If you have concerns or questions regarding this notice or if you would like to exercise your rights in relation to your CCTV Data, please contact it_support@gulf.co.th