

**Notice No. 8/2025**  
**Privacy Notice for CCTV**

This Privacy Notice ("Notice") explains how **NS-Siam United Steel Company Limited** (hereinafter referred to as the "Company") utilizes Closed-Circuit Television (CCTV) systems to monitor areas within and around the Company's premises to ensure the protection of life, health, and property. The Company collects personal data of business partners, customers, employees, directors, contractors, workers, visitors, or any other individuals who enter monitored areas both inside and outside the Company's premises through CCTV cameras. This Notice provides details on how the Company collects, uses, discloses, and transfers personal data that can identify individuals ("**Personal Data**"). The Company reserves the right to amend this Notice at any time and will notify you of any updates when applicable.

### **1. Personal Data Collected**

The Company collects your personal data, including images or videos, sound, and images of objects (such as your vehicle and driving behavior) when you enter the monitored areas inside the building and premises through CCTV cameras. In certain cases, the Company may collect, use, or disclose sensitive personal data (such as your facial recognition data) only if explicit consent is obtained from you or as permitted by law.

### **2. Processing of Personal Data**

2.1 The Company may collect, use, disclose, transfer, and undertake any actions, including but not limited to recording, holding, modifying, altering, destroying, deleting, recovering, compiling, copying, transmitting, storing, segregating, improving, or adding information from CCTV cameras and other relevant personal data.

2.2 The Company will install CCTV cameras in clearly visible areas. The Company will not install CCTV cameras in areas such as employee rooms, changing rooms, restrooms, and shower rooms, except where such areas are considered high-risk and require special surveillance for employee safety, in accordance with Company regulations.

2.3 CCTV cameras operate 24 hours a day and may include audio recording.

2.4 The Company will place signs at entry and exit points, as well as in monitored areas, to inform individuals that CCTV cameras are in operation.

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### 3. Purpose and Lawful Basis of Processing

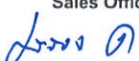
The Company will collect personal data as specified in this Notice, with the purposes of processing personal data classified by lawful basis as follows:

Lawful Basis	Purpose of Processing
Legitimate Interest	<ul style="list-style-type: none"> <li>○ To verify personal identity.</li> <li>○ To monitor health and safety, including the security of your property.</li> <li>○ To monitor the Company's buildings, premises, and assets from damage, disruption, destruction, and other crimes.</li> <li>○ To support the effective resolution of disputes arising in disciplinary or grievance processes and to support investigations or proceedings related to internal whistleblowing.</li> <li>○ To serve as evidence in the event of crimes or accidents occurring within or around the premises.</li> <li>○ To investigate incidents occurring within the buildings and premises.</li> </ul>
Legal Obligation	<ul style="list-style-type: none"> <li>○ To support law enforcement agencies in preventing, deterring, and detecting crimes, as well as prosecuting criminal offenses.</li> <li>○ To support the establishment of legal claims or defense in civil proceedings, including but not limited to labor disputes.</li> <li>○ To comply with legal requirements as requested by authorized government agencies, including but not limited to laws related to workplace safety and environmental regulations. The Company considers CCTV surveillance as a necessary measure to fulfill such legal obligations.</li> </ul>
Vital Interest	<ul style="list-style-type: none"> <li>○ To protect vital interests, prevent or mitigate harm to life, body, or health of individuals captured by CCTV.</li> </ul>

The Company will process personal data only for the purposes outlined above. In some cases, the Company may determine that it is lawful to process personal data for related purposes that do not contradict or go beyond the original purposes. However, if processing is required for purposes unrelated to the original purpose, the Company will obtain new consent or take other measures to ensure legal compliance. If you do not wish for the Company to retain your personal data, you may exercise your rights as the data subject as outlined in this Notice. Please be aware that failure to provide personal data to the Company may impact you, such as the inability to fulfill your requests or contractual obligations. This may result in restrictions on your access to Company premises, inconvenience, non-fulfillment of contractual obligations, or even potential loss of opportunities. In some cases, failure to provide the required data may affect legal compliance by the Company or yourself, leading to legal consequences.

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## 4. Disclosure to Third Parties

4.1. The Company will keep CCTV footage related to you confidential and will not disclose or transfer such data to third parties unrelated to the processing of personal data, except as required to fulfill the purposes of CCTV installation as stated in this Notice.

4.2. The Company may disclose CCTV footage and related personal data to the following third parties:

4.2.1 The Company may disclose or transfer CCTV footage and related personal data to affiliated companies for the Company's legitimate interest in achieving the purposes of CCTV installation.

4.2.2 Government agencies and/or law enforcement agencies. The Company may disclose CCTV footage and related personal data to comply with legal requirements or to support law enforcement in investigations or legal proceedings in civil or criminal cases, such as the Royal Thai Police, Office of the Attorney General, courts, or other authorized government officials such as investigators and prosecutors. Disclosure may also occur in support of the Company's own legal proceedings.

4.2.3 Third-party service providers. The Company may disclose or transfer CCTV footage and related personal data to external service providers to carry out necessary procedures for protecting your health, safety, and property.

4.3 The Company may disclose or transfer your personal data captured by CCTV to third-party service providers located outside Thailand to carry out necessary procedures for protecting your health, safety, and property. Such disclosure or transfer will only occur with your consent unless there is another significant legal basis (e.g., compliance with contractual obligations between the Company and another party for your benefit) as permitted by applicable law.

4.4 If your personal data captured by CCTV is transferred to a country with inadequate data protection standards as defined by Thailand's personal data protection laws, the Company will take necessary measures to ensure the protection of such data at a level equivalent to the Company's own standards in compliance with applicable data protection laws in Thailand.

## 5. Retention of Personal Data

The Company will store your CCTV footage within its systems for the period necessary to fulfill its duties in accordance with the purposes of CCTV installation as stated in this Notice. When the Company is no longer legally authorized to retain your personal data, the data will be deleted from the system and Company records. However, in the event of legal or disciplinary proceedings, your CCTV footage may be retained until the conclusion of such proceedings, including any applicable appeal period. After this period, the data will be deleted or archived in accordance with applicable laws.

The Company will implement a monitoring system to ensure that personal data is deleted or destroyed upon expiration of the retention period or when it is no longer relevant or necessary for the original purposes.

## 6. Data Subject Rights

You have rights over your personal data in accordance with the Personal Data Protection Laws. We will respect your rights and will promptly take action in accordance with laws, rules or regulations

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related to the processing of your personal data under certain circumstances. You have the following rights regarding your personal data:

#### 6.1 Right to Access

You have the right to request access to and receive a copy of your personal data that we hold, or request that we disclose the source of such personal data that you have not given consent to.

#### 6.2 Right to Portability

You have the right to request your personal data that you have provided to us based on your consent, contractual necessity, or request, or as specified by the Personal Data Protection Committee. If we have made such personal data available in a commonly readable and usable format through automated tools or devices, and it can be used or disclosed through automated means, you also have the right to: (1) request that we send or transfer personal data in such format to another data controller when it can be done by automatic means and (2) request to receive your personal data in the same format that we have sent or transferred directly to another data controller, except where technical conditions are not possible.

#### 6.3 Right to Object

You have the right to object to our collection, use, or disclosure of your personal data in the following cases:

(1) When we collect your personal data for the necessity of performing a public interest task, exercising governmental rights, or for our or a third party's legitimate interests;

(2) We collect, use or disclose your personal data for direct marketing purposes; or

(3) We collect, use, or disclose your personal data for scientific, historical, or statistical research, except when necessary to perform a mission for our public interest.

#### 6.4 Right to Erase or Destroy

You have the right to request us to erase, destroy or anonymize your personal data in the event that (1) your personal data is no longer necessary for us to keep for the purposes; (2) you withdraw your consent and we have no legal authority to continue to collect, use or disclose such personal data; (3) you object to our collection, use or disclosure of your personal data collected by it due to the necessity to perform its mission for the public interest or the exercise of government rights or for the legitimate interests of us or other persons or juristic persons, and we cannot reject such objection; (4) you object to the collection, use or disclosure of your personal data for direct marketing purposes; or (5) your personal data has been unlawfully collected, used or disclosed, unless we are required to keep your personal data for compliance with the law, the establishment of legal claims, or the exercise or defense of our claims.

#### 6.5 Right to Restrict

You have the right to request a restriction on the use of your personal data if: (1) we are in the process of verifying your request to correct your personal data; (2) Your personal data has been collected, used, or disclosed unlawfully; (3) we no longer need to collect, use, or disclose your personal data for any purpose, but you wish us to retain it for your legal benefit; or (4) you wish for us to temporarily restrict the use of your personal data while your objection is being reviewed or investigated

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#### 6.6 Right to Rectify

You have the right to request that we correct, update, and complete your personal data to ensure accuracy and prevent misunderstandings.

#### 6.7 Right to Withdraw Consent

If you have given your consent to the collection, use or disclosure of your personal data, whether before or after the effective date of the Personal Data Protection Laws, you have the right to withdraw your consent given to us at any time while your personal data is stored by us, unless restricted by law or you are still under an effective contract. However, your withdrawal of consent will not affect the collection, use or disclosure of personal data that you have previously given your consent to us in accordance with the law. In addition, your withdrawal of consent may prevent us from performing the contract or your request. We may therefore have to terminate the existing relationship and/or contract that you have with us.

#### 6.8 Right to Lodge a Complaint

You have the right to lodge a complaint with the relevant agency or legal authority in the event that we or the data processor, including our employees or contractors or the data processor, violates or fails to comply with the Personal Data Protection Laws.

If you wish to exercise any of the rights mentioned in Sections 6.1 to 6.7, you may submit a request to us as specified in our procedures. Upon receiving your request, we will review it based on the legal requirements and conditions and will complete your request and notify you of the outcome within 30 days from the date we receive your complete request and supporting documents.

Exercising these rights may temporarily prevent you from accessing some of our services while we process your request.

We will not charge you a fee for the exercise of such rights, except if we deem that your request to exercise your rights is an excessive exercise of rights or without any other reasonable cause, we may charge a fee for the exercise of your request at the rate announced by us. You may request to exercise your rights of the data subject from the date the Personal Data Protection Act comes into force onwards.

In the event that you request us to delete, destroy, restrict the processing of personal data, temporarily suspend use, convert personal data into a form that cannot identify the data subject, or withdraw consent, this may prevent us in the performance of duties under the employment contract or related laws. In exercising the rights mentioned above, we reserve the right to charge the costs related to and necessary for processing personal data as requested by the data subject

## 7. Security Measures

7.1 The Company will store your personal data in a controlled environment, protected from unauthorized access, use, or disclosure. The Company will maintain administrative safeguards, technical safeguards, and physical safeguards to prevent unauthorized or unlawful access, use, modification, and disclosure of personal data under control of the Company.

7.2 The Company will implement various security measures to ensure the safety of your personal data in possession or control of the Company. Your personal data will be stored in a secure server which is controlled by authorized personnel with confidentiality. Your personal data and sensitive personal data will be encrypted in our server which only authorized personnel with the password can access.

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## 8. Use of Personal Data for the Original Purpose

The Company has the right to continue collecting and using personal data that was collected before the enforcement of the relevant personal data protection laws, in accordance with the original purpose for which it was collected. If you do not wish for the Company to continue storing and using your personal data, you may notify the Company to withdraw your consent at any time.

## 9. Amendment of Notice

In compliance with the Personal Data Protection Laws, this Notice may be amended from time to time. The Company will post the most current version on the Company's website.

## 10. Contact Us

If you have any questions, concerns or wish to exercise your rights related to your personal data, please contact us at:

### Data Protection Officer

### NS-Siam United Steel Company Limited

**Address :** 12 Soi G2, Pakorn Songkrohraj Road, Maptaphut, Muang Rayong, Rayong 21150

**Telephone Number :** 038-685155

**Email Address :** [privacy\\_info@ns-sus.com](mailto:privacy_info@ns-sus.com)

Issued on March 1, 2025  
NS-Siam United Steel Company Limited



(Mr. Mansaung Klaimanee)  
Data Protection Officer

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