

Privacy Policy on Face Data Use

Last Update 31 May 2024

This Privacy Policy ("Policy") on the use of face data describes how Central Group Online Ltd., and its affiliates (referred to as "Company" "we", "us", or "our") use face data for monitoring and identification personal data of all employees (collectively referred to as "you" or "your"). This Policy also describes how we collect, use, disclose, and transfer individually identifiable information ("Personal Data") about you and set out how the face data will be managed and used by us. We may amend this policy at any time and will notify you of the amendments, where possible.

1. What Personal Data we collect

We capture your recognizable facial features, still images, and facilities through our systems ("Face Data").

2. Why we collect, use, and disclose your Personal Data

2.1 We may collect, capture, 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, adding, in relation to your Face Data and other Personal Data concerning you, for the "Face Data Monitoring Purposes" as listed below, on the legal basis of legitimate interests; vital interest; legal compliance; public interest; consent; or any other basis as permitted by applicable laws (provided that those interests are not overridden by individuals' rights and interests).

3. To whom we disclose your Personal Data

3.1 We will keep Face Data concerning you confidential, and will not disclose or transfer it except to our subsidiaries, affiliates, and other carefully selected third parties now or in the future, licensees, joint venture partners and/or service providers, [who may be located overseas,] to achieve the Face Data Monitoring Purposes provided in this Policy.

3.2 Third parties to which we may disclose Face Data and other Personal Data concerning you include our affiliates (as part of our legitimate interest and our affiliates' interest to achieve the Face Data Monitoring Purposes), governmental and/or regulatory organizations (to comply with legal obligations or to support or assist law enforcement organizations with regard to investigation and prosecution of civil or criminal proceedings), and third-party service providers (as our necessary steps to ensure our protection of your health and personal safety, and belongings). However, the access to Face Data may only be accessed or disclosed to the extent necessary in order to deal with an incident which falls

within one of the objectives identified in this Clause 3.2 or in order to respond a request made by an individual under the law under Clause 2.1.

4. Transfer your Personal Data internationally

We may disclose or transfer your Face Data as part of necessary steps to ensure your health, personal safety, and belongings, to [third-party service providers] that are outside of Thailand, and such disclosure or transfer may only be done by obtaining your consent or there are any other compelling legitimate grounds (e.g., to perform the contract terms between us and other persons for your benefit) as permitted by applicable laws. Such destination countries may or may not have the same data protection standard similar to Thailand, however, we will ensure that the data transfer requirement under applicable data protection law which is in effect at that time is met before such transfer.

5. Security measures

5.1 We use reasonable organizational, technical and administrative security measures to protect Face Data and Personal Data concerning you from accidental, unlawful, or unauthorized destruction, loss, access, use, alteration, or disclosure.

5.2 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.

6. How long do we retain your Personal Data

We will retain your Face Data in our system for the period necessary to fulfil the Face Data Monitoring Purposes for which we obtained them. When we are no longer permitted by the applicable laws to store your Face Data, we will remove it from our systems and records. However, we may retain your Face Data for a longer duration, such as until the end of legal action or if required by the applicable laws or specific Face Data are required to be retained in order to deal with an incident or in order to respond to a request by an individual made under the law.

7. What are your rights with regards to your Personal Data

Subject to the conditions and exceptions under the applicable laws, you may have the rights to access and/or obtain a copy of, port, rectify, delete, destroy or anonymize certain Face Data that we have about you, restrict and/or object to certain activities, in which we engage with respect to your personal data. If we process your Personal Data based on your consent, you may withdraw your consent, but we may not be able to provide you with our goods or services. You

may also have the right to request us to disclose how we obtain your Personal Data without your consent and lodge a complaint with the competent authority under the applicable laws.

8. **Contact us** If you have questions or concerns or would like to exercise your rights in relation to your Face Data, please contact us or our Data Protection Officer at:

1. Central Group Online Ltd.

- K.Sukanya Charoenfooprasert
- 19/111, 919/11 Jewelry Trade Center 54, 55th Fl., Silom Rd., Silom, Bangrak, Bangkok 10500
- (chsukanya@central.co.th / 02-0266151 ext.1112)

2. Data Protection Officer

- Data Protection Officer
- Data Protection Office, Central Group
- 22 Soi Somkid Ploenchit Road, Lumpini, Pathumwan, Bangkok, 10330 Thailand
- email: dpo@central.co.th