

Privacy Policy

for Closed-Circuit Television Camera (CCTV)

Grundfos (Thailand) Company Limited (hereinafter referred to as the “Company” “we” or “us”) installs closed-circuit television cameras (CCTV) to monitor areas and premises in order to protect a life, health, and property. The Company will collect the personal data of customers, employees, directors, contractors and its staffs, visitors, or any persons (collectively called “You” or “Your”), who enter this monitoring areas via closed-circuit television cameras both inside the building and its surroundings. This Privacy Notice describes you about the identifiable person data (hereinafter called “Personal Data”), which is collected, used, disclosed, and transferred by us. In addition, the Company may amend this Notice at any time where is required, and will notify you of such amendment, if possible.

1. Collection of Personal Data

The Company collects photos or videos, sounds and images of objects (such as your vehicle) when you enter a surveillance area within the building and place through closed-circuit television cameras (CCTV).

2. Purposes of Processing Personal Data

2.1. The Company may collect, use, disclose, transfer, and perform any actions, including but not limited to recording, holding, modifying, modifying, destroying, recovering, merging, copying, transmitting, storing, extracting, updating, or adding to the closed-circuit television cameras (CCTV) and others personal data of you for the following purposes:

- (a) To monitor health care, safety and your property;
- (b) To monitor buildings, premises and property against damage, disruption, destruction and other crimes;

(c) To support law enforcement agencies in the prevention, and detection of crime, including prosecution in the event of a crime;

(d) To support effective resolution of disputes arising during disciplinary or complaint proceedings;

(e) To support an investigation or trial related to whistleblowing;

(f) To support establishing of rights or raising defenses for civil or labor case;

(g) To verify and comply with a law.

2.2. The Company will install closed-circuit television cameras (CCTV) in places where can be easily seen and shall not install in staff rooms, changing rooms, toilets, shower rooms, or other areas designated as rest areas for employees, unless such areas is risk and requires for special supervision to the employees, for example.

2.3. Closed-circuit television cameras operate 24 hours a day and may also record voice.

2.4. The Company will install signs at the entrance and exit areas that are monitored by closed-circuit television cameras (CCTV) to notice you about the location of closed-circuit television cameras (CCTV) in such area.

3. Legal Basis for Processing of Personal Data

The Company will not collect, use, disclose, process, transfer and perform any action, including but not limited to saving, holding, modifying, modifying, destroying, deleting, recovering, merging, copying, transmitting, storing, splitting, replacing, or adding to the data from closed-circuit television cameras (CCTV) and other personal data related to you without your consent, **unless** in the following cases:

3.1 It is necessary for Person's life: for preventing or suppressing a danger to a Person's life, body or health;

3.2 It is necessary for legitimate interests: for protecting your health, safety and property, including but not limited to the Company's building, premises, and assets, in addition to take any

other actions to meet the purposes of installing closed circuit television cameras (CCTV) and related third parties, as a case may be. This shall include your fundamental freedoms to protect your personal data from closed circuit television cameras (CCTV). In this regard, the Company will use its efforts to find an algorithm to achieve balancing between your privacy and legitimate interests as appropriate;

3.3 It is necessary for compliance with a law: The Company is obliged to comply with applicable laws, including but not limited to the laws on safety and working environment in case that the Company deems that the use of closed-circuit television cameras (CCTV) is a necessary measure to enable the Company to able to perform such duties.

4. Disclosure and/or Transferring of Personal Data

4.1. The Company will keep your personal data from closed-circuit television cameras confidentiality and will not disclose or transfer such data to third parties, who the Company carefully selected to represent in the present and in the future, the assignee person, partners of joint venture, and/or service providers who may be located oversea for the purpose of installing closed circuit television cameras (CCTV) specified in this Notice.

4.2. Third parties that the Company may disclose information from closed-circuit television cameras (CCTV) and other personal information about you, including:

4.2.1 The Company may disclose or transfer information from closed-circuit television cameras (CCTV) and other personal data about you to other companies in our group of companies for the legitimate interests of the Company pursuant to the purpose of installing closed circuit television cameras (CCTV).

4.2.2 Government agencies and/or law enforcement agencies: The Company may disclose information from closed-circuit television cameras (CCTV) and other personal data about you in order to comply with the law, support or assist the enforcement agencies in an investigation or proceeding in a civil or criminal case.

4.2.3 Third Party Service Providers: The Company may disclose or transfer information from closed-circuit television cameras (CCTV) and other personal data about you to third-party service providers for taking the necessary steps to protect your health, safety and property.

5. Transferring of Personal Data overseas

5.1. The Company may disclose or transfer your personal data from closed-circuit television cameras (CCTV) to external service providers who is located in abroad in order to take the necessary steps protecting your health, safety and property. Such disclosure or transfer of personal data will only be made only upon the obtaining of your consent, unless there are other important legal basis (for example, to perform a contract between the Company and others for your benefit) as required by applicable law.

5.2. If your personal data from closed-circuit television cameras (CCTV) is transferred to a destination country where the data protection standards are insufficient as required by the laws on Personal Data Protection in Thailand, the Company will take necessary steps to protect the personal data transferred to other persons overseas. So that such personal data is protected at the same level that the Company protects your personal data from closed-circuit television cameras (CCTV) in accordance with such the law, which is effective at that time, in addition to perform any other acts that the laws on Personal Data Protection in Thailand have stipulated and required entirely.

6. Retention of Personal Data

The Company will retain your personal data from closed-circuit television cameras (CCTV) in the Company's system for the necessary period to perform its duties to achieve the purposes of installing closed-circuit television cameras specified in this Privacy Notice. In case that the Company is not legally permitted to collect your personal data from closed-circuit television cameras (CCTV), the Company will delete your data from the system and the Company's records.

In the event of trial proceedings or disciplinary action, nonetheless, your personal data from closed-circuit television cameras (CCTV) may be retained until the end of such proceedings. This shall include the possible length of time for filing an appeal, thereafter the data will be deleted or archived as required by the applicable laws.

7. Data Subject Right

Subject to the law and its exemption, you may be entitled as follows:

7.1 Right to Access

This right enables you to access and obtain copies from CCTV about you or ask the Company to disclose your personal data from CCTV obtained without a consent the request, it must be submitted a request in writing to the PDPA working group. The Company will process your request within 30 days from the receipt date of your request by the Company. The request may be rejected by the Company where it is permitted by the law or pursuant to the court order and such access and request for a copy of the CCTV footage may affect the rights and freedoms of others. In case that the Company decides to reject your request, the Company will notify you in writing with reasons prior to deliver to you within the period specified by law.

7.2 Right to Correct

This right enables you to have any incomplete or inaccurate Personal Data the Company holds about you to become correct, current, and complete.

7.3 Right to Object

This right enables you to object the collection, use or disclosure of personal data from closed-circuit television camera (CCTV) if it is necessary for legitimate interests of the Company and/or others. The Company will consider your request as soon as possible after you submitted. However, the Company may reject your request if the Company can prove that there is more important legitimate ground for collecting, using, or disclosing your personal data from closed-circuit television

camera (CCTV) or such collection, use or disclosure is for establishment of legal claims, for compliance or exercise of legal claims, raising the defense of legal claims. In case that the Company decides to reject your request, we will notify you in writing with reason prior to deliver to you within the period specified by law.

7.4 Right to Withdraw

In case where the Company collects, uses, or discloses your personal data with your consent, this right enables you to withdraw your consent to the Company of such processing via CCTV your personal data at any time.

7.5 Right to Erasure or Destroy or Anonymize your Personal Data

This right enables you to ask the Company to delete, destroy or anonymize your personal data from CCTV where is non-personally identifiable information to the extent permitted by law, unless in the case where the Company may be required to collect your personal data from CCTV as required by law, such as the establishment of legal claims, for compliance with or exercise of legal claims or raising the defense of legal claims or for legal obligations.

7.6 Right to Portability

This right enables you to request CCTV recording, which is on an electronic form and can be read or used generally, from the Company, and also to send such information to other data controller; provided that that information must be (a) the personal data provided to the Company; and (b) the personal data that the Company collects, uses, or discloses on the ground of your consent.

7.7 Right to Restrict Processing

This right enables you to ask the Company to suspend the processing of your personal data via CCTV temporarily, particularly in the part that the Company has no rights to store or where you request such information to establish a legal claim, for compliance with or exercise of legal claims or raising the defense of legal claims or for legal obligations.

7.8 Right to Lodge a Complaint

This right enables you to file a complaint with a related government authority, including but not limited to, the Thailand Personal Data Protection Committee, when you see that the Company, the Company's employees, or service providers violate or do not comply with the PDPA, or other notifications issued under the PDPA.

8. Modification of the Privacy Notice

In order to comply with the Personal Data Protection Act B.E. 2562, this Privacy Notice may be amended from time to time and the Company will announce the current version on the Company's website.

9. Contact Us

If there is reasonable reason to doubt or believe that there is any violation of personal data, complaint, or the exercise of Data Subject rights under this policy or the Personal Data Protection Act B.E. 2562, you can contact the company by:

Head of working group on Personal Data Protection Act

92 Chaloeam Phrakiat Rama 9 Road, Dokmai Subdistrict

Prawet District, Bangkok 10250, Thailand

Telephone Number : (+66) 2 725 8999

Fax Number : (+66) 2 725 8998

e-Mail Address : vphraepriungam@grundfos.com