

# CCTV Data Protection Policy

Sap Udom Property Co., Ltd. has installed Closed-Circuit Television (CCTV) cameras to record moving pictures inside and around the premises of Sylva Sukhumvit 61 and Greenery Place Sukhumvit 61, located at 17 and 19/1, Soi Sukhumvit 61, Khlong Tan Nuea, Watthana, Bangkok 10110. This is to ensure security of the Company's properties, and that of staff, residents, and visitors. The Company will explain how personal data from CCTV is collected, stored, used, and disclosed in this Policy.

## 1. Collection and Storage of CCTV Data

CCTV will record photos of every person and property (such as transport vehicles) that enter the Company's premises and may collect all your snapshots or videos.

## 2. Purposes of Collecting Information from CCTV

Company will collect, store, use and disclose your personal data to fulfil the following objectives

### 2.1. To Protect Lives, Health, and Property and Personal Safety at Work

- a) To protect and prevent buildings, facilities, and properties against damage, nuisance, destruction or crime.
- b) To assist law enforcing entities to prevent, investigate, and prosecute crimes and take actions to end crimes.
- c) To resolve disputes arising from disciplinary procedures or complaints in an effective manner.
- d) To assist government units in investigation process and crime reporting.
- e) To protect the Company's staff and visitors

## 3. The Legal Bases Used by The Company to Collect, Store, And Disclose Your Personal Information

3.1. **Vital Interest:** The Company will collect, store, use, disclose, and process personal data only as necessary to prevent or stop damage to the life, body and health of an individual.

3.2. **Legitimate interest:** The Company will collect, store, use, disclose and process personal data to conduct lawful activities in order to fulfil one of the objectives stated in 2.

3.3. **Legal Obligation:** The Company is obliged to comply with laws, including but not limited to laws on safety, health, and environment in the workplace. Using CCTV is a measure to fulfil these obligations.

#### **4. Disclosure of Personal Data**

The Company may disclose your information to third parties, subsidiaries, and service providers as necessary to fulfil the purposes stated above. The Company may also disclose your personal information to law enforcing entities as necessary to fulfil law obligations and to assist them to prevent, investigate, and prosecute and suspending crimes.

#### **5. Storage and Retention of Recorded CCTV**

Your personal data collected from the CCTV will be kept for 30 days, after which they will automatically deleted. However, the Company may retain your personal information longer than 30 days based on the grounds stated in 2. and 3. in order to manage disputes and prosecutions. Your personal data will be deleted from the CCTV once the dispute is resolved or when there exists no legal ground to retain them.

#### **6. Modification of the Policy**

This CCTV Data Protection Policy was last amended and put into effect on 1 June 2022. Any modifications will be publicized on the Company's website as mentioned in 7.

#### **7. Data Protection Officer's Contact Details**

If you wish to exercise your rights according to the Personal Data Protection Act or enquire about policy concerning the Personal Data Privacy Policy, you can contact the Data Protection Officer of Sap Udom Property Co., Ltd. from 9am-6pm daily through any of the following channels:

##### **7.1. Greenery Place Sukhumvit 61**

Postal Address: 19/1, Soi Sukhumvit 61,  
Klong Tan Nuea, Watthana, Bangkok 10110  
Telephone Number: 02-714-0444  
Email: [greenery.sapudom@gmail.com](mailto:greenery.sapudom@gmail.com)

## 7.2. Syla Sukhumvit 61

Postal Address: 17, Soi Sukhumvit 61,

Khlong Tan Nuea, Watthana, Bangkok 10110

Telephone Number: 02-714-0444

Email: [sylva.sapudom@gmail.com](mailto:sylva.sapudom@gmail.com)

Website: [www.sylva-sukhumvit61.com](http://www.sylva-sukhumvit61.com)

LINE Official Account: @153qkmnr



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Katiya Greigarn

Managing Director

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