



Don Muang Tollway Public Company Limited

ISO 9001, ISO 14001, ISO 45001 & ISO/IEC27001 CERTIFIED

Announcement No. 53/67

Office of the Managing Director

Privacy Notice for CCTV

Don Mueang Tollway Public Company Limited (the "Company") has installed and uses Closed-Circuit Television (CCTV) for surveillance and monitoring within and around the Company's premises, such as in and around buildings, at toll plaza buildings, and at toll booths, in order to protect life, health, body, and property. This involves personal data under the Personal Data Protection Act B.E. 2562 (PDPA). Therefore, this Privacy Notice has been created to explain the methods of protection and the process of collecting, using, disclosing, and/or processing ("Processing") your personal data, with the following details:

Section 1: To whom does this Privacy Notice apply?

"Person" includes personnel, customers, business partners, and any natural person who comes into contact with the Company. Hereinafter collectively referred to as **"you"** or the **"Data Subject"**.

Section 2: Personal Data Processed by the Company

The Company installs CCTV cameras in visible locations and will place warning signs indicating the use of CCTV at entrances and exits, as well as in areas the Company deems necessary for surveillance, to collect your personal data when you enter the following areas:

Type of Personal Data	Details
1) Personal Data	e.g., still images, moving images, sound, images of your property
2) Special Category Personal Data	e.g., still images, moving images, or sound that reveal health data, disability data, or other special category personal data.

Section 3: Necessity of Collecting Personal Data

In cases where the Company needs to collect your personal data as necessary for entering into a contract, fulfilling a contract, or complying with a legal duty, if you do not provide your personal data to the Company, the Company may not be able to proceed with your request, as there could be legal impacts or penalties affecting the Company or you.

However, the Company will not install CCTV cameras in areas that may unreasonably infringe upon your fundamental rights, such as private rooms, restrooms, shower rooms, or employee break areas.

Section 4: Legal Basis for Processing Personal Data

The Company collects your personal data under the following legal bases:

- (a) To prevent or suppress a danger to a person's life, body, or health (Vital Interest) (Section 24 (2))
- (b) For legitimate interests (Section 24 (5))
- (c) To comply with a legal obligation (Section 24 (6))
- (d) To prevent or suppress a danger to life (for sensitive data) (Section 26 (1))
- (e) Other bases as permitted by the personal data protection law.

Section 5: Purposes for Processing Personal Data

The Company will process your personal data in accordance with the legal bases for the following purposes:

- 5.1** To protect the health and personal safety of individuals, including their property.
- 5.2** To protect the Company's buildings, premises, facilities, and assets from damage, disruption, destruction, or other crimes.
- 5.3** To support government agencies or other relevant authorities in law enforcement for the purpose of suppression, prevention, investigation, and legal prosecution.
- 5.4** To assist in the effective resolution of disputes that arise during disciplinary or grievance procedures.
- 5.5** To assist in investigation processes or procedures related to complaints/whistleblowing.

5.6 To assist in initiating or defending against civil or criminal lawsuits, not limited to employment-related legal proceedings.

5.7 To verify identity and to comply with applicable laws.

Section 6: Disclosure of Personal Data

The Company discloses your personal data to third parties for lawful purposes, as follows:

6.1 Government agencies, such as the Royal Thai Police, courts, or agencies exercising legal authority.

6.2 Private entities, such as security service providers, software and cloud service providers, legal advisors, medical facilities, and insurance companies, as necessary to ensure the prevention or suppression of danger to life, body, health, and property.

Section 7: Retention Period of Your Personal Data

The Company will retain personal data from CCTV related to you for a period not exceeding 90 days. After this period, the Company will delete or destroy your personal data from the CCTV system, which records continuously on data storage systems (Hard disk) and the cloud. However, if there is a legal necessity, the Company may retain the data for longer than stated, for example, in the event of legal proceedings.

Section 8: Your Rights as a Data Subject

You can exercise your rights by notifying the Company according to the contact details specified in this Privacy Notice. You have the following rights:

8.1 Right to Withdraw Consent: You have the right to withdraw the consent you have given to the Company at any time, unless the right is restricted by law or there is a contract that benefits you.

8.2 Right to Access, Obtain a Copy, and Be Informed of the Processing of Your Personal Data.

8.3 Right to Data Portability when the personal data is in a technical format that allows for transfer.

8.4 Right to Object to the Processing of Personal Data in the following cases:

When the Company processes for legitimate interests.

When the Company processes for public interest.

When the Company processes for direct marketing.

When the Company processes for research or statistical purposes.

8.5 Right to Request Erasure of Personal Data.

8.6 Right to Request Restriction of Processing of Personal Data.

8.7 Right to Request Rectification of Personal Data to be accurate, up-to-date, and not misleading.

Upon receiving your request to exercise your rights, the Company will respond to your request within the period prescribed by law. The Company may refuse to act on your request only in cases specified by law, such as the need to comply with the law or a court order, for the public interest, or if exercising the right might violate the rights and freedoms of others. If the Company denies the request, it will inform you of the reason for the denial.

8.8 Right to Complain: You can complain to the expert committee appointed by the Personal Data Protection Committee according to the rules and procedures prescribed by the Personal Data Protection Act (PDPA).

Section 9: Security Measures and Sending or Transferring Personal Data Abroad

The Company will have measures to securely store your personal data, covering Organizational Measures, Technical Measures, and Physical Measures to prevent breaches of your personal data, in accordance with the criteria set by the Personal Data Protection Act (PDPA). The Company will regularly update these measures to be effective and compliant with the law.

In case of a necessity for the Company to send or transfer your personal data abroad, the Company will comply with the provisions of the Personal Data Protection Act (PDPA) and use appropriate measures to ensure that your personal data is protected and that you can exercise your rights regarding your personal data as prescribed by law.

Section 10: Contact Channels

If you wish to contact, have questions, or want to inquire about the processing of personal data, including the rights and the exercise of the data subject's rights under this notice, you can contact the Company at:

Data Protection Officer: dpo@tollway.co.th

Phone Number: 02-792-6500 ext. 6331

Don Mueang Tollway Public Company Limited 40/40 Vibhavadi Rangsit Road, Sanambin
Sub-district, Don Mueang District, Bangkok 10210

Section 11: Changes to the Privacy Notice

The Company may update or amend this Privacy Notice, in whole or in part, from time to time to align with changing guidelines and legal principles. Therefore, you should always keep track of this Privacy Notice.

Announced on July 17, 2024