

Privacy Notice

For Business Partners or Individuals with a Business Relationship

TOUCH Property including its affiliates and/or joint venture companies, which collect, use, and disclose personal data on behalf of TOUCH Property Company Limited (hereinafter collectively referred to as "TOUCH Property" or "we"), recognize the importance of protecting the personal data of our business partners or those having a business relationship with us (hereinafter collectively referred to as "you"). To ensure that your personal data is protected and handled in accordance with the applicable personal data protection laws, we have issued this Privacy Notice to inform you of the details relating to the processing of your personal data, including the purposes and scope of collection, use, and disclosure (collectively referred to as "processing") that may occur. This Notice also informs you of your rights concerning your personal data and the channels through which you may contact us, as detailed below.

1. Categories of Individuals from Whom We Collect Personal Data

Under this Personal Data Notification, we will collect personal data from the following individuals:

1.1 Business Partners means individuals who sell or will sell goods and/or services to us, whether or not they are registered as our business partners, such as counterparties, service providers, consultants, etc. This also includes natural persons associated with or acting as representatives of a juristic person that is a business partner, such as executives, directors, employees, agents, representatives, or any other natural person, and individuals whose personal data appears in various documents related to transactions between us and that juristic person, such as coordinators, delivery personnel, check signatories, etc., as well as individuals whose data has been provided to us by that juristic person.

1.2 Business-Related Individuals means other individuals who are not Business Partners or our company's personnel, and who have a relationship related to business operations, such as personnel in government agencies regulating business operations and/or overseeing compliance with laws, prospective business participants or business participants, prospective investors or co-investors, agents or brokers in procuring goods or services for us. This also includes natural persons associated with or acting as representatives of that juristic person, such as executives, directors, employees, agents, representatives, or any other natural person, and individuals whose personal data appears in various documents related to transactions between us and that juristic person.

Kindly be informed that certain links provided on our platform may redirect you to external third-party platforms.

In such cases, the processing of your personal data shall be governed exclusively by the privacy policies of the respective third parties. Accordingly, we highly recommend that you carefully review and thoroughly understand the privacy policies of those third parties prior to engaging with their platforms.

2. Objectives of Collection, Use or Disclosure of Personal Data

We will collect, use, or disclose your personal data only when necessary or where there is a legal basis for doing so. This includes cases where the collection, use, or disclosure is required to comply with legal obligations, to fulfill a contract you have entered into with us, for our legitimate interests, and/or under other lawful grounds. Our purposes for collecting, using, or disclosing your personal data include, but are not limited to, the following:

No.	Objectives	Lawful Basis
1.	For contact and coordination related to our business operations.	Legitimate Interests
2.	To verify qualifications or assess suitability prior to entering into a transaction; to assess risks related to such transactions; to verify and confirm identity and/or verify authority, power of attorney, or authorization for signing any agreements or contracts with us; to conduct due diligence or other background checks; and to carry out our internal procedures..	<p>Legitimate Interests</p> <p>Contractual Basis</p>
3.	For the consideration, preparation, execution, and management of contracts or related agreements.	Contractual Basis
4.	For use as information required to register or access electronic systems, or to enable access to internet services or other electronic platforms.	Legitimate Interests

5.	For carrying out pre-contractual procedures, such as vendor registration, assessment of vendor qualifications, and preparation of data prior to the procurement process (e.g., price benchmarking, inputting vendor names and details into our internal systems).	Contractual Basis Legitimate Interests
6.	For purposes necessary to facilitate transactions between our business partners and us, such as identity verification, verification of authority, delegation and acceptance of authority, as well as for maintaining records as evidence supporting related transactions. This includes compliance with our internal rules, regulations, and procedures, as well as the review, preparation, and execution of commercial agreements.	Contractual Basis Legitimate Interests
7.	For business communications, including scheduling appointments, meetings, or discussions related to our goods, services, and projects, or those involving us. This also includes recording details of such communications.	Legitimate Interests

8.	To be used for business planning, reporting, and forecasting; risk management and assessment; governance and audit processes, including internal audits conducted by the Internal Audit Office; internal organizational management; as well as for internal operational purposes related to disbursement processes by our finance and accounting departments.	Legitimate Interests
9.	For use in conducting Know Your Customer (KYC) and/or due diligence processes relevant to our operations, including corporate status checks or other forms of background verification, for the purpose of assessing suitability or evaluating risks prior to entering into any transactions. This also includes identity verification, confirmation of authority, and validation of delegated authority for the execution of any agreements or contracts with us.	Legitimate Interests
10.	For maintaining a database of our stakeholders and/or for managing relationships and coordinating communications related to our operations, including conducting surveys for the purpose of analyzing and improving our business performance.	Legitimate Interests

11.	For internal investigations of complaints, fraud prevention, or other legal proceedings, as well as for reviewing and addressing complaints or allegations related to our operations or relevant persons, in order to ensure transparency and fairness for all parties involved.	Legitimate Interests
12.	For the establishment of legal claims, the delegation and acceptance of authority, the exercise or defense of legal rights, litigation proceedings, and the enforcement of legal judgments or obligations.	Legitimate Interests Legal Obligation
13.	For the purpose of compliance with applicable laws related to transactions between our business partners and ourselves, such as laws governing procurement of government agencies, tax laws, laws pertaining to verification of land rights, laws on the audit of public accounts, securities and stock exchange laws, and laws concerning public information of government agencies.	Legal Obligation

14.	For the purpose of complying with laws, court orders, official letters, or directives issued by authorized governmental agencies, independent organizations, or officials vested with legal authority, including but not limited to compliance with summons, seizure orders, court rulings, police authorities, and government agencies. This also includes reporting or disclosing information to shareholders, government agencies, or independent organizations such as the Revenue Department, Department of Lands, and the National Anti-Corruption Commission, for the purpose of fulfilling relevant legal obligations.	Legal Obligation
15.	For the purpose of legal compliance, investigation, and inquiry under applicable laws and regulations, as well as reporting or disclosing information to government agencies or other authorities empowered by law or court order. This also includes establishing legal claims, exercising or defending legal rights, or asserting legal entitlements.	Legal Obligation
16	When you access and use our social network media, such as Facebook, LINE, YouTube, and other online media, TOUCH Property may collect, use, or disclose your personal data for the following objectives.	For legitimate interests (Legitimate Interests) For Consent (Consent)

	<ol style="list-style-type: none">1. For evaluating the performance and analyzing the market survey and market strategies, including planning, reporting, and forecasting the business.2. For conducting a poll, analyzing, researching, and developing the products and services, including various activities of TOUCH Property to be more suitable to your needs, and for developing the public relations to be more suitable to your needs.3. For conducting the risk management, supervision, inspection, as well as for the internal inspection of the Internal Audit Office and internal management of the organization, such as for examining and preventing the corruption, and so on.4. For contacting and acquiring additional information, investigating complaints, managing of complaints, recording the performance, and performing in accordance with the internal procedures of TOUCH Property.5. For selecting the activity participant, conducting quiz competition through online channels, announcing the result of activity, giving awards to the participants according to the conditions specified by TOUCH Property, including storing in the database regarding the profile of participants of TOUCH Property's activities.	
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17	For the purpose of disclosing necessary information to comply with various assessment criteria required by programs or initiatives in which we participate.	Legitimate Interests
18	For safety management for the residents of TOUCH Property's project, including the use of technology with respect to safety management which the suitable risk assessment shall be provided in order to prevent the encroachment of the rights and liberties of the data subject, such as CCTV, system for collecting and scanning the identity (Biometrics), car registration plate scanning system and/or any other technology system which may be installed and used in the future.	Legitimate Interests Consent
19	For being used as information and supportive documents for any operations with the bank, financial institutes, Department of Business Development, Revenue Department, Excise Department, the Stock Exchange of Thailand, the Securities and Exchange Commission of Thailand, and other relevant outside organizations.	Legitimate Interests

20	For the purpose of providing services to clients in relation to the administration and coordination of juristic person matters and project management in various developments, such as residential villages, condominiums, office buildings, and shopping centers. This includes the management of residential or commercial projects, or any premises under which we are contracted to provide property management or juristic person-related services.	Contractual Basis Legitimate Interests
21	For compliance with applicable legal procedures, including but not limited to registrations and exercising legal claims or entitlements as prescribed by law.	Legitimate Interests Legal Obligation
22	For managing security operations within residential or office projects, or other managed premises under our service agreements, including the use of security technologies. Such operations shall involve appropriate risk assessments to avoid infringing upon your rights and freedoms, for example, through the use of CCTV systems, biometric data systems, vehicle license plate recognition systems, and/or other technologies that may be implemented in the future.	Legitimate Interests

23	For any other purposes that were specified at the time of data collection, or other purposes that are related to any of the above objectives and/or necessary for legitimate and lawful benefits.	Legitimate Interests
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In case the personal data which TOUCH Property collects, for the above objectives, is necessary for the performance of a contract or for compliance with various applicable laws, if you do not provide such necessary information, TOUCH Property may not be able to consider for entering the transaction or managing in accordance with the contract with you (as the case may be).

Furthermore, in case you provide personal data of others to us, you shall be responsible for notifying such persons this Privacy Notice and/or obtaining the consent (if necessary).

3. Personal Data Which Will Be Collected

In general, we collect your personal data by directly requesting or asking for such information from you. In some cases, we may also collect your information through our platforms or from other sources, such as website visits or registration through the creation of an account via our websites or applications. We may also collect data from other sources. In all such cases, we will ensure that the collection is carried out in accordance with the Personal Data Protection Act B.E. 2562 (2019). In this regard, TOUCH Property collects your personal data, as follows.

3.1 General Personal Data

1. Information enables the identification of a person (Identity Data), such as name, surname, national ID card number, passport number, date of birth, gender, age, nationality, signature, information regarding a

change of name-surname, photograph, Professional license, driver's license information, electronic system username, etc., which shall include supporting documents containing such personal information and/or identification documents

2. Contact information (Contact Data), such as address, telephone number, email.
3. Social media information, such as Facebook, Instagram, Twitter, TikTok, and other similar platforms.
4. Financial information (Financial Data), such as bank account number etc
5. Information with respect to communication with TOUCH Property (Communication Data), such as, video or audio recordings when contacting with TOUCH Property.
6. User account information and passwords, applicable only in cases where access to our internal systems is required.
7. Information related to us or the affiliated organization, such as our workplace or affiliated agency, office location, job position, and other related details.
8. Information with respect to educational background, working background, trainings, expertise, and various achievements, and so on.
9. Video recording by CCTV or the Facility Security System.
10. Information with respect to participation of the meetings between TOUCH Property and group companies, including the information regarding the participation of the trainings, seminars, activities, or other projects arranged by TOUCH Property which the record of still photos, motion, and/or sounds may be proceeded during such meeting, training, seminar, or activity.

11. Other information necessary for background check, evaluation of suitability or risk consideration before entering into the transaction, including for proceeding with lawsuit or legal execution, such as marital status, property information, and so on.
12. Other information necessary for verifying connected relationships and potential conflicts of interest with us.
13. Activity history or history on participation in various projects of TOUCH Property.
14. Information with respect to the use of various electronic systems of TOUCH Property, including information regarding the use of Application, website visiting (Browsing Information), such as website browsing history, IP address, and so on.

Other personal data for facilitation as necessary

3.2 Sensitive Personal Data

In general, TOUCH Property does not desire to collect and use the information pertaining to religious beliefs and blood type specified on your copy of national ID card for any objective in particular. In case you provide a copy of national ID card to TOUCH Property, please hide such information. In case you do not hide aforementioned information, it shall be considered that you give a consent to TOUCH Property to hide such information and it shall be considered that the document having such hidden information is valid and enforceable in accordance with the law in all respects. In this regard, if TOUCH Property is unable to hide the information due to some technical restriction, TOUCH Property will collect and use such information as only for a part of your identity verification.

In the case where it is necessary to TOUCH Property to collect your sensitive personal data, TOUCH Property will request for your explicit consent, on a case-by-case basis, unless otherwise specified by law.

TOUCH Property may process the following sensitive personal data.

1. Information pertaining to religious beliefs.
2. Health data and/or disability.
3. Information pertaining to racial.
4. Biometric data such as facial recognition and fingerprints

Furthermore, we do not intend to collect personal data from children under the age limit specified by law ("Age Restriction"). If you are under the Age Restriction, please do not use our services and do not provide us with any personal information.

If you are a parent of a child under the Age Restriction and you are aware that your child has provided us with personal information, please contact us and you may exercise your rights.

If you are a child under the Age Restriction and require our services and products, please have your parents provide consent for the provision of your personal data.

3.3 Cookies

We use cookies to collect personal data as specified in our Cookie Policy.

4.Retention Period

TOUCH Property will retain your personal data for the period as necessary for performing the objectives of collection, use or disclosure of the personal data specified herein. The criteria for determining the retention period are the period

which TOUCH Property still needs to use your personal data in accordance with the objectives and may continue to retain as the period necessary for complying with the laws, or legal prescription, or for the establishment, compliance or exercise of legal claims, or defense of legal claims, or for other cases according to the policy and internal regulations of TOUCH Property.

5. Disclosure of Personal Data

For performing the objectives specified in this notice, TOUCH Property may disclose your personal data to the following third parties.

5.1 Our affiliated companies and/or joint venture companies, our relevant personnel, our partners, and the contractors or service providers we engage.

5.2 Government sectors, supervisory authorities, or other entities prescribed by laws, including the competent officials, such as the court, the police officers, the Securities and Exchange Commission of Thailand, and the Revenue Department.

5.3 Bank or financial institutes.

5.4 Other third party, such as announcement of the list of selected candidates through social media channels of TOUCH Property or publication of photographs of activities or activity news or project news of TOUCH Property to the mass media and third party, and so on.

5.5 Agents, contractor/subcontractor and/or service provider performing any operation for TOUCH Property, such as professional consultants, transportation service providers, contractor performing marketing activities, the company providing accommodations and traveling, the companies organizing the activities, trainings, or seminars, media production contractor,

contractor performing public relation activities, insurer, auditor, legal consultant, co-agent, and so on.

5.6 A person having business relationship (in the case where it is necessary for the performance of contract when the project or business is co-operated).

5.7 Assignees of any rights, obligations, or benefits from us, including those authorized by such assignees to act on their behalf, such as in cases of corporate restructuring, mergers, spin-offs, or business transfers.

In such instances, we may need to transfer your personal data to foreign entities or international organizations associated with us, or pursuant to agreements we have with such entities. You may exercise your rights as a data subject in accordance with the applicable personal data protection laws of the relevant jurisdiction.

5.8 Condominium juristic person, housing estate juristic person, condominium management company, housing estate management company, and lease area management company.

6. Transfer or Disclosure of Personal Data to Other Countries

TOUCH Property may store your personal data in the computers, servers, or clouds of service providers located in other countries, and may process information by using package software or application of service providers located in other countries.

In this regard, to send or transfer your personal data to other countries, for any case, TOUCH Property will comply with the Personal Data Protection Act, B.E.2562 (2019).

7. Your Rights as a Data Subject

As you are a data subject, you have the rights as prescribed by the Personal Data Protection Act, B.E.2562 (2019). In this regard, you may exercise your rights through the channels we have specified. You are entitled to exercise the rights when the personal data protection law is enforced. Your rights are as follows.

7.1 Right to withdraw the consent (Right to Withdraw Consent)

In case TOUCH Property requests for your consent, you are entitled to withdraw the consent for processing of personal data given to TOUCH Property, unless such withdrawal of consent is restricted by law or contract which is beneficial for you.

In this regard, the withdrawal of consent shall not affect any processing of personal data which the consent was already legally given by you. Following such withdrawal, we may be unable to carry out certain or all of the purposes specified.

7.2 Right to access to the personal data (Right to Access)

You are entitled to request for accessing and obtaining a copy of your personal data, which is under responsibility of TOUCH Property, including request TOUCH Property to disclose the acquisition of such information which you do not consent to TOUCH Property.

7.3 Right to request for sending or transferring of personal data (Data Portability Right)

You are entitled to request TOUCH Property to transfer your personal data provided to TOUCH Property in accordance with the laws.

7.4 Right to object the collection, use or disclosure of personal data (Right to Object)

You are entitled to object to the processing of information relating to you for the collection, use or disclosure of personal data that is prescribed by law.

7.5 Right to erase the personal data (Erasure Right)

You are entitled to request TOUCH Property to erase your personal data as prescribed by law. However, TOUCH Property may collect your personal data by electronic system which some of the system may be unable to be erased. In such case, TOUCH Property will destroy or anonymize such personal data to become anonymous data that cannot identify you.

7.6 Right to request for restriction of the use of personal data (Right to Restrict Processing)

You are entitled to request TOUCH Property to restrict the use of your personal data as prescribed by law.

7.7 Right to request for correcting the personal data (Rectification Right)

In case you opine that the information possessed by TOUCH Property is incorrect or you have changed your personal data, you are entitled to request TOUCH Property to correct your personal data so that your such personal data will be accurate, up-to-date, complete, and not misleading.

7.8 Right to lodge a complaint (Right to Lodge a Complaint)

You are entitled to lodge a complaint to the competent authority in accordance with the Personal Data Protection Act, B.E.2562 (2019) in the event that TOUCH Property violates or does not comply with such Act.

In case the data subject filed a request for exercising of rights under the provisions of the Personal Data Protection Act, B.E.2562 (2019), upon receipt of such request, TOUCH Property will proceed with such request within the period specified by law. Anyway, TOUCH Property reserves the

right to reject or non-comply with such request for the case where it is prescribed by law.

You can proceed with the exercise of above specified rights by notifying through the Call Centre, telephone no.1685 which you will be required to file the request for exercising the right of data subject (download), including verify your identity for exercising such rights in accordance with the methods and procedures specified by the Company. In this regard, the Company will consider and inform you of the result of consideration of your request within 30 days from the date which the Company received such request.

8. Amendment of this Notice

We may occasionally amend this Privacy Notice and, if there is such amendment, we will announce it on TOUCH Property's website. In this regard, in case it is necessary to request your consent, we will proceed with requesting the consent from you additionally.

9. Contact Methods

If you have any questions or would like to ask for more information regarding the protection of your personal data, the collection, use or disclosure of your personal data, the exercise of your rights, or any complaints, you can contact TOUCH Property at the following channels.

TOUCH Property Company Limited

Contact place: 59 Soi Rim Khlong Phra Khanong, Phra Khanong Nuea Sub-district, Vadhana District, Bangkok 10110

Telephone no.: 02 688 7555

Email: plusagency@plus.co.th

Data Protection Officer

Contact place: 59 Soi Rim Khlong Phra Khanong, Phra Khanong Nuea Sub-district,
Vadhana District, Bangkok 10110

Telephone no.: 1685

Email: cs@sansiri.com