

Privacy Notice
For Customers and Individuals Interested in the Products and/or Services
of TOUCH Property Company Limited Group

TOUCH Property its affiliates, and/or joint venture companies, which collect, use, and disclose personal data on behalf of TOUCH Property Company Limited (hereinafter referred to as "TOUCH Property"), place the utmost importance on the protection of personal data of customers and individuals interested in our products and services (collectively referred to as "you"). To ensure that your personal data is protected and handled in accordance with applicable personal data protection laws, we have prepared this Personal Data Notice to inform all relevant parties of the details regarding the processing of personal data, including the collection, use, and disclosure (collectively referred to as "processing") that may occur, as well as to inform you of your rights regarding your personal data and the channels through which you can contact us.

1. Type of Persons Which We Collect the Personal Data

Under this Privacy Notice, TOUCH Property collects personal data of the following persons.

1.1 Customer means a person who purchases the products and/or receives the services from TOUCH Property ("Person" shall include any individual being involved with or representing the juristic person which is a customer, and a person whose personal data appears in various documents in connection with transactions with TOUCH Property), such as resident of TOUCH Property's project, and so on.

1.2 Interested person means a person who is interested in and a person who may be interested in the products and/or services of TOUCH Property, such as a person giving information through a salesperson at any project of TOUCH Property, a person entering or notifying information through news subscription form, membership application form, project news subscription form, or location news subscription form, or promotion news subscription form, as well as a person who is under consideration

process for approval of product purchase request and/or request for the use of services, and so on.

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

2.1 In general, whether you are a customer or a person who is interested in the products and/or services, TOUCH Property may process your personal data for the following objectives.

No.	Objectives	Lawful Basis
1.	For the coordination relating to business operation of TOUCH Property.	Legitimate Interests
2.	For collecting and using your personal data, namely name-surname, position, organization, and photograph-motion in connection with the performance and activities of TOUCH Property for public relation through various channels, such as internal email of TOUCH Property and group companies, TOUCH Property's website, Facebook, LINE, YouTube, or other online media of TOUCH Property or other media, such as television, printing media, and so on.	Legitimate Interests

3.	For applying to access and use the electronic system or opening the accessing right or the use of internet or various electronic system.	Legitimate Interests Contractual Basis
4.	For proceeding with planning, reporting, and forecasting the business, risk management, supervision, and inspection, including internal inspection of the Internal Audit Office and internal management of the organization, as well as for benefits of internal operation of TOUCH Property relating to disbursement of the financial accounting department of TOUCH Property.	Legitimate Interests
5.	For operating in connection with Know Your Customer and/or Due Diligence relating to the operation of TOUCH Property, including other forms of checking the business status or background for evaluating the suitability or risk consideration before engaging in various transactions, the proof and verification of identity, and/or checking the authority, authorizing and acceptance of authority for signing in any agreement or contract with TOUCH Property.	Legitimate Interests

6.	For operating in connection with the transfer of rights, obligations, and any benefits, such as merger and acquisition, demerger, or business transfer or any operation legally proceeded.	Legal Obligation
7.	For concluding the database of stakeholders of TOUCH Property and/or for relationship management or coordination relating to TOUCH Property, including opinion surveying for analyzing and improving the operation of TOUCH Property.	Legitimate Interests
8.	For disclosure the information necessary for complying with various evaluations which TOUCH Property engaged.	Legitimate Interests
9.	For investigating, examining the internal complaint of the organization, preventing the corruption, or proceeding with any other legal proceedings, including checking and managing the complaint and accusation relating the operation of TOUCH Property or relevant person to ensure the transparency and justice for every party.	Legitimate Interests Legal Obligation

10.	For accepting the application or considering for approval of participation of the project or various activities of TOUCH Property, such as study trip, business visiting, acceptance of donation, seminar, training project or other projects of TOUCH Property or any project which TOUCH Property co-operates with the third party or government agencies, and so on, including any operation relating to participation of the activities, such as quiz competition, delivery of the award, as well as the evaluation, analyzation and improvement of operation of the project or activity.	Legitimate Interests Contractual Basis
11.	For security around building, the place, and the project of TOUCH Property, including card exchanging prior to the access of such area, the record of a person contacting with TOUCH Property, or the building, the place, and the project of TOUCH Property by CCTV.	Legitimate Interests
12.	For establishing the legal claims, authorizing, and accepting the authorization, complying with or exercising the legal claims, or defending the legal claims, proceeding with lawsuit, as well as proceeding with legal execution.	Legitimate Interests Legal Obligation

13.	For complying with the law or complying with the court writ, a letter, or an order of government agencies, independent entity or competent authorities, such as to comply with the summons, writ of attachment of claims, an order of the court, the police officer, the public prosecutor, government agency, including a report or disclosure to the shareholders, government agencies, or independent entities, such as the Revenue Department, the Land Office, Office of the National Anti-Corruption Commission, and so on, for complying with the relevant laws.	Legal Obligation
14.	For complying with the laws to achieve the purposes with respect to public interest in public health, such as protecting against cross-border dangerous contagious disease or epidemics which may be contagious or pestilent.	Legal Obligation
15.	For managing relating to your sanitation and safety.	Vital Interests

16.	<p>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.</p> <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 	<p>Legitimate Interests</p> <p>Legal Obligation</p>
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	<p>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.</p> <p>6. For complying with the laws, investigating, and examining in accordance with legal process and any other regulations, and reporting or disclosing the information to government agencies, or any other entities which operate by the virtue of law, or the court's order, as well as for establishing a legal claim, complying with or exercising the legal claims or defending the legal claims.</p>	
17.	For evaluating the performance and analyzing the market survey and market strategies, including planning, reporting, and forecasting the business.	Legitimate Interests
18.	For analyzing, researching, and developing the products, services, and various activities of TOUCH Property to be better or more suitable to your needs, including collecting the usage data of TOUCH Property's website for analyzing the use of website's users in order to develop the website and communication strategies of TOUCH Property.	Legitimate Interests

In addition to the above objectives, TOUCH Property may additionally process your personal data for the following cases.

2.2 In case you are a person who is interested in the products and/or services, TOUCH Property may additionally process your personal data for the following cases.

No.	Objectives	Lawful Basis
1.	For considering for approval of product purchase request and/or request for the use of services, including the process of identity verification, checking the authority, authorizing and acceptance of authority, considering the risk on entering into the relevant transactions and performing in accordance with the internal procedures of TOUCH Property for conclusion of contract, performance of contract, delivery of the products, rendering of the services, as well as coordinating, billing, delivering the relevant documents, and so on.	Contractual Basis Legitimate Interests

2.	For evaluating, improving, and developing the products and services, as well as various sale promotions of TOUCH Property, including surveying satisfaction on the products and services of TOUCH Property for more appropriate and suitable to your needs.	Legitimate Interests
3.	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
4.	For evaluating the performance and analyzing the market survey and market strategies, including planning, reporting, and forecasting the business.	Legitimate Interests
5.	For analyzing, researching, and developing the products, services, and various activities of TOUCH Property to be better or more suitable to your needs, including collecting the usage data of TOUCH Property's website for analyzing the use of website's users in order to develop the	Legitimate Interests

	<p>website and communication strategies of TOUCH Property.</p>	
6.	<p>In case you informed the information through our contact channels or various application forms, such as, application for obtaining the information regarding products and services from us, and so on, we may process your personal data for contacting and acquiring additional information in connection with the application or complaint or any information you notified us, including considering and processing in accordance with the application, contacting and sending the information, issuing the receipt (in case any fee or cost for copying the information or sending the documents), examining the facts, storing the records for following up the performance and being the information for risk management, supervision, inspection, as well as for the internal inspection of the Internal Audit Office and internal management of the organization.</p>	<p>Legitimate Interests</p>

2.3 In case you are a customer, TOUCH Property may additionally process your personal data for the following objectives.

No.	Objectives	Lawful Basis
1.	To operate and/or provide services related to our business operations under contractual obligations, such as providing services to residents in managing juristic person matters in residential projects; providing services to tenants in shopping mall and/or office building projects; acting as a brokerage agent for property owners; complying with building rules and regulations; and organizing general meetings of condominium/village juristic persons, etc.	Contractual Basis Legitimate Interests Legal Obligation
2.	For the consideration, preparation, and execution of various related contracts or agreements, including the administration of such contracts or agreements.	Contractual Basis

3.	For managing relationship with the resident of TOUCH Property's project, as a customer, (Customer Relations) by creating an account used with the residents of TOUCH Property's project in the application for communication, financial transaction management, or notification of marketing news which the resident can unsubscribe for the market information at any time.	<p>Legitimate Interests</p> <p>Contractual Basis</p>
4.	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.	<p>Legitimate Interests</p> <p>Consent</p>

5.	For evaluating, improving, and developing the products and services, as well as various sale promotions of TOUCH Property, including surveying satisfaction on the products and services of TOUCH Property for more appropriate and suitable to your needs.	Legitimate Interests
6.	For the consideration, preparation, and execution of various related contracts or agreements, including the administration of such contracts or agreements.	Legitimate Interests Contractual Basis

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

Generally, to collect your personal data, TOUCH Property will collect the personal data by requesting or asking for such information directly from you. However, in some cases, TOUCH Property may collect your personal data from other sources, such as your affiliation company, your employee, secretary or coordinator, government sectors or government agencies, or other publicly available sources, such as websites, the information can be searched on the internet, and so on.

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, photograph, professional license number, information of driving license, username of electronic system (Username), and so on.
2. Contact information (Contact Data), such as address, copy of house registration, telephone number, facsimile number, email, geolocation, emergency contact, social network account, LINE ID, secretary information, and so on.
3. Financial information (Financial Data), such as bank account number, and so on.
4. Information with respect to communication with TOUCH Property (Communication Data), such as information regarding date, time, and place of communication with TOUCH Property, video and audio recordings when contacting with TOUCH Property, and so on.
5. User account information and password, exclusively for accessing TOUCH Property various systems.
6. Information regarding your company or organization, such as your employer or affiliated agency, workplace, job position, etc
7. Video recording by CCTV.

8. 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.
9. 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.
10. Opinion, recommendation, complaints.
11. Activity history or history on participation in various projects of TOUCH Property.
12. Information with respect to screening in accordance with epidemic prevention measures.
13. 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.
14. Other personal data for facilitation as necessary, such as your preferred food or beverage, and so on.

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.

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 group companies and/or joint venture companies

5.2 Government sectors, supervisory authorities, state enterprises, government agencies, public organization, independent entities established in accordance with the law, or other entities prescribed by laws, including the competent officials, such as the court, the police officers, the Revenue Department, the Land Office, the District Office, the Provincial Office, the Securities and Exchange Commission of Thailand, the Anti-Money Laundering Office, the Department of Skill Development, the Department of Labour Protection and Welfare, the Office of the Ombudsman of Thailand, the State Audit Office of the Kingdom of Thailand, the House of Representatives Affairs Committee, the Senate Committee, the Legal Execution Department, the Office of the Attorney General, the State Audit Office of the Kingdom of Thailand, the Office of the National Anti-Corruption Commission, and so on.

5.3 Agencies, organizations, or persons relating to the exercise of legal claims, lawsuits, objection of the complaints or accusation, litigation of TOUCH Property, such as litigants, and so on.

5.4 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.

5.5 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).

5.6 Certification institutes for the management system standards.

5.7 Training participants.

5.8 Bank or financial institutes.

5.9 Assignee of the rights, obligations, and any benefits from TOUCH Property, including authorized person of such assignee, such as restructuring, merger and acquisition, demerger, or business transfer, and so on.

5.10 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.

5.11 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

In some cases, we may be required to disclose your personal data to the other countries, which the standards of personal data protection may be different from Thailand, for the following objectives.

6.1 TOUCH Property facilitates the operation of transactions in accordance with your preference.

6.2 TOUCH Property operates the business or proceeds with various transactions with companies located in other countries. Therefore, it is necessary to disclose personal data, for your benefit, to such companies.

6.3 TOUCH Property may be required to disclose your personal data to, including, government agencies, professional consultants, and any person relating to and necessary to access such personal data for normal business operation of TOUCH Property which is in consistency with your preference, as well as the data may be disclosed to the other countries for proceeding with lawsuit or arbitration that may be done in the future.

6.4 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.

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.

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