



Proud Real Estate Public Company Limited and its subsidiaries

Announcement No. BPI-003/2566

Subject Privacy Policy

Proud Real Estate Public Company Limited and its subsidiaries (hereinafter referred to as the “Company”) recognise the importance of protecting personal data in order to build confidence among personal data owners. The Company has therefore established this Privacy Policy in accordance with the Personal Data Protection Act B.E. 2562 (2019). This Policy sets out the Company's approach to personal data protection as follows:

1. Commitment to Personal Data Protection

Proud Real Estate Public Company Limited and its subsidiaries (hereinafter referred to as the “Company”) are committed to protecting personal data. The Company has established this Privacy Policy to demonstrate its commitment to personal data protection in accordance with the Personal Data Protection Act B.E. 2562 (2019). This Policy sets out the framework governing the collection, use, and disclosure of personal data by the Company.

2. Definitions

“Personal Data” means any information relating to an individual that enables the identification of that individual, whether directly or indirectly, excluding information relating to deceased persons.

“Sensitive Personal Data” means personal data relating to race, ethnicity, political opinions, religious or philosophical beliefs, sexual behaviour, criminal records, health information, disability, trade union information, genetic data, biometric data, or any other information prescribed by the Personal Data Protection Committee.

“Processing” means the collection, use, or disclosure of personal data.

“Data Controller” means a person or juristic person with the authority to make decisions regarding the collection, use, or disclosure of personal data.

“Data Processor” means a person or juristic person that collects, uses, or discloses personal data on behalf of, or under the instructions of, the Data Controller. Such person or juristic person is not the Data Controller.

“Company” means Proud Real Estate Public Company Limited and its subsidiaries.

“Products” means condominiums, townhomes, and other products currently developed by the Company or to be developed by the Company in the future.

“Services” means the services provided by the Company, such as project visits, websites, applications, social media platforms, and other services relating to the Company's business operations, whether currently available or to be introduced in the future.



3. Principles of Personal Data Protection

To ensure compliance with applicable laws, particularly the Personal Data Protection Act B.E. 2562 (2019), the Company has established the following principles for the protection of personal data:

- **Lawfulness:** The Company processes personal data only where the data subject has given consent, where consent is required, or where processing is necessary for the performance of a contract to which the data subject is a party, compliance with legal obligations, the prevention or suppression of danger to a person's life, body, or health, or on any other lawful basis permitted under applicable laws.
- **Fairness:** The Company clearly explains the reasons for collecting personal data to data subjects.
- **Purpose Limitation and Data Minimisation:** The Company collects only the personal data necessary for the specified purposes and ensures that personal data is used only to the extent necessary for those purposes.
- **Transparency:** The Company informs data subjects of the purposes for which their personal data is collected and used.
- **Rights of Data Subjects:** The Company has established procedures that enable data subjects to exercise their rights, such as the right of access to personal data, the right to rectification of personal data, and other rights relating to the processing of personal data.
- **Storage Limitation:** The Company establishes an appropriate retention period for personal data and retains such data only for the period necessary.
- **Integrity and Confidentiality:** The Company implements appropriate security measures to protect personal data. Where personal data is processed by external parties, the Company verifies that such parties have appropriate safeguards in place. Where personal data is transferred outside Thailand, the Company ensures that such transfer complies with applicable laws. In the event of a personal data breach, such as the loss, theft, or damage of personal data, where the breach is likely to affect the rights and freedoms of data subjects, the Company will notify the competent supervisory authority and the affected data subjects, and will take appropriate remedial measures to minimise any adverse impact.

If you have any questions regarding the above principles, you may contact the Company's Data Protection Officer using the contact details provided in the "Rights of Data Subjects" section.

4. Personal Data and Categories of Personal Data Collected by the Company

In the course of its business operations, the Company collects personal data relating to the following areas:



For Employees, the Company collects the following personal data:

Category of Personal Data	Details
1. Identification Information	Name, surname, national identification number, facial photograph, gender, and date of birth
2. Contact Information	Address, telephone number, email address, emergency contact details, and Line ID
3. Financial Information	Bank account details, salary information, documents relating to the provident fund, and supporting documents for personal income tax filing
4. Participation Information	Information relating to participation in Company activities, training programmes, seminars, and Company events
5. Health Information	Medical certificates and health examination results
6. Employment Information	- Employment contract - Salary and other remuneration - Social security and insurance information, together with information relating to occupational accidents and workplace safety - Work performance and performance appraisal records, together with leave and lateness records - Driving licence information, such as the driving licence number, vehicle registration number, and driving licence expiry date, where the employee is assigned driving duties - Information relating to access to Company premises, CCTV recordings, travel undertaken in connection with assigned duties, related expenses, and the use of the Company's communication systems

For Customers, the Company collects the following personal data:

Category of Personal Data	Details
1. Identification Information	Name, surname, address, email address, and telephone number
2. Contact Information	Residential project of interest, purpose of the project visit, and reason for purchasing a residential property
3. Technical Information	IP address, browser type, time zone settings, location data, operating system, platform, and technology used to access the website
4. Website Usage Information	Webpages viewed before accessing the platform, webpages viewed after leaving the platform, duration of website visits, products or information searched for on the platform, the date and time of website visits, and website browsing information
5. Communication Information	Emails, records of conversations, and communication information
6. Contract Information	National identification number, address, credit card number, date of birth, and gender



The Company collects only the name, nationality, and date of birth of minors. A parent or other legal representative must provide consent before submitting any personal data relating to the minor, other than the minor's name, nationality, and date of birth, to the Company. If the Company becomes aware that it has collected a minor's personal data without the required consent, the parent or other legal representative may contact the Company's Data Protection Officer to request the deletion of such personal data. Please refer to the "Rights of Data Subjects" section.

5. Sources of Personal Data

For Employees of the Company: The Company collects your personal data through the following activities:

- Personal data obtained directly from you, such as information provided in employment application forms submitted to the Company through postal or electronic channels, such as the Company's recruitment website, postal applications, or walk-in applications.
- Personal data obtained indirectly, such as information provided by recruitment agencies or government agencies involved in the recruitment process.

For Customers: Your personal data is collected through the following activities:

- Personal data obtained directly from you includes:
 - register for an account on the Company's website or application;
 - contact the Company to request information about a residential project of interest;
 - visit a residential project;
 - provide your personal data during a visit to the Company's residential project; or
 - participate in the Company's sales promotion activities through electronic channels, social media platforms, or other channels.
- Personal data obtained from third parties acting on behalf of the Company in connection with the collection, use, or disclosure of personal data. Such personal data will be used only for the purposes specified by the Company. The Company requires such third parties to maintain the confidentiality and security of personal data in accordance with the standards prescribed under the Personal Data Protection Act B.E. 2562 (2019).

6. Purposes of Collecting, Using, and/or Disclosing Personal Data and the Legal Bases for Processing Personal Data

The following tables set out the purposes for which the Company collects, uses, and/or discloses personal data, together with the legal bases for processing such personal data.

For Employees of the Company:

Purpose	Categories of Personal Data	Legal Basis for Processing Personal Data
1) To perform obligations under the employment contract with employees, including: – salary payment; – overtime payment; – recording attendance and working hours; – recording leave and administering leave entitlements; – performance evaluation, including consideration for promotion; and – exchanging information among the Company's employees and communicating internal Company information.	- Identification Information - Contact Information - Employment Information - Financial Information	Necessary for the performance of the employment contract with employees. (Section 24(3))
2) To provide employee welfare, organise training programmes, organise employee development activities, and organise activities to strengthen employee relationships.	- Identification Information - Contact Information - Participation Information - Employment Information	Legitimate Interests in human resource management to develop employees and the organisation, thereby enhancing the Company's operational efficiency. (Section 24(5))
3) To prepare aggregated statistical information that does not identify individual employees for human resource management purposes.	Information that does not identify individual employees	Legitimate Interests in preparing aggregated statistical information for human resource management and organisational development, provided that such processing does not affect the fundamental rights of the data subjects. (Section 24(5))
4) To retain the results of annual health examinations in order to assess employees' fitness for work in their assigned positions and to provide appropriate welfare and medical treatment. The Company will keep the results of health examinations confidential.	- Identification Information - Health Information	Explicit consent of the data subject. (Section 26)
5) To provide information about the Company's products or services to employees by email.	- Identification Information - Contact Information	Explicit consent of the data subject. (Sections 24 and 26)

For Customers:

Purpose	Categories of Personal Data	Legal Basis for Processing Personal Data
1) To provide services and information relating to residential projects in which you are interested.	- Identification Information - Contact Information - Communication Information	1) Necessary for the performance of a service contract. (Section 24(3)) 2) Legitimate Interests of the Company in providing information relating to residential projects in which you are interested. (Section 24(5))
2) To manage customer relationships (Customer Relations) by organising sales promotion activities.	- Identification Information - Contact Information - Communication Information	1) Necessary for the performance of a contract. (Section 24(3)) 2) Legitimate Interests of the Company in recommending residential projects that correspond to customers' needs and collecting statistical information relating to customers' use of the Company's services in order to improve the Company's services. (Section 24(5))
3) To administer the Company's website, improve the Company's services, and resolve technical problems arising from website use.	- Contact Information - Technical Information	Legitimate Interests of the Company in collecting and analysing information relating to your website use in order to plan business development, improve the Company's services, and provide more effective services to customers. (Section 24(5))
4) To analyse information for website development and improve customers' experience in receiving services from the Company.	- Identification Information - Technical Information - Website Usage Information	Legitimate Interests of the Company in identifying target customers, analysing customers' usage patterns, and improving the website to enhance customers' website experience. (Section 24(5))
5) To enter into contracts relating to the purchase and sale of real property.	- Identification Information - Contact Information - Contract Information	Necessary for the performance of a contract. (Section 24(3))
6) To contact customers and submit information to banks in order to facilitate mortgage applications.	- Identification Information - Contact Information	Necessary for the performance of a contract relating to a mortgage application. (Section 24(3))



Purpose	Categories of Personal Data	Legal Basis for Processing Personal Data
	- Contract Information	
7) To conduct direct marketing by presenting residential projects or services in which you may be interested (only where you have given consent).	- Identification Information - Contact Information	The Company will obtain your consent before using your personal data for direct marketing to present residential projects or services in which you may be interested. (Section 24)
8) To provide residential project juristic person management services after you have purchased a residential project from the Company.	- Identification Information - Contact Information - Communication Information	Necessary for the performance of a contract to provide juristic person management services where you are a party to a contract with the Company. (Section 24(3))

The Company will not use your personal data for any purpose other than those specified above, except where the Personal Data Protection Act B.E. 2562 (2019) permits such processing, such as where it is necessary for compliance with legal obligations, the establishment, exercise, or defence of legal claims, or the prevention or suppression of danger to a person's life, body, or health.

7. Disclosure of Personal Data to External Parties

7.1 The Company may disclose or share your personal data with external parties as follows:

- Service Providers: Information technology service providers, call centres, banks, credit card service providers, legal advisers, delivery service providers, and printing service providers.
- Business Partners: The Company may enhance its services by sharing your personal data with its business partners to review, analyse, and link personal data in order to analyse your needs so that the Company can provide offers and promotions that correspond to your needs. You may notify the Company's representative responsible for processing personal data if you do not wish the Company to process your personal data for this purpose.
- Relevant Government Agencies: The Company may disclose your personal data to relevant government agencies where required by law or to comply with legal investigation procedures. The Company will disclose such personal data in accordance with applicable legal requirements.

7.2 The Company requires all external parties to whom it discloses or transfers your personal data, as described above, to maintain the confidentiality and security of your personal data in accordance with the standards prescribed under Thailand's personal data protection laws. Such parties may process your personal data only for the purposes specified by the Company or as instructed by the Company. They are not permitted to use your personal data for any purpose other than those specified by the Company.

7.3 The Company may disclose your personal data to relevant authorities where required by law, including where necessary to prevent threats to life or bodily harm, to comply with legal obligations, to establish, exercise, or defend



legal claims, or to prevent fraud.

8. Cross-border Transfer of Personal Data

The Company may transfer your personal data to persons/organisations located outside Thailand where personal data protection standards may differ from those of Thailand. To ensure that your personal data is protected effectively, the Company will implement appropriate measures for the cross-border transfer of personal data to such persons/organisations.

Where personal data is transferred to countries whose personal data protection standards are not equivalent to those of Thailand, the Company will implement appropriate safeguards, including adequate personal data protection measures and standard contractual clauses in accordance with the Personal Data Protection Act B.E. 2562 (2019).

9. Personal Data Security Measures

The Company implements technical and organisational measures in accordance with applicable laws, particularly Section 37 of the Personal Data Protection Act B.E. 2562 (2019), to protect personal data against intentional or negligent destruction, loss, alteration, unauthorised access, use, or disclosure, and to prevent other potential risks. The Company has implemented technical measures, such as firewalls, and organisational measures, such as encryption systems or other physical security measures, to maintain the confidentiality of personal data and ensure the security of the system in accordance with the nature of the services provided. For the transmission of credit card information for payment, the Company uses the Secure Sockets Layer (SSL) protocol and encryption technology to protect and maintain the security of such personal data.

10. Retention Period for the Collection, Use, and/or Disclosure of Personal Data

- The Company retains your personal data only for as long as necessary to fulfil the purposes of providing the Company's services and in accordance with the retention periods prescribed by accounting standards, legal requirements, and other applicable regulations.
- In determining the retention period for personal data, the Company considers the amount of data, the nature of its use, the purposes for which the services are provided, the sensitivity of the personal data, the potential risks arising from unauthorised use or disclosure of personal data, and the retention periods prescribed by applicable laws.
- Personal data collected through cookies when you access the Company's website will be retained for the period prescribed by applicable laws.

11. Cookies

The Company uses cookies and similar tracking technologies on the Company's website. You can learn more about the Company's use of cookies and configure your cookie settings through the pop-up window displayed before you access the website. The Company uses cookies for the following purposes:



- **Functionality Cookies:** The Company uses this type of cookie to remember information about your device or web browser, enabling the Company to provide content that better matches your individual interests and to make its services and platforms more convenient and useful to you. To disable these cookies, you can follow the instructions provided in the help function of your browser or device.
- **Analytical Cookies:** The Company uses analytical cookies provided by third-party service providers to collect information about how visitors use the Company's website. The Company anonymises all information collected (Anonymization) before disclosing such information to third parties that process personal data as permitted by law. Such third parties will not combine the information collected from the Company's website with any other information already held by them. You may choose whether to allow the use of these cookies through the cookie settings available on the Company's website.

12. Your Rights as a Data Subject

As the owner of your personal data, you have the right to request that the Company take action in relation to your personal data to the extent permitted under the Personal Data Protection Act B.E. 2562 (2019), as follows:

1. **Right to Withdraw Consent:** You have the right to withdraw your consent to the processing of your personal data at any time while your personal data is retained by the Company.
2. **Right of Access:** You have the right to access your personal data and request that the Company provide you with a copy of such personal data. You may also request that the Company disclose how your personal data, which you did not consent to the Company obtaining, was obtained.
3. **Right to Rectification:** You have the right to request that the Company correct inaccurate personal data or complete incomplete personal data.
4. **Right to Erasure:** You have the right to request that the Company erase your personal data on grounds permitted by law.
5. **Right to Restriction of Processing:** You have the right to request that the Company restrict the processing of your personal data on grounds permitted by law.
6. **Right to Data Portability:** You have the right to request the transfer of the personal data that you have provided to the Company to another data controller or to yourself on grounds permitted by law.
7. **Right to Object:** You have the right to object to the processing of your personal data on grounds permitted by law.

If you wish to exercise any of the rights described above, you may contact the Company's Data Protection Officer directly at Email: dpo@proudrealestate.co.th

To protect the confidentiality of your personal data, the Company needs to verify your identity before responding to your request. Where the Company has doubts regarding your identity, the Company may request that you provide copies of identification documents, such as your national identification card or passport, together with your request. The Company will process your request and notify you of the outcome as soon as practicable.

You have the right to lodge a complaint with the Office of the Personal Data Protection Committee.



13. Policy Review

The Company may revise this Privacy Policy to ensure that it remains appropriate and effective. The Company recommends that you review this Privacy Policy regularly.

14. Contact Details of the Company / Data Protection Officer

If you have any questions regarding this Privacy Policy, you may contact the Company's Data Protection Officer at:
Proud Real Estate Public Company Limited

Email: dpo@proudrealestate.co.th

Telephone: 020350999

Address: Proud Real Estate Public Company Limited, 900 Tonson Tower, 6th Floor, Ploenchit Road, Lumpini Subdistrict, Pathum Wan District, Bangkok 10330

Effective as of 1 May 2023.

Approved by

A handwritten signature in blue ink, appearing to read "Pumipat", written in a cursive style.

(Mr. Pumipat Sinacharoen)
Authorised Director

Proposed by Mr. Kornwara Sai-intr (VP of Business Process Improvement and Information Technology)