

Data Privacy Policy

Sap Udom Property Co., Ltd. (the “Company”) realizes the importance of the protection of personal data, in accordance with the Personal Data Protection Act B.E. 2562 (the “Personal Data Protection Act”)

The Company, as the Data Controller, has the responsibility to inform you about its Personal Data Privacy Policy, which entails the collection, storage, use, and disclosure of your personal data, and has a duty to ensure that all operations comply with the Personal Data Protection Act and relevant laws, announcements, regulations, and rules. You can be assured that your personal data is protected by law.

1. Definitions

- 1.1. **Personal Data** means any information enabling the identification of the person, either directly or indirectly. It is the information that you provide to the Company either in writing or electronically, including your name, surname, address, email address, national identification number, passport, telephone number, etc.
- 1.2. **Sensitive Personal Data** means any information that is specially protected and hence requires careful measures to collect, store, use, and disclose. This includes personal data related to ethnic and racial origin, political opinion, cult, religious and philosophical belief, sexual behaviour, criminal records, health data, disability, trade union information, genetic data, biometric data, and photos and videos.
- 1.3. **Data Subject** means an individual about whom the Company collect, store, use and disclose personal data. The Data Subject can be a client, an employee, a business partner, a service provider, or a company stakeholder.
- 1.4. **Data Controller** means a natural person or a juridical person who has the authority to make decisions regarding the collection, storage, use, and disclosure of data.
- 1.5. **Data Processor** means a natural person or a juridical person who performs actions such as collecting, storing, using, and disclosing personal data on behalf of the Data Controller.
- 1.6. **Data Protection Officer** means a person who is assigned by the Company to provide care to personal data, and take actions related to the rights of the Data Owner as listed in 9.

2. Personal Data Sources

The Company may obtain your personal data through the four channels:

- 2.1. The Company may receive your personal data directly from you or upon signing of the contract, under the following circumstances:
 - 1) You contact the Company to enquire about its residential project, e.g., you give your personal data directly to the Company to enquire about rooms through the Company's websites : www.sylva-sukhumvit61.com.
 - 2) You make an appointment with the Company to view the Company's residential projects.
 - 3) You give your personal data to the Company when viewing the Company's residential projects.
 - 4) You become the Company's trade partner.
 - 5) You sign contracts with the Company, e.g. rental contract, service contract, employment contract, etc.
- 2.2. The Company may receive your personal data from cookies created to identify you when you visit the Company's websites. They are used by the Company to improve the quality, speed, safety, and privacy of its online platform service. The Company has issued and announced a separate cookies policy comprising the management of cookies settings on its websites, which is part of this Data Privacy Policy.
- 2.3. The Company may receive your personal data such as photos and videos from the internet- connected CCTV cameras installed both inside and outside the buildings. They record images in the Company's premises. The Company has also issued a separate CCTV privacy policy, which is part of this Data Privacy Policy.
- 2.4. The Company may receive your personal data from social network platforms, e.g., communications made through LINE Official contact or Email. They contain interaction between you and the Company and service records.
- 2.5. The Company may obtain personal data from its partners such as rental agents to provide services that match customer needs or to prepare for property viewing.

3. Objectives of The Collection, Storage, Use and Disclose Personal Data

The Company may collect, store, use and disclose to third parties your personal data only as necessary to meet the following objectives:

- 3.1. To comply with terms and conditions stated in the contract (e.g., rental contract, service contract, etc): booking a service appointment, carrying out maintenance of the room, cleaning room air conditioners, sending messages and copies of documents through LINE Official Account and email, managing transactions such as receiving rental payments and collecting payments for utility bills, and/or
- 3.2. To comply with relevant laws and orders issued by government officials: notifying the residence for foreigners in accordance with Section 38 of the Immigration Act, filing completed TM.30 forms to the Immigration Bureau, storing employee records including employee registration and payroll in accordance with Section 115 of the Labour Protection Act, and/or
- 3.3. To prevent or stop damage to the life, body, and health of an individual, and/or
- 3.4. To announce information, news, and privileges offered by the Company and sent out invitations to join activities, and/or
- 3.5. To process transactions between you and the Company, which also include the procurement and provision of services, and/or
- 3.6. To ensure security of property, lives, and premises, and secure the Company's benefits as indicated by law, and/or
- 3.7. To improve service and business operation, and/or
- 3.8. To facilitate business transactions in response to your requests, queries, and suggestions
- 3.9. Under the following circumstances 3.9 (1)-(4), the Company may collect, store, use and disclose your personal information to third parties only as necessary before or after making a legal contact.

1) You visit the residential projects, where you made contact the Company through the website

If you visit the residential projects or submit your personal data when contacting the Company through the website : www.sylva-sukhumvit61.com, the Company may collect, store, use, and disclose your personal information only as necessary to communicate with you before and after visiting the residential projects, answer to your queries or offer rooms suitable for your needs.

2) You pay the deposit and rent properties of the Company’s project.

If you pay the deposit or rent Company’s properties, the Company may collect, store, use, and disclose your personal information only as necessary for the purpose of reserving the property, making contracts (e.g., rental contract, etc.), and sending out satisfaction surveys to evaluate customer needs in order to develop better residential experiences and customer service experiences now and in the future.

3) Job Applicant

If you are applying for jobs in the Company, the Company may collect, store, use and disclose your personal information only as necessary to Mekfah Development Co., Ltd, the Company’s subsidiary, to offer more job opportunities to you.

4) Trading Partner/ Rental agents

If you are a Company’s trading partner, or letting agent that find tenants to rents properties of Sap Udom Property Co., Ltd, the Company may use your personal data to send information to you, and/or develop positive relationship with trading partners and/or letting agents under the Company’s rules and regulations.

4. Types of Personal Data Collected by Company and Objective of Data Processing

4.1. The Company will collect your personal data only as needed for the purposes of service provision and contract signing as stated in Section 24(3) of the Personal Data Protection Act.

The Company will never request unnecessary personal data from you. Personal data collected by the Company can be categorized into the following types:

Table: Categorization of Personal Data Collected by the Company

Types of Personal Data	Details
Contact Data	e.g., name-surname, address, email, telephone number
Technical Data	e.g., IP address, type of internet browser, location, operation system, platform of device used to access the Company’s website.

Usage Data	e.g., websites visited before accessing the Company's platform, visited webpages, time spent on each webpage, information searched on the website, access date and time, browsing history
Communication Data	e.g., email, conversation records, communication
Contract-Related Data	e.g., national ID number, passport, address, date of birth (date-month-year)

4.2. The Company also provides details of activities in which personal data is used. The types of data and objectives of data processing are indicated below.

Table: Use of Personal Data in the Company's Activities

Activities	Types of Data	Objectives of Data Processing
1) to provide services and give information about interested residential projects to you	<ul style="list-style-type: none"> – Contact Data – Communication Data 	<ul style="list-style-type: none"> - To ensure compliance with contracts signed between you and the Company (e.g., rental contract, service contract, etc.) - To respond to your queries and offer rooms that match your needs.
2) to manage customer relationship	<ul style="list-style-type: none"> – Contact Data – Communication Data 	<ul style="list-style-type: none"> - To ensure compliance with contracts signed between you and the Company (e.g., rental contract, service contract, etc.) - To provide recommendations on residential projects based your needs, collect data and conduct customer

		research to improve the Company's service.
3) To manage Company's website in order to improve its service and solve technical problems on the websites.	<ul style="list-style-type: none"> - Contact Data - Communication Data 	- To use your personal info together with website usage statistics to develop more effective business plans
4) To develop website and improve customer service.	<ul style="list-style-type: none"> - Technical Data - Usage Data 	- To improve website user experience
5) To make rental contracts	<ul style="list-style-type: none"> - Contact Data - Contract-Related Data 	- To ensure compliance with contracts signed between you and the Company (e.g., rental contract, service contract, etc.)
6) To contact the government units, e.g., notifying residence of foreigners to the Immigration Bureau	<ul style="list-style-type: none"> - Contact Data - Contract-Related Data 	- To ensure compliance with laws
7) To manage the housing estate juristic person and other property-related services	<ul style="list-style-type: none"> - Contact Data - Communication Data 	<ul style="list-style-type: none"> - To ensure compliance with contracts signed between you and the Company (e.g., rental contract, service contract, etc.)

5. Storage Limitation

5.1. The Company will collect personal data such as contact data, communication data, technical data, usage data, and contract-related data only as necessary

to fulfil the objectives stated in this Data Privacy Policy throughout the duration of the contract signed between you and the Company (e.g., rental contract, service contract, employment contract, etc). Company will retain your personal data for a specific period from the date of termination of the contract, which vary according to the prescription periods set by relevant laws, in other words the period required by law to retain the personal data. Copies of passport will be kept for ten years. Accounting documents will be kept for five years from the end of the accounting period. VAT records will be kept for five years after filing a VAT return or issuing a VAT report (on a case-by-case basis). Employee registration documents will be kept for no less than two years after the end of the employment contract. However, the Company may need to retain personal information after the prescription period under certain circumstances such as when the litigation process takes place.

5.2. The Company will store documents of your personal data in the location appropriate to the type of the data. It can be stored on paper or in electronic devices. The Company will comply with the security measures of personal data stated in this Data Privacy Policy.

6. Personal Data Security Measures

6.1. The Company has established policies, regulations, and guidelines to protect personal data, such as the security standards for ICT and the measures to protect personal data against loss, unauthorized access or disclosure, use or disclosure for any purpose that is different from the objectives, misuse, modification of personal data, and destructive cyberattacks. Also, the security measures such as encryption and the limitation of access are applied to ensure that only authorized people can have access to personal data. They will be trained to become aware of the importance of personal data protection.

6.2. The Company will put in place appropriate security measures and regulations to control personal data, in order to prevent against loss and access, use, change, modification, and disclosure by an unauthorized person. The Company will revise security measures when needed to ensure that data is secured in response to technological change.

6.3. The Company ensures that staff, representatives, and personal data recipients keep the data confidential and handle the data securely according to the Company's policy.

6.4. The Company will destroy or delete your personal data after the retention period (*see* 5.) or when there exists no legal ground to retain your personal data. The method used to destroy the data depends on the storage method. Printed paper will be destroyed by the shredder. Personal data kept in devices

or recording devices will be permanently deleted. Measures will be applied to ensure that that deleted data is neither any longer recoverable nor accessible.

7. Cookies Policy

Cookies are text files stored in your computer which record information about your internet usage or visit to websites. The Company will use information from cookies to provide better, faster, and safer service and protect your privacy when visiting our website. The following cookies will be used by the Company:

- 7.1. **Essential Cookies:** These are cookies essential for the operation of the website, e.g., safety, identity verification, and system management. These cookies cannot be disabled.
- 7.2. **Marketing Cookies:** The Company will use marketing cookies to monitor the effectiveness of advertising and public relations, in order to offer you services that match your interest. These types of cookies will be disabled by default. You can enable them by browsing through the help topics in your browser.
- 7.3. **Functionality Cookies:** Company will use functionality cookies to remember your device and browser so as to adjust settings including username and language accordingly, and to deliver information relevant to your preference and interest in a timely manner. This will make the service more convenient and user-friendly. Functionality cookies will be disabled by default. You can enable them by browsing through the help topics in your browser.
- 7.4. **Analytic Cookies:** Company will use this type of cookies to analyze the website traffic, which will be used as guidelines to advertise services on the social media. Analytic cookies will be disabled by default. You can enable them by browsing through the help topics in your browser.

8. Disclosure to the Third Part or External Organizations

The Company will never disclose your personal information to external third parties or other organizations unless it receives consent from the Data Owner, or has contractual commitments or legal obligations to do so. In this stance, the Company may need to disclose personal information to the following natural person, the juristic person, and entities:

- 8.1. Those who have service obligations to the Company: account auditing, accounting, providing legal advice, collecting rental and service fees, conducting building maintenance.
- 8.2. Governmental organizations, the Government and any other entities recognized by law. This is to ensure compliance with laws and orders, requests as well as collaboration with other agencies such as Immigration Bureau, The Revenue Department and the Ministry of Labour in legal matters.

9. Rights of The Data Subject

As Data Subject, you are entitled to:

- 9.1. Access and request copies of your personal data
- 9.2. Edit and modify personal data collected by the Company
- 9.3. Object to the Company collecting, storing, using, and disclosing personal data.
- 9.4. Request the Company, as Data Controller, to suspend the use of, delete, destroy, or anonymize personal data.
- 9.5. To withdraw consent for any personal data that are collected, stored, used, and disclosed by the Company. However, this may affect your benefits stated in contracts and agreements signed between you and the Company (to be determined on a case-by-case basis).

You may exercise your rights by contacting the Company's Data Protection Officer through the channels stated in 12.

10. Legal Compliance

The Company has developed this Data Privacy Policy in line with Personal Data Protection Act B.E. 2562, and relevant laws, announcements, and regulations. These are rules that the board and staff need to comply.

11. Modification of The Policy

The Personal Data Privacy Policy was last amended and put into effect on 1 June 2022. The Company reserves the rights to change the Policy on an occasional basis in compliance with the Personal Data Protection Act. Any modification will be publicized on the Company's websites as mentioned in 12.

12. Data Protection Officer's Contact Details

If you wish to exercise your rights regarding the Personal Data Protection Act or enquire about the Data Privacy Policy, you can contact the Data Protection Officer of Sap Udom Property Co., Ltd. from 09.00 am. – 06.00 pm. daily through the following channels:

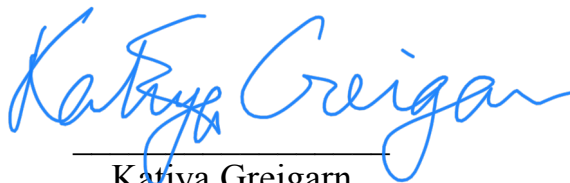
12.1. Greenery Place Sukhumvit 61

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

12.2. Sylva Sukhumvit 61

Postal Address: 17, Soi Sukhumvit 61,
Klong Tan Nuea, Watthana, Bangkok 10110
Telephone Number: 02-714-0444
Email: sylva.sapudom@gmail.com
Website: www.sylva-sukhumvit61.com

LINE Official Account: @153qkmnr



Katiya Greigarn
Managing Director
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