



PPP GREEN COMPLEX

Privacy Notice for the Use of the Visitor Management System

(VMS Privacy Notice)

PPP Green Complex Co., Ltd.

PPP Green Complex Co., Ltd. (hereinafter referred to as the "Organization") is operating a Visitor Management System (VMS) to record personal data for retrospective reference purposes in order to track and protect life, health and property. The Organization collects personal data of officers, operators, customers, employees, contractors, visitors, or any person (hereinafter collectively referred to as "you") who enters the premises through the use of the said Visitor Management System (VMS).

This Privacy Notice for the Use of the Visitor Management System (VMS) ("Notice") provides information regarding the collection, use, or disclosure of data that can identify you ("Personal Data") as well as your rights, as follows:

1. Legal Basis for Processing Personal Data

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

- Necessity to prevent or suppress danger to life, body, or health of you or other persons.
- Necessity for the legitimate interests of the Organization or other persons, where such interests are not less important than your fundamental rights in personal data.
- Necessity to comply with relevant laws governing safety and the work environment, and the Organization's property.

2. Purposes of Your Personal Data Collection

The Organization collects your personal data for the following purposes:

1. To protect your personal health and safety, including your property.
2. To support relevant authorities in law enforcement for deterrence, prevention, investigation, and legal proceedings.
3. To assist in dispute resolution arising during disciplinary or grievance processes.
4. To assist in investigation processes or complaint referral processes.
5. To assist in initiating or defending civil proceedings, including but not limited to employment-related legal actions.

3. Personal Data Collected and Used by the Organization

In accordance with the purposes stated in Section 2, the Organization installs the Visitor Management System (VMS) at Guard Post 1, and will place warning signs indicating the presence of the Visitor Management System (VMS) at the entrance and exit of Guard Post 1, as well as areas the Organization deems necessary to monitor, in order to collect your personal data when you enter the premises, as follows:

Categories of personal data collected:

- Still image (identification card)
- Name – Surname
- Vehicle registration number

In the event that you provide a copy of your national identification card which contains sensitive personal data such as religion and blood type, the Organization generally has no intention of collecting and using such religion and blood type data appearing on your national identification card copy for any specific purpose. If you provide a copy of your national identification card to the Organization, please redact such information; or if you have not done so, it shall be deemed that you authorize the Organization to redact that information, and the document with such redaction shall be fully valid and legally enforceable. However, if the Organization is unable to redact the information due to certain technical limitations, the Organization will collect and use such data solely as part of your identity verification document.

4. Disclosure of Your Personal Data

The Organization will keep the data in the Visitor Management System (VMS) relating to you confidential and will not disclose it, except where the Organization finds it necessary to achieve the monitoring and surveillance purposes set out in this Notice. The Organization may disclose the VMS data to the following categories of persons or entities:

1. Competent authorities as required by law, in order to assist and support law enforcement, or for investigation, inquiry, or legal proceedings.
2. Third-party service providers, as necessary to ensure the prevention or suppression of danger to the life, body, health, or property of you or other persons.

5. Your Rights under the Personal Data Protection Act B.E. 2562 (PDPA)

The Personal Data Protection Act B.E. 2562 (PDPA) aims to give you greater control over your personal data. You may exercise your rights under the PDPA when the provisions relating to data subject rights become effective, as detailed below:

1. The right to access, receive a copy, and request disclosure of the source of your personal data that the Organization holds, except where the Organization has the right to refuse your request under law or court order, or where your request would have an impact that may cause damage to the rights and freedoms of other persons.
2. The right to request rectification of your personal data that is inaccurate or incomplete, so that it is accurate, current, complete, and not misleading.
3. The right to request restriction of the use of your personal data in any of the following cases:
 - 3.1 When the Organization is in the process of verifying your request to rectify your personal data to be accurate, complete, and current.
 - 3.2 Your personal data has been collected, used, or disclosed unlawfully.

3.3 When your personal data is no longer necessary for the retention purposes as notified by the Organization, but you wish the Organization to continue retaining such data for the purpose of exercising your legal rights.

3.4 When the Organization is in the process of proving legitimate grounds for the collection, use, or disclosure of your personal data, or examining the necessity for the collection, use, or disclosure of your personal data for public interest, arising from your exercise of the right to object to the collection, use, or disclosure of your personal data.

4. The right to object to the collection, use, or disclosure of your personal data, except where the Organization has legitimate grounds to refuse your request (e.g., the Organization can demonstrate that the collection, use, or disclosure of your personal data has grounds that override your rights, or for the establishment, exercise, or defense of legal claims, or for public interest in accordance with the Organization's mandate).

6. Personal Data Retention Period

To achieve the monitoring and surveillance purposes via the Visitor Management System as set out in this Notice, the Organization will retain personal data in the VMS relating to you for a period of 1 (one) year from the date the data was recorded by the officer, in accordance with the applicable retention period under relevant laws, regulations, and practices. The data is stored in the Organization's computer systems. Upon expiry of such retention period, the Organization will delete and destroy your personal data.

7. Personal Data Security Measures

The Organization has implemented appropriate personal data security measures, both technically and administratively, to prevent loss or unauthorized access, deletion, destruction, use, alteration, modification, or disclosure of personal data, in accordance with the Organization's Information Security Policy.

In addition, the Organization has established a personal data protection policy, announced organization-wide, together with guidelines to ensure security in the collection, use, or disclosure of personal data, maintaining Confidentiality, Integrity, and Availability of personal data. The Organization reviews such policy and this Notice periodically as appropriate.

8. Responsibilities of the Data Controller

The Organization has designated that only authorized personnel with responsibilities relevant to the collection, use, or disclosure of personal data for this processing activity shall be permitted to access your personal data. The Organization will ensure that such personnel strictly comply with this Notice.

9. Amendments to the Privacy Notice

In updating or amending this Notice, the Organization may make changes as it deems appropriate and will notify you via www.pppgc.co.th with the date of the latest version indicated at the end. Nevertheless, the Organization recommends that you regularly check for any new notices, particularly before entering the Organization's premises. Your entry into the premises shall constitute acknowledgement of the terms of this Notice. Please refrain from entering the premises if you do not agree with the terms of this Notice. If you continue to enter the premises after this Notice has been amended and published through the above channel, you shall be deemed to have acknowledged such changes.

10. Contact Information

You may contact us regarding this Notice at:

1) Data Controller

- Name: PPP Green Complex Co., Ltd.
- Address: 321 Moo 5, Chang Raek Sub-district, Bang Saphan Noi District, Prachuap Khiri Khan Province 77170
- Tel (Head Office): +66 32 909 611
- Email: info@pppgc.co.th

2) Data Protection Officer (DPO)

- Address: 321 Moo 5, Chang Raek Sub-district, Bang Saphan Noi District, Prachuap Khiri Khan Province 77170
- Tel (Head Office): +66 32 909 611
- Email: dpo@pppgc.co.th

Example — VMS Notice sign to be posted at the location where the Visitor Management System is installed, to inform data subjects before entering the area: