

Notice of Processing on Personal Data

(For Potential Buyer/ Buyer/ Residence Owner)

Dusit Thani Public Company Limited (“**Dusit**”), as a controller of Personal Data, is bound by Personal Data Protection Act B.E. 2562 (2019) (“**PDPA**”). In processing¹ individual’s Personal Data, Dusit is required to comply with PDPA, including the obligation to notify the data subject of his legal rights pursuant to this document, and for certain cases, obtaining consent from data subject.

1. Collection of Personal Data

Dusit may collect Personal Data directly and indirectly from data subject, his representative or other related persons, through Dusit’s business partners, other businesses in Dusit Group, Dusit’s phone services and digital services (including website and application) as well as other reliable sources (such as association, governmental organization, governmental body, private organization, seminars, training workshops, exhibitions) organized either by Dusit, governmental or private sector including social media.

2. Types of Personal Data Collected

- Full name, email address, postal address, telephone, nationality, place of work, work history, copy of ID card/passport, proof of address, mortgage details
- Payment information (such as a credit and debit card) and bank account details, financial information, bank statements, payslips or income details, confirmation of income
- Recordings when you call our customer service line,
- Any other documents deemed relevant when buying, selling, letting or renting a property
- Details of anyone Authorized to act on your behalf if applicable

¹ Processing means any operation which is performed on Personal Data, such as collection, recording, organisation, storage, alteration, use, disclosure, forward, dissemination or otherwise making available

- monitor, record, store and use any telephone calls, CCTV recordings, email or other communication you provide
- Name and contact details of a guarantor
- Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

3. Retention Period

Dusit will retain your Personal Data as long as it is necessary for the purpose of data processing. After that, Dusit will erase and destroy your Personal Data except as may be required, by applicable laws, or for protection of our interest. In general, your Personal Data will be kept for a maximum period of 10 years or otherwise longer if it is specifically provided by law.

4. Purposes of Use and Disclosure

Dusit will use and disclose your Personal Data for the following purposes:

- Selling properties (either freehold or leasehold)
- Set up your user account
- Notify you of the sales/letting process
- To detect, investigate and report financial crime (e.g. Fraud)
- Check anti-money laundering
- Marketing communications to inform you of special offers, promotions, new lines and Sales. Provide you with online advertising
- Notify you about enhancements to our services, such as changes to the website and new services that may be of interest to you

- Contact you to undertake customer satisfaction surveys, invite you to provide product reviews or for market research
- Maintain network and data security
- Manage property i.e. housing, tenancy/lease and account on behalf of property owner
- Organise and assist community events
- Check any instructions given to us, for training purposes, and to improve the quality of our customer service
- Support any alteration/reparation made to the property you are living in
- Settle any arrears payments such as rent or other expenses
- Provide welfare, benefits and debt advice
- Proceed with a residential sale or purchase
- Keep in touch with customers to understand the needs and preferences
- Invite customer to events
- To process and perform our obligations under our contract with customer including:
 - (a) Manage payments, fees and charges
 - (b) Collect and recover money owed to us
- Detect and prevent fraud
- Comply with applicable laws that require us to process certain Personal Information
- Comply with inspection, analysis and preparation of documents upon request of governmental organizations and regulatory bodies

- Protect the health of residence
- Ensure the safety and security of residence

In the case where Dusit appoints third party service provider(s) to process your Personal Data, Dusit will process your Personal Data for the purposes of performing Dusit's contractual obligations, compliance with legal obligations, based on Dusit's legitimate interests or based on your consent (if necessary). Dusit will not disclose or permit the disclosure or make available your Personal Data other than in accordance with the relevant ground unless a prior consent of data subject has been given to Dusit or PDPA allows Dusit to do so without obtaining consent from data subject.

If any data subject could not share Personal Data necessary for Dusit to process Personal Data based on the ground specified above, Dusit will not be able to perform its contractual obligations with such subject matter nor able to comply with legal obligations.

Dusit will process Personal Data in strict compliance with applicable laws. In case where you have given a consent to any data processing activity, you may withdraw your consent at any time.

5. Disclosure

Dusit will not disclose your Personal Data without any legal basis. Your data may be disclosed or transferred to governmental organizations, governmental bodies or third parties including:

- **Service Providers/Vendor:** We may share your Personal Information to our third-party service providers, subcontractors and other associated organisations for the purposes of carrying out a task in accordance to the contract we have in place with you. However, when we share your Personal Information with third parties, we disclose only the Personal Information that is necessary to deliver the service and we have a contract in place that requires them to keep your Personal Information secure and only for the duration it is required to carry out that specific task. Such third-party companies may fall under the following categories; referencing companies, deposit protection, cleaning, inventory, maintenance, building management etc.

We work closely with various third-party vendors to bring you a range of quality and reliable products and services designed to meet your needs. When you enquire about or purchase one or more of these products, the relevant third-party vendors will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your data and therefore we advise you to read their privacy notice. Such third-party companies may fall under the following categories; utility providers, mortgage providers, tax consultants, furnishing, financial advisors, rent protection, content protection, etc.

- **Business Partners:** As allowed by applicable law, we disclose Personal Information with select Business Partners who provide goods, services and offers for the purposes described in this Notice
- **Government Authorities:** We may share Personal Information to relevant government authorities to fulfill any legal obligations and/or requirement we may have. We may also share the Personal Information to relevant government authorities in order to fulfill our contractual obligation such as the local authorities for certain permissions and/or registrations.
- **Financial Institutions:** We may share Personal Information to any financial institutions, charge or credit card issuing companies, credit information or reference bureau, or collection agencies necessary to establish and support the payment of any services being requested. Personal data may also be disclosed to any person or persons that have a right under local law to gain access to such information provided they are able to prove their authority to access such information.

Dusit will disclose your Personal Data to the recipient outside of Thailand only where it is permitted by PDPA or other applicable laws.

In the event where Dusit is required to disclose your Personal Data to a third party, Dusit will follow appropriate procedures to ensure that the third party will properly handle your Personal Data in order to prevent data loss, unauthorized access, improper use, modification, disclosure or processing.

6. Data Security Measure

Dusit adopts the high-standard security system in both technology and procedures to prevent

any possible data theft. Dusit implements various measures to protect its computer system (such as Network Firewall, Intrusion Detection, Threat Prevention, URL Filtering, Application Control, Email Security, Server and Endpoint Protection, Secure Socket Layer, Cookies), through substantial investments, effort and human resources as to ensure that Dusit achieves high-standard measures and your personal data remains safe.

Although Dusit makes its best efforts to protect personal data with our technical mechanism along with the management by our personnel to control access and keep personal data against unauthorized access, Dusit cannot always guarantee the security and confidentiality of personal data from every incident that may arise, such as virus threat and unauthorized access. A data subject should regularly keep up with technology news, install personal firewall software to prevent his computer from threat or data theft.

7. Right of Data Subject

In exercising any right under Clause 7, data subject shall comply with criteria and procedures specified in Clause 8 of this document. However, the rights specified in this Clause are subject to change as the relevant law may be amended from time to time by the government. Dusit will inform you about the changes.

7.1 Right to be notified: if Dusit wishes to collect, store, use or disclose your Personal Data in any manner beyond the intended purposes or your given consent, Dusit will notify and/or seek your prior consent with respect to such additional scope.

7.2 Right to Access to your Personal Data: You may request for a copy of your Personal Data and request to disclose about the source of your Personal Data.

7.3 Rectification of the Personal Data: To ensure that your Personal Data is accurate, up-to-date, complete and not misleading, you may file a request to rectify any of your Personal Data that has been changed by following the procedures specified in Clause 8.

7.4 Right to data portability: In case where it is technically available, you may request to receive your Personal Data in a commonly used or readable by the automatic device or to automatically transfer.

7.5 Right to erasure of your Personal Data: You may request to erase or make your

Personal Data pseudonymised under any of the following circumstances: (a) your Personal Data is no longer needed to be collected, stored, used or disclosed for the intended purposes, (b) you withdraw your consent for your Personal Data to be collected, stored, used or disclosed and Dusit no longer has any legal right to process your Personal Data for the intended purposes, (c) you object to Dusit's processing of your Personal Data, or (d) your Personal Data was processed in contravention of the PDPA.

7.6 Request to suspend the use of your Personal Data: You may request Dusit to suspend its use of your Personal Data in any of the following events:

(1) when Dusit is in the process of verifying certain information for the purpose of rectifying, updating, completing or avoiding any misleading about your Personal Data upon your request;

(2) when your Personal Data is to be erased under Clause 7.5, but you instead request to suspend its use;

(3) when it is no longer necessary to store your Personal Data, but you request Dusit to continue the storage of your Personal Data for establishing legal claims, legal compliance, exercise of legal rights or defenses; or

(4) when Dusit is in the process of verifying its legitimate rights in its data collection or processing for purposes specified by law.

7.7 Right to object the processing of Personal Data: You may object to the collection, storage, use or disclosure of your Personal Data in any of the following events:

(1) In case where your Personal Data was collected by Dusit for the purpose of (a) Dusit's compliance with a governmental order or (b) any legitimate interest of Dusit or other legal entity;

(2) In case where Dusit has processed your Personal Data for the purpose of direct marketing; and

(3) In case where Dusit has processed your Personal Data for any research purposes as specified in relevant laws, including for statistical purpose.

7.8 Right to withdraw consent: You may withdraw your consent at any time. Your withdrawal will not have any effect on Dusit's previous data processing. If your withdrawal will affect

any part of your Personal Data, Dusit will notify you of such effect at the time you make such withdrawal.

However, Dusit may deny your request to withdraw consent if the processing is for the purpose of, or for complying with, applicable law or court order, the withdrawal may adversely affect and harm the rights and freedom of the data subject himself or other people, the processing is for research purposes that has appropriate protection for Personal Data, or the processing is for establishing legal claims, legal compliance, exercise of legal rights or defenses.

8. Criteria and Procedures for Exercise of Your Rights

1	<ul style="list-style-type: none">▪ If you wish to exercise your right, please submit your request via e-mail at customerservices@dusit.com▪ Alternatively, you may contact our Data Protection Officer at the following: Dusit International 319 Chamchuri Square Building 29th Floor, Phayathai Road, Pathumwan, Bangkok 10330, Thailand Tel: 02200-9999 Ext 3662 e-mail: dpo@dusit.com▪ Please mark as “Personal Data Request from a Guest” with your first name, last name and contact information.
2	<ul style="list-style-type: none">▪ Your request will be sent to Dusit’s data protection officer for verification of your identity. We will require you to produce some form of photo identification (copy of a government-issued identification with signature, passport, driver’s license or Student ID Card), home or business address, phone number, information of your stay with Dusit Hotels & Resorts, and details of products purchased. You will also be asked to sign a request form.
3	<ul style="list-style-type: none">▪ The data protection officer will consider your request by considering various factors such as its legitimate reasons, its negative effect on a third party etc. and whether the PDPA provides for any exemptions.
4	<ul style="list-style-type: none">▪ If your request is approved, the data protection officer will proceed and report

	the result to you without delay via the channel you have specified in your request.
5	<ul style="list-style-type: none"> ▪ If your request is denied, the data protection officer will notify you with explanation without delay via the channel you have specified in your request. You may make an appeal to the authority as prescribed by the PDPA which Dusit will inform you in Dusit's notification of such denial.

Remark:

1. The procedures above will take no more than 30 (thirty) days following the receipt of your request and all supporting documents.
2. Dusit's process will not incur any costs to you. But if there is any cost, Dusit will notify you prior to taking any action.

9. Contact Information

If you have any questions relating to an exercise of your rights or your given consent, you may contact us at:

Name: Suwat Itsarothaikul (Data Protection Officer)

Address: Dusit International,

319 Chamchuri Square Building, 29thFloor,

Phayathai Road, Pathumwan,

Bangkok 10330, Thailand

Telephone: 02200-9999 Ext 3662

E-mail: dpo@dusit.com