

EASTERN STAR REAL ESTATE PUBLIC COMPANY LIMITED

Subject: Privacy Policy	
Effective Date: 1 June 2022	Revision No.: 02

1. Principles and Reasons

Eastern Star Real Estate Public Company Limited recognizes the importance of the personal data of customers, partners, employees and related parties entrusted to the Company. The Company uses appropriate methods in the management, protection, and handling of such personal data, in terms of personal data collection, use, disclosure or handling for various purposes including communication, product procurement, service provision, answering questions or complaints, information provision, product and service news notification, as well as promotions offered by the Company or a third party selected by the Company in its business operations.

2. Objectives

2.1 To be used as an operational guideline according to the processes and terms pursuant to the Personal Data Protection Act, B.E. 2562 (2019), for example, for giving consent, data management to support the exercising of data subject rights, as well as the collection, use and disclosure of personal data, in order to comply with the operational guidelines in the privacy policy for customers, employees and related parties.

2.2 To inform employees, customers, partners and related parties about their roles and responsibilities.

2.3 To conduct transactions according to the service users' intentions, for example, if a service user subscribes to receive newsletters and promotions, the Company will collect and use only basic data such as first-last names, emails and telephone numbers for communication, or in case of online booking, the Company will collect and use necessary data for issuing important documents for making reservations.

2.4 To correct and improve the efficiency of the website's functions, create marketing plans, analyze usage data, evaluate service, and improve company products and services.

2.5 To send notifications related to the Company's products and services as well as rights, benefits, and promotions related to said products and services.

2.6 The Company will not use or disclose the personal data of service users unless it is necessary according to the objectives mentioned above or consent has been obtained from the service user or the Company is complying with a court order or law, etc.

3. Definition

Personal data means data related to a person that makes it possible to identify that person, whether directly or indirectly, according to the law on personal data protections.

Electronic transaction service means a service provided to a service user of the Company. There are requirements for the service user to submit a request before committing any actions such as requesting permission or approval, etc.

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Service user means the data subject who is the person using electronic transaction services directly via the Company's website or other services of the Company via electronic means.

The Company means Eastern Star Real Estate Public Company Limited

Website means the media for presenting information of Eastern Star Real Estate Public Company Limited which is used on a computer and is a collection of several web pages. This website was created as a marketing channel and to add more channels for communication with customers.

Mobile application means an application for mobile devices such as mobile phones and tablets. The application will help to meet the needs of users and to add more channels for communication with customers.

Cookies means data sent from the website to the computers of visitors of a website while the visitor is accessing the website.

4. Personal Data Collection

4.1 Customers who visit the housing/condominium projects and provide information to the Company via channels such as forms or electronic transaction services for various purposes such as satisfaction surveys, rights reservation, house reservation, creating a contract or other purposes, the Company will collect only data willingly provided by the service user such as first-last name, address, telephone number, email address and other data that are necessary for communication with the customer for reservations, creating contracts, ownership transfers, public relations for new projects, or taking actions as requested by the customer.

4.2 The Company collects the data of employees through the personnel hiring process by the Personnel Department.

4.3 The Company collects the data of all service users through the Company's website and mobile application. Said website or application will collect users' personal data for the purpose of providing services via the Internet such as receiving down payment for a home/condominium unit, registering to reserve the right to purchase a home/condominium unit, or requesting to receive benefits from the Company. Data collected by the Company includes user names, emails, telephone numbers and addresses, etc.

The Company reserves the right to use cookies as tools for collecting data such as the following:

- IP address
- web browser use for access
- visited web pages
- websites that reference the Company's website, etc.

The details of the Cookies Policy are displayed on the Company's website.

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4.4 The Company compiles and collects personal data for the purpose of conducting activities on the website system or in the business of the Company for legitimate purposes of the Company only. Personal data, including both identity and behavioral data of service users, is used for management, participation in competitions, promotions, website system improvement, linked work systems, company product design and development to access target groups, sending newsletters on various occasions, providing information about projects or services on various occasions, and completing the transactions of service users in their use of the website system's services.

5. Personal Data Retention Period

The Company collects only necessary personal data and retains them for only as long as necessary based on the retention period required by law for the establishment, exercise or defense of legal claims according to contract.

6. Personal Data Security

For the benefit of maintaining the confidentiality and security of personal data, the Company has established regulations inside the agency to determine the rights to access or use personal data, whereby employees or related parties must strictly prioritize and act responsibly toward the collection, use, disclosure and protection of personal data collected according to the policy and guidelines for personal data protection.

7. Data Confidentiality Measures

The Company provides a guideline for maintaining data security in terms of technology and work processes. In order to ensure that the personal data of employees, customers and partners are secure, the following measures are used for data protection:

7.1 The personnel hiring process of the Personnel Department collects the data of all employees in the program or application specified by the Company only. Prevention and protection measures are put in place for the security and access of employee data by irrelevant personnel. Furthermore, it is strictly prohibited to disseminate, replicate, modify or do anything related to the personal data of employees without approval or consent from the data subject.

7.2 In the sales, renting and service provision processes, sales employees or representatives are to collect the personal data of customers in the program of application specified by the Company only. In case of documents that are required to be kept for compliance with contracts, they are to be stored in the specified departments only, such as the Finance Department or Legal Department. Furthermore, it is strictly prohibited to disseminate, replicate, modify or do anything related to the personal data of customers outside the Company without approval or consent from the data subject.

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7.3 The Company recognizes the importance of the security of the website system and electronic transaction services via application, and to protect the data of service users from destruction or intrusion by ill-intended or unauthorized individuals, the Company has established measures to maintain the security of the website system and electronic transaction service via application to be in line with the Company's Information Security Policy (Announcement No. 15, Policy and Requirements for the Use of the Information System in the Company).

7.4 The Company may have an agreement with an agency or third party which is a partner, contract partner, business partner or representative who is a distributor, service provider or contractor of the Company for the development of products, services, systems or equipment used to enhance the efficiency of the Company's performance or business operations. Such third party will be informed of the personal data of service users on a limited basis as necessary with consent from the data subject. Moreover, if the Company has hired a third party to handle the personal data of service users, such as to conduct statistical analysis of the website or business activities of the Company, transmission of sales promotion data, etc., the Company will require the contracted third party to maintain confidentiality and security of the personal data of service users and prohibit the use of such personal data for purposes beyond the business of the Company or website activities by specifying this as a clause in the employment contract or document, etc.

8. Data Subject Participation

The Company will disclose the details of personal data when requested by the data subject or the data subject's inheritor of rights, heir, legal representative or legal guardian, whereby the request and usage purposes are to be submitted to the email: info PDPA@estarpcl.com, and the Company will complete this action within 30 days.

If the data subject or the data subject's inheritor of rights, heir, legal representative or legal guardian objects to the collection, accuracy or any actions, such as reporting about personal data alteration or personal data erasure, etc., the Company will also record such objection as evidence.

The Company guarantees that it will not use the personal data of service users it collects for dissemination to third parties for other purposes, unless

- 1) the Company has received consent or approval from the data subject;
- 2) it is for completing a transaction of the service user.
- 3) it is to comply with a legal authority or requirement such as a court order allowing the disclosure of data to a third party, etc.

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9. Data Subject Rights Regarding Personal Data

Data subject rights in this clause refers to the legal rights about which the data subject should be informed. The data subject can request to exercise rights under the provisions of the law and policies stipulated here or as amended in the future, as well as the criteria established by the Company.

9.1 Right to withdraw consent: If the data subject has given consent for the Company to collect, use and/or disclose their personal data (whether their consent was given before or after the effective date of the law on personal data protection), the data subject has the right to withdraw that consent at any time during the period in which their personal data is retained by the Company, unless that right is restricted by law or there is a contract that is benefiting them. The withdrawal of consent may have impact on the data subject. Please study or inquire about the impacts before withdrawing consent for the data subject's own benefit.

9.2 Right of access: The data subject has the right to request access their personal data that is under the responsibility of the Company and request to receive a copy of such data from the Company, as well as request for the Company to reveal how it acquired their personal data by filling out the purposes in the "Request Form for Exercising Data Subject Rights" and attaching related documents, and then sending scans of those documents to the email: info PDPA@estarpcl.com. If the data subject is a current employee or personnel of the Company, they can revise their personal data according to the Company's procedures.

9.3 Right to data portability: The data subject has the right to request to receive their information, in which case the Company will prepare their personal data in a format that can be read or used by an automated device or equipment, and can use or disclose such personal data using automatic methods. Furthermore, the data subject has the right to request for the Company to submit or transfer personal data in the aforementioned format to a third-party data controller when possible by using automatic methods, as well as the right to request to receive the personal data submitted or transferred to the third-party data controller directly, unless this cannot be carried out due to technical reasons.

9.4 Right to object: The data subject has the right to object to the collection, use and/or disclosure of their personal data at any time. If the collection, usage and/or disclosure of their personal data is carried out for necessary procedures under the legitimate interests of the Company or person or other juristic persons within reasonable expectations or for completing public interest missions, and the data subject submits an objection, the Company will continue to collect, use and/or disclose only personal data for which the Company can demonstrate legal reasons that are more important than the basic rights of the data subject or that are necessary for the verification of legal rights, for legal compliance or for defense in a court of law, as the case may be.

9.5 Right to erasure / Right to be forgotten: The data subject has the right to request the erasure, destruction or anonymization of their personal data if the data subject suspects that their

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personal data has been collected, used and/or disclosed illegally or deems that the Company no longer needs to retain the data for the purposes related to this policy or when the data subject exercises the right to withdraw consent or object as stated above.

9.6 Right to restrict processing: The data subject has the right to request for personal data usage to be restricted temporarily if the Company is investigating their request to exercise data rectification or objection rights or in other cases where the Company no longer has the need for the data or is required to erase or destroy the personal data according to the applicable laws but the data subject instead requests for the data processing to be restricted.

9.7 Right of rectification: The data subject has the right to rectify their personal data to ensure that it is accurate, up-to-date and complete and does not cause misunderstanding. If the data subject is a current employee or personnel of the Company, they can rectify their personal data according to the procedures of the Company.

9.8 Right to lodge a complaint: The data subject has the right to lodge a complaint with the relevant legal authorities if they suspect that the collection, usage and/or disclosure of their personal data is a breach or non-compliance with the applicable laws.

10. Data Protection Officer

The Company complies with the Personal Data Protection Act, B.E. 2562 (2019) by appointing a Data Protection Officer (DPO) to inspect operations of the Company that involve the collection, use and disclosure of personal data to be in line with the Personal Data Protection Act, B.E. 2562 (2019) as well as other laws related to the protection of personal data.

11. Channels to Contact the Company

If you have any questions or wish to inquire about additional details regarding the protection of your personal data, please contact the Company via the following channels:

Eastern Star Real Estate Public Company Limited

Address: 898, 5th Floor, Ploenchit Tower, Ploenchit Road, Lumpini, Pathumwan, Bangkok 10330

(1) Sales Office of Eastern Star Real Estate Public Company Limited

(2) Download the Application: STAR FAMILY for both ISO and Android operating systems.

(3) Website: www.estartpcl.com

Contact Number: 091-949-0000

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Address: 898, 5th Floor, Ploenchit Tower, Ploenchit Road, Lumpini, Pathumwan, Bangkok 10330;

Email: info.PDPA@estarpcl.com


12. Privacy Policy Review and Amendments

The Company will review the Privacy Policy at least once a year after the initial announcement and may alter or revise this policy to be in line with legal requirements, changes in the Company's operations, and feedback and opinions from various departments, whereby the Company will announce any changes clearly.

13. Reference Documents

- 13.1 Operational Guidelines for Agreements Between the Data Controller and the Data Processor
- 13.2 Operational Guidelines for Requests to Exercise Data Subject Rights
- 13.3 Operational Guidelines for Managing Requests by Data Subjects
- 13.4 Operational Guidelines for Reporting Personal Data Breaches
- 13.5 Authorization of Rights to Access Data of the Information Department/Personnel and Administration Department
- 13.6 Data Retention by the Data Controller of Each Related Internal Department
- 13.7 Privacy Notice on CCTV Use
- 13.8 Cookies Policy
- 13.9 Other relevant documents (If any)

The Company agrees to ensure the security of personal data and not disclose the personal data of service users to third parties.



(Dr. Torsak Lertsrisakulrat)

Managing Director