

Privacy Notice

N.C. Housing Public Company (“Company”) adheres to ethical business conducts and compliance with applicable legal framework. The Company is aware of your trust in the Company’s products and services and recognizes your need for security in transaction and the handling of your personal data.

For prioritizing your privacy and safeguarding your personal data, the Company, therefore, has set out policies, regulations and rules for the Company’s business providing strict measures in protecting your personal data so that you can be assured that your personal data entrusted to Company will be processed to meet your needs and in accordance with the laws.

1. General Provisions

This Privacy Notice is provided to clarify the details and methods on how company handles the information that we received from you, the purposes for the collection, use, disclosure, and processing, including the retention period of such Personal Data, and your rights as the data subject. As company conducts business in Thailand, the processing of your Personal Data shall therefore fall under the compliance of and is required to comply with Thailand’s Personal Data Protection Laws accordingly.

2. Purposes for the collection, use and disclosure of personal data

2.1 In general, whether you are a Customer, Trade Partner or the Person Having Business Relationship, company may proceed on the Processing of your data.

Purposes	Type of Data	Lawful Basis
For contacting and coordination in relation to the business operation of company	- Contact Information	Legitimate interest basis
For maintaining security in building area, including the exchange of cards for the entry and exit of such area, the recording of videos of the visitors of company or the buildings, by closed-circuit television (CCTV).	- Video, Sound, Image	Legitimate interest basis
For compliance with laws or	- The information being	Legal obligation basis

<p>compliance with court's summon, letter or order of authorities, independent organizations or officers having duties and powers under the laws such as the compliance with a summon, writ of attachment, order of the court, police officers, public prosecutors and government authorities including the reporting or disclosure of information to the shareholders, government authorities or independent organizations such as Energy Regulatory Commission, Ministry of Energy, Revenue Department, Land Department, State Audit Office, the Office of National Anti-Corruption Commission, etc. for compliance with relevant laws.</p>	<p>collected is necessary to meet the requirements of the law or regulatory authorities.</p>	
<p>For the compliance with laws concerning public interest in respect of public health such as health protection against dangerous communicable disease or epidemic which may be contagious or spread into the kingdom.</p>	<p>- The information being collected is necessary to meet the requirements of the law or regulatory authorities. - Health information, Vaccination, Personal health</p>	<p>Legal obligation basis</p>
<p>For the management and administration concerning your health, hygiene and safety.</p>	<p>- Health information, Vaccination, Personal health</p>	<p>Vital Interests</p>
<p>for the safety of entering and exiting the village/building</p>	<p>- Identification Information - Vehicle registration number</p>	<p>Legitimate interest basis</p>

Other than the above purposes, company may further proceed on the Processing of your personal data for the relevant cases as follows:

2.2 In case that you are a Customer, company may proceed on the Processing of your personal data for additional relevant purposes as follows:

Purposes	Type of Data	Lawful Basis
For the benefit in the evaluation, improvement and development of products, the provision of services and relevant sales promotions of company including for surveying satisfaction concerning products and services of company so that they are appropriate and suitable with your requirement.	- surveying satisfaction	Legitimate interest basis
For using as information and supporting documents for any proceeding with banks, financial institutions, Department of Business Development, Revenue Department, Excise Department, Stock Exchange of Thailand, the Office of Securities and Exchange Commission, Metropolitan Electricity Authority, Provincial Waterworks Authority, and other relevant external authorities.	- Contact Information - Bank Account - Other information related to the service - Identification Card (Copied) - House Registration (Copied) - Marriage license - Letter of Spousal Consent - Title deed (Copied)	Legitimate interest basis
To contact, notify, coordinate, announce and collect common services fees	- Contact Information	Legitimate interest basis
For the establishment of a village juristic	- Identification Card (Copied)	Legitimate interest basis
The information will be utilized for the purpose of determining and granting	- Identification Information	Legitimate interest basis

access rights to and from buildings, places, and parking areas		
For emergency communication, in case the need arises to contact you, or in the event of an emergency situation requiring your advice or approval.	- Contact Information	Legitimate interest basis
For conducting a population survey for activities	- Contact Information - Identification Information	Legitimate interest basis
For the purpose of promoting sales, the company may use your personal data, technical and usage information such as IP address, login information, website browsing information, cookie ID, device type used for access, platform settings, and other technologies used for accessing the website, and your profile data, for analysis and presenting you with relevant products or services.	- Contact Information - Technical and usage information	Consent *** The company will request your explicit consent for the company to use your personal data. to analyze and present suitable products or services to you;
For the purpose of direct marketing by the company, for providing information, presenting benefits and promotions through text messages (SMS), telephone, email, social media, and/or other communication channels in case you become a member of the company's various activities, and any other methods agreed upon by you	- Contact Information - Identification Information	Consent *** The company will request your explicit consent for the company to use your personal data for direct marketing.
In order to respond to your inquiries or complaints, and to resolve any issues or disputes arising from your interactions with the company.	- Contact Information - Complaints	Legitimate interest basis

For entering the company's area of responsibility	- Identification Information - Vehicle registration number	Legitimate interest basis
---	---	---------------------------

2.3 In case that you are a Trade Partner, company may proceed on the Processing of your personal data for additional relevant purposes as follows:

Purposes	Type of Data	Lawful Basis
<p>For proceedings in accordance with relevant procedures prior to entering into agreement such as:</p> <ul style="list-style-type: none"> ○ Business Partner registration. ○ Consideration on qualifications of Business Partner. ○ Preparation of information before entering into procurement process such as creating median price, specifying names and details of Business Partners in the internal system of company, etc. ○ The purchase or acceptance of bidding forms, attending the clarification, the presentation concerning procurement works (as the case may be), price bargaining and announcement of the winning bidder. ○ Invitation to bid, bidding, verification of authority, the 	<ul style="list-style-type: none"> - Identification Card (Copied) - Personal Contact Information - Contract - Power of Attorney 	<ul style="list-style-type: none"> - Contractual - Legitimate interest basis

<p>granting or obtaining of authority for submission of bidding documents of the bidders and the consideration on qualifications of company's bidders in accordance with procurement procedures of company including the case that the bidders are the service provider, legal advisor, accounting advisor, business advisor and tax advisor, auditor, financial advisor, financial institution, advisor on accounting and finance system development.</p>		
<p>For the necessity in the conducting of transaction between Trade Partner and company, such as:</p> <ul style="list-style-type: none"> ○ Identity verification, verification of authority, the granting or obtaining of authority including for using as supporting documents for conducting relevant transactions; ○ Proceedings in accordance with rules, regulations and relevant internal procedures company 	<ul style="list-style-type: none"> - Identification Card (Copied) - Personal Contact Information - Contract - Power of Attorney 	<ul style="list-style-type: none"> - Contractual - Legitimate interest basis

<ul style="list-style-type: none"> ○ Consideration, preparation and execution of commercial agreements; ○ The compliance with hiring agreement, service agreement, other commercial agreements and relevant agreements or cooperation between company and Business Partners including the procedures for requesting and consideration of relevant documents which may contain personal data of the director of the company which is a third party or representative of state authorities. ○ The acceptance of work pursuant to agreements between company and Business Partners, the administration of commercial supplies and products, the issuance of work certification until completion 		
---	--	--

In case that the personal data collected by company for the aforementioned purposes is the data necessary for the performance of agreements or the compliance with relevant applicable laws, if you refuse to provide such necessary personal data, company may not be able to consider entering into transaction or perform administration in accordance with the agreement with you (as the case may be).

Furthermore, in case that you have provided personal data of other person for us, you shall be responsible to inform those people of this Personal Data Privacy Notice and/or the letter requesting for consent (if necessary).

3. Personal Data which shall be collected

In general, for the collection of your personal data, company shall collect your personal data by directly requesting the data from you; nonetheless, there may be some circumstances that company collects your personal data from other sources such as the company that you are positioned in, your employee, secretary or coordinator, government authorities or state authorities or other sources of publicly disclosed information such as website and searchable data on the internet, etc.

In this regard, company shall proceed to collect your personal data as follows:

3.1 General personal data: is information that enables you to be identified either directly or indirectly Your personal data that the company collects, uses and/or discloses such as

- Identity data such as first name, last name, identification card number, passport number, date of birth, gender, age, nationality, signature, photo, identity number of the professional license, driving license, company's defensive driving license, username, etc.
- Contact data such as address, a copy of house registration, phone number, facsimile number, email, Geolocation, emergency contact person, social media account, LINE ID, secretary information, etc.
- Financial data such as bank account number, etc.
- Data regarding companies or authorities that you are working in, such as companies or authorities that you are working in, place of work, position of work, etc.
- Data regarding educational profile, work profile, training, proficiency and relevant achievements, etc.
- Recording of videos by closed-circuit television (CCTV)
- Opinions, recommendations, and complaints
- Information about the use of various electronic systems of the company, including information about the use of applications, browsing information, such as website browsing history. IP address information (IP Address), etc.
- Other data such as website usage, audio, still images, and movies and any other information that is considered personal data under the Personal Data Protection Laws.

3.1.1 Personal data that you provide directly to the company or through the company or existing with the company, both arising from the use of products and/or services, contact, visit, search via digital channels, website, Call Center, authorized person or any other channel.

3.1.2 Personal data that the Company receives or accesses from other sources which are not directly from you such as government agency financial institution financial service provider business partner credit information company and data service providers, etc., which the Company will collect information from other sources only upon obtaining your consent as required by law. Unless the company is necessary as permitted by law.

3.2 Sensitive personal data

Sensitive personal data that is specifically required by law. The Company will collect, use and/or disclose sensitive personal data only when the company has obtained your explicit consent. or in the event that the Company is necessary as permitted by law The Company may be required to collect, use (hereinafter referred to in this policy, if not specifically referred to as personal data and sensitive personal data relating to you above, collectively as “Personal Data”).

3.3 If in the case of a minor (Individuals under the age of 20) wish the Company to collect personal information of minors. separately considered as follows:

- the holder of parental responsibility over the child when the Minors is not entitled to act alone or when the Minors is below 10 years of age; or
- In the case of a minor over 10 years old but less than 20 years old, the company must obtain consent from the minor. Operate the consent of the legal representative ruler or parents who have the authority to act on behalf of minors.

4. Sources of your personal data

The Company collects your personal information directly from various sources, including:

- Online Platform: The Company may collect your personal information when you register an account on the Internet. survey organizing activities or fill in information to receive promotional offers Subscribe to receive promotional information. or to connect with the company.
- Offline Communication: The company may collect your personal information offline, for example when you enter our offices. when communicating via telephone or when you participate in company activities or giving a business card.

- Contractual: The Company enters a contract with you, the Company may also collect your personal information from other sources, including publicly available sources, business partners of the company or any other person related to the data subject (for example data subject's service providers).
- Personal data obtained by us from third parties such as agents, merchants or companies providing data collection services, alliances, business partners, and/or any other persons who we have relationship with
- Personal Data obtained by us from affiliated companies in SCBX Group, business partners, and/or any other persons who we have relationship with

5. Disclosure of Personal Data to other persons or entities

The company may disclose your personal information to others with your consent or under the legal principles that allow disclosure. The recipient of the information mentioned above will collect, use and/or disclose your personal information within the scope of your consent or relevant scope in this policy.

The company may disclose your personal information to others with your consent or under other legal basis as specified in this policy, such as data processors, business partners, service providers, company representatives, contract workers, financial institutions, external auditors, legal entities with legal authority, and any other individuals or entities that have a relationship or agreement with the company, including but not limited to executives, employees, contractors, consultants, and representatives of the company and the recipient entities of the aforementioned data.

6. The submission or transfer of personal data to foreign countries

In some cases, the company may be required to disclose your personal information to foreign countries, which may have different personal data protection standards than Thailand. Additionally, there may be business dealings or transactions with foreign companies. As a result, we may need to disclose your personal information to these companies, as well as government agencies, professional advisors, and relevant individuals who need access to such information in order to carry out our normal business operations. Furthermore, the company may also disclose information abroad for the purpose of conducting legal proceedings or investigations, which may occur in the future. Additionally, the company may store your information on computer servers or cloud services provided by overseas service providers, and may process data using third-party software or applications located abroad.

In this regard, for the submission or transfer of your data to foreign countries in whatsoever case, company shall comply with the Personal Data Protection Act B.E 2562 (2019).

7. Retention period of the Personal Data

The Company will retain your Personal Data only for the necessary duration, and will collect, use and disclose your Personal Data, as defined in this Policy, in accordance with the duration criteria, namely the period during which you are still related to the Company as a client, and may still retain your Personal Data as long as needed for legal compliance or as per legal prescription, for the establishment of legal claims, legal compliance or exercise of legal claims, or defense of legal claims, or for other purposes in accordance with policies and the internal regulations of the Company.

Furthermore, the company will properly maintain your personal information in accordance with administrative, technical, and physical safeguarding measures to ensure the security and confidentiality of your personal information processing. This means that there are measures in place to ensure confidentiality, completeness, and accuracy of information, and that the information is readily available and protected against unauthorized access. The company has established policies, regulations, and guidelines for protecting personal information, such as information security standards and measures to prevent unauthorized access or disclosure of information by recipients. The company regularly updates its policies, regulations, and guidelines as necessary and appropriate.

8. How we protect your information

The company will keep your personal information secure and in good faith, following administrative safeguards, technical safeguards, and physical safeguards to maintain the appropriate level of security in processing personal information and to prevent the violation of personal data. The company has established policies, regulations, and criteria for protecting personal information, such as information security standards and measures to prevent recipients of information from using or disclosing the information for unauthorized purposes or without authority or consent. The company regularly updates its policies, regulations, and criteria as necessary and appropriate.

"In addition, the management, employees, contractors, subcontractors, agents, consultants, and data recipients from the company have the responsibility to maintain the confidentiality of personal data according to the company's established confidentiality procedures."

9. Your Rights related to Personal Data

"Your rights in this matter are the rights according to the law that you should know. You can exercise various rights under the provisions of the law and the policies established at present or that may be amended in the future, as well as the criteria set by the company. In the case where you are under 20 years old or legally limited in the ability to transact legally, you may exercise your rights by giving your father and mother, the person with legal guardianship, or a person with the authority to act on your behalf, the right to express your intentions."

9.1 Right to Withdrawal of consent

When you consent to the Company for the specific purpose, you have the right to withdraw your consent at any time, except there are legal restriction or contractual obligations which are beneficial to you. Therefore, withdrawal of your consent may affect your benefits, you should therefore study, inquire about the impact before exercise your right. If your withdrawal causing the Company unable to deliver product or provide some service to you, the Company will inform you about the impact of such withdrawal. In this regard, the withdrawal of consent will not impact the collection, usage, or disclosure of your personal data prior to such withdrawal.

9.2 Right to Access and Make a copy of Personal Data

You have the right to access your personal information that is under the responsibility of the company and request the company to make a copy of the aforementioned information for you. You also have the right to request the company to disclose how the company obtained your personal information.

9.3 Right to Data Portability

You have the right to obtain your Personal Data in case that the Company has converted your Personal Data in automatic machine-readable or usable format and can be used or disclosed by automatic means, and may request the Company to send or transfer your Personal Data to third party, or obtain the Personal Data that the Company sent or transferred to third party, except in case that the Company cannot execute such portability by automatic means, or it is technically impractical, or the Company have the right to reject your request in accordance with the law.

9.4 Right to Objection

You have the right to object the collection, usage, or disclosure of Personal Data as follow, however such objection may cause the Company unable to provide you certain services. However, in case that your objection to collect, use, and disclose of Personal Data and such Personal Data is necessary for the Company to perform its lawful operation or for public tasks, the Company may continue to collect, use, and disclose your Personal Data if the Company can lawfully demonstrate prevailing reason, or for the purpose of establishment of legal claims, compliance of legal claims, or defense against legal claims.

In this regard, the Company may reject your request in accordance with the law, court order, or in case that your request may cause damage to rights and freedom of third party.

9.5 Right to Processing Suspension

You have the right to temporarily suspend processing Personal Data in the event that the Company is in the process of reviewing your request to rectify your Personal Data or objection request or any other cases that the Personal Data is no longer necessary for the Company and needs to erase or destroy such Personal Data in accordance with applicable law, but you instead exercise the right to suspend

9.6 Right to erase or destroy

You have the right to request the Company to erase or destroy your Personal Data or anonymize your Personal data except it is necessary for the Company to perform its obligations under the contract in order to provide a service or there are any legal rights to refuse your request.

9.7 Right to Data Rectification

You have the right to rectify or change your Personal Data that is not correct or inaccurate in order to keep such data up-to-date. However, it is depending on the requirements of other applicable laws.

9.8 Right to Complain

You have the right to complain regarding Personal Data via the communication channel of the Company in order to receive explanation or provisional solution from the Company or submit your complaint to the supervising authority in accordance with the Personal Data Protection Act.

9.9 The use of your rights

As mentioned above may be restricted under applicable laws and there may be some cases where the company may refuse or be unable to comply with your request to use such rights, such as having to comply with laws or court orders for the public benefit. The use of your rights may infringe on the rights or freedoms of others. If the company refuses your request, the company will notify you of the reasons for the refusal.

10. Data Protection Officer

The company has implemented measures to comply with the Personal Data Protection Act B.E. 2562 by appointing a Data Protection Officer (DPO) to oversee the company's activities regarding the collection, use, and disclosure of personal data in accordance with the Personal Data Protection Act B.E. 2562 and related laws on personal data protection. Additionally, the company has established procedures for relevant parties to comply with these policies, ensuring that the implementation of personal data protection policies is done accurately and effectively.

11. Contact Information regarding Personal Data

Data Protection Officer (DPO)

N.C. Housing Public Company Limited

1/765 Moo 17, Soi Amporn, Phaholyothin Rd. Km.26,

Tambol Kookhot, Lumlookka District, Pathumtani 12130

Email : dpo@ncgroup.co.th