

BUSINESS PARTNER PRIVACY POLICY MO CHIT LAND COMPANY LIMITED

Mo Chit Land Company Limited (the “**Company**”, “**we**”, “**us**”, or “**our**”) recognizes the importance of protecting personal data. Therefore, we will follow security measures and prioritize the privacy of data subjects when there is a collection, use, and/ or disclosure of your Personal Data (“**process**” or “**processing**”). This is to ensure that the Company manages and processes Personal Data appropriately in accordance with the Personal Data Protection Act B.E. 2562 (2019) and its relevant subordinate laws (“**Personal Data Protection Laws**”).

This Privacy Policy (the “**Privacy Policy**”) has created to inform you, as a business partner’s personnel, authorized persons, authorized signatories, directors, shareholders and other contact persons (collectively referred to as “**you**”).

“**Business Partner**”, according to this Privacy Policy, includes, without limitation, business partners, distributors, suppliers, vendors, service providers, construction contractors, investors, analysts, shops, billboard tenants, independent advisors, securities companies, insurance companies, insurance brokers, insurance agents, banks, joint venture partners, and third parties e.g., third parties requesting to enter the area, contractor’s sub-contractors, related persons according to the rules of the Securities and Exchange Commission (e.g., spouse, children under the age of 20), and other business partners.

The Company collects, uses and/or discloses your Personal Data because we currently or potentially have business relationship with you, or because you work for, represent, or proceed on behalf of our business partners, e.g., the suppliers of products or services, or which we have business communication with which may involve you.

From time to time, we may adjust and/or update this Privacy Policy. We encourage you to carefully read this Privacy Policy and regularly check the Privacy Policy to review any adjustment and/or update we might make in accordance with the terms of this Privacy Policy.

1. WHAT PERSONAL DATA WE COLLECT

For the purposes of this Privacy Policy, “**Personal Data**” means any directly or indirectly identified or identifiable information as listed below.

We may directly collect your Personal Data, inter alia, when you do business with the Company or sign a contract or fill out a form; when you interact with the Company, including having interactions through the Company's online platform, through the Company's website or mobile application; communication via email, telephone, questionnaires, business cards, postage, during meetings and events, or scheduling meetings with you; or from a source in the system, central drive system/central database of the Company or transport software and/or electronic files.

In addition, we may indirectly collect your Personal Data, e.g., from business partner or service provider you work for, act on its behalf, or represent, the BTS Group Companies, public sources (e.g., social media and websites of third parties or relevant government agencies), other third parties (e.g. other business partners of the Company, reference persons and complainants). The specific types of Personal Data which we collect will depend on the relationship with us or the BTS Group Companies. The followings are example of Personal Data that may collect:

- 1.1. Personal information**, such as name-surname, title, age, gender, photo, video, date of birth, nationality, professional information (e.g., position, division, division code, department code, company that you worked for), identifiable information on government-issued document (e.g., national identification card number, passport number, taxpayer identification number, driving license number, house registration number), vehicle-related information (e.g., vehicle identification number or vehicle registration number), signature, business partner’s

identification number (including type of business partner, type of business, area of business), business partner's information (e.g., evaluation score of business partner/service provider, merchant identification number, business partner registration date), including information relating to pricing strategy, discount rate, sales volume, disbursement items, disbursement amount, number of shares;

- 1.2. **Contact information**, such as phone number, mobile phone number, facsimile number, address, place of business address, email address, postal code, social media account information (e.g., LINE ID, Facebook account and available time) and other similar information;
- 1.3. **Transaction information**, such as bank account, payment details, information according to transaction documents (e.g., contracts, invoices, receipts, tax invoices), credit card information (e.g., credit card number, cardholder name, card expiration date);
- 1.4. **Information relating to the interactions between the Company and the business partner**, such as information that you have given to the Company (as appeared in agreement, form or survey), transactional information between you and the Company (e.g., purchase and sale agreement, contractor agreement, consultancy agreement, tendering or bidding document), information relating to purchase and sale transaction with related person/third party, product type, budget type, disbursement budget, expense details, traveling expense, date of purchasing product/service, amount of products/services purchased, number of disbursement items, budget, headquarter number, document number, project name, registered company, creditors, branch, area and payment terms, computer data (e.g., IP address or cookies), vendor and service provider status inspection result, including information from the terms of reference or scope of tendering/bidding/procurement, report of interests, incident report, litigation information, details of quotation in procurement project, annual vendor/service provider evaluation report, CCTV record and construction details for each project;
- 1.5. **Information from CCTV**, such as images and videos recording from closed-circuit television (CCTV). Please see details on how we collect, use and/or disclose Personal Data in the "CCTV Privacy Policy" https://btsvisionarypark.com/wp-content/uploads/2025/02/2_MCL_Privacy-Notice-for-CCTV.pdf
- 1.6. **Sensitive data**, such as sensitive data as shown in the identification card (e.g. religion, race, and blood type)

If you provide Personal Data of any third party (such as emergency contact person, spouse, child, parent, or authorized person) to us, e.g. their name-surname, address, relationship, contact information, and related documents, you represent and warrant that you have the authority to do so by (1) informing such third party about this Privacy Policy; and (2) obtaining consents (as required by law or as necessary) so that the Company can use such Personal Data in accordance with this Privacy Policy

We have no intention to collect sensitive data ("**Sensitive Data**"), however, in case that we do, we will only collect, use, and/or disclose Sensitive Data on the basis of your explicit consent or as permitted by law.

In the event that the Company collects Personal Data from minors under the age of 10, quasi-incompetent persons, or incompetent persons, the Company will ensure that it obtains the necessary consent from the parent, guardian, or curator (as the case may be) before processing their Personal Data. However, the Company may process the Personal Data of minors over the age of 10 without seeking parental consent if such processing is strictly personal to the minor, suitable to their condition, and necessary for their reasonable needs, provided the minor is capable of giving consent independently.

However, if we learn that we have collected the Personal Data from anyone under the age of 10 without the consent of their parents or guardian as required by law or from quasi-incompetent person and

incompetent person without the consent of their guardian or curator (as the case may be), we will immediately delete such Personal Data or only collect, use and/or disclose such Personal Data if we can rely on other legal bases other than the consent basis or as permitted by law.

2. THE PURPOSE FOR COLLECTION, USE, AND/OR DISCLOSURE OF PERSONAL DATA

We collect, use and/or disclose Personal Data for the following purposes:

2.1. THE PURPOSES OF WHICH WE RELY ON CONSENT

We rely on consent for the collection, use, and/or disclosure of Sensitive Data as shown in the identification card (e.g. religion, race, and blood type on the identification card) to verify and identify your identity.

If we rely on your consent for the collection, use and/or disclosure of Personal Data, you have the right to withdraw your consent by contacting us (as specified herein under “**Our Contact Details**”). The withdrawal of your consent will not affect the legality of the collection, use and/or disclosure of Personal Data and Sensitive Data that was based on your consent prior to such withdrawal.

2.2. THE PURPOSES THAT WE MAY RELY ON LEGAL BASES IN PROCESSING YOUR PERSONAL DATA

We may also rely on (1) contractual basis, for our initiation, conclusion, or fulfilment of a contract with you; (2) legal obligation, for the fulfilment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties. We will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your Personal Data; (4) vital interest, for preventing or suppressing a danger to a person’s life, body or health; (5) for establishment and raising of potential legal claims or other legal bases permitted under applicable laws relating to personal data protection (as the case may be). Depending on the context of the interactions with us, we may collect, use and/ or disclose Personal Data for the following purposes:

- (1) **To operate our business:** such as to fulfil our duties and/or requests from business partners, to hold an activity, to request for necessary information, to record, to account, to support and operate other activities regarding services or products of the Company, to conduct financial and payment transaction, e.g., to issue receipts or invoices, to collect debt;
- (2) **To select business partners:** such as to verify you and status of business partners, to check status of business or perform other background checks and screen you and business partners, to assess your and business partners’ suitability and qualifications, to assess your and business partners’ risks (including the verification of public information from law enforcement agencies and/or the Company’s blacklist record), to prepare quotations or bidding offer, to enter into agreements, prepare purchase orders or purchase requests with you or business partners and to evaluate your and business partners’ management;
- (3) **To manage business partner relationship:** such as to keep your Personal Data up-to-date, to maintain the accuracy of Personal Data, to keep agreements, relating documents, agreement’s reference documents and evidence of the work of business partners which may mention you, to plan, operate and manage (contractual) relationships and rights with business partners (e.g., to appoint, withdraw or authorize business partners to engage in transaction and order products or services, process payment, to conduct activities relating to accountancy, audit, invoice issuance, management of product and service delivery), to manage your requests or complaints, to improve, support, monitor, and record;

- (4) **To communicate:** such as communication with business partners about products, services and projects of the Company or business partners (e.g., communication via document, response to questions, requests or operational progress report);
- (5) **To register and verify identity:** such as for your registration, verification, identification and authentication;
- (6) **To conduct marketing activities:** such as to inform you about news and public information which may be useful, including activities, new product and service offers, product and service price negotiation and survey;
- (7) **To manage internal communication within the organization:** such as to publish internal activities and to comply with business codes of conduct, including but not limited to, procurement, disbursement, internal management, training, inspection, report, document delivery and management, data processing, risk control or management, trend and statistical analysis and planning, and other similar or relating activities;
- (8) **To analyse and improve business:** such as to research, analyse data, estimate, survey and evaluate and report on our products and services and your or business partners' performance, including to develop and improve our marketing strategy, and our products and services;
- (9) **To manage IT-related matters:** such as to support IT and IT support departments, to administrate system access, to identify and solve problems in the IT systems, to control access, to monitor system, device, and internet, and to safeguard the security of our systems, to develop, implement, operate and manage the IT systems;
- (10) **To manage business partner information:** such as to compile list of business partners, record data in the system and update the list and directory of business partners (which includes your Personal Data), as well as to store and manage agreements and relating documents which may contain your name;
- (11) **To conduct dispute management:** such as to resolve dispute, enforce the Company's agreements, establish, exercise, or raising legal claims, including to grant authorization;
- (12) **To comply with legal obligations and orders of government agencies:** such as, where there is a reasonable ground to believe that the compliance with the laws and/or orders or cooperation is required, to follow the legal proceedings or government authorities' orders which include government authorities outside Thailand and/or cooperate with court, regulators, government authority and law enforcement bodies. We may have to disclose Personal Data to comply with the said legal provisions, proceedings or government orders. This includes internal investigation proceedings or crime/fraud prevention and/or establishment of legal claims;
- (13) **To protect our interests:** such as, such as, to protect the security and integrity of our business operation, to exercise our rights and protect the interests, e.g., to detect, prevent and proceed with matters in relation to any corruptions or misconducts, intellectual property infringement claims or violations of law, to manage and prevent loss of our assets, to detect and prevent misconduct within the premises, to secure the compliance of the terms and conditions, to monitor incidents, to prevent and report criminal offences and to protect the security and confidence in the businesses;
- (14) **To transfer in case of business transfer or merger:** in case of sale, transfer, merger, organizational restructuring, or other event of the same nature;
- (15) **To provide security:** such as, to prevent or suppress a danger to a person's life, body, health, or asset, or for disease/epidemic control.

In case we are required to collect the Personal Data from you to comply with the laws or our contractual obligations with you or to enter into an agreement with you, we may not be able to fulfill our obligations under the agreement with you or achieve the abovementioned purposes if we do not receive the Personal Data as we request.

3. TO WHOM WE DISCLOSE YOUR PERSONAL DATA

We may disclose or transfer your Personal Data to the following third parties who collect, use, and/or disclose Personal Data in accordance with the purposes under this Privacy Policy. These third parties may be located inside or outside Thailand. You can read their privacy policy to learn more on how they collect, use and/or disclose Personal Data since you will also be subject to their privacy policies.

3.1. BTS Group of Companies

As the Company is part of the “**BTS Group Companies**” which all, including their affiliates and subsidiaries, collaborate among companies, e.g. we may assign or recommend you to the BTS Group Companies, or partially share systems e.g. service system, website related system and/or our database, we may need to transfer your Personal Data to, or otherwise allow such Personal Data to be accessible by the BTS Group Companies for the purposes set out above. In this regard, the BTS Group Companies could also rely on the consent obtained by us to use your Personal Data. Please see [the list of BTS Group Companies](#).

3.2. Our Service Providers

We may engage other companies, agents or contractors to perform services on our behalf or to accommodate the provision of services. We may disclose Personal Data to the third-party service providers, including, but not limited to, (1) infrastructure, software and website developers and IT service providers; (2) marketing, advertisement, design, creative advertising and communication service providers; (3) accounting service provider; (4) data storage and cloud service providers; (5) banks and financial institutions; (6) insurance companies, sub-insurance companies, insurance brokers, insurance agents, loss adjusters and risk surveyors; (7) logistics and transportation service providers; (8) payment and payment system service providers; (9) voting and vote counting service providers; (10) analysts; (11) booking system service providers; (12) outsource internal operation service providers; (13) printing houses; (14) security service provider; (15) parking lots management service providers; and/or (16) surveying service providers.

In the course of providing such services, the service providers may have access to Personal Data. However, we will provide the Personal Data only that is necessary for them to perform the services, and we ask them not to use your Personal Data for any other purposes. We will ensure that all service providers we work with will keep your Personal Data secure.

3.3. Our business partners

We may transfer the Personal Data to our business partners to conduct business and provide services, including, but not limited to, business partners, project owners, contract party, securities companies, stores, construction contractors, joint venture partners, companies that we invest in, co-brand partners and third parties that we share marketing or promotional campaigns for our business operation and service provision insofar as the receiving business partner shall agree to treat your Personal Data in a manner consistent with this Privacy Policy

3.4. Third parties permitted by law

In certain circumstances, we may be required to disclose or share your Personal Data to third parties in order to comply with a legal or regulatory obligation. This includes any law enforcement agency, court, embassy, consulate, regulator, or other government authorities, or other third party where we believe

this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety; or to detect, prevent, or otherwise address fraud, security or safety issues.

3.5. Expert advisors

We may have to disclose Personal Data to our expert advisors including, but not limited to, (1) independent advisors, project advisors, financial advisors; (2) legal advisors who assist us in our business operations and provide litigation services such as defending or initiating legal actions; and/or (3) auditors who provide accounting services or conduct financial audit for the Company.

3.6. Third parties connected with business transfer

We may disclose or transfer your Personal Data to our business partners, investors, major shareholders, assignees or transferees in the event of any organizational restructuring, rehabilitation, amalgamation, business transfer in whole or in part, purchase or sale, establishing joint venture, assignment, or any similar event involving transfer or other disposition of all or any portion of our business, assets or stock. In case that such event happens, the receiving party will comply with this Privacy Policy to protect your Personal Data.

3.7. Other third parties

We may be required to disclose Personal Data based on the legal bases in accordance with the purposes as specified in this Privacy Policy to other third parties, such as the public, complainants or other third parties that we receive a request to access our CCTV records etc. (as the case may be).

We will ensure that third parties or any agencies who have received Personal Data from us will comply with this Privacy Policy to strictly protect Personal Data.

4. CROSS-BORDER TRANSFERS OF YOUR PERSONAL DATA

We may disclose or transfer Personal Data to third parties or servers located overseas, which the destination countries may or may not have the same data protection standards as Thailand's, such as when we store your Personal Data on cloud platform or server located outside Thailand or to receive IT support services. We will take steps to ensure the compliance with the legal measures for data transfer by entering into relevant agreements or may transfer data as permitted by law. This includes entering into non-disclosure agreement or data processing agreement (as the case may be), which stipulate that the recipient of the transfer must implement measures to ensure the security of personal data. This is to ensure that your personal data is transferred securely to the recipient who has an appropriate standard of personal data protection and only happen where permissible by laws.

5. HOW LONG DO WE KEEP YOUR PERSONAL DATA

The Company will retain your Personal Data for as long as it is reasonably necessary to fulfil purposes for which the Company obtained them. However, the Company may have to retain Personal Data for a longer duration, as required by applicable laws.

6. COOKIES AND HOW THEY ARE USED

Cookies is a technology that tracks certain information which will be used to analyse trends, administer our websites, track users' movements around the websites, or to remember users' settings. Some of the cookies are necessary because without them, the site would not be able to function properly. While some type of cookies will help users browse websites more convenient as such type of cookies will remember the users (in a secure manner) as well as language preferences of the service provider.

Cookies will gather or track specified information relating to your website usage and your computer. When you visit websites, the cookies will remember the users (in a secure manner) as well as your language preferences which will enable us to improve your website usage experience, modify the content to your preferences and make your website browsing more convenient.

Usually, most internet browsers allow you to control whether or not to accept cookies. If you reject cookies, it might affect your use of the websites and your ability to use some or all of the features or areas of our websites may be limited. Please see our “**Cookie Policy**” for more details at <https://btsvisionarypark.com/wp-content/uploads/2025/03/3-MCL-Cookie-Policy-for-Website-EN21.pdf>.

7. DATA SECURITY

As a way to protect personal privacy of your Personal Data, we maintain appropriate security measures, which include administrative, technical and physical safeguards in relation to access control, to protect the confidentiality, integrity, and availability of Personal Data against any accidental or unlawful or unauthorized loss, alteration, correction, use, disclosure or access, in compliance with the requirement under Personal Data Protection Laws. This includes the implementation of access control, user authorization, and user responsibilities to prevent unauthorized access, unlawful duplication of Personal Data or theft of device used to store and process Personal Data; this also includes methods that enabling the re-examination of access, alteration, erasure, or transfer of Personal Data.

8. RIGHTS AS A DATA SUBJECT

Subject to Personal Data Protection Laws and exceptions thereof, a data subject may have the following rights to:

- 8.1. Access:** Data subjects may have the right to access or request a copy of the Personal Data we process as well as how we collect Personal Data on other lawful bases apart from consent. For privacy and security, we may require proof of the data subject's identity before providing the requested Personal Data;
- 8.2. Rectification:** Data subjects may have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data that we collect, use and/or disclose rectified;
- 8.3. Data Portability:** Data subjects may have the right to obtain Personal Data we hold about that data subject, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) if we are collecting, using and/or disclosing that data on the basis of data subject's consent or to perform a contract with the data subject;
- 8.4. Objection:** Data subjects may have the right to object to certain collection, use and/or disclosure of Personal Data subject to the applicable law;
- 8.5. Restriction:** Data subjects may have the right to restrict our use of Personal Data where the data subject believes such Personal Data to be inaccurate, that our collection, use and/or disclosure is unlawful, or that we no longer need such Personal Data for a particular purpose;
- 8.6. Withdraw Consent:** For the purposes the data subjects have consented to our collection, use and/or disclosure of Personal Data, data subjects may have the right to withdraw consent at any time;
- 8.7. Deletion:** Data subjects may have the right to request that we delete, destroy or anonymize Personal Data that we collect, use, and/or disclose, except we are not obligated to do so if we

need to retain such Personal Data in order to comply with a legal obligation or to establish, exercise or defend legal claims; and

- 8.8. Lodge a complaint:** Data subjects may have the right to lodge a complaint to the competent authority where the data subject believes our collection, use and/or disclosure of Personal Data is unlawful or non-compliance with Personal Data Protection Laws.

9. OUR CONTACT DETAILS

If you wish to contact us to exercise the rights relating to your Personal Data or if there are any queries about your Personal Data under this Privacy Policy, please contact our Data Protection Officer (DPO) at:

Mo Chit Land Company Limited

1000/9 BTS Visionary Park – North Tower 3rd Floor

Phahonyothin Road, Chomphon, Chatuchak, Bangkok 10900.

Email: info@btsvisionarypark.com Tel: 02 078 0800

This Privacy Policy shall become effective as from 1 March 2025.