

CUSTOMER 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, whether you are a past, current, or potential customer, a service receiver, a visitor, personnel of office and retail tenants, or a visitor to the Company’s website or any other platform, as well as individuals who interact with the Company and/or BTS Group companies (collectively referred to as “**you**”).

This Privacy Policy applies to our business operations at the Company’s business premises, buildings, offices, or other business locations, as well as customer reception points, customer service centers, and communication channels such as telephone, email, postal mail, and social media. It also covers online communication channels, including the Company’s website, booking system, applications, and other relevant platforms, as well as registration channels for accessing services or participating in activities. Additionally, it extends to any other channels or locations through which we receive your Personal Data.

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 or indirectly collect your Personal Data from other sources, such as the BTS Group Companies, the Company’s service providers, the company or organization you work for, the Company’s business partners, public domain (e.g. website and online social media), or the relevant government agencies. The specific type of Personal Data which we collect will depend on your relationship with us or the BTS Group Companies and the services or products you wish to receive from us or the BTS Group Companies. The following are examples of Personal Data which we may collect:

- 1.1 Personal information**, such as title, name-surname, gender, age, occupation, date of birth, identifiable information on documents issued by government agencies (e.g. identification card, passport, house registration number, or work permit), signature, and photograph;
- 1.2 Contact information**, such as postal address, house registration address, national identification card address, workplace address, phone number, email address, LINE user account, Facebook account, and other information related to online social media;
- 1.3 Transaction information**, such as bank account details, payment information, supporting information of a transaction (i.e. agreement, invoices, receipts, or tax invoices), and credit card information (e.g., credit card number, cardholder name, card expiration date);

- 1.4 **Information relating to the use of facilities**, such as the date and time of service usage, service booking records, service personnel, and service usage history.
- 1.5 **Technical information**, such as Internet Protocol (IP) address, log, device model and type, hardware-based identifiers such as universal device identifier (UDID), media access control information, software-based identifier such as identifier for advertisers for iOS operation system (IDFA), or identifier for advertisers for Android operation system (AAID), connection information, access information, single sign-on (SSO) information, login log, access time, time spent on our webpage, cookies, login data, search history, browsing detail, browser type and version, time zone setting and location, plug-in browser types and versions, operating system and platform, and other technology on devices used to access the platform;
- 1.6 **Information related to customer relationship management**, such as customer account opening details, dispute resolution information, report data, refund information, product return request details, communication records with the Company, and consumption/consumer behavior information.
- 1.7 **Information from CCTV**, such as images and video recordings from closed-circuit television (CCTV). Please see details on how we collect, use and/or disclose Personal Data in the “**CCTV Privacy Notice**” at https://btsvisionarypark.com/wp-content/uploads/2025/02/2_MCL_Privacy-Notice-for-CCTV.pdf
- 1.8 **Sensitive data**, such as biometric data (e.g. facial recognition) and 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, employer, disputant, or reference 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 Personal Data and/or Sensitive Data for the following purposes:

- (1) **General Personal Data for the purposes of marketing and communications which we cannot rely on other legal bases:** To provide marketing communications, re-marketing, advertisement, privilege, sales, special offers, notification, newsletter, update report, announcement, promotional activity, news and information relating to our products or services, including products and services of BTS Group Companies and our business partner, to you;
- (2) **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;
- (3) **Biometric data** (e.g. facial recognition): for access control to the Company's building and workspaces, as well as for recording entry and exit times.

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 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 facilitate the rental of office and retails spaces, arrangement of activities, to provide souvenirs and privileges, to request necessary details, to use as evidence, to manage the accounting, to support and conduct other activities relating to the Company's services or products and to proceed financial transactions (e.g. issuing receipts and invoices, and debt collection);
- (2) **To register and verify identity:** such as to register, to record and review information, to authenticate and verify identification;
- (3) **To communicate:** such as to use for any contact and news/information delivery, to inform and invite to participate in activities, to liaise;
- (4) **To manage customer relationship:** such as to consider the complaints, to resolve the issues in the complaints, and to improve the services;

- (5) **To improve products and services:** such as, to analyze, evaluate, and prepare an internal report for the Company, to oversee operation, coordinate, monitor, examine, and control the operation within the Company in order to comply with the policies, rules, and standards, and to evaluate the reliability and completeness of internal operation, to lay out the plans and strategies in relation to the public relations operation and organizational policies, and to improve the business operation or advance other lines of businesses;
- (6) **To facilitate the use of facilities:** such as to enable access to the Company's facilities, to provide a system for booking service appointments, to manage reservations, and to confirm, modify, or cancel bookings.
- (7) **To conduct questionnaires:** such as to conduct satisfaction survey, to develop and improve the service or marketing promotion and facilitation;
- (8) **To ensure the function of our websites, mobile applications, and platforms:** such as to ensure that they function properly, efficiently and securely; to facilitate the use of websites and platforms, to improve layout and content of websites and platforms;
- (9) **To manage IT-related matters:** such as to manage IT-related matters, communication system, and IT security system, to control access to data and systems, to manages internal business in accordance with internal compliance requirements, policies, and procedures, and to revise and update our database.
- (10) **To comply with legal obligations and orders of government agencies:** such as, where the Company has a reasonable ground to believe that they shall comply with the laws and/or orders or shall provide such cooperation, to act in compliance with the laws, legal proceedings or government authorities' orders which include government authorities outside Thailand and/or to cooperate with courts, regulators, government authorities and law enforcement authorities, to comply with the said legal provisions, legal proceedings or government orders which include internal investigation process or crime/fraud prevention and/or to establish legal claims;
- (11) **To protect our interests:** such as, to protect the security and integrity of our business operation, to exercise our rights and protect the interests of the Company , for example 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 of the Company, to secure the compliance of the terms and conditions of the Company, to monitor incidents, to prevent and report criminal offences and to protect the security and confidence in the businesses of the Company;
- (12) **To transfer in case of business transfer or merger:** such as in case of sale, transfer, merger, organizational restructuring, or other event of the similar nature;
- (13) **To manage risks:** such as to perform risk management, performance monitoring and risks assessment; and/or
- (14) **To provide security:** such as to prevent or suppress a danger to a person's life, body, health, or property, e.g. to control contagious diseases or epidemics.

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, provide products and/or services to 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 Companies

As the Company is part of the “**BTS Group Companies**” which all, including their affiliates and subsidiaries, we may collaborate and partially share systems to provide customer services, e.g. service system and website-related systems, 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, internet and website developers and IT service providers; (2) data storage and cloud service providers; (3) booking system service providers; (4) data storage and/or document destruction service providers; (5) marketing, advertisement, design, creative advertising and communication service providers; (6) accounting service providers; (7) surveying service providers; (8) payment and payment system service providers; (9) warehousing and logistics service providers; (10) event organizers and/or (11) parking lots management 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, campaign partners, manufacturer or services provider for the project, , banks, financial institutions, securities companies, insurance companies, insofar as business partners receiving the Personal Data agree to treat the 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.