

**Notice for processing of personal data**  
**(For Subscriber and Trust unitholder)**  
**Prospect REIT Management Company Limited**

Prospect REIT Management company limited (“**Company**”) is a REIT Manager of Prospect Logistics and Industrial Freehold and Leasehold Real Estate Investment Trust (“**Trust**”), on behalf of an information controller according to Personal Data Protection Act, B.E. 2562 (“**Personal Data Protection Law**”) will comply with the personal data protection law for processing any personal data subject of individual, and will follow all personal data protection regulations, including sending notification to data subject under this notice’s conditions and requesting for consent of the subject (In some cases).

In addition, this notice will be applied only when the company is a controller of the information. In case the company is a processor to process the information for other government sector or private organization who is a controller of the information for those activities, please check directly all details of the processing from their data protection policy or a notice of the personal information processing of that government sector or private organization.

**1. Collection and storage of your personal information**

The company may collect and store your personal information in both direct and indirect ways;

- Your given information to the company
- Your given information to any persons involved with trust, such as trustee, underwriter, or property manager.
- Thailand Securities Depository (TSD) who is a trust registrar.
- Your information shared from the group companies.
- Your information shared from other company or organization that has cooperation with you (On behalf of committee or representative)
- Social network and/ or other public relations medias that you use for connecting with the company
- Other reliable sources of public information

**2. Types of personal information collected by the company**

The company may collect various types of information, depending on the objectives of information usage, and its user’s operation, the data collection may include;

- **Personal identification** such as name- surname, title, date of birth, nationality, occupation, identification number, tax identification number, phone number, email, address, copy of identification card, copy of passport, photo, voice, picture and video
- **Personal characteristics** such as age or sex.

- **Personal information of trust investment** such as subscription of trust unit, unitholder registration number, type and number of trust unitholding, brokerage account, chosen agent or broker, and info of trust registration number
- **Financial information** such as bank account, transaction information, withholding tax information, payment method, and other payment details.
- **Data usage history** such as website cookies, including website usage behavior, log info, interest, devices or IP address to access internet service, setting data, website customization, date or location.
- **Other information** such as your given personal information when contacting with the company, interest and type of investment, interaction with the company through Call Center, social network, other chatting channels, investment info, workplace, method for sending documents.

### 3. **Data retention**

The company determines appropriate time for storing your personal information based on concerned objectives, and your information will be later permanently deleted and destroyed. Unless, it is necessary to store your information according to relevant regulations, or it is under the right protection of the company. Generally, data must be stored for maximum 10 (Ten) years, except there may be another law or regulation for longer period of data retention, or it is for the right protection of the company.

Once the storage period is expired, the company will delete and destroy the given data, and ensure the data removal from the company's server, or the data will be kept safely in a form of unidentifiable data subject.

### 4. **Purpose of use and disclosure of personal information**

The company will compile your personal information in order to (1) take action on behalf of a counterparty, (2) comply with the laws, or (3) take the legal benefits. And, the company will disclose your personal information for the mentioned objectives, including the following purposes;

#### 4.1 Purpose of trust management

- To process operation according to your request for subscription of trust units
- To manage and control trust internally, including creating and collecting records, registration related to trust unitholder, and disclosing the information to registrar and involved parties.
- To manage a meeting for trust unitholders
- To process a complaint and summary of all complaints.
- To ensure that the website's content will be effectively presented and shown on your electronic devices.

- To manage all information for trust unitholder, interested persons, analyzers, including various channels for sharing comments, inquiries, reactions and notification of benefits without marketing purpose.
- To provide campaigns, activities, trainings, or seminar arranged by the company.

#### 4.2 Other purposes

- To follow the agreements of the company or trust in both direct and indirect operations.
- To process all necessary operations of the company and generate benefits under the relevant laws and fundamental rights of data subject.
- To ensure the security and safety of the company.
- To ensure the protection and prevent any disguise.
- To verify, analyze and provide all concerned documents requested by government sector or other organizations.
- To comply with any law or concerned regulation.

### 5. Disclosure of personal information

The company will not disclose your personal information without lawful basis for processing, in case the company will have to share your personal information to third party, the company will manage it appropriately in order to ensure the security and no unauthorized access to the information, including unauthorized usage, modification or disclosure. The company may disclose your personal information to the following parties;

- Thailand Securities Depository (TSD)
- Trustee, agent, representative, underwriter, property manager that are contracting partners for the purposes of trust management.
- External service providers or group of companies that serve the company, such as information technology service provider, cloud service provider.
- Government sector and regulators, such as Securities and Exchange Commission
- Auditor, lawyer, and other company's consultants.
- Individual or legal entity who is involved with the company's restructuring, merger, sale, company acquisition, or other group companies' restructuring, or other possibility in the future.
- Other regulators upon your request for information allocation.

### 6. Disclosure of your personal information to overseas.

The company will disclose your personal information to any overseas receiver as permitted by privacy law and/ or relevant regulations, and the company may allocate the information to overseas under international data transfer agreement or other concerned data protection law. The company may share or allocate the information to any receiver who agrees to follow all right protection regulations, that will be prevent breaking a contract or other authorized mechanism when allocating personal information to overseas.

#### **7. Data security and protection measures**

The company has been served by other group companies who has their own policy for information and technology protection as same level of information security standards system or ISO 27001. It is the high cyber security and essential protection system for the access, use, modification, correction, unauthorized disclosure of personal information, and also identity phishing. The company has invested and spent times and men-power to ensure the high standard security and protection management. Your personal information is safe under the company's cyber controls system. In addition, the data security and protection policy of the other group companies is also applied when cooperating with the company, including maintaining the physical and environmental security, controlling both input and output operations, information access, important data backup, confidentiality, and data protection. Moreover, the company and other group companies who provide information and technology services will review all protection measures properly according to relevant laws.

The company will delete or conceal your personal information immediately after storing your information is reasonably no longer required. In addition, the company may appropriately destroy your data without prior notice

Despite the company exerts and attempts to maintain the high standard data protection by using technical equipment together with administrative management to control all data security and unauthorized access to personal information or confidentiality, but it may not prevent all mistakes, such as computer virus attacks or access of hackers. It is highly recommended to always be up-to-date with computer news, install effective software, i.e. Personal Firewall to protect your computer from any attacks, or information phishing, and always check and keep confidentiality of your account statement, such as account balance, date of transaction, including privacy data collection, and financial condition.

#### **8. Rights of the personal data subject**

Using the rights in this provision 8 will be related to the regulations and methods for using the rights of the personal data subject in the provision 9 in this notice. However, the rights under this provision 8 may be changed or updated according to the concerned laws, and there might be any new regulations ruled by government, the company will later send a notice to the data subject.

**8.1 Right to receiving the information:** In case the company needs to collect, store, use or disclose the personal information that might not be related to the mentioned purposes or the given consent, the company will inform and/ or request for the data subject's approval before processing the personal information.

**8.2 Right of access to the personal information :** you have the right to request for a copy of your personal data, and ask for the disclosure of the acquisition of your personal data.

**8.3 Right to rectification of your personal information :** In case there is any modification of your personal data, you have the right to ask the company to correct any inaccurate information according to the provision 9 for your correct, completed, updated data and no misunderstanding.

**8.4 Right to data portability :** In case of backup system provided by the company, you have the right to download or request for automatic download your personal data in any readable or useable forms on your electronic devices.

**8.5 Right to erasure :** You have the right to request for deleting, destroying or concealing the identity of the data subject, storing your personal information is no longer required for these following cases; (A) the given consent of collection, use, and disclosure of the personal information is withdrawn by the data subject, (B) the disclosure of the personal information is processed by the company who has no longer authorization for the data subject, (C) the processing of the personal information is illegally done against the protection law, and (D) there is an objection for the processing of the personal information.

**8.6 Right to restrain the use of your personal data:** You have the right to ask the company to restrain the use of your personal information in these following cases;

(1) When the company is asked by the data subject to verify, modify or update the information to be the correct, completed, updated and no misunderstanding version.

(2) When the information must be deleted or destroyed according to the 8.5, but the data subject asks for the suspension of the information use instead.

(3) When the personal information is no longer required, but the data subject asks the company to store it for a claim right, the legal operation or the use of right, or the defense of legal claims.

(4) When the company is in the process to collect and validate the personal data, or to verify the personal data processing for the legal purpose.

**8.7 Right to object the processing of the personal data:** The data subject has the right to object the collection, storage and disclosure of the personal information in this following cases;

(1) It is a necessary information that is collected by the company for the essential managements; (A) To run the operations for the company's public interest, or (B) to operate the duties under the state order, or (C) to manage the necessities for the legal benefits of the company or other legal entity.

(2) The company processes the personal information for the direct marketing purpose.

(3) The company processes the personal information for the educational purposes by law, including the statistical data.

**8.8 Right to withdraw consent:** The data subject has the right to withdraw the consent at any times, and the withdrawal of the consent will not affect the processing of the personal data that the data subject has previously given the consent. In case the withdrawal of the consent creates any personal data issues, the company will inform the data subject about the concerned effect.

In addition, the company may reject any of above requests if it is for the legal purpose, or it complies with the law or judicial order, or it may cause any damages on the right or freedom of the data subject or other person, or it is for the purpose of education or statistical research under the appropriate protection measures, or it is for a claim right, the legal operation or the use of right, or the defense of legal claims.

For exercising your right according to this provision, the company may consider and manage your request when being the controller of your given personal information only. In case of exercising your right, when the company is a processor to process the information for other organization who is a controller of the information for those activities, the company will notify that controller with the info, in order to support your right and request for being the controller of your personal information later.

**9. Rules and methods for exercising your right as a data subject.**

<p><b>①</b></p>	<ul style="list-style-type: none"> <li>▪ In case you would like to exercise your right, please submit your request through Compliance, and Risk Management department or through electronic media provided by the company.</li> <li>▪ You can download a request form at <a href="http://www.prospectrm.com">www.prospectrm.com</a>, or contact Compliance and Risk Management department via email: <a href="mailto:compliance@prospectrm.com">compliance@prospectrm.com</a></li> <li>▪ Please complete a request form for exercising your right, sign a petition, and also attach a copy of your identification card or passport issued by government office with certified true copy.</li> <li>▪ In case you cannot make a request by your own, but let a third person submitting your request, a letter of attorney is required for this process.</li> </ul>
<p><b>②</b></p>	<ul style="list-style-type: none"> <li>▪ Your request will be transferred to Compliance and Risk Management department of the company in order to verify identity of the applicant.</li> <li>▪ For the process of verification, if it is unable to prove your identity and/ or a third person who submits the request, the company may ask for additional documents or contact the applicant for affirming the additional info.</li> </ul>
<p><b>③</b></p>	<ul style="list-style-type: none"> <li>▪ Compliance and Risk Management department will consider whether the request should be proceeded or not, for example, it is necessary to consider the concerned reason, possible negative effect on other person, or there might be a reason for refusal by law.</li> </ul>
<p><b>④</b></p>	<ul style="list-style-type: none"> <li>▪ In case it is feasible to proceed the request, the Compliance and Risk Management department will manage according to the request for exercising the right, and share the</li> </ul>

	feedback as soon as possible through your given contact channel in the request form.
5	<ul style="list-style-type: none"> <li>▪ If the request cannot be proceeded according to the rules, the Compliance and Risk Management department will notify you with the reason for refusal as soon as possible through your given contact channel in the request form. After that, you have the right to submit your complaint to a legal regulator who will later send you a notification of consideration's result.</li> </ul>

**Remarks:**

1. Proceeding the above operations will take no longer than 30 days after receiving the request with all concerned document.
2. All above request procedure can be proceeded without any charges, however there may be a fee for some operations, the company will inform you before starting any process.
3. In case the company rejects your request, you will be able to send your complaint to the Personal Data Protection Committee to this address;

Personal Data Protection Committee Office

Office of the Permanent Secretary, Ministry of Digital Economy and Society

Telephone: 1033-142-02

Email: [pdpc@mdes.go.th](mailto:pdpc@mdes.go.th)

**5. Contacting**

If you have further queries about exercising your right or your given consent, please contact this;

**Compliance and Risk Management Department**

Address: No. 345, 345 Surawong Building, 5th Floor Surawong Road, Suriyawong, Bangrak,  
Bangkok 10500

Tel: 02-697-3793

E-mail: [compliancerm@prospectrm.com](mailto:compliancerm@prospectrm.com)

Or

**Data Protection Officer: Prospect REIT Management Company Limited**

Address: No. 345, 345 Surawong Building, 5th Floor Surawong Road, Suriyawong,  
Bangrak, Bangkok 10500

Tel: 02-697-3793

E-mail: [prm@prospectrm.com](mailto:prm@prospectrm.com)