



Enclosure 11

Personal Data Privacy Policy

As ALLY REIT Management Company Limited (“Company”, “we”, “us”, or “our”), is engaging in a business as the REIT Manager of ALLY Leasehold Real Estate Investment Trust (“ALLY”), has always been committed to conduct the business under the principle of good governance and aware of the importance of security and privacy of data. Accordingly, as the Company seek to manage the processing of your personal data transparently and as the Company value the privacy of our customers, this Privacy Policy has been declared to inform our customers about our policy regarding the collection, use, and disclosure of personal data of individuals (“you”) in compliance with the Personal Data Protection Act B.E. 2562 (2019) (“PDPA”), and applicable laws and regulations. This Privacy Policy will inform you about our method to collect, use, and disclose your personal data, types of data, and purposes of such operation, as well as details regarding the data retention period, the disclosure of personal data to third parties, your rights, confidentiality and security of your personal data, and our contact information.

This Personal Data Privacy Policy (“Privacy Policy”) is implemented to maintain trust and confidence in the administration of your personal data by ensuring that the Company will manage them properly and have in place the measures to safeguard personal data as stipulated by the laws and as equivalent to the international standards. In this regard, please note that the Company is merely a data controller. In case the Company processes the personal data in any activities as a data processor for other public or private entities who are the data controller in such activities, please review the details of data processing from the personal data privacy policy or notice of personal data processing of those public or private entities directly.

This Privacy Policy Notice is applicable to the following persons:

1. Our customers

Individual customers: former and present customers who are natural persons.

Corporate customers: directors, shareholders, true beneficiaries, employees, guarantors, collateral providers, and legitimate representatives of former and present corporate customers, including other natural persons authorized to represent corporate customers. In any case, the Company encourages our corporate customers to ensure that your authorized representatives or any relevant natural persons are aware of our Privacy Policy.

2. Persons not being our customers

Such persons include individuals who do not have our products or services but the Company may be required to collect, use, or disclose your personal data, such as investors, persons having made

payment to or received payment from our customers, visitors of our website or application, or receiving services at our office, guarantors or collateral providers, true beneficiaries, beneficiaries named in the insurance policy, directors or legitimate representatives of juristic persons receiving our services or entering into contracts with us, debtors of our customers, professional consultants, as well as our directors, investors, and shareholders, including legitimate agents thereof, and any persons related to the transactions with us or our customers.

Please note that the links as appeared on our platform could lead you to platforms of third parties. Upon entering such platforms of third parties, the processing of your personal data will be entirely subject to the privacy policies of such third parties. For this reason, the Company encourages you to read and understand the privacy policies of such third parties when you access such platforms.

1. Sources of personal data

Generally, the Company will collect your personal data from you directly. However, in certain circumstances, the Company may obtain your personal data from other sources which we will handle in accordance with the provisions of the PDPA. Personal data that the Company collects from other sources may include but not limited to the following data:

- Data that you provide to the Company directly;
- Personal data that you provide to persons related to ALLY, such as Trustee, underwriters, Property Manager, etc.;
- Thailand Securities Depository Company Limited (TSD), as the Registrar of ALLY;
- Personal data obtained from our affiliates and subsidiaries;
- Data that we obtain from agencies or organizations that you (as a director or representative) work with;
- Online social media and/or other public relation media that you choose to contact us;
- Other reliable public information sources.

2. Types of personal data collected by us

The types of personal data that the Company collects, uses, or discloses depend on the scope of products and/or services that you may have used or interested in. The data encompass both personal data and sensitive personal data, including but not limited to the following data:

- **Personally Identifiable Information** e.g., name-surname, title, date of birth, nationality, occupation, identification number, taxpayer number, phone number, email, contact address, copy of identification card, copy of passport, photograph, voice, still image and video;

- **Personal characteristic details** e.g., age, gender;
- **Details relating to the investment in ALLY** e.g., information on trust unit subscription, trust unitholder register number, type and amount of trust units held, securities trading account, the chosen agent or broker for securities trading, and the registration number on trust certificate;
- **Financial details** e.g., bank account, transactional data, withholding tax data, payment methods, and other payment details;
- **Usage history data** e.g., data collected automatically via websites, including user behavior, your log data, your interest, device data and IP address that you use to access the services, data regarding website settings and adjustments, date, or your location;
- **Other details** e.g., personal data that you provide to the Company when you contact us, such as interest and structure of investment, correspondences between you and us via call center, online social media, and other communication channels, investment data, work details, and document sending method.

3. Purposes of the use and disclosure of personal data

The Company may disclose your personal data to the following persons or organizations, subject to the requirements of the PDPA;

3.1 Purposes of REIT management

- to proceed with your trust unit subscription form;
- to use in the management and internal control of ALLY, including the drafting and collecting of records, registrations in relation to the Trust Unitholders, and to disclose such information to relevant registrars or authorities;
- to enter into contracts that the Company executes on behalf of ALLY with companies or persons;
- to hold the Trust Unitholders' Meeting;
- to carry out the proceedings relating to debt collection;
- to carry out the proceedings relating to complaints and to prepare complaint summary report;
- to report the incidents which have or may have a significant impact to ALLY or its assets;
- to report the status and progress of the resolution of legal disputes, and report the outcome of dispute resolution;
- to ensure that the content of our website will be presented to you and displayed on your electronic devices effectively;

- to manage the data of the Trust Unitholders, interested investors, and analysts, including communication via various channels, or to comment, inquire, correspond, and notify the benefits without marketing purposes;
- to organize or participate in activities, training, or seminars held by us.

3.2 Other purposes

- to perform our contractual duties or ALLY's, both direct and indirect performance of obligations;
- to conduct businesses that are necessary for the legitimate interest of the Company, subject to the fundamental rights of the data subject;
- to support the stability and security of the Company;
- to assess and handle your requests;
- to prevent and detect forgery;
- to inspect, analyze, and prepare documents as requested by government agencies and regulatory agencies;
- to carry out the duties stipulated by relevant laws.

4. Consent to our disclosure of personal data

The Company will not disclose your personal data without legitimate grounds for data processing. In the event that the Company is required to provide your personal data to third parties, we will proceed in accordance with appropriate procedures to ensure that the third parties will handle your personal data to prevent the loss of data, unauthorized access to the data, illegitimate use, modification or disclosure and access to the data, whereby we may disclose your personal data to the following third parties;

- Thailand Securities Depository Company Limited (TSD);
- Trustee, agents, representatives, underwriters, or the Property Manager, who are counterparties of the Company in agreements for the purposes relating to the management of ALLY;
- External service providers or affiliates and subsidiaries which provide services to us, such as information technology providers, cloud service providers;
- Government agencies and regulatory agencies, such as the Office of the Securities and Exchange Commission;
- Auditors, attorneys, and advisors of the Company;

- Any other individuals or juristic persons related to the company reorganization, merger, sale, and acquisition of the Company or our affiliates and subsidiaries for the purpose of reorganization that has been conducted or may be conducted in the future;
- Other data controllers to whom you desire to provide or transfer the data.

5. Sending or transferring your personal data overseas

The Company will disclose personal data to receivers overseas only in the cases permitted by the laws on personal data protection and/or applicable laws. The Company may comply with the rules on the transnational transfer of data by entering into standard agreements or using other mechanisms provided in the applicable laws on data protection. In addition, the Company may rely on the agreements concerning data sending or transferring which require that the receivers of personal data accept that the data subject is entitled to exercise his/her rights against the receivers of personal data in the event of a breach of agreements concerning the sending or transferring of personal data or other mechanisms permitted to transfer personal data overseas.

6. Data security

The Company has implemented internal security measures and strictly enforced the Privacy Policy to safeguard your personal data, including encryption and access control measures. Accordingly, the Company require our personnel and external contractors to comply with appropriate standards and the Privacy Policy, as well as to ensure the data security and have in place appropriate measures for using, sending, or transferring your personal data.

7. Retention period of personal data

The Company will retain your personal data as long as you remain our customer. When you end your relationship with us, the Company will retain your personal data for a reasonable period necessary for each type of personal data and for the purposes as stipulated in the PDPA. The Company will retain your personal data in compliance with the prescription or period stipulated by applicable laws. Furthermore, the Company may be required to keep data recorded from video cameras in case there are any relevant meetings with the Trust Unitholders and/or meetings in connection with investor relations matters for the protection of our rights and benefits.

When the period set out above has elapsed, we will follow the procedures on the erasure and destruction of such data to ensure that all of your data is safely removed from our server or kept only in the format that the data subject is nonidentifiable.

8. Use of cookies

The Company may collect and use cookies and technologies of similar nature when you use our products and/or services, including the use of our website and application, as well as the sources of data collection on browsers and devices of the personal data subject and data collection devices of third parties, such as data analytics service providers on marketing data or data relating to the collection of data using this kind of technology directly from the website. Please see details at [Cooky Policy](#).

9. Rights of the personal data subject

Under the laws on personal data protection, you, as the data subject, are entitled to the following rights, and the exercise of which shall be in accordance with the laws and subject to any revisions to comply with any regulations stipulated by the laws on personal data protection:

- the right to access personal data;
- the right to amend personal data;
- the right to request an erasure or destruction of personal data;
- the right to restrict the use of personal data;
- the right to object to the collection, use, and disclosure of personal data;
- the right to request data transfer;
- the right to withdraw consent.

10. Contact us

If you have any queries or wish to inquire additional details about Privacy Policy Notice of the Company, please contact the Company through the following channels:

ALLY REIT Management Company Limited

Address: No. 888 Praditmanutham Road, Klong Chan Sub-district, Bangkapi District, Bangkok 10240

Email: dpo@kegroup.co.th

Contact number: 02-101-5999

11. **Amendment to the Privacy Policy Notice**

The Company may change or amend this Privacy Policy from time to time, whereby we will update the current version of the Privacy Policy on ALLY's website. Please see additional details at the [Privacy Policy](#).