



PRIVACY POLICY

AIM REAL ESTATE MANAGEMENT COMPANY LIMITED

We, AIM Real Estate Management Co., Ltd., (hereinafter called “we”, “us”, “our”, “Company”) always place importance on your Personal Data to ensure your trust in our transparency and accountability in collection, use, or disclosure of your Personal Data. By virtue of the Personal Data Protection Act B.E. 2562 (2019) (“PDPA”) including relevant laws and regulations, we hereby issue this Privacy Policy (“Policy”) to inform you of our collect, use or disclose your Personal Data performed by us, our officers or employees including our contractual party or third party who has the duty or obligation to act as Data Processor to process your Personal Data for and on behalf of us, under the following details:

1. Scope of this Policy

This Policy applies to all Personal Data of a person who directly relates with us, including a person who relates to us as REIT manager of AIM Commercial Growth Freehold and Leasehold Real Estate Investment Trust (“AIMCG”) whether at present or in future.

A person who relates to us includes, without limitation, to the following:

- 1) Individual business partner or contractual party
- 2) Officers, employees, operators, or workers
- 3) Individual REIT unitholders
- 4) Directors, authorized persons, representatives, agents, shareholders, or workers of our corporate related persons
- 5) Visitors and users of our website, <https://www.aimreit.com> and <https://www.aimcgreit.com> including other communication channels monitored by us (if any).
- 6) Other individual whom we collect his/her Personal Data e.g., job applicants, family members of our employees, executives, and directors.

2. Definition

Personal Data means any information relating an individual which enable the identification of such individual, whether directly or indirectly, but not including the information of the deceased person in particular.

Sensitive Data means Personal Data as prescribed under the Section 26 of PDPA, e.g., Data pertaining to racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any other data which may affect the Data Subject in the same manner, as prescribed by the Personal Data Protection Committee.



Data Processing means any operation performed to Personal Data, whether by automatic method, e.g., to collect, record, copy, organize, amend, revise, use, recover, disclose, transfer, publicize, transfer, merge, erase, destroy, etc.

Data Subject means an individual who owns the Personal Data collected, used, or disclosed by us.

Data Controller means a natural or juristic person having the power and duties to make decisions regarding the collection, use or disclosure of Personal Data.

Data Processor means a natural or juristic person who operates in relation to the collection, use, or disclosure of Personal Data pursuant to the orders given by or on behalf of a Data Controller; whereby such natural or juristic person is not Data Controller.

3. Source of Your Personal Data

We collect or acquire your Personal Data from several sources as follows:

1) Directly collect from you, the Data Subject, through various channels e.g., job application, contract, document signing, or other channel monitored by us, or collect during the time you contact us at our office or via other means or channels monitored by us.

2) Collect from you, the Data Subject, during your use of our website, product or other service as specified by our contract or obligation e.g., to track your behavior on how you use our website, product, or service via cookies.

3) Collect from other source apart from the Data Subject, provided that such source must have power, authority, lawful basis, or consent from the Data Subject to disclose Personal Data to us e.g., Thailand Securities Depository Co., Ltd., Office of the Securities and Exchange Commission, Stock Exchange of Thailand, Department of Business Development, Ministry of Commerce, including based on a necessity for performing contractual obligation requiring data sharing with other party.

In case where you provide Personal Data of third party to us, you will oblige to notify the details of our collection, use, disclosure, and the rights of Data Subject specified under this Policy to such party, as well as obtain his/her consent if required for disclosure of such Personal Data to us.

4. Our Lawful Basis for Processing

We will collect, use, or disclose your Personal Data to the extent as required or permitted by the following lawful basis for collection, use or disclosure of Personal Data:

Lawful Basis	Description
Compliance with applicable laws	<p>For enabling our compliance with all our applicable laws, including, without limitation:</p> <ul style="list-style-type: none"> - Securities and exchange law - Taxation law - Accounting law - Labor law - Law regarding computer traffic data retention - Personal data protection law - Other applicable laws <p>including, to comply with rules, regulations and/or order of authority e.g., court, state authority, regulatory authority, or authorized officers.</p>
For performance of contract	<p>For enabling us to perform our contractual duties, obligation, or take any necessary action for concluding a contract between you and us and/or SCB Asset Management Co., Ltd. as trustee of AIMCG, including to perform any acts before concluding a contract with you of which failing to perform such act may affect or prevent the contract conclusion, including, without limitation:</p> <ul style="list-style-type: none"> - Consideration and approval to entering into a contract - Making our internal report - Identification for entering into a contract - Tracking and recording transaction - Calling for debt payment - Enforcing our contractual rights
For our legitimate interests	<p>We rely on the basis of legitimate interests by considering our benefits or third party's benefits, except where such interests are overridden by the fundamental rights and freedoms of Data Subject, including, without limitation:</p> <ul style="list-style-type: none"> - Ensuring security of our premises - Data processing for our internal affair - Management of our relationship e.g., complaint and dispute management - Filing a lawsuit, prosecuting, or taking related legal actions



	<ul style="list-style-type: none"> - Motion and/or voice recording in meeting, training, seminar or marketing and public relation event - Facilitating audit process performed by our auditors - Maintaining cyber-security
Consent	For collection of Personal Data for any other purposes apart from those specified under Section 24 and/or 26 of the PDPA, we rely on your consent and will notify the purpose of our collection, use or disclosure before requesting your consent.
Other lawful basis	<p>Apart from the lawful basis which we mentioned earlier, we may collect, use, or disclose your Personal Data based on the following lawful basis:</p> <ul style="list-style-type: none"> a) necessary to carry out a task in the public interests, or for exercising official authority b) prevent or suppress a danger to a person's life, body or health c) prepare historical documents, significant research, or statistics.

If we are required to collect, use, or disclose Personal Data from you to meet our legal obligations or to enter into an agreement, or perform our contractual obligation for you, we may not be able to perform our contractual obligation to you, whether entirely or partially, if you fail to provide your Personal Data or object our Data Processing activity.

5. Categories of Personal Data We Collect, Use or Disclose

We may collect, use, or disclose your Personal Data based on your relationship with us. Our collection, use or disclosure of Personal Data are categorized and exemplified as follows:

Category	Description and examples
Personal details	Title, name, surname, middle name, nickname, signature, identification number, nationality, driving license number, passport number, household registration, profession license number, social security number, taxpayer I.D. number, etc.
Personal Attributes	Date of birth, gender, height, weight, age, marital status, photo, etc.
Contact details	Telephone number, mobile number, facsimile number, email, postal address, social media credentials (Line ID, MS Teams), etc.
Working and education information	Job descriptions, working experience and education record e.g., type of employment, occupation, rank, position, duty, expertise, work permit, reference person details, term of position, working history, salary data, work commencement date, resignation date, employee evaluation, benefits and welfare, our assets and properties occupied by our personnel, bank account number, education institute, educational background, education record, and graduation date, etc.
Social relation details	Directorship, interested party in a transaction carried out by us, relationship with our director, executive, other related person, etc.
Data about your use of website monitored by us.	computer traffic data, user behavior data of our website (monitored by us e.g., https://www.aimreit.com and https://www.aimcgreit.com), searching history, cookies, or similar technologies, device ID, device category, connectivity details, Browser's information, etc.
Sensitive Data	Racial, religious, disability, criminal records, biometric data, health data, etc.

The categories specified above is merely for the general framework for processing of your Personal Data.

6. Cookies

We collect and use cookies including other similar technologies in websites monitored by us e.g., <https://www.aimreit.com> and <https://www.aimcgreit.com>, only for the purpose of security and facilitating your use, and developing our websites, provided that you can set or erase your cookies configuration through your web browser's settings.



7. Personal Data of Minors, Incompetent and Quasi-Incompetent Persons

If we become aware that collection of any Personal Data must rely on consent of the Data Subject who is a minor, incompetent or quasi-incompetent person, we will not collect such Personal Data unless we receive the consent from the legal guardian who has the authority to act on behalf of such minor, incompetent, or quasi-incompetent person, as the case may be, under the conditions prescribed by law.

In the case where at the time of collection, we do not know that the Data Subject is a minor, incompetent, or quasi-incompetent person, and we later discover that we collected Personal Data from the Data Subject without consent given from the legal guardian, we will promptly erase or destroy the collected Personal Data if we cannot rely on any other lawful basis for such collection, use and disclose apart from consent of the legal guardian.

8. Purpose of Personal Data Processing

We collect, use, or disclose your Personal Data for several purposes based on your relationship with the Company.

- 1) Conduct our business operation
- 2) Retain and update data related to you, and document referring to you.
- 3) Conduct any necessary action in corporate management including job application, recruitment of director and officers, employee evaluation, etc.
- 4) Prevent, detect, avoid, or inspect a security breach, law violation, or illegal act which may cause damage against the Data Subject and/or us.
- 5) Conduct identification, authentication, and data verification when you make a contact or do a transaction with us, use your lawful right, or use a right related to your Personal Data.
- 6) Conduct risk assessment and management.
- 7) Send our notification, communication, or news to you.
- 8) Prepare and deliver relevant and necessary document or information.
- 9) Self-identification, prevention of spam, unauthorized, or illegal act.
- 10) Perform necessary act to fulfill the obligation required by regulatory authorities, taxation authorities, law enforcement authorities, or our statutory obligation.
- 11) Take necessary action for legitimate interest of the Company or other person.
- 12) Prevent or suppress danger to a person's life, body, or health
- 13) Comply with applicable law, announcement, order, take legal action, or comply with Personal Data related act under a court warrant.

The purposes specified above is merely for the general framework for processing of your Personal Data.



9. Disclosure to Third Party

Under the purposes specified above, we may disclose your Personal Data to the following person:

Category	Description
governmental authorities or agencies we required by law or other significant purpose (e.g., for public interests) to make disclosure	Law enforcement authorities, regulatory authorities, or for other significant purposes e.g., Revenue Department, Labor Department, Department of Disease Control, Office of the Securities and Exchange Commission, etc.
Contractual party who provides welfare service to our employees	Third party procured by us to provide welfare service to our employees e.g., insurance company, hospital, payroll service provider, bank, telephone service provider, etc.
Service provider	We may assign our service provider to acts on our behalf or facilitate our operation e.g., cloud, website, document delivery, payment, internet, telephone, digital ID, social network, transportation, meeting arrangement service providers, external advisor, etc.
Other data recipient	We may disclose your Personal Data to other data recipient e.g., contact person, family member, hospital, training institute or other authorities e.g., for performing a transaction or contractual obligation, training, etc.
Public disclosure	We may disclose your Personal Data to the public only if necessary, e.g., disclosure enforced by the law on Securities and Exchange.

The categories specified above is merely for the general framework for our disclosure of your Personal Data.

10. Cross-Border Transfer of Personal Data

In some cases, we may be required to send or transfer your Personal Data to other country oversea for the purpose to do a transaction or provide service to you e.g., to send Personal Data to Cloud System having its platform or server located in other country.

If we have necessity to send or transfer your Personal Data to a destination country in overseas, we take an action for ensuring that the Personal Data sent or transferred will be performed with sufficient Personal Data protection measures according to international standard, or perform our sending or transfer under the condition as required by law e.g.,



- 1) Compliance with law requiring us to send or transfer your Personal Data to overseas
- 2) We have notified you and received your consent in case where the destination country has insufficient standards of Personal Data protection, according to the country list announced by the Personal Data Protection Committee
- 3) Necessity for performance of contractual obligation under a contract between you and us.
- 4) Performance of contractual obligation under a contract between other individual or juristic person and us for your benefit.
- 5) Prevention or suppression of danger to a person's life, body, or health, if you cannot provide consent at that time.
- 6) Necessity for carry out a task in the public interests.

11. Retention Period of Your Personal Data

We will retain your Personal Data throughout the period required to achieve the related purposes provided in this Policy or other applicable laws. Upon expiry of retention period or your Personal Data becomes unnecessary for achieving such purposes, we will erase or destroy the Personal Data or make it anonymous in a pattern and standard in accordance with the rules for the erasure or destruction of Personal Data as prescribed by law or international standard. We reserve the right to continue to retain your Personal Data until the end of legal prescription or the finality of related dispute by court's order or judgment.

12. Security of Personal Data

We implement a security measure to protect all Personal Data by limiting access only to specific employee, or authorized or assigned person, as necessary to fulfill the purpose notified to you. These personnel must strictly uphold and comply with our security measures, and maintain all Personal Data learned for performing the duty and responsibility utmost confidential. In addition, if we send, transfer or disclose your Personal Data to any third party, whether for performance of contractual obligation, or other agreements, we will adopt security and confidentiality measures for your Personal Data as appropriate and in accordance with the law to always ensure the security of your Personal Data we collect.

13. Your Rights under PDPA

According to PDPA, the Data Subject may exercise several rights related to their Personal Data as the following:



1) Right to access

You have the right to access to, obtain copy of your Personal Data or request the disclosure of the acquisition of your Personal Data we collected without your consent, unless we are entitled to reject your request under the laws or court orders, or if such request will adversely affect the rights and freedoms of others.

2) Right to rectify

If you find your Personal Data is inaccurate, incomplete, or obsolete, you have the right to request rectification for making your Personal Data accurate, up-to-date, complete, and not misleading.

3) Right to erase and destroy

You have the right to request us to erase, destroy or anonymize your Personal Data to become the anonymous data which cannot identify the Data Subject, under the terms and conditions prescribed by law.

4) Right to restrict Data Processing

You have the right to request us to restrict the use of your Personal Data in the following case:

- a) We are pending examination process in accordance with your request to rectify your Personal Data.
- b) Your Personal Data is unlawfully collected, used or disclosed.
- c) Your Personal Data is no longer necessary to be retained for the purposes of such collection, but Data Subject has necessity to request the retention for the purposes of the establishment, compliance, exercise, or defense of legal claims.
- d) We are pending verification of our lawful basis to collect your Personal Data or pending examination of necessity in collection, use or disclosure of your Personal Data for public interest, due to your objection of our Data Processing.

5) Right to object Data Processing

You have the right to object our collection, use or disclosure of your Personal Data, unless we have lawful grounds to reject your request of such right e.g., we can demonstrate that there is a compelling legitimate ground for the collection, use or disclosure of your Personal Data, or is undertaken for the establishment, compliance, or exercise legal claim or for the reason of public interest.

6) Right to withdraw consent

In case you have given your consent for us to collect, use, or disclose your Personal Data, whether before or after the effective date of the PDPA, you have the right to withdraw the given consent any time as long



as we retain your Personal Data, unless we are required to retain your Personal Data, by law or contractual obligation between you and us for your benefit.

7) Right for data portability

You have the right to receive your Personal Data from us in the format which is readable or commonly used by ways of automatic tools or equipment and can be used or disclosed by automated means. In addition, you have the right to request us to send or transfer your Personal Data to other Data Controller as prescribed by laws.

8) Right to file a complaint

In case where you found that we fail to comply with the PDPA you have the right to file a complaint with the Personal Data Protection Committee. In this regard, before filing a complaint, we would like to request you to contact and provide us an opportunity to learn the matters of fact, give explanation and resolve your concerns.

14. Amendment of this Policy

We may amend, revise or modify this Policy from time to time as deem appropriate, and will update you our current Policy via <https://www.aimreit.com> and <https://www.aimcgreit.com>.

15. How to contact us

If you have any question, suggestion, or require more additional information about our collection, use and disclosure of Personal Data, or this Policy, or you wish to use your right under the PDPA, you can contact us via email: ir@aimrm.co.th or telephone No. 02-254-0441-2.