

**Privacy Statement
for Trust Unitholders and Trustee representatives**

This privacy statement for Trust Unitholders and Trustees' representatives ("**Privacy Statement**") is the policy of Bhiraj REIT Management Company Limited ("the Company" or "we") as manager of Bhiraj Office Leasehold Real Estate Investment Trust. This privacy statement has been prepared as we recognize your privacy and commit to protect your personal data security. In addition, we will store, collect, use and disclose your personal data with respect to this Privacy Statement which is in compliance with the Personal Data Protection Act B.E 2562 (2019) ("**PDPA**").

This Privacy Statement applies to protect your personal data as:

- (1) Person holding investment units of Bhiraj Office Leasehold Real Estate Investment Trust ("BOFFICE") ("Trust Unitholders")
- (2) Person who is authorized by the Trust Unitholders to attend the Trust Unitholders' meeting ("Proxy")
- (3) Trustee representatives of BOFFICE ("Trustee representatives")

1. Type of Personal Data

"**Personal Data**" means any data relating to an individual which can identify such individual, directly or indirectly, excluding the data of a deceased individual or any other data as specified under the PDPA.

- 1.1 If you are Trust Unitholders, the Personal Data that we may collect from you consisting of:

No.	Types of Personal Data	Details
(1)	"Identity Data"	(1) name, family name (2) identification number or passport number (3) date of birth (4) nationality (5) marital status (6) signature
(2)	"Contact Details"	(1) current address (2) phone number (3) email (4) work address
(3)	"Financial Data"	(1) bank account number and account type; (2) registration number of BOFFICE unitholder (3) data of BOFFICE unitholder (4) registered member number of Thailand Securities Depository (5) income from the holding of BOFFICE investment units

1.2 If you are Proxy, the Personal Data that we may collect from you consisting of:

No.	Types of Personal Data	Details
(1)	“Identity Data”	(1) name, family name (2) identification number or passport number (3) date of birth (4) nationality (5) signature
(2)	“Contact Details”	(1) current address (2) phone number (3) email
(3)	“Sensitive Personal Data” (only if you are a manager)	medical examination result

1.3 If you are Trustee representatives, the Personal Data that we may collect from you consisting of:

No.	Types of Personal Data	Details
(1)	“Identity Data”	(1) name, family name (2) identification number or passport number (3) date of birth (4) nationality (5) signature
(2)	“Contact Details”	(1) current address (2) phone number (3) work address
(3)	“Qualification Data”	job position

If you would like to work with us or enter into any contract or transaction with us, we need to collect your Personal Data. If you do not provide such Personal Data which is necessary and required to proceed with the relevant activities or transactions to us, we may not be able to proceed with certain matters as requested by you, perform our contractual obligations and comply with the applicable laws which we have to comply.

If you provide the Personal Data of other individual to us, you confirm that such individual has reviewed this Privacy Statement and that such individual has given his/her consent regarding the processing of their Personal Data pursuant to this Privacy Statement. You are required to present and deliver the consent form of such persons to us upon our request.

For the Personal Data collected before 1 June 2022, we will proceed with such Personal Data in accordance with the PDPA and for the same purposed for which we collected and used. Nevertheless, for any Personal Data which is required to be collected, used or disclosed only with your consent pursuant to the PDPA, if you would like us to stop retaining and using or disclosing of such Personal Data, you may request to withdraw your consent at any time by contacting us or our data protection officer (DPO) as detailed in Paragraph 8 of this Privacy Statement.

2. Collection of the Personal Data

We may collect the Personal Data provided by you directly from you or by other channels as follows:

- 2.1 **Related Person:** we may collect your Personal Data from your coordinator, representative, agent or any other person you have relationship with.
- 2.2 **Related Company/ Organization:** we may collect your Personal Data from company, agency or organization you work for such as a BOFFICE Trustee.
- 2.3 **Public Sources:** this channel includes government agency, state enterprise, regulatory entity such as the Securities and Exchange Commission of Thailand and the Stock Exchange of Thailand as well as public websites and social media platforms.

3. Retention Period

We will retain your Personal Data as necessarily required to achieve the purposes specified in this Privacy Statement, but in any case, no longer than the period specified in the table below. However, we may continue to retain the Personal Data as long as (1) it is permitted by the PDPA and/or other applicable laws, (2) you and we continue to have an on-going legal relationship with each other, (3) we are required to retain the Personal Data under any laws or regulations, (4) you have granted consent to us and/or (5) it is deemed necessary to achieve the purposes specified in this Privacy Statement.

No.	Data Subject	Retention Period
1.	Trust Unitholders and Proxy	10 years after a termination of legal relationship between you and us
2.	Trustee representatives	10 years after a termination of legal relationship between you and us

4. Purposes of Personal Data Processing

Your Personal Data shall be collected, used and disclosed only for the purposes stated below, the purposes you consented, and any other purposes as permitted or required in the PDPA and/or any applicable laws.

No.	Purposes	Personal Data	Lawful Basis pursuant to Section 24 and Section 26
1.	To proceed for summoning, arranging, and proceeding with the BOFFICE Trust Unitholders meeting, including the notice of meeting, identity verification, Proposal of the meeting agenda, registration, proceeding with the meeting, voting or voting for the resolution, submitting any questions or suggestions, or requesting or delivery the relevant documents, reports or to proceed in accordance with the resolutions of the Trust Unitholders' meeting or the preparation of meeting minutes and evidence of meeting attendance	<u>Trust Unitholders</u> (1) Identity Data (2) Contact Details (3) Financial Data	Legal Obligation
		<u>Proxy</u> (1) Identity Data (2) Contact Details	Legal Obligation

No.	Purposes	Personal Data	Lawful Basis pursuant to Section 24 and Section 26
2.	<p>To proceed with below purposes;</p> <p>(1) to prepare any documents such as Distribution of unit reports</p> <p>(2) to examine the withholding tax payments related to the dividend payment of BOFFICE</p> <p>(3) to act related to dividend payment/capital reduction money such as checking for cash from the cheque</p>	<p><u>Trust Unitholders</u></p> <p>(1) Identity Data (2) Contact Details (3) Financial Data</p>	Legal Obligation
3.	<p>To proceed with matters necessary to Company's interest, including internal management such as making documents to report directors and executives</p>	<p><u>Trust Unitholders</u></p> <p>(1) Identity Data (2) Contact Details (3) Financial Data</p>	Legitimate Interest
4.	<p>To proceed with any related to the management of BOFFICE, including the following proceed:</p> <p>(1) capital increase</p> <p>(2) issuing and offering for sale of securities such as trust units, debentures</p> <p>(3) preparation of documents related to the management of BOFFICE</p> <p>(4) any transactions on behalf of BOFFICE trustees such as entering into contracts, registering business Security.</p>	<p><u>Trustee representatives</u></p> <p>(1) Identity Data (2) Qualification Data</p>	Legitimate Interest
5.	<p>To proceed with matters necessary to Company's interest, including</p> <p>(1) to prepare, prevent and manage potential risk, to conduct internal audit and to engage with legal, account or tax advisors in relevant matters</p>	<p><u>Trust Unitholders</u></p> <p>(1) Identity Data (2) Contact Details (3) Financial Data</p>	Legitimate Interest

No.	Purposes	Personal Data	Lawful Basis pursuant to Section 24 and Section 26
	(2) to disclose Personal Data in case there is a merger and acquisition, business restructuring, bankruptcy proceeding, rehabilitation, capital increase and any other matters having similar nature (3) to disclose data to the Company which is deemed necessary to conduct internal audit and internal coordination as necessarily required to improve our business operation	<u>Proxy</u> (1) Identity Data (2) Sensitive Data (3) Contact Details <u>Trustee representatives</u> (1) Identity Data (2) Qualification Data	Legitimate Interest

5. To Whom Personal Data is Disclosed

Company may disclose your Personal Data to a third party and/or government agency as shown below.

- 5.1 Government agencies, such as, Stock Exchange of Thailand and the Securities and Exchange Commission of Thailand
- 5.2 Any affiliated companies
- 5.3 Third party providing service to Company, such as, a company that provides Trust Unitholders meeting arrangement service, auditor and internal auditor, legal advisor, advisors
- 5.4 Person who work with us, such as Trustees
- 5.5 Person who BOFFICE's Trustee creates or will transact with us for BOFFICE's benefits
- 5.6 Guest and visitors of website, social media or our application or that we control

6. Your Rights

You are entitled to the rights stipulated in the PDPA, which are subject to the conditions prescribed in the PDPA and other laws related to such rights, as follows:

- 6.1 **Right to Access:** You have the right to access or request a copy of your Personal Data, which the Company is collecting, using or disclosing, including to disclose the acquisition method of your Personal Data which we obtained without your consent.
- 6.2 **Right to Data Portability:** You have the right to obtain your Personal Data, provided that the Company has arranged such Personal Data in the format which is readable or commonly used by ways of electronic tools or equipment and can be used or disclosed by automated means. You have the rights to request the Company to transfer your Personal Data to third party or receive the Personal Data which we has transferred to third party, unless it is impossible to do so because of the technical circumstances, provided that such requested Personal Data must be collected, used, or disclosed by us pursuant to your consent, or under contractual basis, or other criteria prescribed by law.
- 6.3 **Right to Objection:** You have the right to object the collection, use, and disclosure of your Personal Data in the event that the Company processing your Personal Data with any of the following basis: the public interest, legitimate interest, or for the direct marketing purposes or for the scientific, historic or statistic research purpose.

- 6.4 **Right to Deletion:** You have the right to request the Company to delete or destroy your Personal Data or to anonymize your Personal Data for certain reasons.
- 6.5 **Right to Restrict Processing:** You have the right to request the Company to restrict the processing of your Personal Data during we're considering your request either to rectify your Personal Data or objection to our processing of your Personal Data, or restrict a processing of your Personal data instead of deletion or destroying of your Personal Data in a case where your Personal Data is no longer needed but you have specifically requested the Company to keep your Personal Data for a purpose of establishing any legal entitlement, compliance to the laws, making any demands or requests or to use it as argument against any claim.
- 6.6 **Right to Rectification:** You have the right to request us to rectify your Personal Data to be accurate, up to date and not misleading.
- 6.7 **Right to File a Complaint:** You have the right to file a complaint with the Personal Data Protection Committee if we, our employees or our contractors violate or do not comply with the PDPA.
- 6.8 **Right to Withdraw Consent:** You have the right to withdraw your consent at any time, whether for some or all purposes, by follow our determined procedure and method. Nevertheless, your consent withdrawal shall not affect the collection, use and disclosure of Personal Data which you have consented us to proceed prior to such withdrawal.

You may exercise these rights by contacting the Company or our data protection officer (DPO) as detailed in Paragraph 8 below.

In the event that your consent withdrawal will affect you in any manner, we will inform you of such consequences. In case you withdraw your consent, such withdrawal shall not affect the collection, use and disclosure of Personal Data which we have already conducted by your consent.

For your interests which we concern, together with our commitment to secure your Personal Data , the Company may refuse to comply with your request in the event that (a) the person submitting the request cannot prove that he/she is the data subject or does not have the authority to submit such request, (b) the request is not reasonable, such as, the person submitting the request does not have the rights under the PDPA or there is no Personal Data of such person in Company's possession, (c) the request is excessive or vexatious, such as, the request unreasonably repeats a previous request (d) Company has compelling legitimate grounds to reject such request as required or permitted by the PDPA and/or any applicable laws.

7. Privacy Policy

The Company has published our Privacy Policy which sets out general information in relation to our collection, use and disclosure of Personal Data of all types of data subjects, as well as another details, such as, cross-broader transfer, cookies and Personal Data safeguard measures which do not cancel, replace, or override any provision in this Privacy Statement. If there is any conflict between the two documents, the Privacy Statements shall prevail.

Please consider our Privacy Policy at www.bofficereit.com

8. Contact Us

Regarding all queries or awareness with respect to the Personal Data arising from this Privacy Statement, or the activities of Company, including the exercise of any rights as set out in Paragraph 6, please contact us and our data protection officer at below address:

BHIRAJ REIT MANAGEMENT COMPANY LIMITED

To: Investor Relations Team / Compliance and Risk Management Team
Address: No. 591, United Business Center II Building, 7th floor, Soi Sukhumvit 33, Sukhumvit Road, Khlong Tan Nuea Sub-district, Vadhana District, Bangkok
Tel: 0-2261-0170
Email: boffice.brrm@bhirajburi.co.th
Website: <https://www.bofficereit.com/th/contact-us>

Personal Data Protection Officer

To: Personal Data Protection Officer

Address: No. 591, United Business Center II Building, 7th floor, Soi Sukhumvit 33,
Sukhumvit Road, Khlong Tan Nuea Sub-district, Vadhana District, Bangkok

Tel: 0-2261-0170

Email: boffice.brrm@bhirajburi.co.th

This Privacy Statement is reviewed and comes into effect on 1 June 2022.