

Privacy Notice for Trust Unitholders' Meeting

This privacy notice for the unitholders' meeting of S Prime Growth Leasehold Real Estate Investment Trust (the "SPRIME") is provided to inform you, as a unitholder, a proxy, a custodian, or an authorized person of a unitholder who is a juristic person, of the policy with respect to the collection, use and/or disclosure of your personal data, and your rights as a data subject.

1. Personal Data to be collected

SPRIME shall collect your personal data, including but not limited to, name-surname, nationality, age, date of birth, photograph, identification card number (or government identification card number, or passport number), securities registration number, address, telephone number, email, and health data filled in Coronavirus Disease 2019 (COVID-19) Health Declaration Form (if any), vote casting, images taken at and voice recorded during the unitholders' meeting, and information related to electronic systems access and usage such as IP Address (in case of online attendance and/or access to the unitholders' meeting).

Remark: For registration documents and/or proxy submitted by you to SPRIME which may contain sensitive data, such as race, blood type, and religion, which are not required for the purpose of holding the unitholders' meeting, SPRIME would like to inform you that SPRIME has no intention to collect such sensitive data. As such, you may redact those sensitive data prior to submitting your documents to SPRIME. In case you did not redact those sensitive data contained in your documents, SPRIME reserves its right to redact such sensitive data of yours. In such case, it shall be deemed that SPRIME has not collected any of the said sensitive data.

2. Purpose of the Collection, Use and/or Disclosure

SPRIME shall collect, use and/or disclose your personal data on a basis of (1) legitimate interest, (2) initiation or fulfilment of a contract, (3) fulfilment of legal obligations, or (4) other legal basis pursuant to the personal data protection laws, including but not limited to, for the fulfilment of SPRIME's legal obligations as an investment trust listed in the Stock Exchange of Thailand, identification verification and proceeding upon your request, meeting registration, calculation of meeting quorum, vote counting at the unitholders' meeting, preparation of register book for securities holders or any actions in relation to title documents for unitholding, dividend payment to the unitholders, for the prevention or suppression of a danger to a person's life, body or health, including for disease control from the COVID-19 pandemic. If you do not wish to provide your personal data to SPRIME where such personal data is needed for performing the objectives abovementioned, SPRIME reserves its right to reject your registration to attend the unitholders' meeting or performing any other action for you if such action requires the said personal data.

3. Period for Retention of Personal Data

SPRIME shall retain your personal data for as long as it is reasonably necessary to fulfil SPRIME's purpose of personal data collection, use and/or disclosure. However, to comply with the applicable laws, SPRIME may have to retain your personal data for a longer duration, as required by applicable law.

4. Third parties whom SPRIME may disclose your personal data

SPRIME may disclose or transfer your personal data to the following third parties:

- 1) Service providers that SPRIME engages for processing your personal data for the purpose of registration to attend the unitholders' meeting, calculation of the meeting quorum and vote counting in the unitholders' meeting;
- 2) Government agencies or competent authorities, so that SPRIME fulfills with its legal obligations,; and
- 3) SPRIME's website in order to publicize images and/or video taken at the trust unitholders' meeting and the minutes of the unitholders' meeting.

5. Your rights as data subject

You, as the data subject, are entitled to withdraw consent given for the collection, use and/or disclosure of personal data (only in case SPRIME rely on your consent), to request access to or to obtain a copy of your personal data processed by SPRIME, to request for personal data transfer, to object the personal data processing, to delete or de-identity personal data, to restrict the data processing, to request for correction of personal data and to lodge a complaint, subject to rules and procedures as required by the personal data protection laws. SPRIME may reasonably and lawfully refuse to proceed with your request.

6. Contact detail

If you have any queries or if you wish to exercise the rights relating to your personal data, please contact SPRIME at:

Investor Relations Department

S REIT Management Company Limited

No. 123, Suntowers A Building 31st Floor, Vibhavadi-Rangsit Road

Chomphon Sub-District, Chatuchak District, Bangkok 10900

Telephone 02-617-6465 or 02-050-5555 Extension 259

Email: info@sprimegrowth.com