



Further information is available:

- via notice
- at our reception customer information /register
- via CCTV Privacy Notice Link

**Data controller identity and contact details:**

Vana Nava Co., Ltd.

129/99 Soi Moobaan Nongkae, Nongkae, Hua Hin, Prachuapkhirikhan 77110 Thailand

Tel.: 032-909-606

Email: [info@vananava.com](mailto:info@vananava.com)

**Data protection officer contact details:**

E-mail: [info@vananava.com](mailto:info@vananava.com)

Tel.: 032-909-606

**Purposes of the processing for which the personal data are intended as well as the legal basis for the processing:**

- The data controller operates a video surveillance system in buildings and locations for the purposes of ensuring security in certain areas of the data controller's places of business, and to comply with applicable laws and regulations.
- The legal basis: Legal Obligation and Legitimate Interest

**Data subject rights:**

As a data subject you have several rights against the data controller, in particular the right to request from the data controller access to or erasure of your personal data.

For further details on this video surveillance as well as your data subject rights, please kindly find the full information through the options presented on the left.

## Vana Nava Co., Ltd.’s CCTV Privacy Notice

[Last Modified: 01 June 2023]

### 1. Purpose and Scope

Vana Nava Co., Ltd. (“the Company”) is aware of the importance of your personal data given to the Company with trust. Therefore, the Company is obliged to comply with the Personal Data Protection Act B.E. 2562 (“PDPA”) and to assure the rights of individuals concerning the collection, use, storage, disclosure, and deletion of personal data (“process”). The Company may collect the personal data of employees, customers, visitors, third parties, or any persons (collectively referred to as “you”) who enter the monitoring area inside and around the building, and various locations (“area”) of the Company through CCTV equipment.

<p><b>Data Controller Contact Information</b></p> <p>Vana Nava Co., Ltd.          129/99 Soi Moobaan Nongkae, Nongkae, Hua Hin,          Prachuapkhirikhan 77110 Thailand          Tel.: 032-909-606          Email: info@vananava.com</p>	<p><b>Data Protection Officer (DPO) Contact Information</b></p> <p>Tel.: 032-909-606          Email: info@vananava.com</p>
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#### Purpose of processing personal data:

- To comply with the business standards concerning management structure, working system, and services of securities business operators and derivatives business operators.
- To prevent danger to life, health, and personal safety including your property.
- To protect facilities and property from damage, obstruction, destruction of property, or other crimes.
- To support agencies involved in law enforcement to deter, prevent, search and prosecute.
- To assist in the effective resolution of disputes arising in disciplinary or grievance procedures.
- To assist in investigations or proceedings related to whistleblowing.
- To support the establishment of rights or raise them as defenses in legal proceedings, including but not limited to civil and labor cases.
- To comply with applicable laws and regulations.

‘Legal Bases’ means justifiable reasons to process personal data in accordance with Article 24 and Article 26 of the PDPA. In this regard, the Company relies on the following legal bases to process your personal data;

- Legitimate Interests: The Company shall process your personal data to maintain security for any persons who enter the monitoring area, to take care of the Company's assets, and to investigate incidents occurred within the area.
- Legal Obligation: The Company shall process your personal data to comply with the laws regarding managing and storing of information, documents, or evidence relating to the business operations. Moreover, the Company may process your personal data as requested by government agency regarding crimes or accidents that occur within or around the area, or to provide them with evidence in connection.

## 2. What personal data do we process?

The Company may process these groups of personal data specified hereunder;

- identity data including, but not limited to, photo, video and voice record.

## 3. How do we collect your personal data?

The Company will directly collect your personal data through CCTV equipment.

## 4. How do we use your personal data?

The Company shall process your personal data in accordance with the Company's purpose regarding area monitoring which is based on the legal basis under the PDPA.

The Company will process your personal data according to the stated purposes and scope. If there came upon a case where your personal data were to be processed for other purposes, and it is unlikely to rely on other legal bases, the Company would ask for new consent to process your personal data on such uses.

## 5. Usage of Personal Data with External Third-party Organization

The Company may be required to disclose or transfer your personal data to third-party organisations, in order for such organisations to process personal data in accordance with agreements with the Company or legal obligations. These organisations may include;

- government agencies including, but not limited to, the Royal Thai Police, Office of the Attorney General, court, or government officers such as prosecutors and inquiry official.

For the case where personal data is being passed on the third-party organizations, the Company will ensure that the minimum amount of personal data is being sent and consider anonymisation and pseudonymisation techniques for greater security. Nevertheless, third-party organizations who will process your personal data for the Company will be required to have an appropriate privacy policy. The Company does not permit these third-party organizations to use the personal data in a way that diverge from the agreed scope and purpose.

## 6. Transferring Personal Data to Foreign Countries

In this processing activity, the Company does not transmit or transfer your personal data to any foreign country.

## 7. Security Measures for Personal Data Protection

The Company has implemented security measures to ensure the security of your personal data. Further, third-party organizations must carry out the processing of your personal data in accordance with the Company policy and agrees to ensure the security of your personal data (More details are available at “Information Security Policy”).

## 8. Time Period of Personal Data Storage

The Company will store your personal data throughout appropriate period according to the Company’s scope and purpose including other important matters such as legal requirements, accounting and auditing purposes. (More details are available at (More details are available at Vana Nava’s Data Protection Officer).

## 9. Data Subject Rights

Your personal data rights include:

- right of access – you have the right to request a copy of all your personal data and assess if the Company is processing your personal data in accordance with relevant laws;
- right to data portability – for the case where the Company has in place an automated platform allowing you to access your personal data automatically:
  - you have the right to ask for your personal data to be transferred automatically to other organisations, and

- you have the right to request for your personal data in such a format that has been transferred from the Company to other organisations, except for the case where there is a technological limitation;
- right to object – you have the right to object to any data processing activity of your personal data which has been relied on certain legal bases, including:
  - legitimate interest;
- right to erasure – you have the right to request for data deletion or anonymization, in accordance to the following cases:
  - where processing required terms become expired
  - where there is objection raised against data processing activity, and
  - where data processing activity is not in accordance with relevant laws;
- right to restrict processing – you have the right to restrict any data processing activity in accordance with the following cases:
  - during pending examination process
  - for cases related to personal data which shall initially be deleted and/or destroyed, but was followed by an additional request of processing restriction instead
  - for cases where the data processing terms have passed, but you have requested for processing restriction due to legal reasons, and
  - during the process of data processing objection verification; and
- right to rectification – you have the right to edit your personal data to be correct and concurrent to the present. If any mistake was detected, the Company might not edit this ourself.

In some circumstances, the Company may not be able to carry out and support exercise of your rights, including, but not limited to, the cases where a legal process is taking place.

Please be informed that the Company does record all requests to ensure all issues are resolved. For any queries regarding your personal data protection and rights, more details are available at: [TDPG3.0-C5-20201224-1.pdf \(chula.ac.th\)](#)

In the case where you have the intention to exercise your personal data protection rights, or to file complaint against your personal data processing, please contact the Company’s DPO (contact details have been provided above). the Company will process this request in a secure and timely manner. Also, in case that the Company fails to preserve your rights under the PDPA, you can file complaint to the Office of the Personal Data Protection Commission (“**PDPC**”).

## 10. Policy Revision

This privacy policy was last updated on 01 June 2023. The Company holds the rights to review and edit this privacy policy as the Company sees fit. Any revision made will be notified to all related parties under this privacy policy.