

Vana Nava Co., Ltd. Vendor’s Privacy Policy

(Vana Nava Co., Ltd. Privacy Policy)

[Latest updated: 01 June 2023]

Vana Nava Co., Ltd. ( “Vana Nava” “we”, “us” and “our”) processes personal data of vendors, contact person of vendor, visitors, suppliers, potential vendors, authorized signatories, coordinators of vendor, lecturers, coordinators, licensors, certificate guarantors, certificate issuers, engineers, external system auditors, and employees of rental shop (collectively referred to as “Vendor”, “you” and “your”) with the reasonable measures to act in compliance with the Thailand’s Personal Data Protection Act B.E. 2562 (“PDPA”). You may find the full version of our Vendor’s Privacy Policy (“Privacy Policy”) through the attached QR code, however the summary of the Privacy Policy is shown below.

Topic	Overview
What data do we process?	We process collected personal data including, but not limited to, identity data, employment data, address/contact data, financial data, supporting documents, transactional data, and profile data.
How do we use those data?	We process personal data according to the purposes and scope of us, and with the legal bases as explained in our Privacy Policy.
Who do we transfer information to?	In some circumstances, we may be required to disclose and/or transfer your personal data to third - party organisations, which are clarified in our vendors/partners list.
What are your rights as a data subject?	As a data subject, you are entitled to the data subject rights which include, but not limited to, right of access, right to rectification and right to erasure.
Revision of the policy	Any revision made will be notified to all related parties under this Privacy Policy.



## Privacy Policy

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## 1. Purposes and Scope of the Privacy Policy

This Privacy Policy applies to all Vendor of us. In this regard, we mainly act as the data controller under the PDPA. Therefore, we are committed to collect and process your personal data in accordance with the purposes and scope of us as specified herein this Privacy Policy.

<b>Data Controller Contact Information</b>	<b>Data Protection Officer (DPO) Contact Information</b>
Vana Nava Co., Ltd. (Branch 00001)  129/99 Soi Moobaan Nongkae, Nongkae, Hua Hin, Prachuapkhirikhan 77110 Thailand Tel.: 032-909-606  Email: info@vananava.com	Tel.: 032-909-606  Email: info@vananava.com

This Privacy Policy covers data subjects who are our vendor, including vendors, contact person of vendor, visitors, suppliers, potential vendors, authorized signatories, coordinators of vendor, lecturers, coordinators, licensors, certificate guarantors, certificate issuers, engineers, external system auditors, and employees of rental shop.

As used in this Privacy Policy, the following terms shall have the meanings set forth below:

“process” means anything done with Vendor’s personal data, including collection, storage, use, disclosure and deletion of personal data.

“legal bases” means justifiable reasons to process personal data in accordance with Article 24 and Article 26 of the PDPA.

This Privacy Policy may be revised at any given time as notified to you through appropriate channels.

## 2. Personal Data We Collect

We collect the following categories of your personal data;

- identity data including, but not limited to, full name, signature, picture, taxpayer Identification number, and identification number;
- address/contact data including, but not limited to, email address, phone number, and Line ID;

- employment data including, but not limited to, name of a company, agency, company address, business email address, business phone number, job position, employment history, and power of signatory;
- transactional data including, but not limited to, water park ticket, date of, and number of users;
- financial data including, but not limited to, amount of withholding tax, and bank account number;
- supporting documents including, but not limited to, contract, copy of identification card, PP.50, copy of passport, affidavit, copy of house registration, company registration document, copy of bank account, PP.20, driver's license, identification card, and commercial registration; and
- profile data including, but not limited to, lecturer's profile, educational qualification, gender, and age.

### **3. How We Collect Your Personal Data**

In general, we will directly collect your personal data through these processes (or channels) including, but not limited to;

- when directly contact with Vendor or via Line OA, email, and telephone;
- when receive data from Vendor in paper, and electronic format;
- when Vendor fills in paper form; and
- when access through website.

However, we may collect additional personal data through third-party organisations which include;

- coordinator

#### 4. How We Process Your Personal Data

We process your personal data to carry out tasks per our scope and purposes of providing groups of activities.

Group of Activities	Group of PII's	Legal Bases
<b>Organizing public relation activities and promoting service</b> [ROP ID: VN-FB05]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address/contact data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>
<b>Conducting internal report</b> [ROP ID: VN-EN09, VN-SA16]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address/contact data</li> <li>● Transactional data</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Contract</li> </ul>
<b>Drafting or approving documents /contracts</b> [ROP ID: VN-EXE08]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Employment data</li> <li>● Address/contact data</li> <li>● Supporting documents</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>
<b>Holding meeting and seminar</b> [ROP ID: VN-EXE05]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address/contact data</li> <li>● Employment data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>
<b>Notification of service-related news</b> [ROP ID: VN-DMK10]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address/contact data</li> <li>● Transactional data</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate interest</li> </ul>
<b>Monitoring the operations of vendors</b> [ROP ID: VN-EN04, VN-EN05, VN-EN06, VN-PA04]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Employment data</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Contract</li> </ul>
<b>Contacting and contracting with vendors</b> [ROP ID: VN-DMK17, VN-DMK22, VN-DMK24, VN-HK02, VN-EN02]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address/contact data</li> <li>● Supporting documents</li> <li>● Employment data</li> <li>● Transactional data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> <li>● Legitimate interest</li> </ul>

Group of Activities	Group of PII's	Legal Bases
,VN-EN03, VN-EN11, VN-PA01 ,VN-PA02, VN-PA05, VN-FB01 ,VN-FB07, VN-RT01, VN-RT02 ,VN-RT03, VN-RT04, VN-SA02 ,VN-SA03, VN-SA04, VN-SA05 ,VN-SA13, VN-SA14, VN-SA15 ,VN-LD05, VN-LD06,VN-LD21 ,VN-FIN06, VN-FIN07]	<ul style="list-style-type: none"> <li>● Profile data</li> <li>● Financial data</li> </ul>	
<b>Drafting quotations or contracts</b> [ROP ID: VN-SA12]	<ul style="list-style-type: none"> <li>● Address/contact data</li> <li>● Transactional data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>
<b>Recording of area access control</b> [ROP ID: VN-PA03, VN-OPR06]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Supporting documents</li> <li>● Address/contact data</li> <li>● Employment data</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate interest</li> </ul>
<b>Coordinating with vendor</b> [ROP ID: VN-IT05, VN-IT15]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Employment data</li> <li>● Address/contact data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>
<b>Maintaining relationships with customers and vendors</b> [ROP ID: VN-SA07]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address/contact data</li> <li>● Employment data</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate interest</li> </ul>
<b>Service reservation</b> [ROP ID: VN-SA09, VN-SA10,VN-SA11]	<ul style="list-style-type: none"> <li>● Address/contact data</li> <li>● Transactional data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>
<b>Legal documentation and business license</b> [ROP ID: VN-LD11, VN-LD13 ,VN-LD15, VN-LD18, VN-LD22]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Employment data</li> <li>● Profile data</li> <li>● Supporting documents</li> <li>● Address/contact data</li> </ul>	<ul style="list-style-type: none"> <li>● Legal obligation</li> <li>● Contract</li> </ul>

We 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, we would ask for new consent to process your personal data on such uses.

#### 5. Usage of Personal Data with Third-Party Organisations

We may be required to disclose and/or transfer your personal data to third-party organisations, in order for such organisations to process personal data in accordance with agreements with us and/or Legal obligations. These organisations may include;

- our affiliated company including, but not limited to, Proud group, Andamanda Phuket, True Arena Hua Hin, and Proud head office.
- external auditors including, but not limited to, UIC Certification Services Co., Ltd.;
- government authorities including, but not limited to, Department of Labor Protection and Welfare, Excise Department, Ministry of Energy, and Hua Hin municipality office; and
- outsourcing company including, but not limited to, Medmedical;
- our affiliated company including, but not limited to, Proud group, Andamanda Phuket, True Arena Hua Hin, and Proud head office.

For the cases where personal data are being disclosed and/or transferred to third-party organisations, we will ensure that the minimum amount of personal data are being disclosed and/or transferred, and may consider anonymization and pseudonymisation techniques for greater security. Further, the third-party organisations who will process your personal data for us will be required to have in place appropriate privacy policy. We do not permit these third-party organisations to use your personal data in a way that diverge from the agreed scope and purposes.

#### 6. Transferring of Personal Data to Foreign Countries

According to the scope and purposes specified herein this Privacy Policy, we are currently not required to pass on personal data to foreign countries.

In this regard, we will pass on your personal data only when any of these requirements has been met. The requirements include;

- the receiving foreign country has adequate personal data protection standards as certified by the Personal Data Committee;

- the receiving organisation has in place a comprehensive privacy policy which has been certified by the Personal Data Committee;
- the receiving organisation is obligated to follow a substantial privacy policy with sufficient remedial measure in accordance with the procedures identified by the Personal Data Committee including, but not limited to, standard contractual clauses and code of conduct.
- a pre-requisite to the exercise of legal rights;
- consent has been obtained from you who are well-aware of the inadequate personal data protection standards of the receiving countries or international organisations;
- a requirement for the execution of an agreement to which you are a party of, or the fulfillment of a request you made prior to entering into the agreement;
- a necessary task to carry out under a contractual obligation between us and other persons or entities for the benefits of yours;
- to ensure the safety or limit further damage to an individual's health who cannot give consent at the current time; and
- a necessary task for the good of the public.

## **7. Security Measures for Personal Data Protection**

We have implemented certain security measures to ensure the security of your personal data. In this connection, third-party organisations are required to carry out the processing of personal data in accordance with our security policy, and to ensure the security of your personal data (More details are available at "**Information Security Policy**").

## **8. Time Period of Personal Data Storage**

We will store your personal data throughout appropriate period according to our scope and purposes, 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. Vendor's Personal Data Rights

Your personal data rights include:

- right to revoke consent – for the case where we have obtained your consent in order to process your personal data;
- right of access – you have the right to request a copy of all your personal data and assess if we are processing your personal data in accordance with relevant laws;
- right to data portability – for the case where we have 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 us 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 and/or processing purposes, including:
  - public task or legitimate interest
  - direct marketing purposes, and
  - scientific, historical or statistic research purposes, unless the processing is necessary for public task;
- 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 consent has been withheld, and we cannot rely on other legal bases to process your personal data
  - 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, we might not edit this ourselves.

In the cases where we 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, you will continue to have the right to retract your consent by emailing all related parties. We will therefore be required to terminate all processes as soon as possible. However, the retraction only applies to the data processing carried out thereafter. Any data processing activity carried out before the retraction will not be reversed.

Please be informed that we do 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 \(chula.ac.th\)](https://www.chula.ac.th/TDPG3.0-C5-20201224-1.pdf)

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 our DP0 (contact details have been provided above). We will process this request in a secure and timely manner. Also, in case that we fail 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 applies to all our Vendor, and was last updated on 01 June 2023. We hold the rights to review and edit this Privacy Policy as we see fit. Any revision made will be notified to all related parties under this Privacy Policy.