



Vana Nava Co., Ltd. Applicant's Privacy Policy

(Vana Nava Co., Ltd. Privacy Policy)

[Latest updated: 01 June 2023]

Vana Nava Co., Ltd. (referred to as “**Vana Nava**”, “**we**”, “**us**” and “**our**”) processes personal data of applicants (referred to as “**Applicant**”, “**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 Applicant'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, address/contact data, profile data, family data, employment data, biometric data and supporting documents.
How do we use those data?	We process personal data according to our purposes and scope, 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 of our Applicant. In this regard, we mainly act as the data controller under the PDPA. Therefore, we are committed to collect and process Applicant's personal data in accordance with our purposes and scope as specified herein this Privacy Policy.

Data Controller Contact Information VANA NAVA Co., Ltd. 546/7, Plearnjit Road, Lumpini, Pathum Wan, Bangkok, Thailand Tel.: 032-909-606 Email: info@vananava.com	Data Protection Officer (DPO) Contact Information Tel.: 032-909-606 #4030 Email: hr@vananava.com
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As used in this Privacy Policy, the following terms shall have the meanings set forth below:

“process” means anything done with Applicant'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 Applicant through appropriate channels.

2. Personal Data We Collect

We collect the following categories of Applicant's personal data;

- identity data including, but not limited to, full name and portrait photo;
- address/contact data including, but not limited to, address and phone number;
- profile data including, but not limited to, age, gender and education background;
- family data including, but not limited to, family member's occupation and emergency contact person; and
- employment data including, but not limited to, applied position and department and starting date;
- supporting documents including, but not limited to, copy of ID card, copy of house registration and CV/resume.

In addition, we may process the following certain type of sensitive personal data;

- criminal record; and
- biometric data including fingerprint.

3. How We Collect Your Personal Data

In general, we will directly collect Applicant's personal data through process or channel including, but not limited to, when you send your data via hard copy or email.

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

- recruitment website including, but not limited to, JobsDB; and
- government agency including, but not limited to, Royal Thai Police.

4. How We Process Your Personal Data

We process Applicant's 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
Recruiting new employees [ROP ID: VN-HR02, VN-HR03, VN-HR04, VN-HR25, VN-HR26, VN-HR27, VN-HR28]	<ul style="list-style-type: none">● Identity Data● Address/Contact Data● Profile Data● Family Data● Employment Data● Biometric Data● Supporting Documents	<ul style="list-style-type: none">● Contract● Consent

We will process Applicant's personal data according to the stated purposes and scope. If there came upon a case where Applicant's 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 Applicant's personal data on such uses.

5. Usage of Personal Data with Third-Party Organisations

According to the scope and purposes specified herein this Privacy Policy, at this moment, we are not required to disclose and/or transfer Applicant's personal data to third-party organisations.

However, 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 Applicant's personal data for us will be required to have in place appropriate privacy policy. We do not permit these third-party organisations to use Applicant's 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, at this moment, we are not required to pass on personal data to foreign country.

However, we will only disclose or transfer Applicant's personal data if any of the following requirements has been met;

- 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 Applicant who is 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 Applicant is a party of, or the fulfillment of a request Applicant 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 Applicant;
- 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 Applicant's 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 Applicant's personal data (More details are available at "**Information Security Policy**").

8. Time Period of Personal Data Storage

We will store Applicant's 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. Applicant'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 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, 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, and
 - for cases where the data processing terms have passed, but you have requested for processing restriction due to legal reasons; 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 DPO (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 of our Applicant, 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.