



## Vana Nava Co., Ltd. Customer’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 Customer (collectively referred to as “Customer”, “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 Vana Nava Customer’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, transactional data, supporting documents, health data, employment data, financial data, IT data and supporting documents.
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 of our Customer. In this regard, we mainly act as the data controller under the PDPA. Therefore, we are committed to collect and process Customer's personal data in accordance with the purposes and scope of us as specified herein this Privacy Policy.

Data Controller Contact Information	Data Protection Officer (DPO) Contact Information
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 Customer, including potential Customer, website visitors, application service users, participants, visitors (outsider)

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

“process” means anything done with Customer'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 customer through appropriate channels

## 2. Personal Data We Collect

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

- identity data, including, but not limited to, full-name, portrait photo, national identification number;
- address / contact data, including, but not limited to address, telephone number, email;
- profile data, including, but not limited to age, date of birth, nationality;
- transactional data, including, but not limited to credit card information, ticket information, date of service use;

- health data, including but not limited to incident information, first-aid and medical emergency information, allergen information;
- employment data, including but not limited to company, job title, company address;
- financial data, including but not limited to bank account;
- IT data, including but not limited to IP Address, Login Time / Logout Time, behavior of website users
- supporting documents, including but not limited to copy of national identification card, copy of passport, tax invoice

### 3. How We Collect Your Personal Data

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

- when Customer directly provide documents through telephone, email, Line, social media, company websites;
- when Customer participate to marketing activities through social media, company websites, Line;
- when Customer fills in relevant forms, such as medical emergency form, incident form, area entering form;
- when enter into agreement with Customer.

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

- e-commerce platform, such as Traveloka, Shopee and Lazada;
- social media, such as Facebook, Google, TikTok, TripAdvisor;
- legal representatives, such as guardian, parent;
- accident witnesses

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

We process Customer'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
<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>Providing food service</b> [ROP ID: VN-FB02, VN-FB04]	<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>Providing Water Park service</b> [ROP ID: VN-DMK01, VN-DMK02, VN-DMK03, VN-DMK04, VN-DMK20, VN-DMK21, VN-OPR05]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Transactional data</li> <li>● Profile data</li> <li>● Supporting Documents</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> <li>● Consent</li> </ul>
<b>Financial management</b> [ROP ID: VN-FIN01, VN-FIN04]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Financial data</li> <li>● Supporting Documents</li> <li>● Employment data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>
<b>Registration and management of membership</b> [ROP ID: VN-IT08, VN-IT18, VN-AD01]	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Profile data</li> <li>● Supporting Documents</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>

Group of Activities	Group of PII	Legal Bases
<p><b>Organizing public relations activities and promoting service</b></p> <p>[ROP ID: VN-DMK06, VN-DMK07, VN-DMK08, VN-DMK12, VN-DMK18, VN-SA01]</p>	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Profile data</li> <li>● Supporting Documents</li> <li>● IT data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> <li>● Legitimate interest</li> </ul>
<p><b>Conducting internal reports</b></p> <p>[ROP ID: VN-DMK05, VN-DMK13, VN-SA16, VN-OPR01, VN-OPR02, VN-OPR03, VN-HR21]</p>	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Employment data</li> <li>● Transactional data</li> <li>● Profile data</li> <li>● Health data</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Contract</li> <li>● Consent</li> <li>● Vital interest</li> </ul>
<p><b>Tax operations</b></p> <p>[ROP ID: VN-FIN02, VN-FIN05]</p>	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Supporting Documents</li> </ul>	<ul style="list-style-type: none"> <li>● Legal Obligation</li> </ul>
<p><b>Conducting internal audit</b></p> <p>[ROP ID: VN-FIN03]</p>	<ul style="list-style-type: none"> <li>● Identity data</li> </ul>	<ul style="list-style-type: none"> <li>● Legal Obligation</li> </ul>
<p><b>Contacting and contracting with vendor</b></p> <p>[ROP ID: VN-SA02, VN-SA03]</p>	<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>
<p><b>Drafting quotations and contracts</b></p> <p>[ROP ID: VN-SA04, VN-SA05, VN-SA12]</p>	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Employment data</li> <li>● Transactional data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>

Group of Activities	Group of PII's	Legal Bases
<p><b>Providing transportation service</b></p> <p>[ROP ID: VN-S13, VN-SA14]</p>	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Employment data</li> <li>● Transactional data</li> <li>● Supporting Documents</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>
<p><b>Recording of access control</b></p> <p>[ROP ID: VN-OPR06]</p>	<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> </ul>
<p><b>Cooperation and complaints handling process.</b></p> <p>[ROP ID: VN-DMK09, VN-DMK16, VN-DMK19, VN-DMK23, VN-FB03, VN-FB06, VN-FB08, VN-SA06, VN-AD03, VN-AD04, VN-OPR04]</p>	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Profile data</li> <li>● Employment data</li> <li>● Health data</li> <li>● Transactional data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> <li>● Legitimate interest</li> <li>● Consent</li> </ul>
<p><b>Maintaining relationships with customers and vendors</b></p> <p>[ROP ID: VN-SA07]</p>	<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>
<p><b>Service reservation</b></p> <p>[ROP ID: VN-SA08, VN-SA09, VN-SA10, VN-SA11, VN-SA15]</p>	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Employment data</li> <li>● Transactional data</li> </ul>	<ul style="list-style-type: none"> <li>● Contract</li> </ul>
<p><b>Conducting marketing analysis</b></p> <p>[ROP ID: VN-DMK11, VN-DMK14, VN-DMK15, VN-AD02]</p>	<ul style="list-style-type: none"> <li>● Identity data</li> <li>● Address / contact data</li> <li>● Profile data</li> </ul>	<ul style="list-style-type: none"> <li>● Consent</li> <li>● Legitimate interest</li> </ul>

Group of Activities	Group of PII's	Legal Bases
	<ul style="list-style-type: none"> <li>● IT data</li> <li>● Supporting Documents</li> <li>● Employment data</li> </ul>	

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

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

We may be required to disclose and/or transfer Customer's 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;

- delivery companies including, but not limited to, Thailand Post Co., Ltd;
- travel companies including, but not limited to, TripAdvisor;
- Insurance companies including, but not limited to, DHIPAYA LIFE ASSURANCE Co., Ltd (Public);
- bank alliances including, but not limited to, Siam Commercial Bank Co., Ltd (Public);
- government agencies including, but not limited to, the Revenue Department;
- service providers including, but not limited to, Taximail Co., Ltd, AA AUDIT FIRM Co., Ltd;
- Hospitals including, but not limited to, Bangkok Hospital, Hua Hin Hospital, San Paolo Hospital;

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 Customer'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 Customer'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, we are currently required to pass on personal data to foreign countries i.e., worldwide via Tripadvisor website.

In this regard, we will pass on Customer's 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 Customer 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 Customer is a party of, or the fulfillment of a request Customer 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 Customer;
- 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 Customer'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 Customer's personal data (More details are available at "**Information Security Policy**").

## 8. Time Period of Personal Data Storage

We will store Customer'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. Customer'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 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 our Customer 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.