



PRIVACY POLICY

Introduction

At Vinarco Group of Companies ("Vinarco"), we value the rights and freedoms of all people. This includes respecting your privacy and protecting your data in compliance with the Personal Data Protection Act B.E. 2562 ("PDPA"), relevant laws, and regulations.

Purpose of Policy

This privacy notice describes how we collect, use, and disclose (or "process") your information. It provides you with how to contact us and outlines your rights concerning your personal data.

Scope of Policy

This policy applies to all employees, contractors, and third-parties, vendors who collect, use, or disclose ("Processing") Vinarco's data, regardless of the format (Electronic, Hard copy, or Verbal)

Important Information

Who are we?

Throughout this document, "we", "us", "our", and "ours" refer to the Vinarco. Wherever we have said "you", "your" or "yours", this means you (Data Subject).

Data Controller

Vinarco is the Data Controller when we collect and process Personal Data about you.

We have appointed an external group Data Protection Officer (DPO) responsible for overseeing questions concerning this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please get in touch with the external DPO using the following address below.

Vinarco Group of Companies

1168/111, 37th Floor, Lumpini Tower
Rama 4 Road, Thungmahamek,
Sathorn, Bangkok 10120, Thailand
Tel: (+66) 0 2285 6540-9
Email: Contact@vinarco.com

Our Data Protection Officer (DPO)

VinarcoPDPA (Thailand) Limited
1168/112, 37th Floor, Lumpini Tower
Rama 4 Road, Thungmahamek,
Sathorn, Bangkok 10120, Thailand
Email: dpo@vinarco.com

You have the right to lodge a complaint at any time to the Office of Personal Data Protection Committee (PDPC), which serves as the supervisory authority for data protection issues in Thailand. You can contact them using the information provided below.

The Personal Data Protection Committee (“PDPC”)

The Government Complex Commemorating His Majesty
Ratthaprasasanabhakti Building 7th Floor,
Chaengwattana Road, Thung Song Hong Sub-District, Lak Si District
Bangkok, Thailand 10210
Tel: 02 141 6993, 02 142 1033
E-mail: Saraban@pdpc.or.th
Website: www.PDPC.or.th

We would, however, appreciate the opportunity to address your concerns before you approach the PDPC. Therefore, we kindly request that you first contact us directly.

The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, and transfer different kinds of personal data about you, which we have grouped as follows:

- **Identity Data:** includes but is not limited to first name, last name, username or similar identifier, title, date of birth, and other details.
- **Contact Data** includes but is not limited to billing address, residential address, email address and telephone numbers.
- **Financial Data:** includes but is not limited to bank account details, bank statements, credit card details and payment details.
- **Transaction Data:** includes but is not limited to details about payments to and from you and financial information and identification documents (e.g., for KYC verification, for bursary assessment or for fundraising).
- **Technical Data:** commonly known as online identifiers and includes Internet Protocol (IP) address, unique mobile device identification numbers (such as your Media Access Control (MAC) address, Identifier For Advertising (IDFA), and/or International Mobile

Equipment Identity (IMEI), type of device, your login data, browser type and version, time zone setting and geolocation, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the website.

- **Academic Data:** includes but is not limited to your academic or other education-related records, references, and test results.
- **Usage Data:** includes but is not limited to information about how you use our website, and services, education, and employment data; images, audio, and video recordings or CCTV.
- **Marketing and Communication Data:** includes but is not limited to your preferences in receiving marketing communication from us and/or our third parties, news about our products/ services and your communication preferences.
- **Aggregated Data:** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

If you decide to make a payment for any of our products/ services, your Financial Data, including your bank account and payment card details, will be collected, and processed by our external payment service provider. We will not have access to collect, use, store, or transfer your Financial Data

We collect, use, and share Aggregated Data. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, suppose we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you. In that case, we treat the combined data as personal data that will be used according to this privacy policy.

Sensitive Personal Data

- a) When necessary, we need to process personal data which is designated as “sensitive” or “special category personal data” to facilitate our company operations and activities. Such data includes personal data regarding a data subject’s concerning:
 - b) Health;
 - c) Accessibility;
 - d) Information relating to safeguarding;
 - e) Criminal records;
 - f) Ethnicity;
 - g) Religious or Philosophical beliefs;
 - h) Biometric data (e.g. fingerprint, facial recognition, etc.)
 - i) Sexual behaviour; or
 - j) Political opinion.

How Is Your Personal Data Collected

We collect the majority of the personal data we process directly from the data subject concerned. There are instances where we collect data from third parties (for example, referees/references, and previous Companies) or from publicly available resources.

We collect data about you when:

- you have expressed an interest in applying for our company;
- you have registered to attend (or have attended) one of our events;
- you visit our website or social media;
- you have expressed an interest in working for, or with, us; or
- you are employed by an organization with whom we have a business relationship.

How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- We are about to enter or have entered a contract with you for the performance of a contract.
- Where it is necessary for our legitimate interests (or those of a third party), your interests and fundamental rights do not override those interests and
- Where we need to comply with a legal or regulatory obligation.

Purposes For Which We Will Use Your Personal Data.

In the table below, we describe how we may use your personal data and which of the legal bases we rely on to do so. We have identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. In addition, processing of your data is not limited solely to the purpose/ activity contained within this table.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
The recruitment, selection, and onboarding of Employee	a) Identity b) Contact c) Technical d) Academic e) Usage f) Financial g) Sensitive	a) Performance of a contract with you b) Explicit consent
The safeguarding of employee welfare and provision of pastoral care, welfare, health care services and support.	a) Identity b) Contact c) Academic d) Sensitive e) Technical	a) Performance of a contract with you b) Explicit consent

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
Compliance with legal and regulatory requirements	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Academic e) Usage f) Sensitive g) Financial h) Transaction 	<ul style="list-style-type: none"> a) Legal obligation
Operational management including the compilation of employee records; the administration of invoices, fees, and accounts; the management of company property; the management of security and safety arrangements (including the use of CCTV and monitoring of the company's IT and communications systems in accordance with our Acceptable use of the company's ICT facilities and the internet agreement); the administration and implementation of our company's rules and policies for employee; health and safety management; and the maintenance of historic archives.	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Academic e) Usage f) Sensitive g) Financial h) Transaction 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Explicit consent c) Necessary for our legitimate interests d) Vital Interests
Employee administration including the recruitment of employee/engagement of contractors; administration of payroll, pensions, and sick leave; review and appraisal of employee performance; conduct of any grievance, capability or disciplinary procedures; and the maintenance of appropriate human resources records for current and former employee; and providing references	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Academic e) Usage f) Sensitive g) Financial h) Transaction 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Explicit consent c) Necessary for our legitimate interests
Maintaining relationships with our former Employee	<ul style="list-style-type: none"> a) Identity b) Contact 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests
Keeping a record of historical and memorable events relevant to the maintenance of a historical record	<ul style="list-style-type: none"> a) Identity b) Contact 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests
To manage our relationship with you, which will include, but not limited to: <ul style="list-style-type: none"> a) Notifying you about changes to our terms or privacy policy b) Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> a) Identity b) Contact c) Marketing and Communications 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Necessary to comply with a legal obligation. c) Necessary for our legitimate interests d) Explicit consent
To management and protect our company and the website (including cookies, troubleshooting, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Transaction e) Usage 	<ul style="list-style-type: none"> a) Performance of contract b) Necessary for our legitimate interests c) Necessary to comply with a legal obligation. d) Explicit consent

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a) Technical b) Usage c) Marketing and Communications d) Aggregated	a) Necessary for our legitimate interests b) Explicit consent

Change of Purpose

We will only use your personal data for the purposes we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and obtain your consent to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Marketing

We provide you with choices regarding our use of your personal data for marketing and advertising purposes. We have established the following personal data control mechanisms:

- You will receive marketing communications from us if you have subscribed for an account with us or purchased/ used services from us and you have consented to receive that marketing. All our marketing communications contain an opt-in option, and you can opt-out at any time. Please note that the opt-out will not affect the lawfulness of the processing that has taken place before the opt-out.

Third-Party Links

Our website may contain links to third-party websites, plug-ins, and applications. Clicking on these links or enabling connections may result in third parties collecting or sharing data about you. We do not control those third-party websites and are not responsible for their privacy policies. We recommend that you review the third party's privacy policy of every website you visit when leaving our site.

Third-Party Marketing

We will get your explicit opt-in consent before sharing your personal data with any Vinarco for marketing purposes.

Disclosure of Your Personal Data

- We will keep your personal data confidential and do not have a policy to sell your personal data to a third party. If there is a legal necessity to disclose your personal data, we will only disclose your personal data to authorized persons or parties as necessary. We may share your personal data with third parties as set out below for the purposes specified in the table in section 4 above:

- Our company partners and our authorized representative personnel;
 - Service providers such as representative companies, travel agencies, contractors, consultants, financial institutions, healthcare providers, cloud service providers, online travel agents (OTA) websites, marketing companies, educational websites, and information technology (IT) development companies. Such parties may locate either domestically or internationally and all party is under agreement with us;
 - Government or regulatory agencies, to comply with law or request of authorized departments.
- We may seek to acquire other businesses or merge with them, or our business or part of our business may be sold. If a change happens to our business, we will notify such changes to you about your personal data. Your personal data may be disclosed to our advisers and those of any prospective purchaser or partner. The new owners or partners may use your personal data in the same way as set out in this privacy policy. Your data will only be disclosed for the purposes identified in this privacy policy (as may be updated periodically) unless a law or regulation allows it explicitly or requires otherwise.
 - We require all third parties to respect the security of your personal data and treat it according to the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our agreement. All our third-party processing partners are vetted under our third-party due diligence process and have signed Data Processor Agreement with us.

International Transfers

Some of our external third parties are based outside the Kingdom of Thailand, so their processing of your personal data will involve a transfer of data outside the Kingdom of Thailand.

Whenever we transfer your personal data out of the Kingdom of Thailand, we ensure an adequate level of personal data protection is offered to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the Personal Data Protection Committee (PDPC) (as appropriate).
- Appropriate safeguards are in place in accordance with data protection laws. These safeguards include the use of standard contractual clauses and/or data protection clauses approved by the Personal Data Protection Commission (as appropriate)
- The transfer is otherwise allowed under data protection laws (including where we have your consent, or the transfer is necessary for the performance of a contract with you).

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, disclosed, or unavailable.

In addition, we limit access to your personal data to those employees, agents, professional advisers, contractors, and other third parties who have a business need to know on the Principle of Least Privilege (PoLP). They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We periodically review all privacy and security policies and update them, when necessary, in line with changes in data protection laws or when any new technologies are introduced into our business.

Where the introduction of new technologies results in a high risk to your personal data, we will perform a Data Protection Impact Assessment (DPIA). We will only proceed if we are able to mitigate any identified high risks. Our methods of collecting personal data are reviewed by management before they are implemented to confirm that personal data is obtained fairly, without intimidation or deception, and lawfully, adhering to all relevant rules of law, whether derived from statute or common law, relating to the collection of personal data.

In the unlikely event of a data breach incident, we have implemented procedures to address any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. You can refer to our SOP-PDP-ISMS-003_Personal Data Protection Control Procedure for the risk classification of a breach.

Data Retention

We will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including meeting legal, accounting, or reporting requirements. You can refer to SOP-GRP-QMS-002_Document Control Procedure for the retention period of each type of data as a reference.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law, we must keep basic information about our service users/ employees (including Contact, Identity, Financial, and Transaction Data) for **Ten tax years** as part of our legal obligations to do so.

You can request the deletion of your data under certain circumstances. Please contact the above Data Protection Officer (DPO) to request erasure and for more information.

Additionally, in some cases, we may anonymize your personal data for research or statistical purposes, making it no longer associated with you. In such instances, we may use this information indefinitely without further notice to you.

Your Data Subject Rights

We value your rights under the Personal Data Protection Act (PDPA) and recognize the importance of protecting your personal data. As such, you have the following rights:

- The right to be informed about the purpose of collecting and processing the data.
- The right to withdraw the given consent.
- The right to access and obtain the data collected from you.
- The right to object the collection, use, and disclosure of your data.
- The right to restrict the use of your data.
- The right to correction of your data.
- The right to transfer your data to another data controller.
- The right to have your data erased, destroyed, or anonymized.

What We May Need from You: To prevent unauthorized access to your personal data, we may need to request specific information from you to confirm your identity and ensure your right to access your personal data or exercise any other rights. We may contact you to ask you for further information concerning your request to speed up our response.

Time Limit to Respond: We try to respond to all legitimate requests **within 30 days**. Occasionally it may take us longer than thirty days if your request is particularly complex or you have made several requests, in which case we will inform you of the reason and expected time of completing the request.

DSAR Submission: If you wish to exercise any of the rights set out above, please use the [Data Subject Access Request form \(DSAR\)](#) to make a submission.

Policy Updates

Our policies are regularly reviewed and adjusted to align with the requirements of applicable laws and regulations, ensuring compliance and protection of your privacy rights. This review occurs at least annually and/or whenever changes are made to relevant laws and regulations.

This Policy is dated 11th April 2024 and will be reviewed by Vinarco periodically as necessary or upon the development of the concerning technology to ensure effective and appropriate security measures in line with minimum legal requirements as prescribed by the law's relevant authorities.

Vinarco Headquarter, 11 April 2024



Mr. Chakrit Wongsakornraksa
Group Managing Director
VINARCO GROUP