



Operational Policy

Personal Data Protection (Privacy Policy)

Privacy Policy

Nowadays, technology has changed and advanced rapidly. There are many different communication channels, making it easier to violate the privacy of personal information. And many times, it leads to distress or damage to the owner of the information. Therefore, there must be a law on personal data protection to set criteria , mechanisms or measures to supervise the protection of personal information, including the collection, use or disclosure of personal information.

Vara Food and Drink Co., Ltd. realizes and places great importance on the rights and privacy of the owner of personal data and will take strict measures to maintain security, confidentiality and prevent the use of personal data without prior permission from the owner of the personal data. The company has established this personal data protection policy to provide a method for managing personal data and have appropriate security measures and operate in accordance with the objectives and consent of the owner of the personal data given to the company regarding the collection, use or disclosure of such personal data in accordance with the law on the protection of personal data and other relevant laws or regulations.

1. Personal information

1.1 Personal Data means information about an individual that enables the identification of that individual, either directly or indirectly, but does not include information about a deceased person, for example, name, surname, telephone number, address. Email, national ID card number , etc.

1.2 Sensitive Personal Data means personal data that is specifically specified by law, such as race, political opinions, religious or philosophical beliefs, sexual behavior, criminal history, health information, disability, trade union information, genetic information , biometric information, or any other similar information specified by law, which the Company must handle with special care. The Company will collect, use and/or disclose sensitive personal data only when receiving the express consent of the individual or in cases where the Company is required to do so as permitted by law .

2. Methods of collecting and receiving personal information

2.1 The Company collects and receives your personal information through various channels as follows:

2.1.1 Personal information that you provide directly to the Company: You may provide personal information directly to the Company to inquire, fill out various forms online or by document to apply for a job, apply for a service or contact for business, inquire for information or provide opinions/feedback to the Company Group, etc.

2.1.2 Personal information that the Company automatically collects from you: The Company may collect certain technical information about your device, activity and browsing patterns. Website usage history information (Browsing) of your website automatically using cookies and other similar technologies. Some cookies are necessary for the website to function properly and some are cookies that provide convenience to website visitors.

2.1.3 Personal Data received by the Company from external parties: The Company may receive your personal data from government agencies or regulatory agencies exercising legal authority, external parties from time to time, such as the Securities and Exchange Commission, brokers , banks, business partners, partners, service providers, recruitment agents, government agencies, contractors and professionals, personnel of the Company Group, and applicants.

2.2 In collecting your personal data, you will be informed of the details as specified in this Privacy Policy, including but not limited to the legal basis for collecting, using and/or disclosing your personal data for lawful purposes or, where applicable, your consent is required by applicable data protection laws, the Company will seek your explicit consent to enable the Company to process your personal data.

3. Personal information collected

3.1 Personal data collected by the Company under this Privacy Policy is personal data of the data owner in the following categories:

3.1.1 Customers and investors mean natural persons who are securities holders, website visitors, purchasers or service recipients, and any other persons who contact to request information or purchase and receive services from the Company, regardless of whether personal information is obtained directly or indirectly.

3.1.2 Contractual parties, professionals and persons involved in the Company's business operations include natural persons who are contractual parties or are involved in any contract. With the Company, which includes business partners, vendors, suppliers

Service providers, contractors, consultants, software business professionals and other similar individuals.

3.1.3 Personnel of the Group include natural persons who are employees, workers or any person who works for the Group, directors, managers, executives, experts and persons who receive salary, wages, benefits or

Any other compensation directly from the Group and includes family members of the Group's personnel.

3.1.4 Applicants are natural persons who have submitted an application or personal history details to the Group of Companies, either in writing or verbally, with the purpose of applying for a job/applying for an internship, becoming an employee or

Employees/trainees who have not yet been selected by the Group of Companies and includes family members of the applicant and references.

3.2 Your personal data that is collected and is subject to this Privacy Policy, including:

Personal information that you provide directly to the Company, or personal information that the Company automatically collects from you, or personal information that the Company receives from external parties, such as:

3.2.1 Personal information such as name, surname, date/month/year of birth, age, gender, photograph, number and copy of passport . (Passport) or national identity card , signature, nationality, marital status and family information.

3.2.2 Sensitive personal data such as religion, criminal history, health information, health examination results, disabilities and biometric data.

3.2.3 Contact information such as address, telephone number, email, social media contact information, and

Details of contact persons in case of emergency

3.2.4 Financial information, such as bank account numbers and tax information.

3.2.5 Technical information, such as information on access to the Company's website and various systems, computer traffic information (log) , contact and communication information between you and other users, information from usage records, such as device identifiers, computer IP numbers, device IDs, device types, mobile network information, connection information, geographic location information, browser types. (Browser) Login and logout information, application or website information that you accessed before and after. (Referring Website) system usage history log information, login log information (Login Log), transaction record information (Transaction Log), usage behavior (Customer Behavior) , system login statistics, time spent visiting the system (Access Time), information you search for, use of various functions in the system, and information that the Company has collected through cookies (Cookies) or other similar technologies.

3.2.6 Information regarding education, training and work, such as education and training history, qualification certificates or transcripts, scores or grade levels, education level, language ability, professional license information, registration number, registration start date, registration expiration date, registration renewal, information on duties, start date, training information and testing information organized by the Stock Exchange of Thailand Group or other relevant agencies, diplomas or certificates, work history, salary or wages.

3.2.7 Other information such as recorded images and/or audio via closed circuit television (CCTV) , photographs, recorded images and audio, recorded conversations, and information showing trends in purchasing goods or services.

4. Purpose of collecting, using, disclosing personal information

4.1 The Company collects, uses or discloses your personal data for the following purposes:

In data processing as follows:

4.1.1 It is necessary for the performance of a contract to which you are a party or for use in taking action at your request prior to entering into such contract .

4.1.2 It is necessary for the legitimate interests of the Group or of any person or legal entity other than the Group.

4.1.3 It is necessary for the performance of the Company's duties in carrying out its missions for the public benefit .

4.1.4 To prevent or suppress danger to life, body or health of individuals.

4.1.5 Managing your complaints against the Company

4.1.6 Creating a database and using the information for the purpose of analysis and presenting any services or products of the Company or for the purpose of developing and improving marketing, products and services to meet customer needs.

4.1.7 For the legitimate interests of the Company or of any person or juristic person other than the Company, which will not infringe on your fundamental rights or freedoms.

4.1.8 To consider qualifications, select for appointment or employment as employees, student employees, interns, and for other management purposes that may be beneficial to you, including advertising and public relations, recording photographs, recording images and sounds, recording conversations, sending information on job recruitment and internships, as well as improving and developing the applicant selection system, considering the group's workforce.

4.1.9 To perform the employment contract with you, including to comply with the law, such as collecting and recording accounting and tax information, withholding tax, labor protection, and to manage the social security fund and provident fund for you .

4.1.10 To manage the payment of salary, compensation or other benefits to you in accordance with the employment contract made with you.

4.1.11 To manage training, provide equipment, facilities and various welfare to you, such as health insurance and medical expenses, and keep medical records for the purpose of welfare management and inspection of compliance with the Group's personnel management regulations.

4.1.12 To verify information, qualifications and implement the procurement procedures of the Group.

4.1.13 To perform the contract with you (or the organization you represent), to purchase products or services from you (or the organization you represent), including contacting you to manage the contract between the Group and you (or the organization you represent), to obtain products or services, to carry out operations related to warranties, and to pay or collect money for products, services and various expenses to you (or the organization you represent) (if any).

4.1.14 To manage the relationship between the Group and you (or the organization you represent).

4.1.15 To comply with the law, such as collecting and recording accounting and tax information, withholding tax.

4.1.16 To check your service usage information for the development of security standards in service usage and management. and protection of information technology infrastructure, such as service provision Wi-Fi in this section of the company group Your personal data may be used only as necessary and may be

encrypted before use and/or randomly checked, tested for access by other persons in order to manage risks, detect, prevent or eliminate fraud or other activities that are likely to violate the law, relevant usage regulations or the Group's terms and conditions of use .

4.1.17 To control entry and exit of buildings and to ensure that the Group's buildings and areas Have Safety and security for the Group's personnel and visitors to the Group, including assets and information located or stored in the building, to monitor and inspect the entry and exit of the building, secured areas, protected rooms, information technology infrastructure or operational data, and other areas (collectively referred to as “buildings and areas”) which prevent entry and exit of the building. and the areas of the Group without permission and to prevent, detect and investigate incidents related to safety, such as unauthorized entry and exit of the buildings and areas of the SET Group, theft, fire or physical assault. The consent you have given to the Company when it is not possible to rely on exceptions or refer to legal basis in the cases specified above. If the Company We will process any Personal Data specifically for the purposes stated and for which we have given your consent, and we will process any Personal Data that is Sensitive Personal Data where we are legally able to do so or with your express consent.

4.2 Since your personal data will be processed by the Group for the purposes specified in Section 4.1 above in the part related to compliance with the law or contract or necessary to enter into a contract with you, and your personal data is necessary for the achievement of such purposes, if you do not provide such personal data to the Group, there may be legal consequences or the Group may not be able to perform its duties under the contract entered into with you or be unable to enter into a contract with you (as the case may be). In such case, the Group may have to refuse to enter into a contract with you or cancel the provision of the relevant services to you, whether in whole or in part.

5. Disclosure of your personal information

The Company is required to disclose your personal information to third parties, whether they are juristic persons or natural persons, only to the extent necessary for the purposes or provision of services related to the products. The Company may disclose information to:

5.1 TBN Software Co., Ltd. and its group companies, including its employees, workers, directors. Managers or personnel of the Group as relevant and necessary (need-to-know basis) for the processing of your personal data.

5.2 Service Provider means a juristic person or natural person whom the Company considers to be qualified to provide services to you, such as a document delivery service provider.

5.3 Any agency or other person as required by law, such as the Bank of Thailand, the Anti-Money Laundering Office, the National Credit Bureau Co., Ltd., police stations, courts , the Department of Enforcement, credit management companies.

Assets and other entities for which the Company is required to submit information in accordance with the law

5.4 Partners, business partners, service providers, service recipients and personal data processors that the Group has assigned to perform duties of care, responsibility, service or management of personal data, which may have legal status.

Individuals or natural persons, such as in the area of developing, improving, or maintaining the security standards of work systems and information technology systems, payment systems, accounting audits, human resource management, or providing any other services that may be beneficial to you.

5.5 Disclosure of your personal data to other persons will be carried out only for the purposes specified or other purposes permitted by law. In cases where the law requires your consent, the Group will seek your explicit consent first.

5.6 In the event that the Group discloses your personal data to another person, the Group will provide appropriate measures to protect the disclosed personal data and to comply with the standards and duties of personal data protection as prescribed by the Personal Data Protection Act .

5.7 In the event that the Group sends or transfers your personal data abroad, the Group will take steps to ensure that the Group sends or transfers to the destination country, international organization or overseas recipient that has adequate standards for protecting personal data. In some cases, the Group may request your consent for the transfer of your personal data abroad, as required by the Personal Data Protection Law .

6. Storage and retention period of your personal data

6.1 The Group will retain your personal data for the period necessary to achieve the purposes specified in the processing of such personal data. The retention period of personal data will change depending on the purposes specified in the collection and processing of such personal data.

6.2 The Group will retain personal data for the period specified by applicable laws and taking into account business practices for each type of personal data. After such period, the Group may:
Destroy such personal data from the Group's storage or systems without prior notice to you.

7. Rights of personal data owners

As a data subject, you have the following rights related to your personal data, subject to the criteria, methods and conditions as prescribed by the Personal Data Protection Act. If you wish to exercise your rights, you can contact the Group (Contact method according to Section 10 below).

7.1 Right to access personal data:

You have the right to access your personal data and request that the Group provide you with a copy of such personal data, including requesting that the Group disclose the source of your personal data that the Group has collected, used and disclosed without requiring your consent, to the extent permitted by the Data Protection Act.

7.2 Right to personal data portability:

You have the right to receive personal data about you in a commonly used, machine-readable or accessible format, including the right to request that your personal data be transmitted or transferred in such a format to another data controller or to yourself, unless technically impossible, as required by applicable data protection laws .

7.3 Right to object to the processing of personal data:

You have the right to object to the processing of your personal data and the Group will do so if the Group

7.3.1 We rely on our or a third party's legitimate interests or the public interest in processing your personal data, except where the Group can demonstrate compelling legitimate grounds or the processing of your personal data is for the establishment, exercise or defence of a claim, or

7.3.2 Process your personal data for direct marketing purposes.

7.3.3 Process your personal data for scientific, historical or statistical research purposes, unless it is necessary for the performance of a task carried out in the public interest of the Group. In the event that you object to the processing, please indicate whether you wish to have your personal data erased or to prevent the Group from processing such personal data.

7.4 Right to erasure of personal data:

You may request that the Group erase or anonymize your personal data.

In the following cases:

7.4.1 Your personal data is no longer necessary to be retained for the purposes for which your personal data was processed.

7.4.2 You withdraw your consent on which the Personal Data is collected and processed and the Group no longer has the legal authority to collect or process such Personal Data.

7.4.3 You have objected to the processing pursuant to Section 7.3 or

7.4.4 Where your personal data is collected or processed unlawfully, the above-mentioned cases shall not apply to the processing of personal data where it is necessary for the purpose of exercising freedom of

expression, for the preparation of historical or statistical documents, for the performance of a task in the public interest, for the necessity of compliance with the law, for the purpose of achieving objectives related to preventive medicine or occupational medicine, or for the public interest in public health, for the purpose of establishing, exercising or defending legal claims, or for the purposes of compliance with the law.

7.5 Right to suspend the use of personal data:

You have the right to request that the processing of your personal data be suspended in the following cases:

7.5.1 The Group is in the process of verifying the accuracy of the personal data as requested by you.

7.5.2 In the event that personal data must be deleted or destroyed in accordance with Section 7.4 but you wish to suspend use instead

7.5.3 The Group no longer has a need to use your personal data, but you need and request the Group to keep such personal data for the purpose of establishing, complying with or exercising a claim, or defending a claim in accordance with the law, or

7.5.4 The Group is in the process of proving under Section 7.3 (a) or investigating under Section 7.3 (c) in order to reject your objection under Section 7.

7.6 The right to have personal data corrected:

You have the right to request that your personal data be corrected if it is inaccurate, out of date, incomplete or misleading.

7.7 Right to revoke consent:

In the event that the Group relies on your consent to process your personal data, you have the right to withdraw your consent to the processing of your personal data that you have given to the Group at any time during the period that your personal data is in the possession of the Group.

7.8 Right to lodge a complaint:

If you have any concerns or questions about the Group's processing of your personal data, Please contact the Group Companies (Contact method as per Section 10 below). In the event of a violation of the Personal Data Protection Act, you have the right to lodge a complaint with the Group Personal Data Protection Commission Office . We will make every effort to the best of our ability to facilitate and act on your request without delay, unless it is found that acting on such request causes an unreasonable burden to the Group or risks violating the protection of personal data of others or is contrary to the law or where it is impossible to act on the request .

8. Security of personal data storage

The Group has established and/or selected a personal data storage system with appropriate mechanisms and techniques and has security measures in accordance with the Personal Data Protection Act and related laws, including limiting access to your personal data from employees, workers, and agents of the Group to prevent your personal data from being used, disclosed, destroyed, or accessed without authorization.

9. Changes to the Personal Data Protection Policy

The Company will review the Privacy Policy regularly to ensure compliance with the practices and relevant laws and regulations. If there are any changes to the Privacy Policy, the Company will notify you by posting the information on the Company's website.

10. Contact channels for the Company and Personal Data Protection Officer

You can contact the company for more information about the personal data protection policy at

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Email: privacy@varafood.com