

Privacy Notice

For Customer

This Notice shall take effect from February 4, 2025, onwards.

AI and Robotics Ventures Company Limited and ARV Subsidiaries (hereinafter referred to as “we,” “us,” “our,” or “ours”) recognize the importance of the protection of your personal data. Therefore, we have issued our Privacy Notice (“Notice”) in order to prescribe the process of data collection, storage, usage and disclosure, also including other rights of the Data Subject under Thailand’s Personal Data Protection Act B.E. 2562 (2019) (“PDPA”).

We would like to announce this Notice with the following:

1. Definition

“**ARV Subsidiaries**” means the companies that are a subsidiary of AI and Robotics Ventures Company Limited, including but not limited to (i) Rovula (Thailand) Company Limited; (ii) Skyller Solutions Company Limited; (iii) Cariva (Thailand) Company Limited; (iv) Varuna (Thailand) Company Limited; (v) Bedrock Analytics Company Limited; (vi) Bind Systems Company Limited; and (vii) S2 Robotics Company Limited.

“**Personal Data**” means any information relating to a person which enables the identification of such person, whether directly or indirectly, but not including the information of deceased persons in particular.

“**Sensitive Personal Data**” means any information relating to a particular person which is sensitive and presents significant risks to the person’s fundamental rights and freedoms, which includes data regarding racial or ethnic origin, political opinions, cults, religious or philosophical beliefs, sexual behavior, criminal records, health data, disabilities, trade union information, genetic data, biometric data, or any data which may affect the Data Subject in the same manner, as prescribed by the Personal Data Protection Committee.

“**Personal Data Protection Committee**” means the Committee appointed under the PDPA, in charge of the duties and authorities to govern, issue criteria or measures or provide any other guidance as prescribed by the PDPA.

2. Application of this Notice

This Notice applies to you if you are:

Category of Data Subject	Definition
Customers	Existing Customer and Prospective Customer, collectively.
Existing Customer	A customer (a natural person) who purchases our products and/or services or enjoys our products and/or services free of charge via all means, for personal use.
Prospective Customer	A natural person who has subscribed to receive any news, updates, promotion, and other marketing materials from us, in spite of the fact that you have not purchased.
Associated Person	A contact person or authorized representative of the entity who purchases our products and/or services via all means, or any persons, who are relevant to the Customers, such as family members relatives, and friends.

We may collect the Personal Data as described below from person(s) under 20 years old. If you are a minor, we recommend that your parents or guardians read this Notice together with you, and that the parents and/or guardians of minors give consent (if required) and guidance before a minor provides his/her Personal Data to us.

This Notice does not apply to some of our products and/or services that have their own privacy notice or similar documents. If you purchase and/or use these products and/or services from us, please refer to their respective privacy notice or similar documents.

3. Collection of Personal Data

We shall collect your personal data within the purpose, scope, and lawful and fair methods as is necessary which is defined hereinbelow. In case we need to collect sensitive data, we shall request explicit consent from you before such collection, except for when this is allowed by the PDPA, or other laws.

In general, we will collect and process the following categories of your Personal Data:

Category of Personal Data	Example of your Personal Data
Device information and access data	Device identification, operating system and corresponding version, time of access, configuration settings, information on Internet connection (IP address)
Identification and contact information	Full name, phone numbers, address, GPS location, e-mail address, date of birth, age, gender, identification card number, passport number, data contained in the identification card and passport, LINE ID, Facebook account, profile picture, selfie picture with identification card or passport, signature, organization or company's name, position, current residence city and country, interests, etc.
Voice, photo, and video recording	Voice and video recording of the meeting in which you are the attendant
Payment information	For example, your bank account number, bank account information, and information of payment evidence, relationship with the Customer
Personal Data of Associated Persons	For example, full name, address, phone contact number, e-mail address
Sensitive Personal Data	<p>Your data related to the COVID-19 vaccination status and COVID-19 test result may also be collected by us. We may also collect your Sensitive Personal Data which appear on the copy of your identification card, i.e., your religious belief and/or blood type. However, we do not have an intention to process such Sensitive Personal Data; therefore, we will require you to omit, blind or cross out the information about religious belief and/or blood type before providing a copy of your identification card to us.</p> <p>In the case where such Sensitive Personal Data still appears on a copy of identification card, we may, at any time, blind or cross out such Sensitive Personal Data in order to comply with the PDPA (which requires us to collect personal data to the extent that is necessary and relevant for our business operations).</p>

In the case where we will collect the Personal Data other than those proscribed in this Notice, we will inform you about the collection or the processing of the Personal Data and may request for your consent (if required), in accordance with the conditions prescribed by the PDPA.

4. Methods for the collection of your Personal Data

In general, we will collect the Personal Data directly from you; however, in the case where it is necessary for us to collect your Personal Data from other sources, we will ensure that your Personal Data will be collected and protected in accordance with the PDPA.

In the case where you provide the Personal Data of a third party including the Associated Persons to us, you warrant that you have informed such person about the processing of his/her Personal Data by us as explained in this Notice. In addition, if the consent for the processing of the Personal Data is required, you agree to assist us in obtaining the valid and enforceable consent from such person in accordance with the requirements prescribed in the PDPA.

5. Purpose of Collecting and Usage of Personal Data

In general, we will process your Personal Data for the following purposes:

Purposes	Type of Personal Data	Legal Basis
<p>To enter into an agreement or establish a legal relationship with you or the legal entity of which you were authorized to represent, and to execute and perform our obligations under such agreement.</p> <p>Your Personal Data is necessary for the following purposes:</p> <ul style="list-style-type: none"> - To create and register customer account and enrollment; - To proceed with purchase payment; - To furnish you and the legal entity you are contact person or authorized representative with our services and/or products; - To communicate with you or for the legal entity you represent (not for marketing purposes); and - To enter into an agreement with you or the legal entity you are contact person or authorized representative. 	<ul style="list-style-type: none"> - Identification and contact information - Finance information - Personal Data of Associated Persons - Sensitive Personal Data (i.e., health-related data such as your medication records, visual sign, disorders, medical conditions (which are related to CVS, RS, KUB, GI/HPB, endocrine, muscle/bone, reproductive system etc.), pharmacy record, weight, height, BMI, heart rate, calories intake and burned, body movement) - Sensitive Personal Data, i.e., religion and/or blood type data in the Thai identification card (if required) <p>Remark: If you do not provide any Personal Data that is necessary for creation/registration of customer's account in our systems, payment completion, provision of our products/services, for our communication with you, and for our entering into the agreement with you or the entity you represent, we may not be able to enter into an agreement with you or the entity you represent,</p>	<ul style="list-style-type: none"> - Legitimate interest (for corporate Customer - to proceed with the purchase payment, to furnish the legal entity you represent with our products and services, and to comply with our obligations under the agreement we have with the legal entity you represent) - Contractual Obligation (for individual Customers - to proceed with the purchase payment, to furnish you with our products and services, and to comply with our obligations under the agreement we have with you) - Legitimate interest (for Customer to create and register of customer account and communication) - Explicit consent (for the processing of Sensitive Personal Data)

	nor to execute or perform our obligations as specified under the said agreement (either in whole or in part), nor to proceed with your purchase and the payment.	
To handle your request and/or complaints in respect to our products and services and to furnish you with our after-sale service	<ul style="list-style-type: none"> - Identification and contact information - Finance information - Sensitive Personal Data, i.e., religion and/or blood type data in the Thai identification card (if required) <p>Remark: If you do not provide any Personal Data that is necessary for us to handle your request and/or complaints and to furnish you with our after-sale services, we may not be able to solve your concerns and requests including to return your purchase payments or to answer your queries.</p>	<ul style="list-style-type: none"> - Legitimate interest (for corporate Customer) - Contractual Obligation (for individual Customers) - Explicit consent (for the processing Sensitive Personal Data)
To furnish you or the legal entity you represent with our gifts/rewards	<ul style="list-style-type: none"> - Identification and contact information 	<ul style="list-style-type: none"> - Legitimate interest (For corporate Customer) - Contractual Obligation (if the provision of rewards/gift is stated in the agreement between we and you) - Consent (if the provision of rewards/gift is not stated in the agreement between we and you)
To process your Personal Data and health-related data (COVID-19 vaccination status, and COVID-19 test result) when you visit/access our premise in order to comply with our internal policy, for our safety, and for prevention of COVID-19 pandemic and public health	<ul style="list-style-type: none"> - Identification and contact information - Sensitive personal Data (i.e., COVID-19 vaccination status, COVID-19 test result) 	<ul style="list-style-type: none"> - Legitimate interest (for processing of Personal Data) - Explicit consent (for processing of Sensitive Personal Data)
To conduct KYC, and credit assessment for credit scoring evaluation in order to enter into the agreement with individual Customers	<ul style="list-style-type: none"> - Identification and contact information - Finance information - Sensitive Personal Data, i.e., religion and/or blood type data in the Thai identification card (if required) 	<ul style="list-style-type: none"> - Legitimate interest (for processing of Personal Data) - Explicit consent (for processing of Sensitive Personal Data)

<p>To conduct customer surveys for improvement of our products/services, and marketing activities and campaign e.g., sending marketing materials, promotions, special deals, and invitation to marketing and business events/seminars</p>	<ul style="list-style-type: none"> - Identification and contact information 	<ul style="list-style-type: none"> - Legitimate interest (For Existing Customer) - Consent (For Prospective Customer)
<p>To maintain or support our normal operation</p> <p>We may have to process your Personal Data to support our internal operation under the following purposes</p> <ul style="list-style-type: none"> - To take a record or prepare minutes of the meeting which you are the attendants 	<ul style="list-style-type: none"> - Voice, photo, and video recording 	<ul style="list-style-type: none"> - Legitimate interest
<p>To comply with applicable laws</p> <p>We may be required to process your Personal Data to comply with laws, regulations, orders, notifications, or other rules issued by authorities.</p> <p>For example,</p> <ul style="list-style-type: none"> - Proceed or submit any required information and documents, or arrange to comply with our tax obligations and to submit the required documents to the Revenue Department including but not limited to processing with VAT refund and issuing of invoice; and - Comply with other laws, such as the PDPA, and laws related and applicable to our business 	<ul style="list-style-type: none"> - Identification and contact information - Payment information - Sensitive Personal Data, i.e., religion and/or blood type data in the Thai identification card (if required) <p>Remark: If you do not provide any Personal Data that is necessary for compliance with the law, which is applicable to us, we and/or you may be unable to comply with the laws, and that may affect the necessary processing of your Personal Data as well as may result in the violation of applicable law.</p>	<ul style="list-style-type: none"> - Legitimate interest (to arrange to comply with our tax obligations) - Legal obligation (Section 24 (6) of the PDPA for the processing of Personal Data, and Section 26 (5) of the PDPA for the processing of Sensitive Personal Data)
<p>To establish, exercise, comply or defend legal claims</p> <p>Your Personal Data may be processed as part of the establishment, exercising, compliance or defense of legal claims.</p>	<ul style="list-style-type: none"> - Identification and contact information - Sensitive Personal Data (i.e., religion and/or blood type data in the Thai identification card (if required)) 	<ul style="list-style-type: none"> - Legitimate interest (for processing of Personal Data) - Establishment of legal claims (for processing of Sensitive Personal Data)
<p>Cookies</p> <p>Your Personal Data may be processed in order to enhance your experience of visiting and</p>	<ul style="list-style-type: none"> - Device information and access data 	<ul style="list-style-type: none"> - Legitimate interest - Consent for personalization and advertising cookies

<p>using our website, to make the visit of our website more attractive and pleasant, and to enable the use of certain functions, we use so-called "Cookies" on various pages.</p> <p>For more information of the Cookies we use, please refer to section 6. Cookies below.</p>		
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In the case where we will process your Personal Data for purposes other than those prescribed in this Notice, which has been informed you, we will inform you about such additional processing of the Personal Data, and/or arrange to obtain your consent, if required by the applicable law.

6. Cookies

Please note that Cookies are small text files that are stored on your device. Some of the Cookies we use are deleted after the end of the browser session, i.e., after closing your browser (so-called, session Cookies). Other Cookies may remain on your device and allow us or our affiliate to recognize your browser on your next visit (so called, persistent Cookies).

Below is the information about your choices as well as a detailed list of Cookies we use:

(1) Required Cookies

These Cookies are required to navigate our site, and in order to use the features provided. Without the use of such Cookies, proper functioning of our site is not guaranteed (e.g., entering text), while browsing through pages on the website. In addition, they are Cookies that collect information about how visitors use our website, for example, which pages they visit most often, and if they receive error messages from websites. They also allow our site to remember your choices such as language, or region to provide improved features. We also use these Cookies to store whether you have given us your consent to use Cookies or to temporarily store the information you have entered, as necessary.

(2) Functional Cookies

These Cookies collect pseudonymous information and cannot track your movements on other websites. We use these Cookies for pseudonymized usage analysis.

(3) Personalization and Advertising Cookies

These Cookies are used to play more targeted advertising relevant to the user and adapted to their interests.

You can set your browser so that you are informed about the setting of Cookies and individually decide on their acceptance or exclude the acceptance of cookies for specific cases or in general. Failure to accept Cookies may limit the functionality of our website.

You can install additional add-ons in your browser that block unnecessary cookies. By doing so, you will not see any interest-based advertisements. This Notice covers the use of Cookies by us and does not cover the use of cookies by any advertisers, or other third-party websites, which may link to our website. If you link to or is directed to a third-party website, you are encouraged to read the privacy notice, as well as cookies policy, of such third-party website.

7. Personal data disclosure

We shall not disclose your Personal Data without your consent unless it is solely for the above mentioned purposes which rely on other lawful bases.

In processing Personal Data for the above purposes, it may be necessary for us to disclose your Personal Data to third parties, as follows:

- (a) to any of our affiliates or group companies, domestically, for internal management and administration work, to perform our contractual obligations, and for other purposes as identified in this Notice;
- (b) to external legal counsels in the case of legal proceedings and legal execution;

- (c) to general counsels, advisors, auditors, and other experts;
- (d) to other third-party vendors, suppliers, or service provider, who provide services to us;
- (e) to any competent regulatory, prosecuting, tax or governmental agencies, courts, or other tribunals in any jurisdiction;
- (f) to any other persons or entities to whom we are required to make disclosure by applicable law and regulations. Also, we may disclose it by virtue of laws, such as requests for the purposes of litigation or prosecution, or requests made by the private sector or other persons involved in the legal proceedings, or whom we are permitted by you to disclose your Personal Data; and/or
- (g) to prospect buyer in case of merger or acquisition of us.

8. The Cross-Border Transfer of the Personal Data

In certain circumstances, we transfer, disclose, and give access of your Personal Data to third parties located outside of Thailand, for processing of Personal Data for the purposes mentioned in this Notice. The destination countries may have different data protection standards to those prescribed by the data protection authority in Thailand.

Notwithstanding that, we will ensure that it will protect your Personal Data by implementing adequate personal data protection standards for the transfer of your Personal Data outside Thailand, as prescribed under the PDPA.

In any event, we shall govern the above-mentioned persons to treat the personal data as confidential and not to use the data for purposes which are not covered in prior notifications.

9. Retention of the Personal Data

We retain your Personal Data for as long as is required in order to fulfil our contractual obligations under the agreement with you. In general, we will retain your Personal Data for ten (10) years after the cessation of our contractual relationship or our last communication.

Notwithstanding anything in this section, we may retain your Personal Data longer than the above period, only as otherwise permitted or specified by the applicable law.

10. Direction of Personal Data Protection

We shall establish measures including for the security of Personal Data in accordance with the laws, regulations, rules, and guidelines regarding personal data protection for employees and other relevant persons. We shall promote and encourage employees to learn and recognize the duties and accountabilities in the collection, storage, usage, and disclosure of personal data. All employees are required to follow this Notice and all guidelines regarding personal data protection in order for us to remain in compliance with the PDPA accurately and effectively.

11. Rights of Data Subject

You are entitled to request any actions regarding your Personal Data as per the following:

- 11.1 Right to withdraw consent, or to request a change to the scope of your consent; however, any consent which was obtained earlier shall not be affected.
- 11.2 Right to request that we confirm to you whether we have in possession any Personal Data that is related to you; and right to access; to request access to and obtain a copy of the Personal Data related to you, including to request the disclosure of the acquisition of the Personal Data obtained without your consent.
- 11.3 Right to rectification or update any Personal Data that is related to you.
- 11.4 Right to request that we erase or destroy, or de-identify your Personal Data;
- 11.5 Right to restriction of processing of your Personal Data.
- 11.6 Right to request that we transfer your Personal Data in a format which is generally readable or usable by automatic device or tool.

- 11.7 Right to object the processing of your Personal Data.
- 11.8 Right to file a complaint in relation to our processing of your Personal Data with the Personal Data Protection Commission, in accordance with the procedures set out in the PDPA.

You may request these rights by sending a notice or submitting a request to the channel following the Contact Information of this Notice.

We shall consider the right request received and inform the Data Subject without undue delay, but not exceeding thirty (30) days from the date of receiving the request to access, or to access and obtain a copy of the Personal Data related to you, or to request the disclosure of the acquisition of the Personal Data obtained without the Data Subject's consent. However, we may deny such a right subject to exception by applicable laws. And as far as permitted by the applicable law and regulations, we may be entitled to charge reasonable expenses incurred in respect to handling any of the above requests.

12. Review and Changes of Notice

We may review this Notice to ensure that it remains in adherence to laws, any significant business changes, and any suggestions and opinions from other organizations. We shall review the amended policies thoroughly before implementing all the changes and announce on its website: <https://arv.co.th/>.

In the event that the amendment, change, or update will affect the purposes for which your Personal Data has originally been collected, we will notify you about such changes and obtain your consent (if required by law) prior to such changes becoming effective.

13. Contact Information

If you have any inquiries in relation to your Personal Data, or you would like to exercise any of your Data Subject Rights, you may contact us at:

AI and Robotics Ventures Company Limited and ARV Subsidiaries

Vanit Place 25th floor, 304 Phahonyothin Road
Samsen Nai, Phaya Thai, Bangkok 101400
Thailand

Our Data Protection Officer (DPO)

VinarcoPDPA (Thailand) Ltd
1168/111, 37th Floor, Lumpini Tower
Rama 4 Road, Thungmahamek,
Sathorn, Bangkok 10120, Thailand
Email: arv.dpo@arv.co.th