

Privacy Notice

For Employee

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
Employee	An employee whether being a permanent employee, temporary employee, former employee, outsourced staff, or intern.
Associated Person	Any natural person, who are relevant to the Employee, such as parents, spouse, family member, emergency contact person, reference person, and beneficiary person.

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.

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
Identification and contact information	For example, your full name, address, information contained in a copy of household registration, passport number, identification card number, data contained in the passport and identification card number, work permit number, issue and expiry date of identification card or passport, date of birth, place of birth, driving license number, gender, marital status, photographs, telephone numbers, mobile phone number, e-mail address, signature, vehicle registration number and details etc.
General employee information	For example, your information contained in your job application, your employee number, position, department, employment starting and ending date, years of working experience, educational background, professional training records, other talents, military status, office e-mail address, employee account, employee account password, social security number, social security hospital etc.
Information obtained during the course of your employment	Any other Personal Data that you may provide to us during the course of your employment, to the extent that it is not contrary to the law
Performance information	For example, time and attendance records, evaluations, feedback, information about work rules or your complaints, annual leave, sick leave, absence, employee monitoring and assessments, data relating to disciplinary offences, etc.
Finance information	For example, your salary, benefits, compensation and remuneration, disbursements (such as accommodation, car expenses, social security, provident fund, taxes deduction), your bank account number and bank account information, etc.
Personal Data of Associated Persons	For example, full name, address, office address, occupation, contact number, identification card number, date of birth, social security number place of birth (for child), relationship with you.
Sensitive Personal Data	<p>We may process your health-related data e.g., COVID-19 test and vaccination status, chronic disease and illness, and medical record, your face-scanned photo, palm and fingerprint, disability and/or criminal record.</p> <p>We may also collect your Sensitive Personal Data that appears 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 during recruitment process, at the time of entering into the employment agreement, and throughout the course of your employment through various methods, such as e-mail, in person, and relevant online platforms and applications which we use for communication with the Employee, or via any other internal communication channels.

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.

We may collect Personal Data of Associated Person from the respective Employee for specific purposes, such as emergency contact, and providing benefits to the Employee and the Associated Person. In such case, the Employee shall warrant that the Employee has provided such Associated Person with 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 Associated 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 between we and you</p> <p>Your Personal Data is necessary for us to enter into an employment agreement with you.</p>	<ul style="list-style-type: none"> - Identification and contact information - General employee information - Finance information - Sensitive Personal Data <p>Remark: If you do not provide any Personal Data that is necessary for entering into an agreement with you, we may not be able to proceed to enter into an agreement with you.</p>	<ul style="list-style-type: none"> - Legitimate interest (for preparing documents for arranging a new Employee to enter into an agreement) - Contractual Obligation (to proceed with your request to enter into an employment agreement) - Explicit consent (for the processing of Sensitive Personal Data that appear on the copy of Thai identification card, i.e., religious belief and/or blood type)
<p>To perform the rights and comply with the obligations under the agreement between we and you, including to proceed with payment of your salary, compensation and remuneration</p> <p>It is necessary for us to process your Personal Data to perform rights and obligations under the employment agreement or within the legal relationship between we and you, e.g., to provide welfare, to proceed with payment of your salary/compensation/bonus or any other remunerations, to provide the insurance to the Employee, or</p>	<ul style="list-style-type: none"> - Identification and contact information - General information employee - Information obtained during the course of your employment - Performance information - Finance information - Personal Data of Associated Persons - Sensitive Personal Data 	<ul style="list-style-type: none"> - Contractual Obligation (for the processing of the Employee's Personal Data) - Legitimate interest (for the processing of the Associated Person's Personal Data for the provision of benefits i.e., health/life insurance) - Explicit consent (for the processing of Sensitive Personal Data i.e., health related data and Sensitive Personal Data that appear on the copy of Thai identification card, i.e., religious belief and/or blood type)

<p>make any other payments, as agreed in the agreement between we and you.</p> <p>We also process Personal Data of the Associated Person for the provision of benefits.</p>	<p>Remark: If you do not provide any Personal Data that is necessary for performing our duties and exercising our rights under an agreement with you, we may not be able to perform our duties and exercise our rights, as specified under the agreement, either in whole or in part.</p>	
<p>To conduct HR administration and management work</p> <p>For example,</p> <ul style="list-style-type: none"> - Conduct criminal background check after signing employment agreement with you; - Set up a personnel file, office phone, and e- mail, and create and register a new employee account and profile; - Authorize the access to our data, folders, files and premises; - Generate username and password of employee's account for accessing our system/network; - Prepare and maintain list of employees and organization chart for contacting and manpower planning purposes; - Prepare power of attorney for submission of legal documentation/forms; - Record Employee's emergency contact; - Record Employee's time attendance (face- scanned photo, palm and fingerprint), and record Employee's leaves; - Investigation and record of Employee's disciplinary offences; - Assess and evaluate Employee's work performance and qualifications, determination and consideration of salary, compensation and remuneration; 	<ul style="list-style-type: none"> - Identification and contact information - General information employee - Information obtained during the course employment of your - Performance information - Finance information - Personal Data of Associated Persons - Sensitive Personal Data <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 (in relation to set up for internal authorization, system, process and record, employee's performance assessment, traveling related matters, employee training (not legally required), for our safety and to comply with our internal policy) - Legal Obligation (in relation to the leaves that the Employee is entitled to, to proceed with relevant payment for Employee and Employee's resignation matters) - Explicit consent (for the processing of Sensitive Personal Data i.e., health-related data, criminal record, biometric data, and Sensitive Personal Data that appear on the copy of Thai identification card, i.e., religious belief and/or blood type)

<ul style="list-style-type: none"> - Proceed with Employee's request to reimburse expenses spent while performing works; - Book plane tickets and accommodations for the Employee; - We collect your COVID-19 test and vaccination status for safety and to comply with our internal policy; - Provide trainings to Employee (not required by law); and - To proceed with request of Employee to resign and to provide prior termination notice to the Employee as required by law. 		
<p>To provide benefits and facilitate the Employees</p> <p>For example,</p> <ul style="list-style-type: none"> - Arrange for procuring life/health insurance policies for Employee and Associated Persons; - Provide annual health check to Employee; - Report/registration/amendment/termination of membership provident fund; - Provide welfare/ benefit to the Employee, for example, marriage allowance, funeral aid, childbirth allowance; and - Issue certificate of employment or any other employment-related document as may be requested by the Employee. 	<ul style="list-style-type: none"> - Identification and contact information - General information employee - Information obtained during the course of your employment - Finance information - Personal Data of Associated Persons - Sensitive Personal Data <p>Remark: If you do not provide any Personal Data that is necessary for performing our duties under an agreement with you, we may not be able to perform our duties, as specified under the agreement, either in whole or in part.</p>	<ul style="list-style-type: none"> - Legitimate interest (for the processing of the Associated Person's Personal Data to provide welfare/benefits, issuance employment-related documents, and for of to facilitate Employee for provident funds related matters) - Contractual Obligation (for provision of insurance and annual health check, welfare/benefit) - Explicit consent (for the processing of Sensitive Personal Data i.e., health-related data and Sensitive Personal Data that appear on the copy of Thai identification card, i.e., religious belief and/or blood type)
<p>To communicate, contact, and coordinate with you</p> <p>We will need to process your Personal Data in order to communicate, contact, or coordinate with you during the employment period.</p>	<ul style="list-style-type: none"> - Identification and contact information - General information employee - Information obtained during the course of your employment 	<ul style="list-style-type: none"> - Legitimate interest
<p>To comply with applicable laws</p>	<ul style="list-style-type: none"> - Identification and contact information 	<ul style="list-style-type: none"> - Legitimate interest (to arrange to comply with our tax obligations and to obtain visa

<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"> - Arrange for registration of a new Employee with the Social Security Office (SSO), and to submit required information and documents in order to comply with relevant laws; - Arrange to comply with our tax obligations, including, without limitation, the withholding tax payment with the Revenue Department; - Provide trainings to the Employees as required by the Skill Development Act B.E. 2540, as amended, and to submit training reports to the Department of Skill Development as required by law; - Arrange to obtain visa and work permits for foreign employees; and - Comply with other laws, such as the PDPA, Le., by fulfilling your requests to exercise rights in respect to your Personal Data, or complying with labor laws, such as laws concerning social security. 	<ul style="list-style-type: none"> - General information Employee - Sensitive Personal Data. <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>	<p>and work permits for foreign employees)</p> <ul style="list-style-type: none"> - 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 - General information Employee - Information obtained during the course employment of your - Performance information - Finance information - Personal Data of Associated Persons - 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)

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. 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.

7. 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.

8. 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.

For Personal Data stored in Azure Cloud Server, it will be retained during your employment period and until one (1) month thereafter. And for Personal Data processed for the purpose of reimbursement of employee's expense (i.e., Identification and contact information, and Finance Information), it will be retained only for five (5) years from receipt.

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.

9. 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.

10. Rights of Data Subject

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

- 10.1 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.
- 10.2 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.
- 10.3 Right to rectification or update any Personal Data that is related to you.
- 10.4 Right to request that we erase or destroy, or de-identify your Personal Data;
- 10.5 Right to restriction of processing of your Personal Data.
- 10.6 Right to request that we transfer your Personal Data in a format which is generally readable or usable by automatic device or tool.
- 10.7 Right to object the processing of your Personal Data.
- 10.8 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.

11. 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.

12. 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



บริษัท เอไอ แอนด์ โรโบติกส์ เวนเจอร์ส จำกัด AI and Robotics Ventures Company Limited

304 อาคารวานิชเพลส อารีอี (อาคาร เอ) ชั้นที่ 25 ยูนิต 2501 ถนนพหลโยธิน แขวงสามเสนใน เขตพญาไท กรุงเทพมหานคร 10400
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Our Data Protection Officer (DPO)

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