### PRIVACY POLICY - VEDA SIAM GROUP

For Members & Customers of Our Restaurants & Brands

Effective Date: August 15, 2025

# Your Privacy at a Glance

We believe in being open and honest. Here's a simple summary of our privacy promise to you. For all the details, we encourage you to read the full policy below.

Who We Are	Veda Siam Co., Ltd. and our affiliated	
	restaurant and food & beverage brands	
	(collectively the "Veda Siam Group"). We act	
	as the Data Controller for your personal data.	
What We Collect	We collect a wide range of data, including your identity, contact details, membership history, payment and transaction data, dining preferences, and technical data from our online platforms. A full, detailed list is provided in Section 3.	
Why We Use It	To manage your membership contract, process transactions, personalize your experience, conduct data analytics for business improvement, and, with your consent, send you marketing and promotions from us and our partners.	
Who We Share It With	We share data within the Veda Siam Group, with our trusted service providers (e.g., IT, payment gateways), business partners, and legal authorities when required. We do not sell your personal data.	
Your Key Rights	You have the right under law to access, correct, or request the deletion of your data, withdraw your consent at any time, and object to certain data uses, such as direct marketing. Details are in Section 11.	

# **Full Privacy Policy**

# 1. Our Commitment to Your Privacy

The Veda Siam Group is committed to protecting the personal data of our customers and members in full compliance with Thailand's Personal Data Protection Act, B.E. 2562 (2019) ("PDPA"). This policy details how we collect, use, disclose, and secure your data across all our brands.

This policy applies to all personal data collected through any of our restaurants, websites, mobile applications, membership forms, call centers, social media channels, and all other interactions with the Veda Siam Group.

# 2. Who We Are and Who is Responsible

**Veda Siam Co., Ltd.**, together with its affiliated restaurant and food & beverage brands (collectively the "**Veda Siam Group**," "we," "us," or "our"), are the "Data Controllers" responsible for your personal data.

- Corporate Address: Veda Siam Co., Ltd., No. 63/202, Moo 2, Koh Keaw Sub district, Meung Phuket, Phuket 83000
- Corporate Email: vedasiam.th@gmail.com

• Corporate Phone: +66611737156

#### 3. The Personal Data We Collect

We collect data necessary to provide our services and manage your membership across our brands. The specific data collected depends on your interaction with us.

- **Personal Details:** Title, name, surname, gender, age, nationality, date of birth, and identifiable information on government-issued documents (e.g., National ID, Passport) where required for verification.
- **Contact Details:** Postal address, delivery address, email address, phone number, and social media account details (e.g., LINE ID, Facebook account) if used to interact with us.
- **Membership & Profile Details:** Membership ID, username/password, membership tier, purchase history, interests, preferences, feedback, survey responses, and loyalty program participation.
- **Transaction Details:** Payment information, card usage, order details, receipts, date and location of purchase, refund details, and information about complaints or claims.
- **Financial Details:** Credit/debit card information and bank account details, processed securely through our certified payment partners.
- **Technical Details:** Internet Protocol (IP) address, login data, browser type, device type, operating system, and platform information when you access our online platforms.
- **Behavioral Details:** Information about your purchasing behavior and data supplied through the use of our services, such as your preferred reservation times or seating areas at our various venues.
- Marketing and Communication Details: Your preferences for receiving marketing from us and our partners.
- Special Note on Sensitive Data: We may need to collect sensitive data, such as food allergies or dietary restrictions, to ensure your safety and well-being. We will only collect, use, or disclose this data after obtaining your explicit and separate consent.

#### 4. Personal Data of Minors

Our services are not intended for individuals under the age of 20. We do not knowingly collect personal data from minors without verifiable parental or guardian consent. If we learn that we have unintentionally collected such data, we will take immediate steps to delete it.

# 5. How and Why We Use Your Personal Data

We process your data based on lawful grounds. The table below outlines our purposes and the legal basis for each.

Purpose of Processing	Examples of Data Used	Lawful Basis Under PDPA
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To Provide Our Services &	Identity, Contact, Membership,	Contractual Necessity
		Contractual Necessity
Manage Your Membership	Transaction, Financial	
To Send Marketing,	Identity, Contact, Profile,	Consent
Promotions & Personalized	Transaction, Marketing	
Offers		
To Improve Our Business,	Transaction, Profile,	Legitimate Interest
Products & Services	Behavioral, Technical	
To Conduct Data Analytics &	Transaction, Behavioral,	Legitimate Interest or Consent
Profiling	Profile, Technical	
To Communicate With You &	Identity, Contact, Membership,	Contractual Necessity
Manage Our Relationship	Transaction	·
To Ensure Your Dining Safety	Sensitive Data	Explicit Consent
(Allergies)		
To Comply with Legal &	Identity, Financial, Transaction	Legal Obligation
Regulatory Obligations	-	
To Protect Our Interests &	All relevant categories	Legitimate Interest
Prevent Fraud	_	

#### 6. Who We Share Your Personal Data With

We may disclose or transfer your data to the following parties:

- Within the Veda Siam Group: We may share your data among our affiliated brands and our parent company, Veda Siam Co., Ltd., for centralized administration, data analytics, and to offer you integrated benefits and services across our ecosystem.
- Our Service Providers: We engage trusted third parties to perform services on our behalf, such as IT and software developers, data storage and cloud providers (e.g., AWS, Google Cloud), payment processors, marketing agencies, and research firms. They are contractually bound to protect your data.
- Our Business Partners: We may share data with partners in our loyalty or co-branding programs to provide you with joint offers and rewards.
- **Professional Advisors:** Our legal advisors, auditors, and insurers in the course of their professional services.
- **Government Authorities & Law Enforcement:** Where required to comply with a legal obligation, court order, or other lawful request from a government authority (e.g., Revenue Department).
- Third Parties in a Business Transfer: In the event of a merger, acquisition, or reorganization, your data may be transferred to the new entity, which will be bound by this policy.

#### 7. International Transfers of Your Personal Data

Some of our service providers or group companies may be located outside of Thailand. In such cases, we will ensure your data is transferred securely and receives a level of protection compliant with the PDPA, using measures such as Standard Contractual Clauses or transferring to countries deemed to have adequate data protection standards.

#### 8. How Long We Keep Your Data

We retain your personal data only for as long as is reasonably necessary to fulfill the purposes for which it was collected, including to satisfy any legal, regulatory, or accounting requirements.

As a general rule, your membership data will be retained for the duration of your membership and for up to **3 years** after its termination to resolve any disputes and comply with legal obligations.

### 9. How We Protect Your Data

We have implemented robust administrative, technical, and physical security measures to safeguard your personal data. This includes access controls, data encryption, firewalls, and regular training for our staff to prevent unauthorized access, alteration, loss, or disclosure of your information.

# 10. Cookies and Tracking Technologies

When you visit our websites or use our apps, we use cookies and similar tracking technologies to enhance your experience, analyze trends, and administer the platform. These may include tools like Google Analytics and Facebook Pixel. You have control over these cookies through your browser settings and our cookie consent banner. For full details, please see our group **Cookie Policy** https://loyalty.lumagroup.rest/doc/cookie\_policy.pdf

# 11. Your Legal Rights Under the PDPA

You have the following rights over your personal data:

- Right to Access: Request a copy of the data we hold about you.
- Right to Rectification: Ask us to correct inaccurate or incomplete data.
- Right to Erasure: Ask us to delete your data where it is no longer legally necessary for us to hold it.
- **Right to Restrict Processing:** Ask us to temporarily halt the processing of your data under certain conditions.
- **Right to Object:** Object to the processing of your data, especially for direct marketing purposes.
- **Right to Data Portability:** Request your data in a machine-readable format to transfer to another service.
- **Right to Withdraw Consent:** You can withdraw your previously given consent at any time. This will not affect the lawfulness of processing done before your withdrawal.
- Right to Lodge a Complaint: You have the right to lodge a complaint with Thailand's Personal Data Protection Committee (PDPC) if you believe we have not complied with the law.

#### 12. How to Contact Us

To exercise your rights or if you have any questions about this policy, please contact us:

- Attention: Group Data Protection Officer
- Email: vedasiam.th@gmail.com
- Mailing Address: Veda Siam Co., Ltd., No. 63/202, Moo 2, Koh Keaw Sub district, Meung Phuket, Phuket 83000

You may also make inquiries at any of our restaurant locations, and they will direct your request to the appropriate corporate channel.

#### 13. Updates to This Policy

We may update this policy from time to time to reflect changes in our practices or the law. The latest version will always be available on our main group website and at our venues. We will notify you of any significant changes.