

Privacy Policy

This Privacy Policy ("Policy") is set out by BlueVenture Tech Co., Ltd. ("Company") as a personal data protection measure in which it prescribes criteria for collection, use and disclosure of personal data, including notification of the rights of service users for their acknowledgment. Service users should therefore need to fully understand this Policy prior to their use of Wellneso Platform.

1. Definition

1.1 "Personal Data" means any data which identify a person either directly or indirectly, including data of a service user provided to the Company, or received by the Company or that the Company has access from other sources. Personal Data are categorized into two types as follows:

1.1.1 General Personal Data means information relating to name and family name, sex, date of birth, age, identification number, postal address, telephone number, fax number, email address, IP address, or any data which identify that person, or number, code or any other materials which identify oneself such as voice record or photograph;

1.1.2 Sensitive Personal Data means information relating to racial or ethnic origin, religious beliefs, sexual orientation, data concerning health, genetic and biometric data or any other data which equally matter to the personal data owner;

1.2 "Service User" means a personal data owner who uses Wellneso mobile application ("Wellneso");

1.3 "Company" means BlueVenture Tech Co., Ltd. and its authorized companies or persons;

2. Purpose

2.1 The Company will collect, use and disclose personal data of the Service User only as necessary for the performing of its duties and providing services in accordance with the purpose with the consent of the Service User and as required by law.

2.2 The Company will collect, use and disclose personal data for the benefits of the provision of services to the Service User as follows:

2.2.1 To verify and ascertain the identification of the Service User;

2.2.2 To offer and provide core services to the Service User of TPA Care, enabling him/her to have access, use and conduct electronic transaction as specified in the Terms and Conditions of Use of Wellneso;

2.2.3 To enable the Company to provide assistance to the Service User, answer questions and handle customers' demands concerning the core services;

2.2.4 To conduct surveys relating to popularity and satisfaction or for improvement of quality of services;

2.2.5 To provide news and/ or marketing information relating to health conditions that meet the demands of the Service User;

2.2.6 To analyze and monitor the service usage and check previous records in the case of problems that may incur from the usage, such as records of Log Files of the users by automatic system;

2.2.7 To implement in compliance with the rules as prescribed by law.

2.3 If there is any change of the purpose of the collection, use or disclosure of Personal Data, the Company will inform the Service User of such change and seek consent from the Service User or undertake any other means in accordance with the rules as prescribed by law.

3. Data Collection and Use of Personal Data

3.1 The Company will collect Personal Data of the Service User that the Company has received from the Service User directly through Wellneso, pamphlet and/ or any other channels or any other reliable sources such as the Participating Member Company or government agencies for abovementioned purpose. The Company will collect and use Personal Data of the Service User by using legitimate and fair methods.

3.2 The Company will collect, use or disclose the following information:

3.2.1 Contact data such as name and family name, telephone number, postal address, email address;

3.2.2 Identification data such as username, password, name-family name, PIN code, biometric data, mobile phone number;

3.2.3 Demographic data such as date of birth, identification card number, age, gender, photograph, language;

3.2.4 Health data such as weight, height, steps, distance, calories;

3.2.5 Insurance data such as details of insurance coverage, past claims;

3.2.6 Device such as operating system of the device of the Service User (where access is permitted through device setting);

3.2.7 History of use such as search history, features or functions used on cookies.

3.3 The Company will obtain consent from the Service User prior to compiling Personal Data; unless

3.3.1 It is an act for public interest or to comply with legal or regulatory obligations;

3.3.2 It is necessary to prevent or eliminate danger to life, body or health of a person;

3.3.3 It is necessary to execute the contract to which the Service User is a party, or to proceed on request of the Service User before entering into a contract;

3.3.4 It is necessary for legitimate interests of the Company or a person or other legal persons unless such benefits are less significant than basic right in Personal Data of the Service User;

3.3.5 It is required by law.

3.4 Certain types of services may need to collect, use or disclose Sensitive Personal Data which will be conducted with the permission of the Service User only under the rules as prescribed by law.

3.5 The Company may enquire and collect additional information from the Service User to ensure that the information is at all-time accurate, current and complete.

4. Disclosure of Personal Data

The Company may disclose Personal Data to employees who are authorized by the Company, government agencies or law enforcement authorities, financial institutions, internal or external auditors, Cloud Computing service providers both in Thailand and abroad or any other persons as necessary for abovementioned purposes which are permitted by the Service Users to collect, use and disclose their Personal Data to carry out as necessary in accordance with the purposes of service provision as well as to oblige as required by law or to conduct an investigation or take legal action.

5. Security Measure and Protection of Personal Data

The Company will set forth appropriate measure for personal data protection and develop IT security system in compliance with standards as required by law as well as raise awareness about the obligations of personal data protection with which the employees, officers of the Company and its contractors or outsourced service provider shall strictly comply.

6. Rights of Personal Data Owner

The Service User has the right under the conditions prescribed by law as follows:

6.1 Right to access and obtain a copy of Personal Data relevant to oneself or certain details of how the Company obtained such Personal Data whereas the Service User did not permit the collection or retention;

6.2 Right to obtain Personal Data relevant to oneself from the Company which is readable or workable on automatically functioned devices or equipment, including to send or transfer such information to other Personal Data controller;

6.3 Right to object to collection, use, or disclosure, or processing of Personal Data of the Service User except the case where it is proven that the Company collects, uses or discloses such information legally, or to act on or exercise the right of claim under the law, or to dispute the right of claim, or to abide by a contract between the Service User and the Participating Member Company, or to rely on legitimate right under other laws;

6.4 Right to erase or destroy or to make identification of the personal data owner unidentifiable in the following cases:

(1) When it is no longer necessary to maintain it for the purpose of collection, use or disclosure;

(2) When the Service User withdraws his/ her consent to the collection, use or disclosure of Personal Data; and the Company is not entitled to collect, use or disclose such information;

(3) When the Service User objects to the collection, use or disclosure of Personal Data which have been conducted without permission from the Service User; and the Company is not in the position to reject the objection;

(4) When the collection, use or disclosure of Personal Data have been conducted unlawfully.

6.5 Right to suspend the use or disclosure of Personal Data relevant to oneself is subject to the following circumstances:

(1) When the Company is in the process of examining Personal Data as requested by the Service User;

(2) When the Personal Data would have to be removed or destroyed by the provision of the law after it is no longer necessary to be retained for the purpose of collection; but the Service User requested suspension of use instead as the Service User wishes to maintain it so as to establish the right of claim by law, act on or exercise the right of claim under the law, or dispute the right of claim;

(3) When the Company is in the process of proofing or examining to reject the objection of the Service User.

6.6 Right to make request to the Company to correct or change Personal Data to satisfy oneself that the information is accurate, complete and up-to-date and not misleading;

6.7 Right to withdraw the consent to collection of Personal Data. Such withdrawal would not cause any effects on the information previously processed;

6.8 Right to file complaints in the case the Company including its employees or contractors have violated or failed to comply with the Personal Data Protection Act (2019) or notifications issued by virtue of this Act.

The Service User may file a request to exercise the abovementioned rights to email Hello@BlueVentureTech.com

7. Period of Personal Data Retention

7.1 The Company will store Personal Data of the Service User for certain period of time as necessary for the purpose of servicing to only.

7.2 The Company will set up an examination system to remove or destroy irrelevant or unnecessary Personal Data beyond the purpose of personal data collection, or to act on the request of the personal data owner, or when the personal data owner has withdrawn his/her consent, excepting the retention for the purpose as required by law;

7.3 As long as the Service User holds a user account, the Company will maintain such personal data as email, name-family name and other details to ensure that the Service User is able to access and use the services except the account has been dormant for more than 5 years.

8. Changes to the Privacy Policy

The Company will regularly review and revise this Privacy Policy to ensure that it is current and up to standards. The Service User will be informed through TPA Care or other channels as appropriate.

9. Restrictions of Rights

9.1 Service User is requested to examine the privacy policy and guidance of other websites or other Mobile applications linked to Wellneso so as to be aware and understand how such websites or Mobile applications which are linked to Wellneso collect, use or disclose personal data. Nonetheless, the Company is not able to certify the message or confirm any actions as announced in such websites or Mobile applications which are linked to Wellneso and the Company does not take any responsibility if such websites or Mobile applications which are linked to Wellneso fail to act in accordance with the Privacy Notice;

9.2 The Company accepts no responsibility to any damages due to the Service User having disclosed his/her Personal Data to a third party, or those arising out of negligence of the Service User who failed to exit the system properly after use, or used with undue regards to IT security.

10. Contact

If you have any questions regarding this Privacy Policy, please contact the Company at Hello@BlueVentureTech.com

I consent to having the Company collect, use and disclose my data for obtaining core services of Wellneso, including news or participation in marketing campaigns arranged by the Company and the conduct of popularity and satisfaction surveys or for improving quality of the services