



PRIVACY NOTICE FOR PERSONNEL AND RELATED PERSONS

1. Purpose and Scope

Brighton College International School Bangkok (the “**School**”, “**we**”, “**us**” or “**our**”) is committed to meet and uphold all obligations under the Personal Data Protection Act, B.E. 2562 (2019) (the “**PDPA**”). This Privacy Notice will help you understand our guidelines on protecting your personal data (as defined below), to describe our grounds and means to collect, use, disclose, make cross-border transfer and/or otherwise process (collectively will be referred to as to “**process**”) your personal data, and to explain your rights in connection with such personal data as well as your options to protect such personal data.

This Privacy Notice applies to the processing of personal data of personnel and related persons in human resources management related activities. This should be read and comprehended and periodically revisited by all related parties to ensure a complete understanding of the processing of your personal data.

For the purpose of this Privacy Notice, “**personal data**” means any information relating to an identifiable living individual who can be identified from that data or from that data and other data. “**Sensitive data**” means any personal data revealing racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, and biometric data of a person.

This Privacy Notice shall apply to individuals who are involved in the human resources management related activities, which include (i) our staff (including foreign and Thai staff), (ii) the staff’s dependents (spouses and children), (iii) and outsourced staff (outsourced academic staff, maids, gardeners, security guards, maintenance staff, canteen staff, and school bus staff), which shall be collectively referred to in this Privacy Notice as “**you**” or “**your**”.

If you have any question or suggestion regarding our guidelines on protecting your personal data or if you wish to exercise your rights in accordance with the PDPA, please contact us through the following channel:

Brighton College International School Bangkok

8/8 Krungthep Kreetha Soi 15 Yaek 4 (Surao Yai),
Krungthep Kreetha, Hua Mak, Bangkok 10240

Tel. 02-136-7898

Contact the HR Department at hr@brightoncollege.ac.th

or

Contact the Compliance Team at compliance@brightoncollege.ac.th

2. Who Has the Right to Process Your Personal Data?

Since we have the role and responsibility in determining the purposes and means of the processing of your personal data in accordance with the PDPA, we shall act as the data controller for your personal data.

3. What Personal Data Do We Collect?

Personal Data

In case of staff (including foreign and Thai academic and support staff)

We collect the following categories and types of personal data of staff (including foreign and Thai staff), including but not limited to:

- a) identity data, such as full name, preferred name, copy of national ID card, copy of passport, copy of Visa, taxpayer ID number, photograph, signature;
- b) profile data, such as date of birth, gender, marriage certificate;
- c) details of qualification, such as educational qualifications, teaching license;
- d) contact details, such as telephone number, email, address;
- e) employment data, such as employment history, CV, employee ID number, RFID card number, time event logs, position, department;
- f) financial data, such as salary, copy of bank account book, withholding tax certificate; and
- g) IT information, such as username, password, log files, IP address, MAC address, location.

In case of staff's dependents (spouses and children)

We collect the following categories and types of personal data of staff's dependents, including but not limited to:

- a) identity data, such as full name, birth certificate; and
- b) profile data, such as marriage certificate.

In case of outsourced staff (outsourced academic staff, maids, gardeners, security guards, maintenance staff, canteen staff, and school bus staff)

We collect the following categories and types of personal data of reference persons, including but not limited to:

- a) identity data, such as full name, copy of national ID card, copy of passport
- b) profile data, such as date of birth, age
- c) contact details, such as address
- d) financial data, such as copy of bank account book

Sensitive Data

Apart from the personal data specified above, we may also process the following sensitive data:

In case of staff (including foreign and Thai staff)

- a) health data, such as medical information, medical certificates.
- b) criminal records.

In case of outsourced staff (outsourced academic staff, maids, gardeners, security guards, maintenance staff, canteen staff, and school bus staff)

- a) criminal records.

4. How Do We Collect Your Personal Data?

In case of staff

We directly collect staff's personal data in order to carry out all the processing purposes specified herein this Privacy Notice. However, in some circumstances, we collect staff's personal data from pupils.

In case of staff's dependents (including spouses and children)

We generally indirectly collect personal data of the staff's dependents through the staff.

In case of outsourced staff (outsourced academic staff, maids, gardeners, security guards, maintenance staff, canteen staff, and school bus staff)

We generally indirectly collect the personal data of the outsourced staff through the outsource service providers' companies, in order to carry out all the processing purposes specified herein this Privacy Notice.

5. How Do We Use Your Personal Data?

We use your personal data to carry out tasks as per our scope and purposes of providing groups of activities, including but not limited to:

In case of staff

- a) making contact and coordinating with the staff;
- b) applying for the teaching license;
- c) applying for and renewing work permit and Visa;
- d) administering salary and reimbursements;
- e) processing payments;
- f) processing insurance claims;
- g) conducting criminal record checks;
- h) managing the School's clearance for pupils;
- i) administering timetables, examinations, and grades and reporting pupils' progresses;
- j) arranging the School's residential trips and visits;
- k) creating account and storing personal data on the School's systems, programs, and other educational online platforms;
- l) managing the access control and authentication of the School's systems, programs, and other educational online platforms;
- m) complying with applicable laws and regulations;
- n) recruiting teachers and staff members;
- o) providing healthcare; and
- p) processing payments;

In case of staff's dependents (including spouses and children)

- a) processing insurance claims;

In case of outsourced staff (outsourced academic staff, maids, gardeners, security guards, maintenance staff, canteen staff, and school bus staff)

- a) conducting criminal record check;
- b) managing outsourced staff;
- c) safeguarding and protecting the pupils and staff;
- d) processing payments;

We rely on the following legal bases and certain special conditions to process your personal data. Not all of your personal data will apply to every legal basis and certain special conditions stated below, and may be based upon one single or a combination of several legal bases.

(1) Contractual Basis

We are obligated to process your personal data to carry out the responsibilities committed according to employment contract and service agreements. These required personal data make up most of the data stated in Clause 3. In the case where you withhold any of your personal data in respect to the specified purpose, we may not be able to meet our obligations under employment contract with you. For example, we may not be able to administer your salary and benefits.

(2) Legitimate Interests

In specific situations, we require your personal data to achieve our or any third parties' legitimate interests, provided that your interests and fundamental rights and freedoms are not overridden by those interests.

(3) Legal Obligations

We are obligated to process your personal data according to any of our legal obligations, including but not limited to providing your personal data to the Ministry of Education, Immigration Bureau, and Teacher Council.

(4) Consent

In limited circumstances, we require consent and/or explicit consent of staff to process staff's personal data and/or sensitive data.

6. Who We Will Share Your Personal Data with

In order to perform our contractual and other legal responsibilities or purposes, we may be required to disclose your personal data to external third-party organisations. These organisations may include:

- a) governmental bodies;
- b) pupils and families;
- c) cloud service providers;
- d) insurance companies;
- e) hospitals;

For the case where your personal data is being disclosed to any of the external third-party organisations, we will ensure that the minimum amount of personal data will be disclosed. Also, all third-party service providers that process your personal data on behalf of us will be required to process your personal data within the scope and purposes specified in this Privacy Notice, and to put in place appropriate security measures in order to protect your personal data to the extent required by law.

7. Transferring Personal Data to Foreign Countries

For the purposes mentioned in this Privacy Notice, we may disclose or transfer your personal data to third parties or servers located in another country which may or may not have the same data protection standards as Thailand's. In addition, we have taken steps and measures to ensure that your personal data is securely transferred, that the data recipients have suitable data protection standards in place, and that the transfer is in compliance with the PDPA.

8. Security Measures for Personal Data Protection

We have implemented technical and organisational measures to provide protection against loss, misuse, unauthorized access, disclosure and modification of your personal data. External third-party organisations are also required to carry out the processing of your personal data in accordance with our security policy.

9. How Long Do We Keep Your Personal Data?

We will retain your personal data for as long as it is reasonably necessary to fulfill our scope and proposes set out in this Privacy Notice, and to establish, exercise or defense the legal claims. However, we may have to retain your personal data for a longer duration, if required by any applicable law.

10. Your Personal Data Rights

Subject to applicable laws and exceptions thereof, your personal data rights include:

- a) **Right to withdraw consent** – where your consent and/or explicit consent has been obtained, you are entitled to withdraw such explicit consent by submitting the consent withdrawal form to us;
- b) **Right of access** – you may have the right to request a copy of all your personal data we are processing about you;
- c) **Right to data portability** – for the case where we have an automated platform allowing you to access your personal data automatically:
 - (i) you may have the right to ask for your personal data to be transferred automatically to other organisations; and
 - (ii) you may have the right to ask for your personal data to be directly transferred to other organisations, with the exceptions of cases where there is a technological limitation;
- d) **Right to object** – you may have the right to object to any data processing activities of your personal data in some circumstances;

- e) **Right to erasure** – you may have the right to request for the deletion or anonymization of the personal data that we process about you, in accordance with the following cases:
 - (i) the personal data is no longer necessary for the processing purposes;
 - (ii) you have withdrawn your explicit consent for us to process your personal data;
 - (iii) you object the processing of your personal data by us based on our legitimate interests and we do not have an overriding legitimate ground for the processing; and
 - (iv) the processing activity is not in accordance with the law.
- f) **Right to restrict processing** – you may have the rights to restrict any data processing activities, in accordance with the following cases:
 - (i) during the verification process in accordance with the rights request to rectify the personal data;
 - (ii) for cases related to personal data which the School has initially been asked to erase but was followed by an additional request of processing restriction instead;
 - (iii) for cases when the data processing terms have passed, but you have requested for processing restriction due to legal reasons; and
 - (iv) during the process of personal data processing objection verification;
- g) **Right to rectification** – you may have the right to edit your personal data to be correct and up to date; and
- h) **Right to lodge a complaint** - you may have the right to lodge a complaint to us and competent authorities in the case that we unlawfully or not in compliance with applicable laws with the processing of your personal data.

Please be informed that your above-mentioned rights are subject to the relevant factors and we may not be able to proceed with your request if we can rely on any lawful grounds to further process your personal data.

In the case where you have the intention to exercise your personal data protection rights, please contact us through channel specified above. We will process this request in a secure and timely manner.

11. Privacy Notice Revision

In order to improve the efficiency of the processing of your personal data, we may amend this Privacy Notice as we deem appropriate. We will notify you if such changes materially affect the processing of your personal data, or if we are required to do so by law.