



PDPA PRIVACY NOTICE FOR PUPILS, PARENTS OR GUARDIANS AND RELATED PERSONS

1. Purpose and Scope

Brighton College Bangkok Vibhavadi (the “College”) 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, 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 pupils, parents or guardians and related persons. 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; and “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, biometric data of a person.

This Privacy Notice shall apply to individuals who are our pupils, parents or guardians and other related persons, including designated carers, Designated Safeguarding Leads of any previous College, persons to whom the cheque is payable, new College’s contact persons, and emergency contact persons, 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 at the address/telephone at the bottom of each page of this notice, and ask to speak to the PDPA Lead, Mr. Neil Hayward, Head of the Senior College.

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 Pupils

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

- a) identity data, such as full name, nickname, national ID card number, copy of national ID card, passport number, copy of passport, birth certificate, College ID number, videos, photographs;
- b) profile data, such as gender, date of birth, nationality, native language, activities, interests, disciplinary issues, communication skills, weight, height;
- c) educational details, such as year of entry, current grade, year group, transcript, previous education, development milestones, class, assessment data, attainment grades, effort grades, attendance, participation grades, English levels;
- d) contact details, such as home address, telephone number, email;
- e) IT information, such as username, password, log files, IP address, MAC address, location
- f) other data, such as a personal statement, reference letter, reasons of withdrawal, date of withdrawal.

In case of Parents or Guardians

We collect the following categories and types of personal data of parents or guardians and related persons, including but not limited to:

- a) identity data, such as full name, national ID card number, copy of national ID card, passport number, copy of passport, signature, photograph,
- b) profile data, such as relationship with the pupil, gender, marital status, nationality;
- c) employment data, such as occupation details;
- d) financial data, such as payment information, financial status, income information, bank account details, copy of book bank account;
- e) property data, such as copy of house registration, details of vehicles;
- f) contact details, such as telephone number, email, address; and
- g) other data, such as parental responsibility.

Sensitive Data

Apart from the personal data specified above, we may process other sensitive data of pupils, such as health data, psychologist reports and external examination results data.



4. How Do We Collect Your Personal Data?

In the Case of Pupils

We generally indirectly collect pupils' personal data through parents or guardians, related persons, or third parties. However, in some circumstances, we may directly collect pupils' personal data.

In the Case of Parents or Guardians

We generally directly collect parents or guardians' personal data in order to carry out all the processing purposes specified in this Privacy Notice.

In the Case of Related Persons

For the case of other related persons, we indirectly collect related persons' personal data through pupils and parents or guardians. However, in some circumstances, we may directly collect related persons' personal data.

5. How Do We Use Your Personal Data?

In the Case of Pupils

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

- a) administering pupils' enrolment and withdrawal;
- b) asking for consent to process personal data;
- c) making contact regarding College related matters and in case of emergency;
- d) monitoring and tracking pupils' progress and making reports;
- e) administering timetables, examinations, and grades and reporting pupils' progress;
- f) supporting the provision of facilities and services, IT service, library service, food service;
- g) registering for courses;
- h) issuing College ID badges;
- i) safeguarding and protecting pupils;
- j) providing healthcare;
- k) sending out the College newsletter;
- l) providing Senior School Scholarships;
- m) applying for universities;
- n) determining English levels;
- o) preparing educational content and making reports;
- p) arranging College events (including sports competitions and tournaments), activities, residential trips and visits;
- q) providing special educational needs;
- r) creating accounts and storing personal data on the College's systems, programs, and other educational online platforms;



- s) managing the access control and authentication of the College's systems, programs, and other educational online platforms as well as providing the IT support;
- t) complying with applicable laws and regulations;
- u) issuing invoices and collecting debts;
- x) preparing and sending envelopes to pupils;

In Case of Parents or Guardians and Related Persons

We use parents or guardians and related persons' personal data to carry out tasks per our scope and purposes of providing groups of activities, including but not limited to:

- a) administering pupil's enrolment and withdrawal;
- b) making contact regarding College's related matters and in case of emergency;
- c) asking for consent and approval to process own personal data and/or pupils personal data, and to enable participation of pupils regarding College's activities;
- d) monitoring and tracking pupils' progress and making reports;
- e) issuing College's ID badges;
- f) supporting the provision of facilities and services, such as the IT service, library service, and food service;
- g) registering for courses;
- h) safeguarding and protecting pupils;
- i) providing healthcare;
- j) sending out the College's newsletter;
- k) arranging the College's events (including sports competitions and tournaments), activities, residential trips and visits;
- l) creating accounts and storing personal data on the College's systems, programs, and other educational online platforms;
- m) managing the access control and authentication of the College's systems, programs, and other educational online platforms as well as providing the IT support;
- n) issuing invoices and collecting debts;
- o) requests for bursaries or discounts;

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.



6. Contractual Basis

We are obligated to process your personal data to carry out the responsibilities committed according to the enrollment contract. 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 the enrollment contract with you. For example, we may not be able to administer your enrollment and provide our service to you.

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.

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 and other relevant governmental bodies. In the case where you withhold any of your personal data in respect of this specified purpose, there might be consequences under relevant laws.

Consent

In limited circumstances, we require consent or explicit consent of pupils and/or parents or guardians to process pupils' personal data and/or sensitive data.

7. 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) parents or guardians;
- b) governmental bodies;
- c) our service providers, such as printing companies, external trip operators, health care service providers, catering service providers, photography service providers, cloud service providers, educational service providers;
- d) new Colleges or prospect Colleges or universities;
- e) educational assessment institutions and education and examination bodies;
- f) insurance companies;
- g) relevant professionals; and
- h) on-site staff of outsourced service providers.



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. In addition, 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.

8. 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.

9. 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.

10. 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 purposes, as set out in this Privacy Notice, and to establish, exercise or defend any legal claims. However, we may have to retain your personal data for a longer duration, if required by any applicable law.

11. 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 consent and/or 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;



- (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 consent and/or explicit consent for us to process your personal data and/or sensitive 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 College 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;
- 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 in the manner specified above.

We will process this request in a secure and timely manner.

12. 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.