



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 vendors and suppliers’ personal data. 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 all vendors and suppliers (including their directors, coordinators, staff or contact persons of vendors and suppliers, and facilities users), who make contact with us or enter the School area, 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, Bangkapi, Bangkok 10240

Tel. 02-136-7898

Contact the Procurement Department at procurement@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 the processing 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?

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

- a) identity data, such as full name, national ID card number, copy of national ID card, copy of passport;
- b) profile data, such as date of birth, age;
- c) contact details, such as telephone number, email, address, LINE ID; and
- d) financial details, such as copy of bank book;
- e) employment details, such as position.

4. How Do We Collect Your Personal Data?

In general, we will directly collect your personal data when you make contact with us. However, in some circumstances, we may indirectly collect your personal data through contact persons.

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:

- a) processing payment and making purchase order;
- b) selecting vendors;
- c) generating invoices;
- d) collecting debts;
- e) entering into contracts; and
- f) using the School's facilities.

We rely on the following legal bases to process your personal data. Not all of your personal data will apply to every legal basis 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 in order to make contact or enter into an agreement with you. 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 for us to process it in respect to the specified purpose, we may not be able to make contact or enter into an agreement with you.

(2) Legitimate Interests

In specific situations, we require your personal data to achieve our legitimate interests, such as making contact with you, provided that your interests and fundamental rights and freedoms are not overridden by such interests.

6. Who We Will Share Your Personal Data With?

We may be required to disclose your personal data to external third parties, such as cloud service providers, to process your personal data.

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 purposes set out in this Privacy Notice, and to establish, exercise or defend 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 of access** – you may have the right to request a copy of all your personal data we are processing about you;
- b) **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;

- c) **Right to object** – you may have the right to object to any data processing activities of your personal data which are based on legitimate interest as lawful ground;
- d) **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 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;
- e) **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;
- f) **Right to rectification** – you may have the right to edit your personal data to be correct and up to date; and
- g) **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 efficiency in operating your personal data, we may amend this Privacy Notice as we deem appropriate. We will notify you if such changes materially affect the operation of your personal data, or if we are required to do so by law.