



# AMBASSADOR Education Group

# AMBASSADOR Data Protection and Privacy Policy Education Group

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# 1. Introduction

## Policy Statement and Objectives

This privacy notice is provided for the School’s students, parents and employees to be made aware of the School’s policies regarding collection, use and disclosure of your personal information in accordance with Thailand’s Personal Data Protection Act B.E. 2562 (2019) (“**PDPA**”). The policy purpose and objective is to give effect to the provisions of the PDPA and to safeguard personal data.

AEG and its subsidiaries (hereafter referred to collectively as “We”, “the School”, “the Group” and “AEG”) is responsible for safeguarding all students, and in doing so it collects and processes personal data.

The School and AEG are considered to be *data controllers* and you are considered as a *data subject*. AEG is required to keep and process certain information about its students, parents, staff, vendors, third parties and other stakeholders, in accordance with its legal obligations under the PDPA.

This policy is in place to ensure all stakeholders are aware of their responsibilities and outlines how the School complies with the core principles of the PDPA.

It is of utmost importance to AEG and its affiliated Schools that:

- AEG guarantees commitment to protecting personal data of students, parents, employees and any other stakeholders.
- AEG ensures that students’, parents’, employees’ and other stakeholders’ personal information, in AEG’s possession is adequately protected to avoid unauthorized access, use, or disclosure.

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- AEG guarantees that the personal data will be used appropriately, transparently, and securely in accordance with applicable laws and for the purpose for which it was collected.

This privacy notice will determine the methods of collection, use and disclosure of personal information, types of data and purposes for doing so including details about the retention period. Disclosure of personal data to third parties, your rights, confidentiality and security of your personal data and how you can contact the School.

This policy will be implemented in conjunction with other School policies such as:

- Code of Conduct
- Child Safeguarding Policy
- Photography and Videos at School Policy
- E-safety Policy
- CCTV Policy

## 2. Principles

In accordance with the requirements outlined in the PDPA, your personal data will be:

- 2.1. Processed lawfully, fairly and in a transparent manner.
- 2.2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- 2.3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 2.4. Accurate and, where necessary, kept up-to-date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

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- 2.5. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.
- 2.6. The PDPA also requires that the controller be responsible for, and able to demonstrate, compliance with the principles.

**3. Data Subjects**

The School collects personal data and sensitive categories of personal data of students, parents, staff and other stakeholders for all educational purposes, performance of the duties and other activities of the School. We use the information you provide for purposes that are necessary and required to undertake the performance of the contract into which you are entering or have entered into and do so as we are required to do by law.

**4. What data do we collect from you?**

**The School collects personal information from students and parents for academic, educational and administrative purposes.**

- 4.1. Personal details such as full names, date of birth, gender, age, nationality, family/guardian information and marital status.
- 4.2. Contact information such as address, telephone number, e-mail address, social media account name and emergency contact person(s) details.
- 4.3. Identification and authentication details such as identification number (ID card), passport number and information, birth certificate, driving license and visa and immigrations status.
- 4.4. Data concerning security such as CCTV images, audio and video images.

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4.5. Information technology details such as logging and audit in the use of IT systems and education technology apps, applications and cloud based systems, IP addresses of students' personal devices when connected to the School's network.

**The School collects employees' personal information. Personal Data will be used and limited to the extent necessary, including:**

- 4.6. Name, surname, date of birth, gender, age, educational background, nationality, identification number, passport number, employment history, job position, photographs, social media account, driver's license number.
- 4.7. Contact information such as address, telephone number, e-mail address, social media account name and emergency contact person(s) details.
- 4.8. Official document information such as a copy of your ID card, a copy of your passport and work permit.
- 4.9. Financial information such as bank account name and number, tax ID and insurance information.
- 4.10. Information about related third parties for emergency use.
- 4.11. Information obtained from the School system or as an employee, such as employee ID, IP address when School network is used, work permit number, attendance records, work duration, overtime work, absence and leave from work, CCTV images and/or video.

**The School collects contractors, suppliers, vendors and third parties personal information. Personal Data will be used and limited to the extent necessary for the company's operating objectives, including:**

- 4.12. Contact information such as address, telephone number, e-mail address.

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4.13. Name, surname, date of birth, identification number, company name, business registration number.

4.14. Financial information such as bank account name and number, VAT number.

**5. Sensitive Categories of Information**

We may need to collect sensitive information such as religion, ethnicity, biometrics, disability information, medical information, and criminal record. We will always ask your consent when we process this information, except when other legal basis is established, including, among others:

- 5.1. For the purpose of preventing or suppressing dangers to the life, body or health of the person when the data subject is unable to give consent.
- 5.2. It is information that is made public with the consent of the personal data subject.
- 5.3. It is necessary for the establishment of legal claims, compliance or exercise of legal claims or the rise of the defense of legal claims.
- 5.4. It is imperative to comply with the law.

This sensitive information shall be treated carefully by the School and will only be used for specific purposes. It will not be released to a third party without your explicit consent unless it is necessary to protect your interests.

**6. How do we collect this data from you?**

- 6.1. Data is collected during the application process by means of enquiry form, application form, enrolment contract, new student details information sheet and possibly information from your previous School. After admission to the School we will collect additional information as needed.

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- 6.2. We collect employee information during the recruitment process and thereafter if employment is offered to the candidate.
- 6.3. We may further collect contractors, suppliers, vendors and other third party information if and when required when entering into a contractual relationship.

**7. Why do we collect this data from you?**

- 7.1. The purpose of us collecting and processing **student and parent** data is:
  - 7.1.1. To process and manage applications for admission.
  - 7.1.2. To maintain students’ personal details, academic and non-academic records.
  - 7.1.3. To facilitate the internships, placement or industrial training, as well as co-curricular activities.
  - 7.1.4. To provide relevant administrative support and counseling services.
  - 7.1.5. To improve the quality of our educational and academic services.
  - 7.1.6. To manage the use of facilities such as libraries, dining halls, computer systems, etc.
  - 7.1.7. To conduct graduation and alumni events.
  - 7.1.8. To arrange School buses and transportation.
  - 7.1.9. To invoice tuition fees and other payments.
  - 7.1.10. To communicate with students and parents in respect to any important announcements, including matters relating to career services, postgraduate studies and alumni.

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- 7.1.11. To collect and relay information for relevant local or international statutory authorities or examination boards.
- 7.1.12. To contact students' next of kin in case of emergencies.
- 7.1.13. To comply with any regulatory, audit or security-related requirements.
- 7.1.14. To facilitate the School's operations and management, including the compilation of student records, the administration of invoices, fees and accounts, management of School property, management of security and safety procedures.
- 7.1.15. To manage and monitor our IT and communication systems
- 7.1.16. To keep children safe ( allergies, disabilities, special education needs)
- 7.1.17. To meet the statutory duties placed upon us from the Ministry of Education.
- 7.1.18. To keep record of historical and memorable events relevant to the maintenance of historical records.

7.2. The purpose of us collecting and processing employee data is:

- 7.2.1. To comply with an employment contract you entered into with us.
- 7.2.2. To comply with labor relations, employment law and social security.
- 7.2.3. To comply with the laws and statutory obligations, such as paying taxes and other statutory duties.
- 7.2.4. For assessing job skills and competence.
- 7.2.5. For coordinating work.

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- 7.2.6. To pay compensation, welfare benefits, employment benefits.
- 7.2.7. For use in approvals, authorizations, or work processes.
- 7.2.8. To determine eligibility and suitability for a position.
- 7.2.9. For use in granting access to the area and use of the School's assets.

7.3. The purpose of us collecting and processing contractors, suppliers, vendors and third parties data is:

- 7.3.1. To comply with a contract.
- 7.3.2. To comply with the laws and statutory obligations, such as paying taxes and other statutory duties.
- 7.3.3. To pay for services rendered or products purchased for the School.

## 8. Legal Bases and Consent

8.1. We process your personal data for the purpose stated above and based on the following legal bases:

- 8.1.1. We have an individual's consent to do so (or their parent's, if appropriate). You can withdraw your consent at any time by emailing [DPO@aegcm.com](mailto:DPO@aegcm.com)
- 8.1.2. it is necessary for the performance of a contract (e.g. an employment contract with a member of staff);
- 8.1.3. it is necessary for our compliance with our legal obligations. In this respect, we may use personal data to exercise or perform any right or obligation conferred or imposed by law in connection with employment; and/or for the prevention and detection of crime, and in order to assist with

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investigations (including criminal investigations) carried out by the police and other competent authorities;

8.1.4. it is necessary for our or a third party’s legitimate interests. These “legitimate interests” include our interests in providing high quality education, fostering relationships with those in the school community, and our interests in managing and operating the school to the best of our abilities.

8.1.5. it is necessary to protect an individual’s vital interests (in certain limited circumstances, for example where a student has a life-threatening accident or illness while at school and we have to process that student’s personal data in order to ensure the student receives prompt and appropriate medical attention);

8.1.6. it is necessary for the establishment, exercise or defense of legal claims;

8.1.7. it is necessary for reasons of substantial public interest, including safeguarding purposes;

8.1.8. it is necessary for medical purposes, including medical diagnosis and the provision of health care or treatment for students, managing related health care systems, and/or for assessing the working capacity of staff;

8.1.9. it is necessary for archiving, research or statistical purposes.

8.2. Your information will be shared with the Ministry of Education after registration in order for our School to comply with the legal obligations placed on us as a School operating in Thailand.

8.3. The education services we provide require us to collect and process special categories of data for the purposes of safeguarding, the protection of vulnerable children, and wellbeing of those within our care. We do not disclose or share special

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categories of data without explicit and unambiguous consent unless we have to do so where we are required to by law, or where we have good reason in protecting the vital interests of an individual, or where not doing so would place someone else at risk. We may ask for your consent to use your information in certain ways as an alternative to relying on any of the legal grounds mentioned above. For example, we may ask for your consent before taking or using some photographs or videos with regards to promotional materials such as, but not limited to, marketing videos, brochures, x-stands, billboards and School websites.

**Photographs and Videos**

8.4. Photographs and videos are a key medium through which to record and share everyday life at the School to the parents, students, employees, alumni, prospective families and the general public. We use such media for promotional purposes including, but not limited to, the School’s website, printed publications, electronic newsletters and the School’s social media. Photographs and videos are also generated for educational purposes (records of lessons, field trips, sports, events, staff professional development) by faculty and students and play an important role in the delivery of our teaching and learning programme. As members of the School community, parents, students, employees and alumni may be photographed or filmed and these photographs or films used for promotional or educational purposes.

8.5. Photos and videos as mentioned above will only be processed if prior consent was obtained.

**CCTV**

8.6. We collect information in the form of camera footage via our CCTV-systems to ensure the safety and security of students and staff. We retain these CCTV images for 90 days after which they are deleted, unless we need to retain the images for further investigation or law enforcement purposes. Please note, some of our legacy

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systems can only retain footage for up to 14 days, these older CCTV systems may be upgraded by the time this policy is reviewed and updated in 2023.

### **Cookies & Tracking**

8.7. We utilize Google Analytics in tracking visitors to the School website. This information is not used to identify personal information, nor is it used for any purpose other than improvement of the website based on identifiable trends. Cookies – small pieces of information stored on your computer to indicate sites that you have visited – are used only in conjunction with Google Analytics for the purpose of enhancing the website. These cookies are not used to gather personal information about visitors, and no other visitor tracking is conducted. Additional information about Google Analytics and privacy is available on the Google Support website.

### **9. How do we store and safeguard your data?**

We ensure the integrity and confidentiality of personal data in our possession and control, by taking appropriate and reasonable technical and organizational measures to prevent; loss of, damage to, unauthorized destruction of, unlawful access to, or any other processing of personal data inconsistent with the PDPA. This is achieved by putting access rights in place, passwords, two-factor- authentication, Firewall, secured hard copy files, among others.

### **10. With who do we share your data (Disclosure)**

Your personal data is stored and used for the purpose which it was provided. Your personal data will not be disclosed without prior consent or in instances permitted by law and/or the PDPA (legal basis) such as:

10.1. The Ministry of Education (Legal Obligation);

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- 10.2. Providers of information systems that are necessary for the School to deliver the admissions, administration, teaching and learning, pastoral development, and child protection services (Performance of Contract and Legitimate Interest);
- 10.3. Family nurses, doctors or social service organizations (Vital interests)
- 10.4. Providers of IT hosting and maintenance services (Performance of Contract and Legitimate Interest);
- 10.5. The Police (If required to do so by Law);
- 10.6. Government agencies in accordance with the duties of the employer such as the Social Security Office, the Revenue Department, the Legal Execution Department (Legal obligation).
- 10.7. Our affiliates such as Schools within AEG (Legitimate Interest).

Personal data may also be transferred to other data processors. For such transfers of personal data, We have implemented suitable safeguards.

## 11. Your legal rights

You can exercise your rights under the Act by contacting the School’s Data Protection Officer:

Right to access and obtain a copy of your personal data.

- 11.1. Right to request correction of your personal data.
- 11.2. Right to request erasure of your personal data.
- 11.3. The right to request the suspension of the use of your personal data.
- 11.4. The right to object to the collection, use or disclosure of your personal data.

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- 11.5. The right to obtain or request the transmission or transfer of your personal data to another data controller (Data Portability).
- 11.6. Right to withdraw consent previously given.
- 11.7. Right to complain to the School.

In the event that there is a reason to believe that we have violated or failed to comply with the PDPA, you have the right to lodge a complaint with the Personal Data Protection Committee (PDPC) in accordance with the rules and procedures prescribed by the PDPA.

**12. Retention Period**

The School will store your personal data for a timeframe prescribed by the relevant local and international; laws, best practice, standards and regulations.

**13. Data Protection Officer (DPO)**

If you have any questions or would like to get more information about the company's privacy policy notice, please contact the company through the following channels.

Telephone:

School Address: 272 Moo 2 Chiang Mai, Lampang Super Highway, Tambol Nong Pheung, Sarapee, Thailand.

Data Protection Officer E-mail [DPO@aegcm.com](mailto:DPO@aegcm.com) or at the address of the company above.

If you wish to request to exercise your rights under the Personal Data Protection Act, please contact the School's Data Protection Officer (DPO) for exercising all your rights.

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The School's Data protection Officer (DPO) will monitor the group's compliance with the PDPA and other laws, including managing internal data protection activities, advising on data protection impact assessments, conducting internal audits, and providing the required training to staff members. If you wish to lodge a complaint relating to the processing of your personal data, you may send an email to [DPO@aegcm.com](mailto:DPO@aegcm.com) detailing the nature and purpose of the complaint.

**14. Changes and updates to the Privacy Policy Notice**

This policy is reviewed annually by the DPO and the Board.  
The next scheduled review date for this policy is August 2023.

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