

# Privacy Notice

## Heathfield International School

### 1. General Provisions

In compliance with the Personal Data Protection Act B.E. 2562 (2019), including any relevant subordinate legislation and any future amendments thereto (collectively referred to as the “Personal Data Protection Laws”), Heathfield International School (the “School”) has issued this Privacy Notice (the “Notice”).

This Notice is intended to explain how the School handles information that can directly or indirectly identify you (“Personal Data”) in accordance with the Personal Data Protection Laws. Such handling includes, but is not limited to, the collection, use, disclosure, or any operation performed on Personal Data, whether by automated means or otherwise—for example, recording, organizing, storing, adapting or altering, retrieving, transmitting, transferring, disseminating, making available in any form, aligning, combining, restricting or denying access, transferring, erasing, or destroying (collectively, “Processing”).

The School issues this Notice to inform you of the purposes for which your Personal Data will be processed, the retention period of such Personal Data, as well as your rights as a data subject. You are strongly encouraged to carefully read and understand the terms of this Notice, which are set out in detail below.

### 2. Categories of Individuals Whose Personal Data Are Collected by the School and Sources of Personal Data

2.1 Under this Notice, the categories of individuals whose Personal Data the School collects and processes, as well as the sources of such Personal Data, consist of five categories as follows:

	Categories	Details	Sources of Personal Data
(1)	Personal Data relating to students or service users	Individuals who use the School’s services and/or other persons in a similar capacity, such as parents, guardians, or custodians of students, alumni or graduates, research participants or activity participants, seminar attendees, website users, application users, persons contacting the School to	<ul style="list-style-type: none"><li>When you contact or communicate with the School through the website, applications, telephone, email, in-person meetings, or by any other</li></ul>

		request information or services, and respondents to service-related surveys. This definition also includes persons related to or acting on behalf of such individuals, which may include legal entities, as well as individuals whose Personal Data appears in documents associated with relevant processes.	<p>means.</p> <ul style="list-style-type: none"> <li>• When you express your intention to use the School's services and enter into an agreement with the School.</li> <li>• When you participate in marketing activities, lucky draws, events, or other related activities.</li> <li>• When information is collected from the School's service providers, such as application providers, e-commerce providers, or public relations and service referral providers.</li> <li>• In certain cases, the School may collect your Personal Data from public sources, whether you disclose such Personal Data yourself or have given consent to any party to disclose your Personal Data.</li> </ul>
(2)	Personal Data relating to business partners	Individuals who submit bids to sell products and/or provide services to the School, or who have other similar relationships with the School, such as agents,	<ul style="list-style-type: none"> <li>• When you complete various forms through the School's website or other</li> </ul>

		<p>intermediaries, service providers, consultants, experts, academics, lecturers, business project participants, contractual counterparties, or other comparable persons. This definition also includes natural persons related to or acting on behalf of counterparties that are legal entities, as well as individuals whose Personal Data appears in documents related to the relevant processes.</p>	<p>channels.</p> <ul style="list-style-type: none"> <li>• When you provide information in connection with offering products or services.</li> <li>• When you enter into an agreement with the School and submit documents containing your Personal Data to the School.</li> <li>• When you make inquiries, provide opinions or feedback, or submit complaints to the School via telephone, email, or by any other means.</li> <li>• In certain cases, the School may collect your Personal Data from public sources, business-related sources, or commercial sources, whether you disclose such Personal Data yourself or have given consent to another party to disclose your Personal Data.</li> </ul>
(3)	Personal Data relating to employees	Individuals who work for or perform any duties for the School and receive salary, wages, benefits, or any other	<ul style="list-style-type: none"> <li>• In certain cases, the School may collect your Personal Data in the capacity of a</li> </ul>

		<p>form of remuneration from the School, regardless of its designation, such as directors, executives, staff, teachers, employees, personnel, interns, or other similar persons. This definition also includes persons related to the School's employees and individuals whose Personal Data appears in documents related to the relevant processes, such as family members (e.g., parents, spouses, and children), emergency contacts, reference persons, beneficiaries, and guarantors.</p>	<p>family member, emergency contact person, beneficiary, or guarantor of the School's employees.</p>
(4)	<p>Personal Data relating to job applicants</p>	<p>Individuals who apply for employment with the School or who may be considered for employment by the School. The School may collect the Personal Data of job applicants directly or from third parties. This definition also includes persons related to the job applicant and individuals whose Personal Data appears in documents related to the recruitment process, such as family members, reference persons, and emergency contacts.</p>	<ul style="list-style-type: none"> <li>• When you submit documents or a résumé to apply for employment with the School.</li> <li>• When you submit a job application form and supporting documents to the School, whether through walk-in applications, job fair applications, or applications via the School's website.</li> <li>• When you attend a job interview with the School.</li> <li>• The School may also receive your Personal Data from third-party job application websites, your references, recruitment</li> </ul>

			<p>agencies, government authorities, educational institutions, or information available on social media, whether you disclose such Personal Data yourself or have given consent to another party to disclose your Personal Data.</p>
(5)	<p>Personal Data relating to the general public</p>	<p>Individuals not included in the categories above, whose Personal Data the School processes, whether the School collects such data directly, automatically through the use of cookies or other technologies, or receives it from third parties—for example, persons captured on closed-circuit television (CCTV) or individuals who visit the School’s website.</p>	<ul style="list-style-type: none"> <li>• When you are captured in still or moving images by closed-circuit television (CCTV) under the School’s supervision.</li> <li>• When you access the School’s website, whether intentionally or unintentionally.</li> </ul>

2.2 In certain cases, the School may collect your Personal Data automatically through various channels, such as the use of cookies or other similar technologies.

2.3 When collecting your Personal Data, you will be notified of the details as set out in this Notice, including, but not limited to, the purposes and legal basis for collecting, using, disclosing, and/or processing your Personal Data. In cases where the Personal Data Protection Laws require your consent for certain processing activities, the School will obtain your explicit consent.

2.4 In the event that the School collected your Personal Data prior to the effective date of the relevant provisions of the Personal Data Protection Laws relating to the collection, use, or disclosure of Personal Data, the School will continue to collect and use your Personal Data for the original purposes previously notified to you. You have the right to withdraw your consent by contacting the School using the contact details provided in Section 11 of this Notice. The School reserves the right to consider your withdrawal request and act in accordance with the Personal Data Protection Laws.

### **3. Personal Data Collected**

#### **3.1 Personal Information**

Such as name, surname, date of birth, age, gender, weight, height, national ID number, photographs, signature, nationality, race, religion, marital status, military status, family information (e.g., parents, spouse, children), health information, and biometric data (e.g., fingerprints, palm prints, facial images), among others.

#### **3.2 Contact Information**

Such as address as shown on ID card, residential address, delivery address, billing address, phone number, fax number, email, application user IDs (e.g., Line ID), emergency contacts, and reference persons.

#### **3.3 Business Information**

Such as company or factory details (e.g., name, registration number, location, and contact information), vehicle registration numbers, vehicle type, personal data appearing on commercial registration copies, title deeds, maps, locations, and trade conditions.

#### **3.4 Transaction Information**

Such as customer codes, vendor codes, order details (e.g., product, quantity, and quality), product requirements, complaints regarding products (e.g., order date, product type, and issues encountered), temporary delivery note numbers, and delivery details.

#### **3.5 Payment Information**

Such as payment amounts, credit limits, payment terms, account numbers, personal data appearing on invoices, tax invoices, checks and check stubs, payment vouchers, receipts, remittance slips, and bank account debit records.

#### **3.6 Data for Transactional or Legal Evidence**

Such as personal data appearing on copies of ID cards, passports, household registration, name-change certificates, factory operation licenses, registration forms, customer account opening forms, powers of attorney, company certificates, tax registration forms (e.g., Phor.Por. 09/20), maps, collateral documents (e.g., land deeds, bank guarantees, personal guarantees), sales or other transaction-related contracts, delivery notes, lawyer licenses, professional licenses, military service certificates, bank book copies, marriage certificates, birth certificates, new employee payroll approval forms, medical certificates, pre-employment medical checkups, beneficiary forms, social security registration forms, consent forms for background checks, background check reports, employment contracts, employment guarantee letters, and other related documents.

### 3.7 Education and Training Information

Such as educational and training history (e.g., institution name, faculty, field of study, graduation year), qualification certificates, transcripts, language proficiency, computer skills, training and test data, and activities participated in during education.

### 3.8 Job Application Information

Such as personal history, employment history, information in résumés/CVs, criminal records, applied positions, expected salary, interview information, reference documents, and information in interview evaluation forms (e.g., assessment results, knowledge and experience, personal characteristics, teamwork abilities, and potential).

### 3.9 Employment and Performance Information

Such as personnel codes, positions, departments, reporting lines, performance evaluations, work behavior, achievements and/or awards, training information, disciplinary records, internal transfer letters, termination letters, resignation letters, and reasons for resignation.

### 3.10 Compensation and Benefits Information

Such as salary, wages, remuneration, bonuses, gratuities, benefits, bank account numbers, guarantor information, beneficiary information, social security information, provident fund information, tax information, health benefits (including for family members), and/or other benefits. Personal data may appear in medical certificates, annual health check reports, maternity leave forms, welfare advance forms, salary deduction consent forms, receipts, invoices, insurance claim forms (e.g., accident or life insurance), and retirement benefit approval forms.

### 3.11 Attendance and Work Statistics

Such as start date, probation completion date, work attendance date and time, work hours, overtime hours, annual leave, leave requests, leave details including reasons, school entry/exit logs, and usage logs of school systems.

### 3.12 Technical Information

Such as computer traffic data (logs), IP addresses, and data collected via cookies or other similar technologies.

### 3.13 Other Information

Such as purchasing or service usage behavior or trends, recorded voice calls, Line or Messenger messages, social media interactions, and still or moving images captured by CCTV.

## **4. Purposes and Legal Basis for Processing Personal Data**

4.1 The School processes your Personal Data for various purposes based on the following legal grounds (collectively referred to as the “Specified Purposes”).

No.	Specified purposes	Legal basis for processing
(a) Objectives related to the sale of goods and the provision of services to customers, as well as any other related activities.		
(1)	For the purpose of registering new customers or opening customer accounts	<p>Contractual basis: The processing of customers’ personal data is necessary to carry out the customer’s request for registration as a new customer or for opening a customer account.</p> <p>Legitimate interest basis: In the case where the customer is a legal entity, the processing of personal data of individuals related to the customer is necessary for the legitimate interests of the school in conducting its business.</p>
(2)	For the purpose of entering into contracts for the sale of goods and services	<p>Contractual basis: The processing of customers’ personal data is necessary for entering into a contract and for other processes related to the execution of the contract.</p> <p>Legitimate interest basis: In the case of corporate customers, the processing of personal data of individuals associated with the customer is necessary for the school’s legitimate interests in conducting its business, such as managing contracts, verifying customer identity, and assessing customer eligibility.</p>
(3)	For the purpose of managing customer orders, preparing goods and/or services, and carrying out any other related activities	<p>Contractual basis: The processing of customers’ personal data is necessary for the performance of obligations under the sales and service contracts to which the customer is a party, such as preparing and delivering products, issuing invoices, confirming outstanding balances, and sending receipts to the customer.</p>



		Legitimate interest basis: In the case of corporate customers, the processing of personal data of individuals associated with the customer is necessary for the school's legitimate interests in conducting its business.
(4)	For the purpose of making corrections or changes to customer information and handling complaints	Legitimate interest basis: The processing of customers' personal data is necessary for the school's legitimate interests in facilitating customers to update or correct their personal details to ensure accuracy, completeness, and clarity, and to prevent any misunderstanding. This processing is also necessary for the school to enhance the quality of its services, including handling customer complaints or suggestions.
(b) Purpose related to procurement with business partners, the use of service providers, and other related operations.		
(1)	For procurement and the selection of business partners or any other persons in a similar capacity.	<p>Contractual basis: The processing of personal data is necessary to handle requests for quotations from suppliers or any other similar parties prior to entering into a sales contract, service contract, or any other contract related to the School's procurement activities.</p> <p>Legitimate interest basis: The processing of personal data is necessary for the School's legitimate interests in conducting its business and implementing its procurement policies.</p>
(2)	For the registration of new business partners or any other persons in a similar capacity	<p>Contractual basis: The processing of personal data is necessary to handle requests from prospective suppliers or any other similar parties for registration as a new supplier, as well as for any related processes.</p> <p>Legitimate interest basis: In the case of corporate suppliers, the processing of</p>

		personal data of individuals associated with the supplier is necessary for the School's legitimate interests in conducting its business.
(3)	For the preparation and management of contracts between the school and any counterparty.	<p>Contractual basis: The processing of personal data of a counterparty is necessary to carry out the counterparty's request, who has expressed an intention to enter into a contract with the School.</p> <p>Legitimate interest basis: The processing of personal data of a counterparty (or individuals associated with or representing the counterparty, in the case of a corporate counterparty) is necessary for the School's legitimate interests in preparing and managing its contracts.</p>
(4)	For performing obligations under contracts entered into with suppliers or any other similar parties.	Contractual basis: The processing of personal data is necessary to perform obligations under a contract entered into with a counterparty or any similar party, such as ordering goods or services, invoicing and payment for goods or services, and receiving goods or services.
(c) Purpose related to communication and marketing activities		
(1)	For the purpose of communicating with you	Legitimate interest basis: The processing of personal data is necessary for the legitimate interests of the school in communicating with you regarding the sale of goods and the provision of services offered by the school.
(2)	For the purpose of public relations and marketing activities of the school	Consent basis: For any marketing activities, such as sending you marketing communications or requesting still or moving images of you for use in compiling and promoting marketing activities across various media channels, the school will

		carry out such activities based on the consent obtained from you.
(d) Purpose related to data analysis and the improvement of the quality of the school's products and services		
(1)	For the purpose of analyzing data and surveying the behavior of customers or other similar persons.	Consent basis: The School will request interviews and observe the behavior of customers, or may purchase customers' personal data from third parties, for the purpose of analyzing data and studying customer behavior. The School will carry out these activities based on the consent obtained from the customers or other similar individuals.
(2)	For the purpose of analyzing your use of the website, applications, or other channels.	<p>Legitimate interest basis: The processing of your personal data from your use of the website, applications, or other channels is necessary for the legitimate interests of the School in conducting its business and improving the quality of its services.</p> <p>Consent basis: In cases where the School processes your personal data to analyze behavior and deliver personalized advertising based on your behavior, the School will do so based on the consent obtained from you.</p>
(e) Objectives related to human resource management		
(1)	For recruitment, candidate selection, interviews, and any actions related to job applications.	<p>Contractual basis: The processing of personal data of job applicants is necessary to consider the application submitted by the applicant who has expressed their intention to apply and enter the school's recruitment process.</p> <p>Legitimate interest basis: The processing of personal data of job applicants or individuals related to job applicants is necessary for the legitimate interests of the</p>

		<p>school in recruiting and selecting candidates.</p> <p>Consent basis: The assessment of personal data of individuals, in their capacity as family members or reference persons of the job applicant, will be conducted based on the consent provided by those individuals.</p> <p>Consent basis: In cases where the school collects personal data of potential employees on its own initiative from other sources, such as recruiter websites, where the potential employees have not yet expressed their intention to apply for a position (open to job opportunities) with the school, processing will be conducted based on their consent.</p>
(2)	For other actions related to employment and onboarding, such as pre-employment medical examinations, criminal background checks, and employment contract execution.	<p>Contractual basis: The processing of employees' personal data is necessary for the performance of employment contracts and other related agreements, as well as for any actions required prior to entering into such contracts.</p> <p>Legitimate interest basis: The processing of employees' personal data is necessary for the school's legitimate interests in managing human resources, such as verifying and assessing employee qualifications to assign them to appropriate positions.</p> <p>Consent basis: The processing of sensitive personal data of personnel, such as criminal records, health information, and biometric data, is carried out based on the consent provided by the employee.</p>
(3)	For managing employee benefits and welfare, including but not limited to medical reimbursement, welfare programs, annual health check-ups, and group insurance.	<p>Contractual basis: The processing of employees' personal data is necessary for the school to perform employment contracts and other agreements in which the employees are parties.</p>

		<p>Legitimate interest basis: The processing of employees' personal data, as well as the personal data of individuals related to the employees, is necessary for the school's legitimate interests in managing human resources, such as allocating employee benefits and entitlements.</p> <p>Consent basis: The processing of sensitive personal data of employees and related individuals, such as health information, for purposes like managing group insurance or other employee benefits, is carried out based on the consent provided by the employees and related individuals.</p>
(4)	For purposes related to the performance of duties under employment contracts, agreements, appointments, or any other contracts with the school.	<p>Contractual basis: The processing of employees' personal data is necessary for the performance of duties or work within the scope specified in the employment contract, engagement agreement, appointment contract, or any other contract entered into by the employees with the school.</p> <p>Legitimate interest basis: The processing of employees' personal data is necessary for the school's legitimate interests in conducting its business and complying with applicable laws.</p>
(5)	For purposes of salary, wages, bonuses, compensation, or any other benefits.	<p>Contractual basis: The processing of employees' personal data is necessary for the payment of wages, salaries, bonuses, remuneration, and/or any benefits under the employment contract or any other contract to which the employees are a party.</p> <p>Legitimate interest basis: In certain cases, the processing of employees' personal data, including data of related persons, is necessary for the school to comply with applicable laws, such as withholding tax obligations under the Revenue Code.</p>

(6)	For managing employee training and development programs.	Legitimate interest basis: The processing of employees' personal data is necessary for the legitimate interests of the school in managing training activities, such as registering for training courses, preparing training plans and exercises, and providing appropriate facilities for conducting the training.
(f) Objectives related to compliance with applicable laws or legal obligations of the school, and the establishment of legal claims.		
(1)	For compliance with applicable laws or those enforceable against the school	Legitimate interest basis: To comply with laws applicable to the school, such as the Personal Data Protection Act, tax laws, labor laws, social security laws, civil and commercial laws, the Public Limited Companies Act, and securities and exchange laws, among others.
(2)	For the establishment of legal claims and any related actions.	Legitimate interest basis: The processing of personal data is necessary for the establishment of legal claims, the exercise or enforcement of legal rights, or the defense of the school's legal claims in various legal proceedings, such as investigations and hearings conducted by state authorities, case preparation, litigation, and court proceedings.
(g) Objectives related to security and safety management.		
(1)	For monitoring and maintaining public order, as well as ensuring the safety and security of the school's personnel, property, and the general public.	<p>Legitimate interest basis: The processing of personal data is necessary for the legitimate interests of the school in monitoring, maintaining order, and ensuring the security of the school's property and that of others—for example, using CCTV footage to prevent loss or damage to the property of the school and third parties.</p> <p>Legal basis for the protection or prevention of harm to life, body, or health: The</p>

		processing of personal data is necessary for the purpose of monitoring, preventing, or mitigating any events that may pose a risk to the life, body, or health of any individual
(h) Any actions necessary and beneficial to you, as well as other related purposes.		
(1)	For any actions that are necessary and beneficial to you, or directly related to any of the purposes specified above.	Legitimate interest basis: The processing of personal data is necessary for the legitimate interests of the school in carrying out any actions required by the school and/or for your benefit, or directly related to the purposes set out above. In cases where the Personal Data Protection Act requires that the processing of certain personal data must obtain your consent, the school will seek your explicit consent.
(2)	For any other purposes that the school will inform you of.	The school will inform you of any other purposes that require the processing of your personal data beyond the purposes set out above, or in the event of changes to the originally specified purposes. In cases where the Personal Data Protection Act requires that the processing of certain personal data must obtain your consent, the school will seek your explicit consent.

4.2 Because your Personal Data will be processed by the School for the Specified Purposes under Section 4.1, to the extent that such processing is necessary for compliance with legal obligations, for performance of a contract, or for entering into a contract with you, this data is essential to achieving those purposes. If you choose not to provide such Personal Data to the School, it may have legal consequences or prevent the School from performing its obligations under a contract with you, or from entering into a contract with you (as applicable). In such cases, the School may need to refuse to enter into a contract with you, cancel a sale or service related to you, or deny you associated benefits or entitlements, in whole or in part.

4.3 In the event that the School processes your Personal Data in a manner and/or for purposes that are not consistent with the Specified Purposes, the School will provide an additional policy or notice regarding Personal Data protection and/or send a communication to you explaining such processing. You should read any such

additional policy or notice together with this Notice, and/or the relevant communication (as applicable).

## **5. Disclosure of Personal Data**

5.1 The School may disclose your Personal Data for the Specified Purposes and in accordance with legal requirements to the following persons and entities:

(a) Company ... Ltd. both domestically and internationally, including their directors, executives, employees, staff, and/or internal personnel, to the extent necessary for the processing of your Personal Data.

(b) Business partners, service providers, and data processors engaged or appointed by the School to manage/process Personal Data in providing services, such as health checks for personnel by business partners, IT services, data recording services, payment services, postal and courier services, printing services, health services, insurance services, training services, data analysis services, research, marketing, or other services beneficial to you or related to the School's business, e.g., commercial banks, hospitals, life insurance companies, non-life insurance companies.

(c) Advisors of the School, such as legal advisors, lawyers, auditors, actuaries, marketers, or other experts, whether internal or external to the School.

(d) Government agencies with regulatory authority under the law, or those requesting disclosure under legal powers, or related to legal proceedings, or authorized by relevant laws, such as the Department of Labor Protection and Welfare, Department of Skill Development, Department for the Empowerment of Persons with Disabilities, Revenue Department, Social Security Office, Department of Provincial Administration, Department of Business Development, Department of Intellectual Property, Personal Data Protection Committee, Office of Trade Competition Commission, Royal Thai Police, Office of the Attorney General, courts, and the Department of Legal Execution.

(e) Customers, business partners, and contractors of the School with whom you communicate or who are related to your duties or positions, or other persons with similar roles.

(f) Other persons or entities to whom you provide consent for disclosure of your Personal Data, such as publishing images of School activities via various media channels to the general public.

5.2 Disclosure of your Personal Data to other persons shall be carried out only for the Specified Purposes or other purposes permitted by law. Where consent is required under the law, the School will obtain your consent beforehand.

5.3 When disclosing your Personal Data to others, the School will implement appropriate measures to protect the disclosed Personal Data and comply with the standards and obligations of data protection as required by the Personal Data Protection Laws. In cases where the School transfers your Personal Data overseas, the School will ensure that the recipient country, international organization, or foreign



recipient maintains an adequate level of data protection or that such transfer complies with the principles set out in the Personal Data Protection Laws. In some cases, the School may request your consent for such overseas transfer of Personal Data.

## **6. Retention Period of Personal Data**

The School will retain your Personal Data for the period necessary to achieve the Specified Purposes for which the data is processed. The retention period may vary depending on the particular purpose of processing. In addition, the School will retain Personal Data in accordance with any applicable laws (if any), taking into account the statutory limitation periods for any potential legal claims arising from or related to the documents or Personal Data collected by the School, as well as the School's practices and relevant industry practices for each type of Personal Data.

Generally, the School will retain your Personal Data for a maximum of 10 years from the date the legal relationship between you and the School ends. However, the School may retain your Personal Data for a longer period if permitted by law or if retention is necessary to assert the School's legal rights.

Once the retention period has expired, the School will delete or destroy the Personal Data from its storage or systems, and from any third-party service providers (if any), or render the data anonymized so that you can no longer be identified. Exceptions may apply if the School is permitted to retain the Personal Data under the Personal Data Protection Laws or other relevant laws.

For further details regarding the retention period of your Personal Data, you may contact the School using the contact information provided in Section Your Rights Regarding Personal Data<sup>1</sup> of this Notice

## **7. Your Rights Regarding Personal Data**

### **7.1 Right of Access**

You have the right to access your Personal Data and to request that the School provide you with a copy of such Personal Data, as provided under the Personal Data Protection Laws.

### **7.2 Right to Data Portability**

You have the right to receive your Personal Data and, where technically feasible, request that your Personal Data be transmitted or transferred to another data controller or to yourself, as provided under the Personal Data Protection Laws.

### **7.3 Right to Object to Processing**

You have the right to object to the processing of your Personal Data in the circumstances provided under the Personal Data Protection Laws

### **7.4 Right to Erasure**

You may request that the School delete, destroy, or anonymize your Personal Data in cases provided under the Personal Data Protection Laws. As a data subject, you have the rights related to your Personal Data as set out under the criteria, procedures, and conditions prescribed by the Personal Data Protection Laws. If you wish to exercise your rights, you may contact the School using the contact details provided in Section 11 of this Notice.

#### 7.5 Right to Restrict Processing

You have the right to request that the School suspend the processing of your Personal Data in cases provided under the Personal Data Protection Laws.

#### 7.6 Right to Rectification

You have the right to request correction of your Personal Data if such data is inaccurate, outdated, incomplete, or misleading

#### 7.7 Right to Withdraw Consent

In cases where the School relies on your consent to process your Personal Data, you have the right to withdraw your consent for the processing of your Personal Data that you have previously provided to the School.

#### 7.8 Right to Lodge a Complaint

If you have any concerns or questions regarding the School's handling of your Personal Data, please contact the School using the contact details provided in Section 11 of this Notice. In the event that there are reasonable grounds to believe that the School has violated the Personal Data Protection Laws, you have the right to lodge a complaint with the expert committee appointed by the Personal Data Protection Committee in accordance with the procedures and methods prescribed by the Personal Data Protection Laws. The School reserves the right to consider your request to exercise your rights and to act in accordance with the Personal Data Protection Laws.

### **8. Measures for the Storage and Processing of Personal Data**

8.1 The School shall store Personal Data using measures at least at the level required by law and employ appropriate systems to protect and secure such Personal Data. This includes, for example, the use of security protocols, firewalls, passwords, and other technical measures for encrypting data transmitted via the Internet, as well as storing physical documents containing Personal Data in locations with restricted access to authorized personnel only.

8.2 The School restricts access to Personal Data that may be accessed by employees, representatives, business partners, or external parties. Access to Personal Data by external parties shall be limited to what is necessary or as instructed, and such external parties shall be obligated to maintain confidentiality and protect the Personal Data.

8.3 The School shall implement technological measures to prevent unauthorized access to its computer systems.

8.4 The School has monitoring and verification systems in place to manage and destroy Personal Data that is no longer necessary for the School's operations.

8.5 In the case of sensitive Personal Data, the School shall implement enhanced security measures for electronic data, including access control and usage management, operational and backup systems, emergency response plans, and regular risk assessments of the systems.

## **9. Use of Cookies**

Cookies are text files stored on your computer that are used to record details of your Internet usage or your website browsing behavior. The School uses cookies to store information about your website visits to help provide services that are faster, safer, and more efficient. The School uses cookies in the following cases when you use the services through the website:

9.1 Functionality Cookies: The School uses this type of cookie to recognize your device or browser, enabling the School to provide content tailored to your personal interests more quickly. These cookies also help make the services and platforms more convenient and useful to you. You can disable these cookies by adjusting the settings on your device, following the help instructions provided by your browser or device.

9.2 Analytic Cookies: The School uses Analytic Cookies provided by third parties to collect information on how visitors use the School's website. The School anonymizes all visitor data before sending it to third parties. These third parties may use the information or disclose it to others for data processing as permitted by law. The third parties will not combine data obtained from the School's website with information they already hold. You can choose to disable these cookies on the School's website.

## **10. Governing Law under this Personal Data Protection Policy**

This Policy shall be governed by and construed in accordance with the laws of Thailand, and the courts of Thailand shall have jurisdiction over any disputes arising in connection with the agreements under this Policy.

## **11. How to Contact the School**

In the event that you have any questions or wish to exercise your rights as set forth in this Notice, you may contact the School through the following channels:

**Heathfield International School**

**Data Protection Officer (DPO)**

Email: [dpo@heathfield.ac.th](mailto:dpo@heathfield.ac.th)

**Contact Address: Heathfield International School**

**6 Ramkhamhaeng Road**

**Rat Phatthana Subdistrict, Saphan Sung District**

**Bangkok 10240, Thailand**

## **12. Changes to This Privacy Notice**

The School may update this notice from time to time to reflect any changes regarding the processing of your personal data or to comply with the Personal Data Protection Act and other applicable laws. The School will notify you of any significant amendments or updates to this notice through appropriate channels. Therefore, you are advised to review this notice periodically to stay informed of the latest changes.

Notice Effective Date: 1 October 2025