



PRIVACY NOTICE FOR APPLICANTS 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 to 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 when applying for a position with us.

This Privacy Notice applies to the processing in recruitment related activities. This should be read, 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, which include applicants, regardless of the applied positions, and reference persons, former employers and our employees, 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 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 applicants

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

- a) identity data, such as full name, Thai national ID number and details, passport number and details, social insurance number, taxpayer number, photograph;
- b) profile data, such as date of birth, nationality, marriage certificate, house registration, skills, self-declaration of criminal records;
- c) details of qualification, such as educational background, professional development / training, teacher status, military status, special courses, special abilities;
- d) contact details, such as present address, telephone number, email;
- e) financial information, such as book bank account; and
- f) employment data, such as employment history, CV, position, salary.

In case of reference persons and former employers

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

- a) identity data, such as full name;
- b) employment data, such as job position;
- c) contact details, such as email, address, telephone number; and
- d) other data, such as capacity known.

In case of applicants' dependents, such as spouse and children

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

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

Sensitive Data

Apart from the personal data specified above, we may also process sensitive data, which include health data of the applicants.

4. How Do We Collect Your Personal Data?

In general, we will directly collect personal data of applicants who apply for the positions through the recruitment process. We may also indirectly collect personal data of applicants through job search websites, such as JobsDB, and TES platforms, as well as through reference persons and former employees.

In collecting personal data of reference persons and former employers, we will indirectly collect reference persons' and former employers' personal data through the applicants.

5. How Do We Use Your Personal Data?

We use your personal data to carry out tasks as per our scope and purposes of recruiting new employees.

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 condition 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 the recruitment process. 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 successfully or efficiently handle your application to us.

(2) Legitimate Interests

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

(3) Consent

In case of Applicants

We require explicit consent from the applicants in order to process health data.

In Case of Reference Persons and Former Employers

We require consent of reference persons and former employers in order for us to make contact and learn more about the applicants.

6. Who We Will Share Your Personal Data with?

In this process, we do not disclose your personal data to any external third-parties.

7. Transferring Personal Data to Foreign Countries

For the purposes mentioned above in this Privacy Notice, we do not disclose or transfer your personal data to any third parties or servers located in another country.

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.

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 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 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; 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 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;
- 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 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.