



September 21, 2023

## Personal Data Protection Act Policy

### 1. Purpose

This Data Protection Policy outlines the management of Personal Data in accordance with the Personal Data Protection Act (PDPA) Thailand.

This policy seeks to communicate the purposes for which Rose Marie Academy collects, uses, and/or discloses Personal Data. This policy states the agreement and consent given to Rose Marie Academy as well as authorized service providers and relevant third parties for collecting, using, disclosing, and/or sharing Personal Data as stated in this Data Protection Policy.

Rose Marie Academy may update this Policy to ensure that it is consistent with any changes in legal or regulatory requirements. If any change is made to this policy, the updated policy will be published at <https://www.rose-marie.ac.th/Personal Data Protection Act Policy>

### Personal Data

In this Data Protection Policy, "Personal Data" refers to any data or information from which a person can be identified.

Collection of Personal Data, the types of personal data we collect, use, or disclose, varies on the scope of products and/or services that are offered to or used by you. The types of personal data include but are not limited to:

- Personal Details
- Given name, middle name, surname, hidden name (if any)
- Gender
- Date of birth
- Age
- Educational background
- Marital status
- Nationality
- Contact details
- Mailing address
- E-mail address
- Phone number
- Social media accounts
- Identification details and authentication details
- Identification card photo
- Identification number, laser number (back of the identification card)
- Passport information
- Certificate/Alien ID information
- Driving license
- Signatures
- Photographs
- Sensitive personal data

Religion as shown on the identification card  
Blood type as shown in the identification card  
Biometric data (e.g., face recognition, fingerprint, voice recognition and retina recognition)  
Health data (e.g., data relating to weight, height, medical conditions)  
Criminal records

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

## **2. Purposes for the Collection, Use and Disclosure of Personal Data**

Rose Marie Academy may collect, use, and/or disclose Personal Data in various ways, including, but not limited to the following:

As part of the admission process  
Regular school-day and after-school activities  
Through the interaction with Rose Marie Academy staff for official purposes  
Maintaining regular communication with the school community at large  
Disseminating information regarding school programs to the school community  
Ensuring that medical needs are met  
For the use of student data analysis and progress monitoring  
Provide education services, track progression of students and evaluate student's suitability for a course  
Counseling and pastoral care  
Rose Marie Academy Strategic Plan review, planning, and implementation  
During and maintaining various schools' accreditations  
Review academic policies and guidelines  
Management of security and risk  
Marketing purposes (including posting photos in newsletters, publications, and on social media accounts)  
Internal and external audits  
Regulatory reporting and compliance  
Analysis of information to improve and develop the school's website  
Evaluative purposes  
Educational and student care purposes  
Administration purposes  
Verification and updating purposes  
Conducting financial reporting and analysis related to the center operations  
Financial collection processes  
Banking processes  
Managing the center infrastructure and business operations and complying with internal policies and procedures  
Archival of documents and records  
Legal representation  
Managing and terminating an employment relationship  
Security purposes  
Any Human Resources Department purposes  
Visa purposes  
Work permit purposes  
Any other purposes which the school may notify you of at the time of obtaining your consent.

Personal Data will be protected and kept confidential but is subject to the provisions of any applicable law. Rose Marie Academy may disclose your data to third parties that operate with Rose Marie Academy.

We sometimes need to share your Personal Information with third parties (this can involve third parties disclosing Personal Information to us and us disclosing Personal Information to them).

These third parties may include, but are not limited to:

- College Board (Advance Placement (AP) Courses)
- Facebook (On the Rose Marie Academy Facebook Page)
- Government agencies
- Field trip-related companies
- Insurance Companies
- Hospitals and clinics
- Rose Marie Academy legal representation
- Accounting services
- Banking services
- School bus service companies
- ECA Companies or vendors

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We request that our third-party service providers use your personal data for their own purposes and ask them to process your personal data for specified purposes and in accordance with our instructions.

### **3. Administration and Management of Personal Data**

Rose Marie Academy will make reasonable effort to ensure that your personal data is accurate and complete. However, you must also update Rose Marie Academy of any changes in your personal data that you had initially provided.

Rose Marie Academy will not be responsible for relying on inaccurate or incomplete personal data arising from you not updating Rose Marie Academy of any changes in your personal data that you had initially provided.

Rose Marie Academy will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, Rose Marie Academy cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond Rose Marie Academy's control.

Rose Marie Academy retains personal data in accordance with legal, regulatory, business and operational obligations. When Rose Marie Academy ceases retention, the personal data will be disposed of in an appropriate manner.

### **4. Withdrawal of Consent**

Upon joining Rose Marie Academy, all stakeholders are automatically opted-in for the school to use personal data, images and/or videos as needed - including day-to-day student management and posting photos or videos in newsletters, publications, and on social media accounts.

Withdrawing consent for the collection, use, and/or disclosure of personal data or images can be made in person at the Rose Marie Academy office by completing and signing a Withdrawal of Consent Form.

From such a request for withdrawal of consent being made, Rose Marie Academy will process the request and thereafter not collect, use and/or disclose your personal data in the manner stated in your request. Please note that with the withdrawal of consent to any or all use or

disclosure of personal data, depending on the nature of the request, Rose Marie Academy may not be in a position to continue to provide the services or administer any contractual relationship that is in place. Such withdrawal may also result in the termination of any agreement with Rose Marie Academy. Rose Marie Academy's legal rights and remedies are expressly reserved in such a case.

## **5. Access and Correction of Personal Data**

Request can be made to have access to or make corrections to Personal Data records, but Rose Marie Academy has the right to charge a reasonable fee for processing such a request. Such requests can be submitted in person at the office, by telephone or by email to: [rma@rose-marie.ac.th](mailto:rma@rose-marie.ac.th)

## **6. Contacting Rose Marie Academy**

For any question or complaint relating to the use or disclosure of Personal Data, or if more information about Rose Marie Academy data protection practices is needed, please contact Rose Marie Academy Data Protection Officer in person at the office, by telephone or by email to: [rma@rose-marie.ac.th](mailto:rma@rose-marie.ac.th)