Kenan Foundation Asia

 External Personal Data Protection Policy

1. Purpose

Kenan Foundation Asia (“Kenan”) recognizes the importance of respecting each individual’s privacy and the need to treat Personal Data (as defined below) in an appropriate and lawful manner. Accordingly, Kenan has adopted this External Personal Data Protection Policy (the “Policy”) to protect your rights in relation to the processing (as defined below) and management of Personal Data by Kenan, and will take all reasonable and necessary measures to safeguard Personal Data in accordance with the Personal Data Protection Act B.E. 2562 and other applicable Personal Data protection laws and regulations (collectively, the “Law”), and to uphold good data protection practices.

For the purpose of this Policy, Kenan will, for you, act as the Data Controller (as defined under the Law) for processing of your Personal Data.

2. Scope

2.1 This Policy shall be effective as of 1 June 2022, and is subject to further changes or revisions (which shall be notified to you,) Kenan shall continue to review the effectiveness of this Policy from time to time.

2.2 This Policy applies to the processing of Personal Data by Kenan within Thailand or processed in the context of our office in Vietnam. Any breach of the Law or this Policy will be taken very seriously, and disciplinary action may be taken.

2.3 This Policy shall supersede all prior Personal Data protection policies and protocols belonging to Kenan which apply to external parties, if any, unless specified otherwise by Kenan.

2.4 This Policy works in tandem with the applicable External Consent Form which you have signed. Please study such External Consent Form carefully to understand how we use your Personal Data under consent basis.

3. External Personal Data

3.1 Personal Data and Uses

“Personal Data” means any data about an individual which can be used to trace back to any such individual, whether by such data alone or in combination or in conjunction with other data available for any particular processing.

“Processing” and all of its derivatives mean any type of treatment of Personal Data, including collection, transfer, disclosure, use, etc.

List of Personal Data that Kenan is using and/or will use and their purposes and other details are described in the table below. Please study them carefully to understand how we process your Personal Data. Please note that the list below is not exhaustive, although we have afforded our utmost ability to provide as complete a list as possible.

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<tr>
<th>Category of Data Subjects</th>
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<th>Legal Basis</th>
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<th>Retention Period</th>
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<tr>
<td>General</td>
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<tr>
<td>Category of Data Subjects</td>
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<tr>
<td>Government officers</td>
<td>Government document: To obtain the government documents for Kenan operation.</td>
<td>Legitimate interest</td>
<td>Name, Position, Signature, Contact information</td>
<td>Retain for ten years after collection.</td>
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Human Resource (HR)

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<tbody>
<tr>
<td>Kenan Vietnam employees</td>
<td>Power Vision program: To record new employee’s data into Kenan’s system.</td>
<td>Contract</td>
<td>Name, National ID Card, Address, Photos, Position, Fingers print</td>
<td>During the employment and for ten years after.</td>
</tr>
<tr>
<td>Employee’s family member</td>
<td>Visa application: To facilitate foreign employees’ family members to obtain visas.</td>
<td>Legitimate interest</td>
<td>Name, Gender, Passport, Contact number, Email address</td>
<td>Retain for ten years after collection.</td>
</tr>
<tr>
<td>Interns and university staffs</td>
<td>Internship: To liaise with partner universities and to arrange for internship programs for university students.</td>
<td>Legitimate interest</td>
<td>Name, Profile description, Contact number, Email address, National ID Card</td>
<td>During the internship and for ten years after.</td>
</tr>
<tr>
<td>Kenan Vietnam employees</td>
<td>Payroll management: To manage and arrange salary payment to employees and deduct the tax and social security fund.</td>
<td>Contract</td>
<td>Name, Organization’s deductions, Bank account numbers</td>
<td>During the employment and for ten years after.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Legal obligation</td>
<td>Legal deductions such as social security and court’s judgement</td>
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</tr>
<tr>
<td>Kenan Vietnam employees</td>
<td>Leave management: To manage and regulate leaves for employees including record the employees’ leave such as sick leave, personal leave, vacation etc.</td>
<td>Contract</td>
<td>Name, Position, Contact information, Date of leave, Reason for leave</td>
<td>During the employment and for ten years after.</td>
</tr>
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</table>
| Kenan Vietnam employees  | **Insurance claim management:** To apply for and manage life and health insurance claim and benefits regarding IPD, OPD, personal accident, and dental policies, for employees including review the employees’ insurance claims for all year. | Contract         | • Name  
• Position  
• Details of insurance and incidents  
• Contact information                                                                                       | During the employment and for ten years after.          |
| Kenan Vietnam employees  | **Tax application:** To assist employees to file tax and social security fund for executives and employees though electronic system. | Contract         | • Name  
• Gender  
• Contact information  
• Address  
• National ID Card  
• Salary  
• Nationality                                                                                              | During the employment and for ten years after.          |
| Kenan Vietnam employees  | **Compensation fund:** To help Kenan Vietnam office manage the compensation for its employees. | Contract         | • Name  
• Position  
• Expense details                                                                                          | During the employment and for ten years after.          |
| Kenan Vietnam employees  | **Training arrangement:** To arrange training sessions for employees.                   | Contract         | • Name  
• Position  
• Contact information  
• Training details                                                                                         | During the employment and for ten years after.          |
| Kenan Vietnam employees  | **Vendor account:** To manage and update vendor list such as hotels, hospitals, and accounting companies. | Legitimate interest | • Name  
• Name of company  
• Contact number  
• Email address                                                                                           | Retain for ten years after collection.                  |
| General Administration (GA) | **Sharing employee’s information with donors:** To liaise with and send employees’ information to some donors such as USAID as required. | Contract         | • Name  
• Profile description  
• Contact number  
• Email address  
• Educational background  
• Portfolio  
• Past experiences  
• Nationality  
• Licenses  
• Certificates                                                                                             | During the employment and for ten years after.          |
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| Kenan Vietnam employees   | Official documents management: To submit and obtain the documents and to deal with relevant government authorities. | Contract | • Name  
• Name of foundation  
• Address  
• Position | During the employment and for ten years after. |
| Kenan Vietnam employees and relevant external parties | Documents Storage Management: To keep copy of project agreements and related documents for internal use and process. | Legitimate interest | • Contact details of responsible persons  
• Email address | During the employment and for ten years after. |

### Communication and Sponsorship

| Beneficiaries | Kick-off meeting: To arrange a meeting with project teams regarding content for marketing and campaigning for such projects. | Legitimate interest | • Contact information of potential beneficiaries such as name, phone number, and Email addresses | Retain for ten years after collection. |
| Beneficiaries | Processing feedback: To process the feedbacks from beneficiaries to improve the new project. | Legitimate interest | • Name  
• Organization  
• Beneficiaries’ feedback | Retain for ten years after collection. |
| Clients | Kick-off meeting: To arrange a meeting with project teams regarding content for marketing and campaigning for such projects. | Contract | • Contact information of clients such as name, phone number, and Email addresses | During the contract term and for ten years after. |
| Clients | Processing feedback: To process the feedbacks from clients to improve future projects. | Contract | • Name  
• Organization’s name  
• Clients’ feedback | During the contract term and for ten years after. |
| Individual outsource workers | Hiring outsource: To hire outsource workers to help with the preparation of the marketing content such as photos, videos etc. | Contract | • Name  
• Contact number  
• Email address | During the contract term and for ten years after. |
| Corporate outsource workers | Hiring outsource: To hire an outsource worker to help with the production of marketing contents such as photos, videos etc. | Legitimate interest | • Name  
• Organization’s name  
• Contact number  
• Email address | Retain for ten years after collection. |
<p>| Beneficiaries | Interview: To arrange the interview with beneficiaries regarding the opinion and impact of the project. | Legitimate interest | • Nonspecific contents such as photos and comments | Retain for ten years after collection. |</p>
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<tbody>
<tr>
<td><strong>Beneficiaries</strong></td>
<td><strong>Marketing material publication:</strong> To manage the marketing material such as an annual report and project leaflets.</td>
<td>Legitimate interest</td>
<td>• Nonspecific contents such as photos and comments • Contact information such as Email address</td>
<td>Retain for ten years after collection.</td>
</tr>
<tr>
<td><strong>External parties</strong></td>
<td><strong>Newsletter and updates:</strong> To send newsletters and contents to the audiences through various channels such as email, Linkedin, etc.</td>
<td>Legitimate interest</td>
<td>• Name • Business card • Contact number • Email address</td>
<td>Retain for ten years after collection.</td>
</tr>
<tr>
<td><strong>Beneficiaries</strong></td>
<td><strong>CSR Event:</strong> To arrange an interview and take photos from the CSR events.</td>
<td>Legitimate interest</td>
<td>• Nonspecific contents such as photos and comments • Contact information such as email address</td>
<td>Retain for ten years after collection.</td>
</tr>
<tr>
<td><strong>Beneficiaries</strong></td>
<td><strong>Press release and website management:</strong> To undertake press release and publish the contents of CSR events and marketing materials on Kenan’s website.</td>
<td>Legitimate interest</td>
<td>• Nonspecific contents such as photos and comments • Contact information such as Email address</td>
<td>Retain for ten years after collection.</td>
</tr>
<tr>
<td><strong>Beneficiaries</strong></td>
<td><strong>Information in SharePoint:</strong> To input information of project information to SharePoint.</td>
<td>Legitimate interest</td>
<td>• Name • Nonspecific contents such as photos and comments • Contact information such as Email address</td>
<td>Retain for ten years after collection.</td>
</tr>
<tr>
<td><strong>Donors and Beneficiaries</strong></td>
<td><strong>Annual reception event:</strong> To arrange for the annual reception event.</td>
<td>Legitimate interest</td>
<td>• Name • Nonspecific contents such as photos, videos, and comments • Project information</td>
<td>Retain for ten years after collection.</td>
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</tbody>
</table>

**Information Technology (IT)**
<table>
<thead>
<tr>
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<th>Retention Period</th>
</tr>
</thead>
</table>
| Visitors                  | Monitoring: To monitor internet log use, CCTV, file use, device logs. | Legitimate interest | • Name  
• IP address  
• Website history  
• Files  
• Device logs  
• CCTV records | Retain for ten years after collection. |
| Vendors                   | Purchase: To prepare the PR and PO account for accounting team | Legitimate interest | • Name  
• Contact number  
• Email address  
• Organization name | Retain for ten years after collection. |
| Kenan Vietnam employees   | Password and access control: To administer and manage password database and access control. | Contract | • Name  
• Employee ID  
• Position  
• Email address  
• Password information | During the employment and for ten years after. |
| Kenan Vietnam employees   | Premise server: To manage the server for basic network operation. | Legitimate interest | • Name  
• Employee ID  
• Position  
• Email address | During the employment and for ten years after. |
| Clients                   | Input information to Salesforce: To manage for keeping the record of client’s information to Salesforce. | Legitimate interest | • Name  
• Contact number  
• Email address | Retain for ten years after collection. |
| Vendors                   | Office 365: To liaise with the third-party vendors to prepare and arrange for the use of the software with Microsoft. | Legitimate interest | • Name  
• Contact number  
• Email address | Retain for ten years after collection. |
| Kenan Vietnam employees and relevant external parties | Office 365: To provide basic software for basic operation in Kenan. | Legitimate interest | • Name  
• Contact number  
• Email address | Retain for ten years after collection. |
| Kenan Vietnam employees and relevant external parties | Azure cloud: To store basic information necessary for the interaction between Kenan and relevant parties. | Legitimate interest | • Name  
• Contact number  
• Email address  
• Organization’s name  
• Position | During the contract term and for ten years after. |
| Visitors                  | Wi-fi connection verification: To verify a new device upon a request. | Legitimate interest | • Name  
• Contact information | Retain for ten years after collection. |
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<td></td>
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<td>• Details of uses in device</td>
<td>Retain for ten years after collection</td>
</tr>
<tr>
<td>Finance and Accounting</td>
<td></td>
<td></td>
<td>• IP address</td>
<td></td>
</tr>
<tr>
<td>Corporate donors and partners</td>
<td>Funding: To liaise with and undertake funding for project from donors.</td>
<td>Legitimate interest</td>
<td>• Entity’s Name</td>
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<td></td>
<td></td>
<td></td>
<td>• Keys contact person</td>
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<td></td>
<td>• Contact number</td>
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<td></td>
<td></td>
<td></td>
<td>• Email address</td>
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<tr>
<td>Individual donors</td>
<td>Funding: To liaise with and undertake funding for project from donors.</td>
<td>Legitimate interest</td>
<td>• Name</td>
<td>Retain for ten years after collection</td>
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<td></td>
<td>• National ID Card</td>
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<td>• Payment documents</td>
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<tr>
<td>Vendors</td>
<td>Investment profit: To undertake funding from investment profit from vendors such as Morgan Stanley in Hong Kong.</td>
<td>Legitimate interest</td>
<td>• Name</td>
<td>Retain for ten years after collection</td>
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<td>• Contact number</td>
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<td>• Email address</td>
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<td>• Payment documents</td>
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<tr>
<td>Vendors</td>
<td>Payment of office basic expense: To manage the office expense with recorded PO and PR, including petty cash, corporate credit cards, catering, etc.</td>
<td>Legitimate interest</td>
<td>• Name</td>
<td>Retain for ten years after collection</td>
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<td></td>
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<td>• Keys contact person</td>
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<td>• Contact number</td>
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<td>• Email address</td>
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<tr>
<td>Corporate vendors</td>
<td>Payment of project’s expense: To liaise with the vendors and manage the project’s expense.</td>
<td>Legitimate interest</td>
<td>• Name</td>
<td>Retain for ten years after collection</td>
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<td>• Contact number</td>
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<td>• Email address</td>
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<td></td>
<td>• Bank account number</td>
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<tr>
<td>Individual vendors</td>
<td>Payment of project’s expense: To liaise with the vendors and manage the project’s expense.</td>
<td>Contract</td>
<td>• Name</td>
<td>Retain for ten years after collection</td>
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<td>• Contact number</td>
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<td>• Bank account number</td>
<td></td>
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<tr>
<td>Vendors</td>
<td>Payment record: To manage the storage of files and hard copies of payment documents.</td>
<td>Legitimate interest</td>
<td>• Name</td>
<td>Retain for ten years after collection</td>
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<td></td>
<td></td>
<td>• Bank account number</td>
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<tr>
<td>Donors</td>
<td>Budget management report: To arrange for the budget management report for donor.</td>
<td>Legitimate interest</td>
<td>• Name</td>
<td>Retain for ten years after collection</td>
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<td></td>
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<td>• Contact number</td>
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</tbody>
</table>
| External trainers and speakers | Hiring external trainer: To hire external trainers for a project such as CLMV experts and teachers. | Contract | • Name  
• National ID Card  
• Resume  
• Certificates  
• Bank account number | During the contract term and for ten years after. |
| Corporate service providers | Hiring service provider: To hire services provider for a project such as translator, event organizer, hotel, catering, travel agency. | Contract | • Name  
• Organization’s name  
• Contact number  
• Email address  
• Bank account number | During the contract term and for ten years after. |
| External parties (Individual service provider) | Hiring service provider: To hire service provider for a project such as translator, photographer, MC, moderator, speaker, driver. | Contract | • Name  
• National ID Card  
• Resume  
• Bank account number | During the contract term and for ten years after. |
|  |  | Legitimate interest | • Name  
• National ID Card  
• Resume  
• Bank account number | Retain for ten years after collection. |
| Interns | Hiring intern: To hire interns to support a project. | Contract | • Name  
• National ID Card  
• Contact number  
• Email address  
• Bank Account number | Retain for ten years after collection. |
| External parties | Accommodation arrangement: To arrange for an accommodation, travel booking and visa for speaker and participants | Legitimate interest | • Name  
• Contact number  
• Email address | Retain for ten years after collection. |
| Beneficiaries | Training project: To arrange training sessions for beneficiaries such as villagers, SMEs business owner. | Legitimate interest | • Name  
• Contact number  
• Email address | Retain for ten years after collection. |
| Beneficiaries | Pre-test and Post-test of training: To conduct pre-test and post-test of training. | Legitimate interest | • Name  
• Test results  
• Contact information such as email address | Retain for ten years after collection. |
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</thead>
</table>
| Beneficiaries             | **Innovation camp project:** To arrange the innovation camp for students. | Legitimate interest | • Name  
• Guardian’s name  
• Contact number  
• Email address  
• Photos | Retain for ten years after collection. |
| External parties (Beneficiaries) | **Photo and video recording:** To record videos and photos of participants of training and innovation camp. | Legitimate interest | • Non-specific videos and photos | Retain for ten years after collection. |
| Beneficiaries             | **Project report:** To conduct the project report for the donor and/or government officers. | Legitimate interest | • Name of participant  
• Photos  
• Survey results | Retain for ten years after collection. |

**Other Activities under Consent**

| All parties in this policy | Various activities undertaken under consent basis. See applicable External Consent Form for more details. | See applicable External Consent Form |

### 3.2 Formats

Your Personal Data may, upon discretion of Kenan, be collected on hardcopies, electronic median, or other formats. Kenan shall do it best to afford appropriate safety measures to protect these files and documents.

### 3.3 Consent and Withdrawal of Consent

(a) Your consent will be obtained (via the External Consent Form) before Kenan collects, uses, or discloses your Personal Data which requires consent.

(b) You may choose to withdraw your consent (but not retrospectively) by providing Kenan with a written notice at least fourteen (14) days in advance. All communications on your withdrawal of consent should be directed to Kenan’s Data Protection Officer (as defined below), whose business details are set out below. However, please note that there may be consequences of withdrawing the consent, which Kenan will determine and notify to you before the withdrawal or as soon as possible after the withdrawal. Kenan will cease (and cause any of Kenan’s data intermediaries and agents to cease) collecting, using, or disclosing such Personal Data unless it is required or authorized under applicable laws.

### 3.4 Updating and Correcting Personal Data

(a) You must ensure that all Personal Data provided to Kenan by you is true, accurate, and complete at all times. Any change to Personal Data shall be notified to the Data Protection Officer (as defined below) or the Human Resources Department or any personnel specially designated to deal with this change within seven (7) days after the change has taken effect.

(b) Kenan shall correct your Personal Data as soon as practicable and provide confirmation of such correction to you, and if it is unable to do so within thirty (30) days of receiving your request, Kenan shall notify you of the time within which it will respond.
3.5 Transfer and Sharing of Your Personal Data

(a) Kenan may transfer your Personal Data to external service providers in Thailand so these service providers can perform certain tasks on our behalf, such as for cloud and non-cloud storage, recruitment, payroll, analytics, and general assistance, or when there is legal obligation or legitimate interest to do so, such as for audits and corporate sale or restructuring. We will rely on the same basis as notified or consented by you for these domestic transfer and processing activities. In such cases, we will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Law and our standards.

(b) Kenan may transfer your Personal Data to external service providers throughout the world so these service providers can perform certain tasks on our behalf, such as for cloud and non-cloud storage, recruitment, payroll, analytics, and general assistance, or when there is legal obligation or legitimate interest to do so, such as for audits and corporate sale or restructuring. If we have contract basis for any such processing, we will also rely on such for offshore transfer or processing. However, for non-contract basis transfer or processing, we will rely on your consent as given in your respective Consent Form. In such cases, we will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Law and our standards.

3.6 Retention of Personal Data

(a) Your Personal Data will be retained for period(s) as are necessary to meet Kenan’s legal and/or business purposes, and Kenan will cease to retain your Personal Data as soon as it is reasonable to assume that the purpose for collection such Personal Data is no longer being served by such retention, and such retention is no longer necessary for legal and/or business purposes. Our current policy is to retain certain Personal Data of you for up to ten (10) years after they cease to be necessary, subject to the applicable anonymization procedures and at all times in accordance with our document retention and disposal policy, and applicable laws and regulations.

(b) We will notify you if there is any change in policy or specific retention of any of your Personal Data that is not in line with the current policy, or is in any way relevant and warrants your special attention.

4. Data Protection Officer

4.1 Details of the Data Protection Officer of Kenan ("Data Protection Officer") is: Kenan DPO Committee

4.2 The procedure for receiving and responding to queries and/or complaints relating to data protection is set out below:

If there are any concerns or problem related to the personal data has been handled, the queries/complaints can be raised and send to dpo@kenan-asia.org. To assist in dealing with the queries/complaint, the following information should be provided.

1. Name and Surname or company’s name
2. Contact details; telephone number and e-mail
3. Details of queries/complaint
4. Date and time which suspected the concerns or problem occurred
5. Document evidence to support (if any)

Upon receiving the queries/complaints, The Kenan DPO Committee will confirm that complaints will be investigated and provided an estimate of time expected for the process of investigation. The
committee will notified the outcome of the investigation in writing with the committed time and any action taken.

5. **Your Rights**

5.1. Right to be notified: If we wish to collect, store, use, or disclose your Personal Data in any manner beyond the scope of your given consent or the scope already outlined to you herein, we will notify and/or seek your prior consent with respect to such additional scope.

5.2. Right to access: You may, at any time, request to have access to your Personal Data in order to review it and also request to know about how we have come to possess your Personal Data.

5.3. Right to copies: You may request for a copy of your Personal Data in a form that can be reasonably accommodated.

5.4. Right of portability of data: You may request us to transfer your Personal Data in a format that is reasonable and acceptable to another entity of your choice.

5.5. Right to rectification: If your Personal Data has been changed or is not up-to-date, you have the obligation to ensure that your Personal Data is accurate, up-to-date, complete, and not misleading by submitting a request to rectify it in accordance with the procedures announced by us. This, besides being your obligation, is also your right.

5.6. Right to withdraw consent: You may withdraw your consent at any time. We may deny your withdrawal only if the law or the contract does not allow so. Your withdrawal will not have any effect on our previous collection, usage, and disclosure of your Personal Data. If your withdrawal will affect any part of your Personal Data, rights, or benefits, we will notify you of such effect before your withdrawal if it is possible, or as soon as practicable thereafter.

5.7. Right to erasure: You may request to erase or make your Personal Data pseudonymised under any of the following circumstances: (a) your Personal Data is no longer needed for the intended purposes, (b) you withdraw your consent and we no longer have any legal right to collect, store, use, or disclose your Personal Data, (c) you object to the collection, storage, use, or disclosure of your Personal Data and we do not have any legitimate reason to reject your objection, or (d) your Personal Data was collected, stored, used, or disclosed in contravention of the Law. However, we may deny your request if our collection of your Personal Data is made for the purposes authorized by the Law, which include a data collection for statistical research purpose with appropriate protective measures, or for establishment of legal claims, legal compliance, or exercise of legal rights or defences.

5.8. Right to suspension: You may request us to suspend the use of your Personal Data in any of the following events: (a) when we are in the process of verifying certain information for the purpose of rectifying or updating your Personal Data under your request, (b) when your Personal Data is to be erased but you instead request to suspend its use, (c) when it is no longer necessary to store your Personal Data, but you request us to continue the storage of your Personal Data for establishing legal claims, legal compliance, or exercise of legal rights or defences, or (d) when we are in the process of verifying our legitimate interests, against your objection or, in our collection, storage, use, or disclosure for various purposes including the statistical research, as may be permitted by the Law.

5.9. Right to object the processing of Personal Data: You may object to the collection, storage, use, or disclosure of your Personal Data in any of the following events: (a) in case where your Personal Data was collected for the purpose of (i) public interest, (ii) (our compliance with a governmental order, or (iii) any legitimate interest of ours or other legal entity (we may object to such request if we believe your objection will lead to a non-compliance with the law, or (bb) it relates to an establishment of legal claims, legal compliance, or exercise of legal rights or defences, (b) in case where we have collected, stored, used, or disclosed your Personal Data for the purpose of direct marketing, or (c)
in case where we have collected, stored, used, or disclosed your Personal Data for any research purposes as specified in the Law, including for statistical purpose.

6. Language

In the event of any conflict or inconsistency between any term of this Policy or any Thai translation version, this English version shall prevail.