

RISR PRIVACY NOTICE

Personal Data Protection Act B.E. 2562

This data privacy statement pertains to the personal information of members of Ruamrudee International School Ratchapruek Campus (RISR) community, encompassing students, parents, and legal guardians, whether current, former or prospective, as well as that of full-time and part-time RISR faculty, instructional assistants and support staff members, past and present.

RISR, in compliance with the 2021 Personal Data Protection Act (PDPA), is committed to the protection and security of personal information of individuals within the RISR community. When collecting or using personal data, RISR will comply with the requirements of the data protection legislation of the Thai Personal Data Protection Act, B.E. 2562 (PDPA), relevant laws and regulations.

This privacy notice informs you of how the school collects, uses, or discloses your personal data, what and why we collect, use or disclosure of personal data, how long it is kept, individual rights to privacy, and what steps RISR will take to make sure your personal data stays confidential and secure.

PERSONAL DATA COLLECT, USE OR DISCLOSE

The type of personal data and sensitive personal data which RISR collects, uses or discloses include but not limited to the following:

A. Personal Details

First name and last name

Nicknames

Gender

Date of Birth

Age

Educational background

Marital status

House Registration

B. Contact Information

Mailing address

E-mail address

Phone number

Name of representatives or authorized persons/guardian

Social media account handles

C. Identification Information and Authentication

Identification card photo

Identification number, laser number (back of identification card)

Passport information

Birth certificate

Marriage Certificate

Household registration

Certificate/Alien ID information

Driving license

Signature

D. Sensitive Personal Data

Religion as shown in the identification card

Race/Ethnicity

Blood type as shown in the identification card

Biometric data (e.g. face recognition, fingerprint for clock-in/clock-out, voice recognition and retina recognition)

Medical records and conditions

Dietary requirements

Special educational needs

Previous academic records

Previous qualifications

Emergency contact person(s) details

Home and/or office addresses

Personal and/or office email addresses

Phone and/or office contact numbers

Bank account information (through bank transfer slip records)

Social media handles (LINE, Facebook, Instagram, etc.)

Photos, images, and audio and/or video recordings

Record of misconduct and disciplinary action

Record of criminal offence

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

Methods of & Platforms for Data Collection

Personal data is obtained directly from an individual on a voluntary basis, whether a prospective student, family, or employee. As an institution, methods of collecting this data may include (but are not limited to):

- general enquiries to the school via phone or website
- application and registration forms (documents or online forms)
- third-party service platforms or applications to which the school subscribes to for admissions or operational purposes
- various other school and event-related forms, either printouts or digital (e.g. Google Forms, Google Sheets);
- documents pertaining to previous qualifications and certifications

Personal information of students is on file in **Gradelink** as a matter of academic record.

Their privacy policy can be accessed at:

<https://www.gradelink.com/services-privacy-policy/#:~:text=Gradelink%20keeps%20its%20data%20in,from%20selling%20any%20student%20information.>

Personal information of prospective and current students is collected via **OpenApply**, a streamlined online admissions and enrolment platform that offers convenient information management. OpenApply's privacy policy can be accessed at: <https://www.openapply.com/terms/privacy-policy>. The provision of all requested information in the relevant forms is mandatory, unless noted otherwise, and aids in the processing of an application and relevant educational services.

RISR elementary school also utilizes **SeeSaw**, an interactive learning platform for students accessed by both faculty and parents. SeeSaw's privacy policy can be found at <https://web.seesaw.me/privacy-policy>.

Internal communication platforms such as **Google Forms, Google Sheets, and Google Workspace** as well as Grade Link newsletter applications such are utilized by the community. Contact data is protected by the relevant department.

Profile images and biometric data of community members are curated to serve the school's safety and security protocols and systems. The data is protected by the relevant departments.

The RISR official website is www.risr.ac.th. Images and content of personnel and students on the website have been curated with the awareness of personal data protection.

In general, when members of the community are invited to provide personal information, RISR will specify the purpose and intended use of the data, and advise the means of access to or correction of said data, if needed. The data provided will be used internally (with the exception of that used for promotional purposes and given consent) and not shared to any third-party organization or individual, unless mandated by the government or with the permission of the owner. Sensitive personal data is only to be used in specific circumstances and not disclosed to a third party without explicit consent, unless necessary to protect the interests and well-being of an individual.

At times, visitors—those deemed outside of the RISR community—are requested to provide personal data for safety and security purposes when visiting the school campus. Visitors may include but are not limited to prospective parents on a school tour; representatives from other educational institutions; and outsourced services such as caterers or media companies, among other individuals. The data acquired is used internally and only for the duration of the visit.

In general, provided data will be stored for the length of time as designated by the Thai government in regards to compliance. To ensure the security of school systems and an individual's personal data, steps and policies regarding child communication guidelines, safeguarding, technology, and devices, have been outlined to the school community at large.

USE OF PERSONAL DATA

The personal data of the RISR community members is primarily used for (but not limited to) the purposes of:

Academics & Extracurriculars

- implementing the school curriculum
- providing education, support and other relevant services to students
- monitoring and assessing progress and needs
- communicating day-to-day and prudent information within the organization
- scheduling classes and managing the use of classrooms and other educational facilities
- managing extracurriculars such as arts and athletics, fundraising activities, and religious gatherings
- managing student events, such as assemblies, concerts, graduation, PROM, sales, and other co-curricular activities
- relaying information to related authorities or examination boards

Administration & Admissions

- processing applications
- storing students' and employees' personal and familial details
- maintaining academic and non-academic records
- maintaining disciplinary or organizational records as well as the school's historical archive
- invoicing various school fees
- designating applicable support and counseling services
- contacting a student's or employee's emergency contact if necessary

School management, operations & communication

- managing the use of ID cards, security systems, and other facilities such as the boarding house, library and the canteen, among others
- maintaining school and community-related transactions and accounts
- communicating news, important announcements, and protocols with staff, students and parents
- complying with security-related, auditing or regulatory requirements, if any

LAWFUL BASIS IN PROCESSING PERSONAL DATA

Consent is only one of the legal bases for processing personal data, and other legal bases for data processing under the PDPA include:

- Vital Interest: the prevention or suppression of dangers to a person's life, body or health.
- Perform Contract: where the processing is necessary for the performance of a contract to which the data subject is a party or for a precontractual request of the data subject.
- Public Task: where the processing is necessary for the data controller's mission carried out for the public interest or for the exercise of public powers granted to the data controller.
- Legitimate Interest: where the processing is necessary for the legitimate interests of the data controller or another person, which do not override the data subject's fundamental rights in the personal data.
- Legal Obligation: the compliance with the data controller's legal obligations.
- Research: the preparation of historical, archival, research- or statistics-related documents.

All faculty, staff, parents, and students understand upon entering into a contractual relationship with RISR that the school as well as members of the community utilize personal data for educational, operational, communication and archival purposes, and under the legal requirements to support RISR' operation as an educational institution. In some cases, providing information is mandatory, unless specified otherwise.

Non-personal information of administrators and staff, including titles, business addresses, and business contact information may be disclosed publicly on occasion with consent of the individual.

RISR maintains its right to photographs, images, audio recordings, and/or videos of its students for use in RISR promotional materials that include, but may not be limited to, printed materials such as brochures and newsletters, videos, and digital images such as those on the RISR website and other appropriate media-sharing platforms.

The media release and indemnity agreement is a fixture of the RISR enrollment registration package. Any families who decide they do not wish to have their child included in school materials at a later time are informed to reach out to the school's Advancement office. (These students' names are housed and monitored under an internal document entitled the *Do Not Publish List*). Media encompasses images, videos and audio recordings that may be featured on the school website; social media platforms; and school print media such as fliers, posters, brochures, newsletters, and magazines.

Regardless of media consent that has been previously granted, RISR abides by international-standard child safeguarding and tech/media policies. The RISR community is encouraged to confirm permission with parents, students, alumni and personnel regarding individualized media posts, features and interviews. Names of students and personnel are not mentioned in media posts unless the content is in relation to academic or personal achievement and has been approved by the participants.

When relating to student consent, RISR often defers to parents. Parents should note that there may be exceptional circumstances in which they will not be consulted, depending on the student's age and level of understanding. In certain situations, the school may be obliged to maintain confidentiality upon the request of a student with legitimate concerns and what the school has deemed are in the best interests of the student or what is lawfully permitted or required.

Rights Over Personal Data

Significant resources and measures have been taken to protect the well-being and privacy of personnel, students and other members of the RISR community. In the annual upkeep of PowerSchool and other school information systems, RISR encourages its community to update and verify their personal information at the beginning of each academic year. Members of the RISR community have the right to access and request for copies of their personal data in a reasonable format for the purpose of transfer to another data controller.

In abiding with data protection laws, an individual has the right to correct and modify their personal information. In specific situations, individuals may request the restriction or erasure of their personal data. Permission may be withdrawn in regards to Information that has been processed with an individual's consent. Please note, however, that certain information requests may be rejected in certain circumstances based on legal requirements to support RISR operation as an educational institution.

DISCLOSURE OF PERSONAL DATA TO THIRD PARTY PARTNERS

Third party processing partners:

1. Epicure Catering
2. Cigna-RISR Group Health Insurance
3. Cigna-RISR Student Insurance
4. MSIG Travel Insurance
5. Krungsri Bank
6. Ayudhaya Ruam Tun Provident Fund

RISR may seek to acquire additional business partners. If a change happens to the school business, then the new service providers may use personal data in the same way as set out in alignment with PDPA and school privacy policy.

Third parties are expected to respect the security of personal data and to treat it in accordance with the law and in accordance with RISR instructions.

CHANGE OF PURPOSE

RISR will only use individual personal data for the purposes for which it was collected. Unless it is to be used for other reasons, it shall be compatible with the original purpose.

If the school needs to use individual personal data for an unrelated purpose, HR will notify respective individuals and explain the legal basis which allows the school to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

TRANSFERS OF DATA OUTSIDE THAILAND

Transfer of data outside Thailand is permitted only by consent or other lawful bases and legal obligation.

Whenever personal data is transferred outside of Thailand, RISR ensures a similar degree of protection or higher. The school will only transfer individual personal data to countries that have been deemed to provide an adequate level of protection for personal data.

DATA SECURITY

RISR is subject to a duty of confidentiality. The school is in the process of implementing appropriate security measures to prevent personal data loss, access, use or disclosure without authorization. In cases where data exchange is necessary to support academic or extracurricular activities for students, data sharing agreements and non-disclosure agreements may be required by RISR before student participation is allowed.

DATA RETENTION

RISR will only retain personal data to fulfil the purposes it is collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Retention period for personal data is based on sensitivity, potential risk of harm from unauthorized use or disclosure. By law, basic information of individuals such as contact, identity, financial and transaction data is kept for 1 year after departure from the school for tax purposes.

Contacting RISR

In regards to data control, members of the RIS community are welcome to reach out to the Senior Leadership Team with questions and concerns at executiveassistant@risr.ac.th

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