

## Personal Data Protection Policy for Employee

Bangkok Chain Hospital Public Company Limited (“BCH”) and its affiliated companies listed in Appendix 1, as well as any future affiliated companies (which will be notified accordingly) (“Affiliates”), which operate hospital services in the following groups:

- (a) World Medical Hospital Group
- (b) Kasemrad International Hospital Group
- (c) Kasemrad Hospital Group
- (d) Karunvej Hospital Group

including multi-clinic services and other businesses (collectively referred to as the “Group”), respect your privacy and are committed to maintaining high standards in operations and personal data protection. Therefore, the Group has established this Personal Data Protection Policy for Personnel (“Personal Data Protection Policy”) to ensure that the collection, use, or disclosure of personal data is conducted in compliance with the Personal Data Protection Act B.E. 2562 (2019) (“PDPA”).

This policy applies to the protection of your personal data in the capacity as:

- (1) Employee, staff, executives, doctors, nurses, and other medical personnel (“Personnel”)
- (2) Persons related to Personnel such as family members, parents, spouses, children, relatives, beneficiaries, emergency contacts, references, former employers, former educational institutions, training centers, professional councils, former colleagues, insurance agents, and contract witnesses (“Related Persons”)

### 1. Types of Personal Data

“Personal Data” means any information relating to an identified or identifiable natural person, either directly or indirectly, excluding data of deceased persons or any other personal data specified under the PDPA.

1.1 If you are Employee, the personal data that the Group may collect from you includes:

No.	Types of Personal Data	Details
1	<b>“Identifiable Information”</b>	<ul style="list-style-type: none"> <li>(a) First name and last name</li> <li>(b) Photograph</li> <li>(c) Nationality</li> <li>(d) Date of birth</li> <li>(e) Age</li> <li>(f) Gender</li> <li>(g) Marital status</li> <li>(h) National identification number</li> <li>(i) Passport number</li> </ul>

		<ul style="list-style-type: none"> <li>(j) Work permit number</li> <li>(k) Professional license number</li> <li>(l) Employee identification number</li> <li>(m) Driver's license number</li> <li>(n) Vehicle registration number</li> <li>(o) CCTV footage</li> <li>(p) Information related to associated individuals (e.g., family members)</li> <li>(q) Military service information</li> <li>(r) Signature</li> <li>(s) Username and password</li> </ul>
2	<b>"Sensitive Personal Data"</b>	<ul style="list-style-type: none"> <li>(a) Religion</li> <li>(b) Ethnicity</li> <li>(c) Underlying diseases, disabilities, and physical impairments</li> <li>(d) Medical examination results</li> <li>(e) Medical procedure or hospitalization history</li> <li>(f) Food allergies</li> <li>(g) Criminal record</li> <li>(h) Biometric data, such as facial scans and fingerprint scans</li> <li>(i) Drug test results</li> <li>(j) Disabilities</li> </ul>
3	<b>"Contact Information"</b>	<ul style="list-style-type: none"> <li>(a) Address</li> <li>(b) Email address</li> <li>(c) Telephone number</li> <li>(d) Social media accounts (e.g., Facebook, Instagram)</li> <li>(e) Line ID</li> </ul>
4	<b>"Employment Information"</b>	<ul style="list-style-type: none"> <li>(a) Position and department</li> <li>(b) Benefits and entitlements</li> <li>(c) Attendance records (clock-in and clock-out data)</li> <li>(d) Leave and tardiness records</li> <li>(e) Length of employment</li> <li>(f) Performance evaluation results</li> <li>(g) Work performance records</li> <li>(h) Complaints or grievances</li> </ul>

		(i) Disciplinary investigation and action records
5	<b>“Financial Information”</b>	(a) Bank account details (b) Salary and compensation (c) Tax information, including deductions or expenses (d) Social security, workmen’s compensation, and provident fund information (e) Professional liability insurance information (f) Loan information (g) Insurance premium information
6	<b>“Educational Qualification Information”</b>	(a) Educational history (b) Training history (c) Work experience (d) Professional license details (e) Medical practice license details (f) Fields of expertise, skills, competencies, and aptitudes (g) Achievements and awards (h) Assessment or examination results (i) Privilege information for medical professionals
7	<b>“Information Data”</b>	(a) System usage and access logs (log files) (b) Browser usage history

1.2 “If you are an individual concerned, the personal data that the Group of Companies may collect from you includes:”

No.	Types of Personal Data	Details
1	<b>“Identifiable Information”</b>	(a) Full name (b) Photograph (c) Nationality (d) Date of birth (e) Age (f) Gender (g) Company or organization of employment (h) Position or job title (i) Relationship with personnel (j) Signature (k) National identification card number

		(l) Government officer identification number
2	<b>“Financial Information”</b>	(a) Salary and compensation of the insurance agent (b) Bank account details
3	<b>“Contact Information”</b>	(a) Address (b) Email address (c) Telephone number

If you wish to work with, enter into a contract with, or engage in any legal relationship with the Group of Companies, the Group of Companies may need to collect your personal data. If you do not provide your personal data, the Group of Companies may be unable to enter into a contract with you, carry out any requests you make, or perform any obligations under such contracts, agreements, or legal relationships. Additionally, the Group may be unable to comply with legal requirements applicable to it.

If you provide personal data of another individual to the Group of Companies, you confirm that the individual has reviewed this Personal Data Protection Policy and has given consent for the processing of their personal data in accordance with this policy (in cases where no other legal basis exists). You must provide a consent letter from that individual to the Group of Companies upon request.

## 2. Personal Data Collected Prior to the Personal Data Protection Act

For personal data collected prior to June 1, 2022, the Group of Companies will handle such personal data in accordance with the Personal Data Protection Act. If you do not wish the Group to continue collecting and using your personal data, you may withdraw your consent at any time by contacting the Group of Companies or the Data Protection Officer as indicated in Section 9.

## 3. Methods of Collecting Personal Data

The Group of Companies may collect personal data from you directly or from other sources as follows:

### 3.1 Affiliate Companies

### 3.2 Recruitment Service Providers or Job Portals

For example, [www.jobsdb.com](http://www.jobsdb.com), [www.jobbk.com](http://www.jobbk.com), [www.jobthai.com](http://www.jobthai.com), and similar platforms. Individuals related to you such as references, previous employers, previous educational institutions, training institutions, professional councils, former colleagues, family members, parents, spouse, children, relatives, beneficiaries, and any other individuals you have authorized to be contacted in case of emergency

References, disciplinary complainants, commercial banks with which you have loan agreements, insurance agents, and contract witnesses.

### 3.3 Personal Data Obtained from Personnel

If you are an associated individual, the Group of Companies may receive your personal data from its employees.

### 3.4 Public Sources

Such as company websites, government agencies, regulatory authorities, or social media platforms.

## 4. Retention Period of Personal Data

The Group of Companies shall retain your personal data only for as long as necessary to achieve the purposes outlined in this Personal Data Protection Policy, and in no case longer than the periods specified below. However, the Group of Companies may continue to retain your personal data as long as:

- (a) The Personal Data Protection Act and/or other applicable laws permit;
- (b) You and the Group of Companies maintain a legal relationship;
- (c) The Group of Companies is legally required to retain the personal data;
- (d) You have provided consent to the Group of Companies; and/or
- (e) Retention is necessary under the law to achieve the purposes of processing in accordance with this Personal Data Protection Policy.

No.	Data Subject	Retention Period
4.1	Personnel and Related Parties	No more than 10 years from the termination of employment status.

## 5. Purpose of Personal Data Processing

Your personal data will be collected, used, and disclosed for the purposes set forth below, for which you have provided consent, or as required by the Personal Data Protection Act and/or other applicable laws.

No.	Objectives	Personal Data	Legal basis under Section 24	Legal basis under Section 26
<b>5.1 Personnel</b>				
<b>5.1.1 Collection and Use by the Group of Companies</b>				
	1. To verify and identify the data subject.	(1) Identifying Information	(a) Contracts	(a) Establishing legal claims
	2. To perform duties as an employer under employment	(2) Contact Information	(b) Legitimate Interests	(b) Compliance with laws
		(3) Employment Information	(c) Laws	
		(4) Financial		

	<p>contracts and applicable laws, including the payment of salaries, compensation, provision of benefits, and other activities for employees, personnel, and their families.</p> <p>3. To prepare and maintain accounts, registers, and/or any records necessary for the operations of the Group of Companies.</p> <p>4. To verify the accuracy of information in case of complaints or requests.</p> <p>5. To communicate and provide necessary information, or as requested by employees and/or relevant government agencies.</p> <p>6. To assess qualifications, capabilities, and</p>	<p>Information</p> <p>1. Educational Qualification Information</p> <p>2. Information Technology Data</p> <p>3. Sensitive Personal Data</p>		
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	<p>suitability for job positions, and to manage human resources activities.</p> <p>7. To monitor operations, systems, and security in the Group of Companies' working environment.</p> <p>8. To ensure security in company premises.</p> <p>9. To exercise any rights as required by law.</p>			
<b>5.1.2 Disclosure of Personal Data to Third Parties</b>				
	<p>Personal data may be disclosed to relevant government agencies for the Group of Companies to perform its duties in accordance with laws related to public health, labor protection, social security, and other laws applicable to the operation of healthcare facilities.”</p>	<p>(a) Identifying Information</p> <p>(b) Contact Information</p> <p>(c) Employment Information</p> <p>(d) Financial Information</p> <p>(e) Educational Qualification Information</p> <p>(f) Information Technology Data</p> <p>(g) Sensitive Personal Data</p>	<p>(a) Laws</p> <p>(b) Legitimate Interests</p>	<p>Compliance with Laws</p>

	<p>Personal data may be disclosed to banks, financial institutions, and data processors of the Group of Companies, such as accounting advisors, legal advisors, auditors, and internal auditors, for the purposes of providing benefits, paying compensation, performing duties as an employer under employment contracts, and conducting the business of the Group of Companies. Such disclosure may also be necessary for monitoring, auditing, and ensuring security on company premises, as well as exercising relevant legal rights, such as pursuing legal claims.</p>	<p>(a) Identifying Information (b) Contact Information (c) Employment Information (d) Financial Information (e) Educational Qualification Information (f) Information Technology Data (g) Sensitive Personal Data</p>	<p>(a) Legitimate Interests (b) Contracts</p>	<p>(a) Compliance with Laws (b) Establishing Legal Claims</p>
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	<p>Personal data may be disclosed to government agencies and accreditation bodies related to the Group of Companies' business operations for the purpose of developing and improving business standards.</p> <p>Examples include the Department of Labor Protection and Welfare, healthcare accreditation institutions, and the Joint Commission International (JCI).</p>	<p>(a) Identifying Information</p> <p>(b) Contact Information</p> <p>(c) Employment-Related Information</p> <p>(d) Financial Information</p> <p>(e) Educational Qualification Information</p> <p>(f) Sensitive Personal Data</p>	<p>(a) Legitimate Interests</p>	<p>Consent</p>
	<p>Personal data may be disclosed to affiliate companies in the event of a transfer or reassignment of job positions, and for employment purposes under employment contracts or agreements between personnel and the Group of Companies.</p>	<p>(a) Identifying Information</p> <p>(b) Contact Information</p> <p>(c) Employment-Related Information</p> <p>(d) Financial Information</p> <p>(e) Educational Qualification Information</p> <p>(f) Sensitive Personal Data</p>	<p>(a) Contracts</p> <p>(b) Legitimate Interests</p> <p>(c) Laws</p>	<p>Consent</p>

No.	Objectives	Personal Data	Legal basis under Section 24	Legal basis under Section 26
<b>5.2 Relevant Parties</b>				
<b>5.2.1 Collection and Use by the Group of Companies</b>				
	For entering into employment-related insurance contracts for certain positions.	(a) Identifying Information (b) Contact Information (c) Financial Information	Contract	
	(a) To provide employee benefits to you as a beneficiary in accordance with the relevant welfare conditions. (b) For use in emergency contact situations. (c) To retain your information as a witness for evidentiary purposes in executing contracts.		Legitimate Interests	
<b>5.2.2 Disclosure of Personal Data to Third Parties</b>				
	Personal data may be disclosed to banks, financial institutions, and data processors of the Group of Companies, such as accounting advisors, legal advisors, auditors,	(a) Identifying Information (b) Contact Information (c) Financial Information	Legitimate Interests	(a) Compliance with Laws (b) Establishing Legal Claims

	<p>and internal auditors, for the purposes of providing benefits, paying compensation, performing duties as an employer under employment contracts, and conducting the business of the Group of Companies. Such disclosure may also be necessary for monitoring, auditing, and ensuring security on company premises, as well as exercising relevant legal rights, including pursuing legal claims.</p>			
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## 6. Disclosure of Personal Data to Third Parties

The Group of Companies may disclose your personal data to third parties and/or government agencies as follows:

### 6.1 Affiliate Companies

### 6.2 Commercial Banks, Provident Funds, Fund Registrars, Insurance Companies or Their Agents

**6.3 Relevant Parties associated with personnel**, such as references, former employers, previous educational institutions, training institutions, professional councils, former colleagues, emergency contacts, and disciplinary complainants.

**6.4 Parties requesting verification of your employment status**, such as commercial banks or new employers.

**6.5 Auditors and internal auditors, including various advisors**, such as legal, accounting, tax, and actuarial

advisors.

**6.6 Government Agencies**, including healthcare and medical practice offices, professional councils, Revenue Department, Social Security Office, Department of Labor Protection and Welfare, Department of Skill Development, Department for the Empowerment and Development of Persons with Disabilities, Student Loan Fund, Employment Office, Immigration Bureau, Department of Legal Execution, Department of Medical Sciences, Provincial Public Health Offices, National Health Security Office, Emergency Medical Institute, District Offices, courts, police officers, and injured parties.

**6.7 The general public and visitors** to the Group of Companies' websites, social media, or applications (limited to personal data of the Group's personnel).

**6.8 Service Providers**, including IT service providers, training managers, dormitory rental providers, airlines, hotels, travel agents, visa and permit service providers, etc.

**6.9 Other healthcare facilities or external medical service providers.**

**6.10 Accreditation Organizations**, such as the Joint Commission International (JCI) and public healthcare accreditation institutions.

**6.11 Organizations or agencies providing training or educational seminars.**

**6.12 Contracting parties and other individuals with whom the Group of Companies has contact.**

## **7. Your Rights**

You have the rights under the Personal Data Protection Act (PDPA) as follows:

### **7.1 Right of Access and Request for Copies:**

You have the right to access or request copies of your personal data collected, used, or disclosed by the Group of Companies, and to request disclosure of personal data obtained without your consent.

### **7.2 Right to Receive and Transfer Personal Data:**

You have the right to receive your personal data in a format that is commonly readable or usable by automated tools or devices. You may also request the Group of Companies to send or transfer your personal data to third parties, or to receive personal data that the Group has sent or transferred to third parties, unless technically infeasible. This right applies to personal data collected, used, or disclosed based on your consent, under a contract, or other legal basis.

### **7.3 Right to Object:**

You have the right to object to the collection, use, or disclosure of your personal data where the Group of Companies processes your data based on public interest, legitimate interests, or for purposes of direct marketing or scientific, historical, or statistical research.

#### **7.4 Right to Request Erasure:**

You have the right to request the Group of Companies to delete or destroy your personal data, or to make it anonymous so that you cannot be identified for certain reasons.

#### **7.5 Right to Request Suspension:**

You have the right to request the Group of Companies to suspend the processing of your personal data if your request for correction, deletion, or objection is under review, or if the data is no longer necessary but you wish the Group to retain it for the establishment, exercise, or defense of legal claims.

#### **7.6 Right to Rectification:**

You have the right to request the Group of Companies to correct your personal data to ensure it is accurate, up-to-date, and not misleading.

#### **7.7 Right to Lodge Complaints:**

You have the right to lodge a complaint with the Personal Data Protection Committee if the Group of Companies, its employees, or contractors violate or fail to comply with the PDPA.

#### **7.8 Right to Withdraw Consent:**

You have the right to withdraw your consent previously given to the Group of Companies at any time, either partially or entirely, according to the procedures established by the Group. Withdrawal of consent will not affect the lawful collection, use, or disclosure of personal data prior to the withdrawal.

You may exercise these rights by contacting the Group of Companies or the Data Protection Officer as specified in Section 9. Withdrawal of consent may result in the Group being unable to fulfill certain requests or may limit your convenience. However, withdrawal will not affect the lawful processing of data given consent prior to such withdrawal.

The Group of Companies may refuse your request in cases where:

- (a) You cannot provide sufficient evidence to verify your identity or authority to submit the request, or the information provided is incomplete;
- (b) The request is unreasonable, e.g., you have no legal right or the data does not exist;
- (c) The request is manifestly excessive or repetitive without valid reason;
- (d) The Group of Companies is entitled to refuse your request under the PDPA or other applicable laws.

### **8. Privacy Policy**

The Group of Companies has published a Privacy Policy outlining general information on the collection, use, and disclosure of all types of personal data, including details on cross-border data transfers, cookies, and

security measures for personal data. The provisions in the Privacy Policy supplement, and do not replace, modify, or override the terms of this Personal Data Protection Policy. In the event of any conflict, the provisions of this Personal Data Protection Policy shall prevail, as you have been provided the opportunity to review and provide consent.

For further details, please review the Privacy Policy at: [www.bangkokchainhospital.com](http://www.bangkokchainhospital.com)

## **9. Contacting the Group**

If you have any questions or wish to inquire further about this Personal Data Protection Policy or other activities of the Group, including exercising your rights as specified in Section 11, you may contact:

- (a) The Group's Data Protection Officer using the contact details below, and
- (b) The Group, as detailed in Attachment 1.

### **Data Protection Officer**

To: Data Protection Officer

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi 11120, Thailand

Contact Number: 02-836-9999

Email: [dpo@bangkokchainhospital.com](mailto:dpo@bangkokchainhospital.com)

This Privacy Policy was reviewed and came into effect on May 14, 2024.



## **Attachment 1**

### **List of Bangkok Chain Hospital Group Companies and Contact Addresses**

#### **Bangkok Chain Hospital Public Company Limited**

##### **Head Office**

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9999

##### **World Medical Hospital**

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9999

##### **Kasemrad Bangkae Hospital**

Address: 586, 588 Phetkasem Road, Bangkae Nuea Subdistrict, Bangkae District, Bangkok 10160

Phone: 02-804-8959

##### **Kasemrad Prachachuen Hospital**

Address: 950 Prachachuen Road, Wongsawang Subdistrict, Bang Sue District, Bangkok 10800

Phone: 02-910-1600

##### **Kasemrad Rattanathibet Hospital**

Address: 58 Moo 15, Bang Rak Pattana Subdistrict, Bang Bua Thong District, Nonthaburi Province 11110

Phone: 02-921-3400

##### **Kasemrad Ramkhamhaeng Hospital**

Address: 99/9 Ramkhamhaeng Road, Saphan Sung Subdistrict, Saphan Sung District, Bangkok 10240

Phone: 02-339-0000

##### **Kasemrad International Aranyaprathet Hospital**

Address: 885 Moo 5, Ban Mai Nong Sai Subdistrict, Aranyaprathet District, Sa Kaeo Province 27120

Phone: 037-640-000

##### **Rattanathibet Hospital Co., Ltd.**

##### **Kasemrad International Rattanathibet Hospital**

Address: 60 Moo 6, Sao Thong Hin Subdistrict, Bang Yai District, Nonthaburi Province 11140

Phone: 02-594-0020



**Siburind Medical Co., Ltd.**

**Kasemrad Siburind Hospital**

Address: 111/5 Moo 13, San Sai Subdistrict, Mueang Chiang Rai District, Chiang Rai Province 57000

Phone: 053-910-999

**Kasemrad Maesai Hospital**

Address: 952 Moo 1, Wiang Pang Kha Subdistrict, Mae Sai District, Chiang Rai Province 57130

Phone: 053-731-391

**Kasemrad Siburind Clinic, Chiang Saen Branch**

Address: 339 Moo 6, Wiang Subdistrict, Chiang Saen District, Chiang Rai Province 57150

Phone: 053-777-213

**Saraburi Medical Co., Ltd.**

**Kasemrad Saraburi Hospital**

Address: 2/22 Mittraphap Road, Pak Priao Subdistrict, Mueang Saraburi District, Saraburi Province 18000

Phone: 036-315-555

**Navanakorn Medical Co., Ltd.**

**Karunvej Pathumthani Hospital**

Address: 98 Moo 13, Phahonyothin Road, Khlong Nueng Subdistrict, Khlong Luang District, Pathum Thani Province 12120

Phone: 02-529-4533

**Karunvej Ayutthaya Hospital**

Address: 61/9 Moo 4, Khlong Chik Subdistrict, Bang Pa-In District, Phra Nakhon Si Ayutthaya Province 13160

Phone: 035-315-100

**Sothornvejkit Co., Ltd.**

**Kasemrad Chachoengsao Hospital**

Address: 29 Moo 3, Suwinthawong Road, Na Mueang Subdistrict, Mueang Chachoengsao District, Chachoengsao Province 24000

Phone: 038-812-702

**Kasemrad Prachinburi Hospital**

Address: 766 Moo 10, Tha Tum Subdistrict, Si Maha Phot District, Prachinburi Province 25140

Phone: 037-627-000





**Bangkok Chain Management Co., Ltd.**

**Head Office**

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9999

**Branch (1)**

Address: 223/2 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9999

**Bangkok Chain Laboratory and Pathology Clinic**

Address: 141 Moo 12, Bang Rak Pattana Subdistrict, Bang Bua Thong, Nonthaburi 11120

Phone: 02-080-9445

**Bangkok Chain International (Lao) Co., Ltd.**

**Kasemrad International Vientiane Hospital**

Address: 999 450th Anniversary Road, Ban Don Nok Koom, Xaysetha District, Vientiane Capital, Lao PDR

Phone: +85621 833333

**Kasemrad Aree Radiation Oncology Center Co., Ltd.**

**Kasemrad Aree Specialized Radiation Oncology Clinic**

**Head Office**

Address: 223/2 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9983

**Health Chain Innotech Co., Ltd.**

**Head Office**

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9912

**Bangkok Chain Dental Co., Ltd.**

**Head Office**

Address: 44 Moo 4, Pak Kret Subdistrict, Pak Kret District, Nonthaburi Province 11120

Phone: 02-836-9985