

## Personal Data Protection Policy for Business Partners

Bangkok Chain Hospital Public Company Limited (“BCH”) and its affiliated companies listed in Annex 1, as well as any other companies that may be included in the future (which will be notified accordingly) (“Affiliated Companies”), 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 and also provide services for multi-clinics and other businesses (collectively referred to as “the Group”), value your privacy and are committed to maintaining high standards of operations and personal data protection. Therefore, the Group has established this Personal Data Protection Policy for Business Partners (“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 (“PDPA”).

This Personal Data Protection Policy applies to the protection of personal data of individuals in the following capacities:

1. **Business partners, contractors, and/or commercial partners who are natural persons**, including service providers, contractors, space lessees, parking lot lessees, insurance agents, agencies, and other service providers (“Business Partners”).
2. **Directors, authorized representatives, agents, contacts, or personnel of business partners who are legal entities**, including medical personnel of other healthcare facilities (“Corporate Partner Representatives”).
3. **Personnel of business partners under labor outsourcing agreements**, such as security personnel and cleaning staff (“Business Partner Personnel”).
4. **Individuals related to business partners**, such as witnesses in contracts (“Related Individuals”).

### 1. Types of Personal Data

“Personal Data” means any information relating to an identifiable individual, directly or indirectly, but does not include data of deceased persons or other personal data as specified under the PDPA.

The personal data that the Group 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) Marital status

		<ul style="list-style-type: none"> <li>(h) National ID number</li> <li>(i) Passport number</li> <li>(j) Driver's license number</li> <li>(k) CCTV video recordings</li> <li>(l) Workplace</li> <li>(m) Position / Job title</li> <li>(n) Time of entry and exit from premises</li> <li>(o) Height and weight</li> </ul>
2.	<b>"Sensitive Personal Data"</b>	<ul style="list-style-type: none"> <li>(a) Health information</li> <li>(b) Fingerprint records (Fingerprint Scan)</li> <li>(c) Facial structure records (Facial Scan)</li> <li>(d) Criminal history</li> </ul>
3.	<b>"Contact Information"</b>	<ul style="list-style-type: none"> <li>(a) Address</li> <li>(b) Email</li> <li>(c) Telephone number</li> <li>(d) Line ID</li> </ul>
4.	<b>"Financial Information"</b>	<ul style="list-style-type: none"> <li>(a) Bank account details</li> <li>(b) Remuneration / Compensation</li> </ul>
5.	<b>"Educational Qualification Information"</b>	<ul style="list-style-type: none"> <li>(a) Educational and training history</li> <li>(b) Work experience</li> <li>(c) Professional license details</li> </ul>
6.	<b>"Information System Data"</b>	<ul style="list-style-type: none"> <li>(a) System usage and access data (Log files)</li> <li>(b) IP address</li> <li>(c) Usernames and passwords</li> </ul>

If you wish to cooperate, enter into a contract, or establish any legal relationship with the Group, it is necessary for the Group to collect your personal data. If you do not provide your personal data to the Group, the Group may be unable to enter into a contract with you, proceed with any requested actions, perform its obligations under such contract, agreement, or legal relationship, or comply with applicable legal requirements to which the Group is subject.

In the event that you provide the Group with personal data of another person, you confirm that such individual has reviewed this Personal Data Protection Policy and has consented to the processing of their personal data in accordance with this Policy (in cases where there is no other legal basis for processing). You are also required to submit the written consent of such individual to the Group upon request.

## **2. Personal Data Collected Before the PDPA Took Effect**

For personal data collected before 1 June 2022, the Group will handle such personal data in accordance with the requirements set forth in the Personal Data Protection Act. Should you wish to withdraw your consent for the Group to continue collecting and using such personal data, you may do so at any time by contacting the Group or the Data Protection Officer as specified in Section 9.

## **3. Collection of Personal Data**

The Group may collect your personal data directly from you or from other sources, including but not limited to:

- 3.1 Affiliated companies
- 3.2 Insurance companies
- 3.3 Other insurance agents
- 3.4 Labor outsourcing contractors of the Group, such as security and cleaning service companies
- 3.5 Corporate business partners or their representatives
- 3.6 External service providers, such as laboratory service providers
- 3.7 Public sources, such as company websites, government agencies, regulators, or social media

## **4. Retention Period of Personal Data**

The Group will retain your personal data for as long as necessary to fulfill the purposes stated in this Personal Data Protection Policy, and not exceeding 10 years after the termination of the legal relationship between you and the Group.

However, the Group may continue to retain your personal data as long as:

- (a) it is permitted by the Personal Data Protection Act and/or other applicable laws;
- (b) the legal relationship between you and the Group remains in effect;
- (c) the Group has a legal obligation to retain the personal data;
- (d) you have given your consent to the Group; and/or
- (e) it is necessary under the legal framework to achieve the purposes stated in this Personal Data Protection Policy.

## 5. Purposes of Personal Data Processing

Your personal data may be collected, used, and disclosed for the purposes stated below, for which you have given consent, or as permitted under the Personal Data Protection Act and/or other applicable laws.

No.	Objectives	Personal Data	Legal basis under Section 24	Legal basis under Section 26
5.1	<p><b>Contract</b></p> <p>To recruit, select, and evaluate business partners for the purpose of entering into a contract with the Group, performing obligations under such contract, and ensuring the proper execution of contractual duties, including:</p> <p>(a) Payment of remuneration;</p> <p>(b) Requesting and receiving payments;</p> <p>(c) Issuing receipts, tax invoices, billing statements, or other related documents;</p> <p>(d) Verifying your identity in the performance of contractual obligations;</p> <p>(e) Communicating and coordinating matters relating to legal relationships or business transactions with you;</p> <p>(f) Monitoring and evaluating your performance;</p> <p>(g) Verifying the qualifications of medical personnel from other healthcare facilities in cases where the Group engages external medical services.</p>	<p><u>Business Partners</u></p> <p>(a) Identification Data</p> <p>(b) Contact Data</p> <p>(c) Financial Data</p>	<p>(a) Contract</p> <p>(b) Legitimate Interests</p>	-

5.2	<p><b>Legal Compliance</b></p> <p>(a) To comply with applicable laws such as the Civil and Commercial Code B.E. 2535, the Revenue Code, and the Accounting Act B.E. 2543, including accounting record-keeping, audits, and tax-related operations.</p> <p>(b) To comply with court orders and/or orders issued by competent government authorities.</p>	<p><u>Business Partners / Corporate Partner Representatives / Business Partner Personnel / Related Individuals</u></p> <p><u>Types of Personal Data:</u></p> <p>(a) Identification Data</p> <p>(b) Contact Data</p> <p>(c) Financial Data</p>	Legal Obligation	-
5.3	<p><b>Legitimate Interests</b></p> <p>(a) To verify your identity prior to entering into a contract or commencing any work for security purposes.</p> <p>(b) To prevent, respond to, and manage risks; to conduct internal governance, control, and audits; and to consult with legal, accounting, and tax advisors on relevant matters.</p> <p>(c) To maintain a database for future engagements, price comparison, and cost management within the Group.</p> <p>(d) To retain your information as evidence or witness records for contracts or other relevant</p>	<p><u>Business Partners / Corporate Partner Representatives / Business Partner Personnel / Related Individuals</u></p> <p><u>Types of Personal Data:</u></p> <p>(a) Identification Data</p> <p>(b) Contact Data</p> <p>(c) Financial Data</p> <p>(d) Employment and Professional Data</p> <p><b>(e) Information System Data</b></p>	Legitimate Interests	-

	<p>documents.</p> <p>(e) In the case where you act as a representative of a legal entity, to verify your identity and authority to enter into contracts, as well as to coordinate matters related to legal relationships with the Group.</p> <p>(f) To establish, exercise, or defend legal claims, including responding to complaints, legal proceedings, and litigation before the court in the event of a dispute.</p> <p>(g) To assess, analyze, and improve the Group's business operations.</p> <p>(h) To enable audits and certifications by relevant organizations, such as Joint Commission International (JCI)</p> <p>(i) To ensure hospital security, hygiene, and orderliness.</p> <p>(j) To monitor and safeguard security, prevent accidents and crimes, and investigate unlawful or harmful incidents.</p> <p>(k) To disclose information for the purpose of mergers and acquisitions, business restructuring, bankruptcy or rehabilitation proceedings, capital increases, or other similar processes.</p>			
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5.4	<b>Management of business partner personnel</b>  (a) To assess the qualifications and suitability of the business partner's personnel and to store such information in the database during the period of engagement.  (b) To verify and evaluate their performance.	<u>Business partner personnel</u> (a) Identification information (b) Contact information (c) Qualification information (d) Sensitive personal data	Legitimate Interests	Consent
5.5	<b>Insurance Agents / Agencies</b>  Personal data of insurance agents is collected to maintain a database for communication and coordination on various matters and to manage the relationship between parties, such as gifts, hospitality, and sending offers regarding the Group's products and services.	<u>Business Partners</u> (a) Identification Data (b) Contact Data	(a) Legitimate Interests	

## 6. Disclosure of Personal Data to External Parties

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

6.1 Affiliated companies of the Group

6.2 Auditors and internal auditors, including various advisors such as legal, accounting, and tax consultants

6.3 Government agencies, such as the Revenue Department

6.4 Courts, police officers, and claimants

6.5 Commercial banks

6.6 External service providers, such as IT service providers

6.7 Certification and accreditation organizations, such as Joint Commission International (JCI), Hospital Accreditation Institute (Public Organization), ISO Certification Institutes (MASCI), and professional standard accreditation institutes, etc.

6.8 Individuals related to you, such as your employer

## **7. Your Rights**

You have the rights as provided under the Personal Data Protection Act (PDPA), subject to the conditions and criteria set forth in the PDPA and other relevant laws:

### **7.1 Right to Access and Obtain Copies:**

You have the right to access or request a copy of your personal data collected, used, or disclosed by the Group, 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, and you may request the Group to transmit or transfer your personal data to an external party, or to receive personal data that the Group has sent or transferred to an external party, unless technically infeasible. This applies only to personal data that has been collected, used, or disclosed with your consent, under a contract, or based on other legal grounds.

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

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

### **7.4 Right to Request Deletion:**

You have the right to request that the Group delete or destroy your personal data, or render your personal data anonymous so that it can no longer identify you.

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

You have the right to request that the Group suspend the use of your personal data while your request to correct, update, or object to the collection, use, or disclosure of your personal data is being verified; or if you request suspension instead of deletion; or if your personal data is no longer necessary but you request it to be retained for the establishment, exercise, or defense of legal claims.

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

You have the right to request the Group to correct your personal data to ensure it is accurate, current, and not misleading.

### **7.7 Right to Lodge a Complaint:**

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



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

You have the right to withdraw any consent you have provided to the Group at any time, either partially or entirely, following the procedures set by the Group. Withdrawal of consent will not affect any collection, use, or disclosure of your personal data carried out lawfully prior to the withdrawal.

You may exercise these rights by contacting the Group or the Data Protection Officer as specified in Section 9.

Withdrawal of consent may result in the Group being unable to perform certain requests or may reduce the convenience of services provided to you. Withdrawal of consent will not affect any collection, use, or disclosure of personal data that was already lawfully processed.

For the benefit of personal data owners and to ensure strict protection of personal data, the Group may refuse to comply with your request if:

- (a) The requester cannot provide evidence confirming they are the data subject or authorized to make the request, or if the Group does not receive sufficient information to act on the request;
- (b) The request is unreasonable, such as if the requester has no legal right or the Group does not hold the personal data requested;
- (c) The request is excessive or repetitive without reasonable cause;
- (d) The Group is entitled to refuse the request under the PDPA and/or other applicable laws.

## **8. Privacy Policy**

The Group has published a Privacy Policy that outlines general information regarding the collection, use, and disclosure of all types of personal data of data subjects, as well as other details such as cross-border data transfers, cookies, and personal data security measures.

The provisions in the Privacy Policy are supplementary to this Personal Data Protection Policy and do not cancel, replace, or modify any provisions herein. In the event of any conflict or inconsistency, the provisions in the Personal Data Protection Policy shall prevail, as the Group has provided this policy for your specific review and consent.

For more 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 Sriburind 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 Sriburind 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