

Privacy Notice on the Processing of Personal Data of Medical/ Dental Staff

Bangkok Dusit Medical Services Public Company Limited (the “**Company**”) give importance to the protection of the personal data which it receives from all staff, employees, and other Medical/ Dental Staff holding any position in the Company (collectively called the “**Medical / Dental Staff**”). The Company strives to oversee the management, use, and protection of personal data in a responsible and appropriate manner, and in strict compliance with all statutory rules and regulations, as well as with the Guidelines on Personal Data Management. Therefore, the Company has prepared this **Privacy Notice on the Processing of Personal Data of Medical / Dental Staff** (the/this “**Privacy Notice**”) with a view to clarify the details in relation to the collection, use, and disclosure of the personal data of all Medical/ Dental Staff (the “**Process**” or “**Processing**”), which shall apply to all personal data which is compiled and kept by the Company in the course of processing the applications filed by the Medical/ Dental Staff as specified in Clause 3, regardless through whichever channel (the “**Personal Data**”).

1. Purposes of Data Processing

The Company, as the party in control of the Personal Data, processes the Personal Data of the Medical/ Dental Staff only to the extent necessary and with the consent of the Medical/ Dental Staff, or in compliance with the agreement between the Medical/ Dental Staff and the Company, or for any matter in the lawful interests of the Company for the following purposes:

- To authenticate the identity of the Medical/ Dental Staff that performs work in the various divisions of the Company, and for Processing purposes relating to the Company’s security system;
- To perform background checks and to verify the qualifications or Personal Data of the Medical/ Dental Staff against the databases kept by any institution, organization, or agency, the responsibility of which is to control and oversee the Medical/ Dental Staff, or any other competent authority under the law;
- To conduct Processing as necessary for and relevant to the performance of work duties of the Medical/ Dental Staff in order to achieve the respective objectives under the scope for a particular work position or for conducting performance evaluations;
- To conduct Processing as necessary for and relevant to the payments system, computer system, information technology service provision, or any other system of the Company that is key to the performance of work of the Company and/or the Medical/ Dental Staff;
- To contact, through whatever channel, the Medical/ Dental Staff, for the performance of duties by the Medical/ Dental Staff, in order to exchange information between the Medical/ Dental Staff and the various divisions of the Company, and to notify the Medical/ Dental Staff of internal Company news updates, which includes the project that the Medical/ Dental Staff accepted to join such as Teleconsultation;
- To improve work processes system of the Company to ensure that it is more appropriate and in line with the applicable laws, rules, and regulations, whereby Processing is conducted under the information technologies system for the purpose of human resources management of the Company, which may be used jointly, or the data therein shared with, other companies in the Bangkok Dusit Medical Services Public Company Limited network, whether pre-existing or

which may be hereafter established, including Bangkok Dusit Medical Services (collectively referred to as “**BDMS Group**”), for the following purposes:

- To ensure compliance with an agreement, e.g. Malpractice Insurance Contract, Accident Insurance Contract.
- To establish a right, comply with the laws, or to exercise a right of claim under the law, whether by the Company or the Medical/ Dental Staff, e.g. Tax income report; and
- To compile a general statistical corpus of data on the Medical/ Dental Staff of the Company, provided on an anonymous basis, whereby the Company is able to analyze and Process such anonymous statistical data and may share the same with third parties, e.g. Number of Medical /Dental Staff, Number of Specialty, Customer Satisfaction, Physician Engagement, etc.

2. Source of Personal Data

2.1 The Company receives Personal Data directly from the Medical/ Dental Staff, being the information which the Medical/ Dental Staff fills in the Application Form, or the Company website, as well as interviews, tests, and notices to the Company, regardless through whatever means.

2.2 The Company may receive the Personal Data of the Medical/ Dental Staff from any of the following persons, regardless of whichever means, such as via an interview, by telephone, or in writing, for example.

2.2.1 Referees and/or persons employed by the Company, who are acquainted with the Medical/ Dental Staff, whose names are specified in the Application Form, with the consent of the Medical/ Dental Staff, or as authorized by law;

2.2.2 With respect to BDMS Group, if an Medical/ Dental Staff has previously lodged an application for a position, or has previously performed work duties or completed any transaction, with the consent of the Medical/ Dental Staff, or as authorized by law;

2.2.3 Any person other than those stipulated above, whether such person is a natural person, or juristic person in the category of a public entity, private entity, or a state enterprise, may disclose the Personal Data of the Medical/ Dental Staff to the Company, with the consent of the Medical/ Dental Staff, or as authorized by law, in order to achieve the objectives specified under **Clause 1. “Persons under Clause 2.2.3”**.

3. Personal Data collected and processed by the Company

3.1 The Company collects, stores and processes Personal Data, including but not limited to the full name, address, telephone number, email, gender, age, identification number, educational background information, employment history, and other Personal Data of the Medical/ Dental Staff.

3.2 The Company may collect and process Personal Data which constitutes sensitive information, such as data on the physical or mental health of the Medical/ Dental Staff, details on the acts (or alleged acts) of the Medical/ Dental Staff which constitute an offense or is related to

a legal action, or any other information of a similar nature, with the consent of the Medical/ Dental Staff for Processing, whether in writing or otherwise, as shown in the Application Form, as the Medical/ Dental Staff has notified the Company via any means, or as authorized by law.

3.3 Any Personal Data of a similar nature as that which is detailed in Clause 3.1 and 3.2 above, which the Company obtains from a source as listed in Clause 2.

4. Measures for the safekeeping and Processing of Personal Data

4.1 The Company will maintain the Personal Data using security measures as prescribed by law at a minimum, and implement appropriate systems for the protection and maintenance of security for such Personal Data. These include, for example, using the Secure Sockets Layer (SSL) Protocol, firewall protection, password encryption, and other technical measures for limiting access to the Personal Data via the internet. The Company will store the Personal Data in a secure location with protective systems for preventing unauthorized access to the Personal Data which is kept in hard copies.

4.2 The Company will limit access to the Personal Data on a 'need-to-know' basis, whether for Personal Data kept on the internet or in hard copies, to specific persons who are responsible for processing the Personal Data so as to achieve the objective under Clause 1.

5. Processing period of Personal Data

5.1 The duration of the period which the Company will keep the Personal Data of the Medical/ Dental Staff will vary depending on the type and usage of such Personal Data, or to the extent as necessary for the Company to lawfully process such Personal Data. For example, the Company will keep the Personal Data relating to the register of employees for a period of not less than ten years from the date of termination of employment and not less than 3 years from the date of application (in case of medical/ dental staff who are not considered); or the Company may store the Personal Data which may potentially be subject of a dispute for the duration being equivalent to the relevant prescription period of the dispute as prescribed by law, as the case may be.

5.2 Upon the expiry of the period as provided in Clauses 5.1, the Company will destroy the Personal Data in accordance with the procedures for destroying information of the Company and shall complete such process without delay.

6. Types of agencies or persons with access to the Personal Data

6.1 The Company may be required to disclose the Personal Data of the Medical/ Dental Staff to government authorities, competent authorities, or any person prescribed or authorized by the law, as well as in compliance with court orders.

6.2 The Company may be required to disclose the Personal Data of the Medical/ Dental Staff, to the extent necessary, to BDMS Group and/or the persons listed under Clause 2.2.3. The Company has a strict policy to only disclose the Personal Data of the Medical/ Dental Staff to the extent necessary and in accordance with the law.

6.3 The Company may be required to disclose the Personal Data of the Medical/ Dental Staff to the persons who are responsible for evaluating the Medical/ Dental Staff on the behalf of the Company for the purpose of processing the Personal Data required for the

performance of work for the Company and/or the Medical/ Dental Staff, as well as in order to achieve any objective detailed in Clause 1. The Company has a strict policy to only disclose the Personal Data of the Medical/ Dental Staff to the extent necessary and in accordance with the law.

6.4 The Company may store the Personal Data in a Cloud Computing system offered by a third-party service provider located in Thailand or abroad. If the Company uses an international third-party service provider, such provider shall be located in a country with adequate personal data protection standards that are in accordance with the criteria for personal data protection as prescribed by law. The Company shall enter into an agreement with the third-party service provider with caution and due care in considering the security system for the protection of the Personal Data, to the best of its efforts.

7. Rights of and access to the Personal Data by the Medical/ Dental Staff as owner of the Personal Data

The Medical/ Dental Staff may contact the Personal Data protection officer/ the relevant staff of the Company at the details as provided in Clause 8 in order to file a request to exercise the following statutory rights:

7.1 The Medical/ Dental Staff has the right to access the Personal Data which is stored by the Company, as well as to obtain copies of such Personal Data, and to request that the Personal Data which he/she provided to the Company to another person who is responsible for controlling the Personal Data of the Medical/ Dental Staff, or to the Medical/ Dental Staff himself/herself.

7.2 The Medical/ Dental Staff has the right to object to or suspend the collection, use, or disclosure of his/her Personal Data.

7.3 The Medical/ Dental Staff has the right to request that the Company rectifies any incorrect Personal Data, or adds to the existing Personal Data which is incomplete. The Medical/ Dental Staff has the right to request that the Company deletes, destroys, or discloses the source of the Personal Data obtained by the Company in the case that he/she has not given her consent for the provision of the same.

7.4 If the Medical/ Dental Staff finds that the Company or its Medical/ Dental Staff uses or discloses his/her Personal Data in a manner that is not in line with the manner for which he/she has given consent, or in a manner that is not in line with the statutory rights to which the Company is entitled, the Medical/ Dental Staff has the right to file a complaint with the Personal Data Protection Committee.

7.5 The Medical/ Dental Staff has the right to revoke his/her consent for the Processing of the Personal Data [for which he/she had previously given his/her consent] at any time which the Personal Data of the Medical/ Dental Staff is stored with the Company, provided that there is no restriction on the revocation of consent under the law or as provided for under an agreement granting benefits to the Medical/ Dental Staff.

However, the revocation of the Medical/ Dental Staff's consent for the Company to process his/her Personal Data may render the Company to have insufficient data for Processing data in order to achieve the objectives under Clause 1. As a consequence, this may



cause an inconvenience in the performance of duties by the Medical/ Dental Staff, and for the Company.

8. Contact Information

The Medical/ Dental Staff can contact the Personal Data Protection officer/ relevant staff member of the Company for inquiries or to exercise his/her rights at the below details:
Medical Affairs Office of each Hospital in Bangkok Dusit Medical Services.