

## Privacy Notice on the Processing of Personal Data for Medical/ Dental Applicants

### Bangkok Dusit Medical Services Public Company Limited

Bangkok Dusit Medical Services Public Company Limited (BDMS) (the “Company”) committed to protect your Personal Data as an applicant to perform the medical profession who diagnosing and treating patients in a medical facility by using the equipment and equipment of the hospital in the form of an independent professional practice. Your Personal Data will be protected in accordance with the Personal Data Protection Act B.E. 2562 (2019). As the Data Controller, the Company has a statutory duty to issue this Privacy Notice to inform you of the reasons for and methods through which the Company collects, uses, or discloses your Personal Data, as well as to inform you of your rights as the data subjects. The Company confirms that it has duly complied with the Personal Data Protection Act B.E. 2562 to protect your Personal Data.

#### 1. Definitions

“**Personal Data**” means any information relating to an individual, which enables the identification of the owner of such Personal Data, whether directly or indirectly, excluding the data of a deceased person in particular;

“**Sensitive Personal Data**” means Personal Data pertaining to racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data (such as facial model data, iris or retina image data, or fingerprint data), or any data which may affect the data subject in the same manner as prescribed by the Personal Data Committee;

“**Process**” means collection, use or disclosure;

“**Data Controller**” means a person or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the Personal Data;

“Data Processor” means a person or a juristic person who operates in relation to the collection, use, or disclosure of the Personal Data pursuant to the orders given by or on behalf of a Data Controller, whereby such person or juristic person is not the Data Controller;

“BDMS Group” means companies in the network of Bangkok Dusit Medical Services Public Company Limited, whether currently in existence or to be incorporated hereafter; regardless whether registered in Thailand or overseas; and includes Bangkok Dusit Medical Services Public Company Limited.

## 2. Personal Data Collected by The Company

1. The Company will collect your Personal Data as follows:

Type of Personal Data	Description
1. Personally Identifiable Information	such as Name-Surname, ID card number, Photograph, Gender, Date of Birth, Name-Surname of the person referring, Name-Surname of the person in the family.
2. Education/ Work/ Professional Information	such as Work history, Degree Certificate, Professional License, Medical license, Diploma Certificate, Board Certificate, Sub-board Certificate.
3. Contact Information	such as address, telephone number, e-mail address, name of emergency contact person
4. Sensitive Personal Data	such as an act or being accused of an offense or in connection with a prosecution including criminal history, information about physical and mental health conditions, race, religion

2. The Company will not process your Sensitive Personal Data without your prior express consent. However, the Company may process your Sensitive Personal Data without your consent if it is so permitted by the Personal Data Protection Act B.E. 2562, such as when it is necessary to comply

with labor protection laws, or for providing healthcare or social security benefits, for any other public health or social protection purposes. In this regard, the Company has in place appropriate measures for protecting the fundamental rights and benefits of the data subject.

### 3. Sources of Personal Data

The Company will collect your Personal Data from the following sources:

1. Personal Data which you have directly provided to the Company, such as Personal Data in the application form which you have submitted to the Company in person, via the Company website, or via E.mail.
2. Personal Data which the Company receives indirectly such as in the case that you had previously submitted an application for employment, or had previously performed work duties for an organization in BDMS Group, and where you had given consent to the disclosure of your Personal Data.

### 4. Objectives for Personal Data Collection, Use and Disclosure

The Company processes your Personal Data only to the extent as prescribed in the Personal Data Protection Act B.E. 2562, and collects Personal Data only to the extent necessary for the foregoing purpose. A summary of how the Company uses your Personal Data and the lawful basis of processing of Personal Data is provided below:

No	Objective	Type of Data	Lawful Basis of Processing
1.	Interview you for employment	- Personally Identifiable Information	For the legitimate interests of the Company in selecting suitable employees for employment. (Legitimate Interest, Section 24(5))

		<ul style="list-style-type: none"> <li>- Education/ Work/ Professional Information</li> <li>- Contact Information</li> </ul>	
2.	For the verification of the medical/ dental staff's qualifications with the Medical /Dental Council and Educational Institutions both in Thailand and abroad	<ul style="list-style-type: none"> <li>- Personally Identifiable Information</li> <li>- Education/ Work/ Professional Information</li> <li>- Contact Information</li> </ul>	For the legitimate interests of the Company In checking your qualifications with relevant agencies to confirm that you have the qualifications as specified by the Company (Legitimate Interest, Section 24(5))
3.	Criminal background check for consideration for employment	<ul style="list-style-type: none"> <li>- Personally Identifiable Information</li> <li>- Sensitive Personal Data</li> </ul>	<p>1. For the benefit of the company by conducting a criminal background check under the supervision of the Royal Thai Police which is an agency with legal authority (Section 26, last paragraph)</p> <p>2. Legal Compliance: Section 11 of the Medical Professions Act, BE 2525, requires members of the Medical Council to have the following qualifications; (4) never having</p>

			<p>been imprisoned by a final judgment or a lawful order to Imprisonment in cases where the Board deems it to be a disgrace to professional dignity.</p>
4.	<p>Process personal data about physical and mental health conditions in order to select the person who is qualified to work</p>	<p>- Sensitive Personal Data</p>	<ul style="list-style-type: none"> <li>- Legal Compliance: The Medical Professions Act B.E. 2525, Section 11 states that members of the Medical Council have the following qualifications: (5) not being a person having mental disorder or the diseases prescribed in the Rule of the Medical Council.</li> <li>- Compliance base Laws in Diagnosis and Medical Treatment (Section 26 (5) (a))</li> <li>- The important public benefit base is to consider the ability of physicians in terms of health and mental health to provide medical care, which is a public service to the people, whereby</li> </ul>

		<p>the Company provides appropriate measures to protect fundamental rights and freedoms and the interests of the owners.</p> <p>Personal Data (Section 26 (5) (E))</p>
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The Company will not use your Personal Data for any purpose other than for the objectives listed above, unless processing of Personal Data is otherwise necessary as prescribed in the Personal Data Protection Act B.E. 2562, such as for compliance with the law, establishing legal claims, prevention or suppression of a danger to the life, body, or health of a person.

## 5. Disclosure or Sharing of Personal Data

1. The Company may disclose or share your Personal Data to the following third parties:

- BDMS Group when the company has a legitimate base to obtain that information.
- Data Processor, as necessary for the performance of work of the Company. The Company requires that the foregoing third parties maintain full confidentiality of and protect your Personal Data in line with the standards prescribed by the Personal Data Protection Act B.E. 2562, and that such third parties are only able to use your Personal Data for the objectives determined or instructed by the Company. Such third parties are not authorized to use your Personal Data for any purpose other than the said objectives.
- Royal Thai Police (for a criminal background check)
- Medical Council and educational institutions both in Thailand and abroad (to check qualifications and educational background)

2. The Company may store Personal Data on a cloud computing system offered by a third party service provider located in Thailand or overseas. In entering into the relevant agreement with such cloud computing service provider, the Company has exercised due care and

consideration of the security systems for the storage of the Personal Data in order to protect the Personal Data.

3. The Company may disclose your Personal Data to the government agencies, competent authorities, or other juristic persons in compliance with the law, or with a court order.

## 6. Retention Period of Personal Data

1. If you are not selected for the employment, the Company will store the Personal Data which you have provided for a period of one year from the date of receipt of the same. This is retained as evidence in the event of any doubt or complaint relating to unfair selection process for employment with the Company.

2. In order to comply with the law, a court order, or to establish legal claims under the law so as to become a party to any dispute resolution proceedings, the Company may retain the Personal Data for the duration which corresponds with the statutory period under the law, as the case may be.

3. Upon the expiry of the period under 1 or 2 above, the Personal Data will be destroyed by following the Company's procedure for data destruction, and such process shall be completed without delay.

## 7. Measures for Personal Data Security

1. The Company will store Personal Data using measures that are at least in compliance with the standards prescribed by the law, and using appropriate systems for ensuring the protection and security of Personal Data. These include use of, for example, a Secure Sockets Layer (SSL) protocol, firewall protection, password protection, and other technical measures for online data encryption, and storage of paper-based Personal Data in a facility with restricted access.

2. The Company will restrict access to Personal Data, which may be accessed by employees, agents, business partners, or third parties. Access to Personal Data by third parties is strictly restricted to the extent prescribed or instructed by the Company, and such third party has the duty to maintain full confidentiality of and protect such Personal Data.

3. The Company shall put in place technological methods for preventing unauthorized computer systems access.

4. The Company has an auditing mechanism for destroying Personal Data which is no longer required for the operations of the Company.

5. In the case of sensitive personal data, The Company will provide security measures of the document and electronic data to access and control its use, and backup systems, as well as plans for emergencies. Additional, the company provides a regular risk assessment of the system

## **8. Transfer of Personal Data Overseas**

1. The Company may transfer your Personal Data overseas in order to achieve the objectives as the Company has notified you and for which you have granted consent. The Company will notify you of any inadequacies relating to Personal Data protection standards applicable to the recipient country.

2. The Company may transfer your Personal Data without your consent in the case that transfer of Personal Data overseas is for the performance of an agreement to which you are a party, or compliance with your request prior to entering into such agreement, or as prescribed in the Personal Data Protection Act B.E. 2562.

## **9. Your Rights As The Data Subject**

As the data subject, you have the right to request the Company to take the following acts in relation to your Personal Data, to the extent permitted by law:



1. Right to withdraw consent: you have the right to withdraw consent for the Company to process your Personal Data, for which you had given consent, any time which your Personal Data is retained with the Company;
2. Right of access: you have the right to access your Personal Data and to request that the Company makes copies of the same, as well as request that the Company discloses any acquisition of your Personal Data for which you had not given consent;
3. Right to rectification: you have the right to request that the Company rectifies inaccurate Personal Data, or to add to the existing Personal Data which is incomplete;
4. Right to erasure: you have the right to request that the Company erases your Personal Data, for certain reasons;
5. Right to restriction of Processing: you have the right to request that the Company suspends the use of your Personal Data, for certain reasons;
6. Right to data portability: you have the right to transfer your Personal Data which you had provided to the Company to another Data Controller, or to yourself, for certain reasons;
7. Right to object: you have the right to object to the Processing of your Personal Data, for certain reasons;

To file a request relating to any of the above rights, please contact the address below in No.11.

## **10. Amendments To The Personal Data Protection Policy**

The Company may subsequently revise and make amendments to its Personal Data Protection Policy in order to ensure better protection of Personal Data. The Company will notify you of any revision or amendment.

## **11. Contact Information**

If you wish to contact the Data Controller, ask questions, or exercise any right in relation to Personal Data, please contact:



Personal Data Protection Officer

Address : 5/1 Mittraphap Road, Nong Sarai Subdistrict, Pak Chong District, Nakhon

Ratchasima Province 30130

Email : [bhpsecretary@bdms.co.th](mailto:bhpsecretary@bdms.co.th)

Telephone : 094-4042935, 044-316611 Ext. 7134