



BSB British International Primary School

Section 10 Data Protection

WBK (1) 10.4 Personal Data Protection Policy Notice

The purpose of this “Policy Notice” is to provide detailed information about how we process personal data.

What is personal data?

The term ‘personal data’ refers to any information which identifies you or can be used to identify a data subject when used in conjunction with other information.

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A. Scope

This data privacy policy applies to:

- Students that are current, prospective, or prior students enrolled at the school;
- Parents that are current, prospective, or prior parents, and/or legal guardians, of a student(s) at BSB;
- Staff (Faculty and Support) or individuals employed by BSB in any capacity, including full-time and part-time employees;
- Third parties that are referred as individuals or organizations that are not affiliated with or employed by the school, such as vendors.
- Recruitment.

B. General





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The Data Protection Act 2018 controls how your personal information is used by organisations, businesses, Third Party or the Government.

BSB British International Primary School recognises the need to process all personal data obtained in a lawful and appropriate manner. BSB British International Primary School /The British School of Bangkok Ltd is committed to protecting the personal data supplied by a data subject to ensure compliance with the legal and regulatory requirements in accordance with the Act.

This Personal Data Protection Policy (“Policy”) covers the processing of all personal data and sensitive personal data whose use is controlled by BSB British International Primary School / The British School of Bangkok Ltd

C. Data Protection Processing Principles

The Data Protection Act 2018 is the UK’s implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data has to follow strict rules called ‘data protection principles’. They must make sure the information is:

- used fairly, lawfully and transparently
- Collected for specified, explicit, and legitimate purposes.
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- We adhere to PDPA principles, ensuring that data processing is:
- Stored only as long as necessary.
- Processed securely to prevent unauthorized or unlawful processing, loss, or damage.
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

D. Policy Status

- This Policy is applicable to all
- Any Person’s who’s data we hold
- Employees of BSB British International Primary School. For the purposes of this Policy, the term “employees” herein refers to all members of BSB British International Primary School, including teachers, permanent, fixed term and temporary staff, governors, any third party representatives and agents engaged with BSB British International Primary School or overseas.
- Any questions regarding this Policy may be directed to the School Management.

E. Data Collected & Purposes

We collect your personal data to help manage your child’s school account. The law also requires us to keep some personal data, BSB follows the Thailand Data Protection Act 2562.

The Data Protection Act controls how your personal information is used by organisations, businesses, Third Party or the government.





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During the course of BSB British International Primary School business and activities, the school may be required to process information of a data subject, including but not limited to the name of the individual, gender, age, identification number and/or passport number, date of birth, race and nationality, date of incorporation, correspondence address, email address, contact details, school financial status, where necessary bank account information, key medical information and employment information, educational background.

The personal data collected by BSB British International Primary School may be used for but is not limited to the following purposes*:

1. Storing and processing of personal data relating to students and their parents, employees, visitors, and job applicants in the various data storage systems maintained by BSB British International Primary School;
2. Updating and managing the accuracy of the BSB British International Primary School internal record;
3. Billing, taxation and/or auditing purposes;
4. Visas, Work Permits or any document required by the Thai Education Department.
5. Disclosing personal data to the government authorities and/or authorised third party as required by law and/or within the responsibility of BSB British International Primary School as a school; and as reasonably contemplated by the nature of any transaction.
6. IP addresses, location data, and website statistics and Analysis. (see website cookie policy below)
7. Website cookies (see website cookie policy below)

*This list is not exhaustive.

The personal data we do keep relates to your child's enrolment in the school and would include the following.

Information the school keeps for you and your child are:

Parent or guardians' information:

- Identity Data includes first name, last name, I.D / Passport Number, Religion and parents' job and company.
- Contact Data includes billing address, residence, email address and telephone numbers.
- Financial Data includes bank account details where necessary. The proof of payment for credit card will be kept on record with the Accounting Dept.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us eg uniforms, field trips.

Child's Information:

We collect:

- first and last name, gender, date of birth, nationality, I.D / Passport Number, religion any relevant medical details the school should know , other school records.
- Educational information, SEN information from other schools or doctors



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Where we need to collect personal data by law or under the terms of the school enrolment and you fail to provide that data when requested, we may not be able to Enrol your child.

Staff Information including:

- Identity Data includes first name, last name, I.D / Passport Number, Religion and parents' job and company.
- Occupational Employers Details, all necessary Data for Employment
- Contact Data includes billing address, residence, email address and telephone numbers.
- Financial Data
- Financial Details for payroll.

How your personal data is collected:

We use different methods to collect data from and about you including:

- Filling in paper-based forms, such as enrolment forms, we may do this by corresponding with you by email post or telephone.
- Filling in online forms, or corresponding with us via platforms, such as Internet, Google forms and by email.

Automated technologies or interactions.

Parents should check their facebook policy to see what data is collected.

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Third parties or publicly available sources:

We may receive personal data about you or your child from various third parties and public sources as other schools, your doctor, SEN person etc, this information is kept with your child's details.

Where your personal data is stored:

We store your personal data in a variety of places (these are determined by the data received).

How we use your personal data:

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances

- Register you as a new customer and help you manage your school account
- Manage your payments
- Contact you for any reason
- Notify you about changes to our services and policies or any other contact for information about the school.
- Contacting you about your child, school financial obligations,
- Sharing information with the SEN or other medical personnel in case of an accident



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- Where we need to comply with a legal or regulatory obligation.
- Look into any concerns or questions that may arise.
- Register you to MOE system and relevant government department for education background
- Help or send information about school events
- Connect you with other parents by sharing parents contact details with classmates. This is done with parents' permission only
- For the provision of education and enrichment to our students, including the administration of our curriculum; monitoring student academic progress and educational needs; reporting on the same internally and to parents; administration of students' entries to public examinations, and providing references for students (including after a student has left);
- For the provision of educational support and related services to students;
- For the safeguarding of students' welfare and provision of pastoral care, welfare, health care services and support.
- For the provision of a safe and secure environment for students, staff, and visitors to the school.
- For keeping a record of historical and memorable events relevant to the maintenance of a historical record.

Disclosures of your personal data:

We may have to share your personal data with the parties set out above for the purposes as stated above. Where not required by Thai Law or for your child's safety we will not disclose information without your permission.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

Data above is shared but not limited to, and only under these circumstances:

- **With Consent:** When explicit permission is given by the data subject.
- **For Educational Partnerships:** Under strict data protection agreements.
- **With Service Providers:** Who assist in school operations, bound by confidentiality.
- **Legal Obligations:** When required by law or for the protection of our community's vital interests.

International Data Transfers

In cases where data is transferred internationally (e.g., for international educational programs), we ensure adequate protection measures are in place in line with PDPA guidelines.

Deletion of Information:

Information is deleted in a safe way when it is no longer required by law that the school retains the information.

Data Security

BSB British International Primary School will ensure that any personal data which is collected, stored and processed, is stored securely and the appropriate measures are adopted to ensure the safety and confidentiality.



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F. Roles and Responsibilities

The legal responsibility for compliance with the Act lies with BSB British International Primary School who is the “data user”.

Compliance with this Policy and the Act is the responsibility of all employees of BSB British International Primary School.

G. Consent of Individual

BSB British International Primary School may only process personal data with the consent of the data subject whom the data concerns and/or if the processing of the personal data is for the performance of BSB British International Primary School duty as a school to which the data subject is a party.

Such as Reports or Reference Letters or reference forms from other schools, these will only be filled in or sent with the teachers or parents permission.

H. Data Processing

1. As and when BSB British International Primary School is required to collect personal data, the school and its employees must abide by the requirements of this Policy and the Act. In the context of the Act, “processing” is defined to include collecting, recording, holding or storing personal data which includes ID Numbers, passport details, home address, contact details etc.
2. BSB British International Primary School will be responsible for ensuring that any personal data processed in relation to the BSB British International Primary School students and/or another individual is accurate. The personal data will be reviewed periodically to warrant that they are up-to-date and to determine whether retention of such personal data is necessary.

I. Employment at BSB

Staff:

We may collect and process your personal data for the above purposes based one or more of the following legal bases:

Registration with the Thai Education Authority

it is necessary for the performance of a contract (e.g. an employment contract with a member of staff);

Aid staff administration including the recruitment of staff/engagement of contractors; administration of payroll, Social Services and attendance data; staff performance; and the maintenance of appropriate human resources records for current and former staff; and providing references;

J. Disclosure of Information

1. BSB British International Primary School policy is to exercise its discretion under the Act to protect the confidentiality of those whose personal data it has obtained.
2. BSB British International Primary School requires all employees to be vigilant and exercise reasonable caution when asked to provide any personal data to a third party. In particular, they must ensure that personal data is not disclosed either orally or in writing to any unauthorised employees or persons without express prior consent of the School Management and/or any authorised individual.
3. However, as and when it is reasonably required, the personal data in the possession of BSB British International Primary School may be only disclosed to the following third parties:

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- i. External professional advisors and auditors
 - ii. Accrediting Bodies eg EDT / ISAT
 - iii. Governmental departments and authorities.
4. Personal data will not be transferred outside BSB British International Primary School and in particular not to a country outside of Thailand unless:-
- i. Consent from the data subject is obtained;
 - ii. The country's data protection laws provide an adequate level of data protection; and/or Adequate safeguards have been put in place in consultation with BSB British International Primary School

K. Data Security

BSB British International Primary School will ensure that any personal data which is collected, stored and processed, is stored securely and the appropriate measures are adopted to ensure the following:-

1. Source documents are well kept;
2. Paper-based records will be stored securely with restricted access. .
3. Computerised data is protected by passwords;
4. Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive/cloud drive that is regularly backed up.
5. All members of staff must sign the data protection policy.
6. When physical files or any forms relating to data subject are no longer required, they will be shredded or bagged or destroyed securely, and the hard drives consisting of those records will be erased via secure electronic deletion pursuant to such standard procedure by the administration department.

L. Data breaches

Breach Notification

In the event of a data breach, we will:

- Promptly assess the risk to individuals' rights and freedoms.
- Notify the PDPA and affected individuals if there is a high risk.

1. The term 'personal data breach' refers to a breach of security which has led to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.
2. All notifiable breaches will be reported to the relevant supervisory authority within 72 hours of the school becoming aware of it.
3. In the event that a breach is likely to result in a high risk to the rights and freedoms of an individual, the school will notify those concerned directly.

Within a breach notification, the following information will be outlined:

1. The nature of the personal data breach, including the categories and approximate number of individuals and records concerned.
2. The name and contact details of the DPO
3. An explanation of the likely consequences of the personal data breach
4. A description of the proposed measures to be taken to deal with the personal data breach and actions taken to reduce the risk of a similar breach happening in the future.

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5. Where appropriate, a description of the measures taken to mitigate any possible adverse effects.

M. Rights of Data Subject (According to Thai Law)

A data subject has the following rights under the Act:

- Access their personal data and copies of, the personal data that we hold about you (subject to legal exceptions)
- Request correction of inaccurate data.
- Request deletion of data where appropriate.
- Object to processing in certain circumstances.
- Request data portability.
 - Withdraw consent at any time Request for access to personal data held on the individual, the purpose for which the personal data is being used and those to whom it has or can be disclosed to.
 - (1) Prevent data processing that is likely to cause distress or damage.
 - (2) Take action to stop the use of, rectify, erase, and/or dispose of inaccurate personal data.

BSB British International Primary School shall, subject to exemptions, comply with the request and/or take reasonable steps not later than 21 days from the date of receipt of such request.

If you have any questions or concerns about how we are using your personal data or if you would like to exercise any of your information rights, please contact us at

All personal data is securely stored in accordance with legal requirements. We retain personal data only for legitimate purposes, relying on one or more of the lawful bases as set out above, and only for so long as necessary for those purposes, or as required by law.

All Data information on storage, usage, retention and disposal is in the detailed Data Protection and storage map, this follows Thai Education Law.

N. Data retention

1. Data will not be kept for longer than is necessary.
2. Unrequired data will be deleted as soon as practicable.
3. Some educational records relating to former pupils or employees of the school may be kept for an extended period for legal reasons, but also to enable the provision of references or academic transcripts.
4. Paper documents will be shredded, and electronic memories scrubbed clean or destroyed, once the data should no longer be retained.
5. Data retention will follow Thai Law and education requirements.

O. Disposal of Data

1. Personal data obtained will not be retained longer than it is required for its purposes. BSB British International Primary School has an obligation to ensure that the personal data of the data subjects are destroyed and/or permanently deleted after a specified period of time. All employees are required to contact the PDPA Compliance Officer and/or any authorised officer should the need to dispose of any personal data arises.

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2. Personal and sensitive data will be disposed of by means as listed in Item above. Appropriate measures will and must be taken by BSB British International Primary School to ensure that the data destroyed are not reconstructed or processed by third party.

P. Photographs and Videos

1. As part of school activities, the School may take photographs and record images of individuals within the school.
2. The School will obtain written consent from parents/carers, for photographs and videos to be taken of students for communication, marketing and promotional materials.
3. Where the School needs parental consent, the School will clearly explain how the photograph and/or video will be used to both the parent/carer and student.

Uses may include:

1. Within school on notice boards and in school magazines, brochures, newsletters, school banner etc.
2. Any outside external agencies such as the school photographer will sign a return of image data to BSB British International Primary School where all images will be deleted from their storage after the contract has finished and no image shall be used for any other means.
3. Online on our school website or social media pages but not on any staff social media pages
4. Parents are asked to fill out a consent form each year. The school makes it clear that consent can be withdrawn at any time. If consent is withdrawn, the school will delete the photograph or video and not distribute it further, but cannot retrieve any media which is already in the public domain.
5. When using photographs and videos in this way the school will not accompany them with any other personal information about the child, to ensure they cannot be identified.
6. The school understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.
7. The school will always indicate its intentions for taking photographs of pupils, if permission is already granted in the consent form the school will not request permission again before publishing in school media eg posters Facebook website.
8. The consent form gives the school the right to use images/video footage of pupils in a publication, or any way as described in this section such as the school website, newsletter, prospectus, or recordings of school plays or shows etc
9. Images captured by individuals for recreational/personal purposes such as Christmas show or any other event, and videos made by parents for family use, are exempt from the PDPA.
10. Images taken during events by parents are exempt, Parents will be made aware that photos may be taken and are free to withdraw their child from the event.

Q. CCTV

1. The School uses CCTV in various locations around the school site to ensure it remains safe.

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2. The Security videos are kept on a 30 days storage loop and then deleted.
3. The School does not need to ask individuals' permission to use CCTV, but makes it clear through visible signs both at the entrance and on site in different locations where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.
4. Any enquiries about the CCTV system should be directed to the School Manager.

R. Website Cookies Policy

Types of Cookies Used

- **Essential Cookies:** Necessary for the website to function and cannot be switched off. They are set in response to actions made by the user, such as setting privacy preferences, logging in, or filling in forms.
- **Performance Cookies:** Collect information about how visitors use the website, which pages are visited most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor.
- **Functionality Cookies:** Allow the website to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personal features.
- **Targeting Cookies:** Record your visit to the website, the pages you have visited, and the links you have followed. This information is used to make the website and the advertising displayed on it more relevant to your interests.

Consent and Control

- **Users can control the use of cookies through their browser settings.**
- Any cookie consent management platform being used should be mentioned here.
- Users can withdraw their consent at any time.

S. Staff Training

All staff and board members are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.

Contact Data Protection Officer (DPO)

Our DPO oversees data protection strategy and compliance. Contact details:

BSB British International Primary School

36/ 36-1 Sukhumvit Soi 4, Klong Toey, Bangkok, 10110, Thailand.

Tel. (+66)026569961

E-mail address: dpo@bsbangkok.ac



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Policy Review and Amendments

This policy is reviewed regularly and may be amended to remain compliant with legal changes or best practices.

Queries

For any questions or concerns regarding our data handling practices, please contact our DPO.