



Assumption University Announcement

No.12/2023

Subject: Personal Data Protection Policy B.E. 2566 (2023)

To ensure the Data Subject whose Personal Data is collected, stored, used or disclosed by the University's Personal Data processing is conducted in adherence to transparency and in accordance with the Personal Data Protection Act B.E. 2562 (2019) including related legislations, the President - Rector Magnificus, by the virtue of Section 43 of the Private Institution of Higher Education Act B.E 2546 (2003), as amended (No.2) B.E. 2550 (2007), hereby issues the Personal Data Protection Policy as delineated below:

No.1 Assumption University Announcement No.9/2564 (2021) pertaining to the Personal Data Protection Policy B.E. 2564 (2021) is hereby repealed and replaced by this current Announcement.

No.2 In this Announcement,

"University"	means	Assumption University;
"President - Rector Magnificus"	means	President - Rector Magnificus of Assumption University;
"Division"	means	faculty, institute, major/department, center, office;
"Personal Data"	means	information about a person who can be identified either directly or indirectly, but not including information of a deceased person;
"Personal Data Processing"	means	the collection, storage, use, or disclosure of Personal Data, or any sequence of activities carried out on Personal Data, whether automated or not. These activities encompass the recording, arrangement, structuring, retention, changes or adjustment, as well as reception, use, or disclosure by transferring or disseminating any actions to cause the availability, arrangement or merging, as well as the removal, erasure, or damage of Personal Data;
"Personal Data Controller"	means	a person who has power and duty to make decisions regarding the collection, storage, use, or disclosure of the Personal Data;
"Personal Data Processor"	means	the University's personnel who carry out the Personal Data Processing in accordance with the order of the Personal Data Controller;
"Data Subject"	means	students, personnel, alumni, and individuals including persons with parental power to act on behalf of minors, or custodians with power to act on behalf of the incompetent, or curators with power to act on behalf of the quasi-incompetent;

Continued page 2 / "Personal..."



“Personal Data Protection Officer” means a staff, appointed by the University, for protecting Personal Data.

No.3 The University assigns the Vice-President, registrar, deans, and directors as Personal Data Controller.

No.4 Personal Data Processing
 The University processes Personal Data of the Data Subject in a lawful and appropriate manner, by collecting only necessary data required for operations and services, in accordance with the University’s legal obligations and policies that are notified to the Data Subject, and the consent is acquired from the Data Subject before collecting the Personal Data, such as name, email address, phone number, LINE IDs, national identification number, photograph, ethnicity, religion, and any business activity or transactions. The University shall maintain the confidentiality of such data.

No.5 Purposes and legal bases for Personal Data Processing
 The University processes Personal Data for multiple purposes, as authorized on legal bases, contingent upon the nature of the services or activities, the relationship between the Data Subject and the University, or specific contextual considerations. These purposes are as follows:

Purpose of Personal Data Processing	Legal Basis
<ol style="list-style-type: none"> 1. To collect, use, and disclose Personal Data of the Data Subject, such as general information including general Personal Data and sensitive Personal Data. 2. To benefit marketing and advertising implementation that is related to curricula, activities, or services of the University via various channels. 3. To send or transfer Personal Data of the Data Subject to a foreign country by sending or transferring the data only if the University has established a Memorandum of Agreement for a Personal Data exchange with a foreign institution or organization. 	Consent
<ol style="list-style-type: none"> 1. In order for the University’s operations to comply with relevant laws, criteria and regulations, such as the Higher Education Act B.E. 2562 (2019), the Private Higher Education Institution Act B.E. 2546 (2003), the Computer Crime Act B.E. 2560 (2017), the Electronic Transactions Act B.E. 2544 (2001), the Social Security Act B.E. 2533 (1990), the Personal Data Protection Act B.E. 2561 (2018), tax laws, rules, regulations, orders, and cabinet resolutions, as well as actions directed by officials or courts. 	Legislation Obligations
<ol style="list-style-type: none"> 1. For the Data Subject’s registration and identity verification in an application for or use of services provided by the University. 2. For establishing any agreement and contracts related to the provision of services or other relationships between the Data Subject as well as the University, as well as managing and supporting transactions, administration, and other activities related to the mentioned relationship with the Data Subject, as well as for carrying out actions according to the Data Subject’s needs. 	Contracts and Compliance with the Contracts



Purpose of Personal Data Processing	Legal Basis
3. For employment, including the verification and authentication of identity for access to work and the University's systems and various premises, remuneration payment and welfare, human resource management, and enrollment in various training courses, and so forth. 4. For recording information of donations or various supports.	
1. For measuring, evaluating, and analyzing data related to use of the University's services, as part of information to support the development and enhance the effectiveness of the University's services and operations in various aspects. 2. For maintaining safety and orderliness within the University. 3. For exercising the rights of the University and safeguarding the University's interests when necessary and law-abiding, such as investigating, preventing, and responding to various complaints. 4. For ensuring the compliance with the University's rules, regulations, directives, and policies. 5. For administration and preparation of an internal policy report with the University. 6. For administering the website, enhancing user-friendliness, redesigning layout, and improving content on the University's website. 7. For communication and coordination in emergency and general situations. 8. For recruitment, selection, verification, and employment of personnel, including procurement. 9. For education, research, statistical analysis, and the improvement of various services or operations in accordance with the mission of the University. 10. For the benefit to higher educational institutions, schools, agencies, or organizations that request to check or review data with the University regarding the education or work of Data Subject.	Legitimate Interest
1. For education, research, or statistical analysis in accordance with the mission of the University.	Research

In the event that there is a change of purpose or policy, the University will announce it on the University's website or via email or other channels, by circumstance. The objectives of policy changes will be clearly informed.

No.6 Personal Data sources processed by the University are detailed below.

1) The Personal Data which the University directly obtains from various channels, such as student enrolment process, registration, job applications, signing contracts, documents, surveys, or use of products, services or other service channels controlled by the University; or when the Data Subject contacts with the University on site or via other communication channels under control by the University, and so forth.

2) The data the University acquired from the Data Subject's access to the website, products, or other services, in accordance with a contract or mission, such as tracking website usage behavior, use of the University's products or services using Cookies or software on the device of the Data Subject, and so forth.

3) Personal Data can be obtained by the University from sources other than the Data Subject. The mentioned sources of such data must have legal authority, legal reasoning, or obtained consent from the Data Subject for the University to disclose the information such as the digital linkage services of government agencies providing the benefits of comprehensive public services for the Data Subject; the process of receiving Personal Data from other government agencies as the University has a duty according to its mission to establish a central data exchange center to support the operations of government agencies in delivering public services through digital systems; the necessity to provide contractual services in the event that the Personal Data may be exchanged with a contractual partner agency.

The mentioned sources are also meant that the Data Subject provides another person's Personal Data to the University. In this case, the University will process the data for the benefit of that person or the Data Subject. The data provider, however, is responsible for informing that person of the details in accordance with this policy and must seek consent from that person in case the consent is required for the disclosure of data to the University.

No.7 Personal Data Types processed by the University

The University establishes a general framework for processing Personal Data as follows:

Type	Details and Examples
7.1 Personal Information	Information identifying identity of the Data Subject, such as title, name, surname, middle name, nickname, signature, national ID card number, nationality, driving license number, passport number, information of house registration, business license number, professional license number (if any), insured identification number, social security number, and so forth
7.2 Personal Description	Detailed information of the Data Subject, such as birthday, gender, height, weight, age, marital status, military status, photo, language ability, information of bankruptcy, information of being an incompetent or a quasi-incompetent, and so forth
7.3 Personal Contact Information	Information for contacting with the Data Subject, such as homephone number, mobile phone number, fax number, email address, postal address, username on online society (Line ID, MS Teams), accomodation location map, and so forth
7.4 Information of Work and Experience	Employment details including work history and educational history, such as type of employment, occupation, rank, position, duties, expertise, status of work permit, reference information, tax ID number, position history, salary information, starting date, resignation date, assessment results, welfare and benefits, and parcels in possession of operators, work performance, bank account number, educational institution, educational background, academic performance, graduation date, and so forth
7.5 Information of Insurance	Details of the Data Subject's insurance policy, such as the insurer, the insured, the beneficiary, insurance policy number, policy type, coverage cap, claims information, and so forth
7.6 Information of social relationship	Information of the Data Subject's social relationship, such as political status, political position, position in a committee, relationships with the University's operators, information of being a holder of the University's employment contract, information of being a stakeholder in business with the University, and so forth

Type	Details and Examples
7.7 Sensitive Personal Information	Religion, ethnicity, crime history, health information (e.g., blood group, health history), disability, genetic or biometric data (e.g., fingerprints, facial recognition data), political views, and other details of similar nature

No.8 In the event that the Data Subject refuses to provide information necessary for the University's operations, it may result in the University being unable to provide services or it may result in the Data Subject's rights being restricted, either in full or in parts.

No.9 Cookies

The University collects and uses Cookies including other technologies, with the same nature on the website, under the University's control, such as via www.au.edu or on the device of the Data Subject upon his/her use of service. To operate security process for use of the University services and to provide convenience to the Data Subject, as the user, the University will use the data for improving the University website to meet Data Subject's needs. The Data Subject can configure or delete Cookies usage himself/herself through the settings in a Web Browser.

No.10 Personal Data of the incompetent

According to the operations under Section 4, the University will process Personal Data solely for the Data Subject who has the capacity to perform legal actions. The process will also be conducted for persons who attain legal age by marriage or minors who appear to have the same legal capacity as majors only under Section 27 of the Civil and Commercial Code. Exceptionally, in case of a necessity to process Personal Data of minors, the quasi-incompetent, or the incompetent, the University must seek for consent, as the first priority, from a person who is legally authorized to act on their behalf.

No.11 Disclosure of Personal Data of Data Subject

According to the purpose indicated in Item 4, the University may disclose the Data Subject's Personal Data as follows:

Recipient	Details
11.1 Government agencies or authorities whose data the University must disclose, for the purpose of legal compliance or other important purposes (e.g., actions for public interest)	The agencies that enforce laws, or have power of control and supervision, or have other important purposes, such as Ministry of Higher Education, Science, Research and Innovation, Ministry of Labor, Department of Provincial Administration, Revenue Department, Royal Thai Police, Courts, Office of Attorney General, Department of Disease Control, Ministry of Digital Economy and Society, Department of Consular Affairs, Student Loan Fund, etc.
11.2 Contractual parties operating welfare of the University's operators and students	External service providers hired by the University to manage welfare services, such as insurance companies, hospitals, banks, telecommunications service providers, etc.
11.3 Business partners	The University may disclose the Data Subject's information to individuals collaborating with the University for providing services to the Data Subject, such as service agencies with which the Data Subject contacts through the University's services, marketing service providers, advertising service providers, financial institutions, platform service providers, telecommunications service providers, etc.

Recipient	Details
11.4 Service providers	The University may appoint other individuals to provide services or support the University's operations, such as service providers providing data storage (e.g., cloud, document warehouse), developers of systems, software, applications, and websites, document delivery service providers, payment service providers, internet service providers, telecommunications service providers, digital ID service provider, social media service providers, risk management service providers, external consultants, transportation service providers, etc.
11.5 Other types of recipients	The University may appoint other individuals to provide services or support the University's operations, such as service providers providing data storage (e.g., cloud, document warehouse), developers of systems, software, applications, and websites, document delivery service providers, payment service providers, internet service providers, telecommunications service providers, digital ID service provider, social media service providers, risk management service providers, external consultants, transportation service providers, etc.
11.6 Disclosure to public	The University may disclose the Data Subject's information to public if necessary, such as announcement of appointment and declaration of honor.

The types of recipients specified above are only a general framework for disclosure of Personal Data by the University, specifically to those recipients who are only related to the product or service to which the Personal Subject uses or has a relationship.

No.12 Sending or transferring Personal Data to a foreign country

The University may have a necessity to send or transfer Personal Data of the Data Subject to a foreign country for achieving the University's purposes and mission stated above. The University hereby certifies that Personal Data of the Data Subject shall be sent or transferred using appropriate and secure methods to protect the Personal Data of the Data Subject as stipulated by the Personal Data Protection Act B.E. 2562 (2019), under agreement on confidentiality and personal data privacy possibly including the following cases.

- (1) A legitimate action
- (2) A necessity for compliance with a contract in case the Data Subject is the partner to the University, or with a request by the Data Subject before establishing that contract
- (3) A contractual action of the University to another person or legal entity, beneficial for the Data Subject
- (4) An action to prevent or suppress danger to life or the health of Data Subject or of other persons
- (5) A necessity for operating the mission for important public interest

No.13 Personal Data Retention

The University shall retain Personal Data of the Data Subject as long as the data is necessary according to the purposes for collection specified only in the policy, announcement, or relevant laws. However, when the period has elapsed and Personal Data of the Data Subject is no longer necessary for the stated purposes, the University shall delete, destroy Personal Data of the Data Subject, or make the Personal Data no longer identifiable, according to Personal Data deletion and destruction shall be announced by the committee or law, or international standards. Nevertheless, in the event of a dispute, the exercise of rights or lawsuits related to the Personal Data, the University reserves the right to continue retaining that data until the dispute has a final order or judgment.

No.14 Personal Data Security

The University has appropriate measures for Personal Data security to prevent loss, access, use, changes, modification or disclosure of Personal Data without authority or legitimacy, by which an announcement regarding the measures of Personal Data security will be made.

No.15 Data Subject Rights in compliance with the Personal Data Protection Act B.E. 2562 (2019)

The Data Subject has rights to his/her Personal Data under the Personal Data Protection Act, and the University respects the rights by strictly complying with the relevant laws, rules or regulations related to collecting, using, and disclosing Personal Data. The Data Subject may exercise the following rights as the owner of Personal Data unless the University has legitimate grounds to reject the Data Subject's request.

(1) Right to consent withdrawal: The Data Subject has the right to withdraw the Data Subject's consent. However, the withdrawal shall not affect the collection, use, and disclosure of Personal Data to which the Data Subject has already given consent.

(2) Right to access: The Data Subject has the right to access and acquire a copy of his/her Personal Data that the University has collected.

(3) Right to data portability: The Data Subject has the right to acquiring his/her Personal Data from the University or accessing to his/her Personal Data in a format that can be read and used in general by a tool or equipment working automatically and that can be used or disclosed by an automatic method. This right includes the right to request the University to send or transfer Personal Data of the Data Subject to an outsider or to obtain Personal Data that the University has sent or transferred to an outsider.

(4) Right to objection: The Data Subject has the right to object to the collection, use, and disclosure of his/her Personal Data that the University carries out under legitimate interests under the law or for the purposes related to direct marketing, education, scientific research, history, and statistics.

(5) Right to erasure: The Data Subject has the right to request the University to delete, destroy, or anonymize his/her Personal Data in case the University no longer needs it or no longer has legal right to retain such personal information.

(6) Right to restriction: The Data Subject has the right to request the University for restricting the use of Data Subject's Personal Data in the event that the Personal Data is undergoing verification, or while the University is considering the request for the right to make objection or in case a request is made to the University to suspend the use of Personal Data instead of deleting or destroying it.

(7) Right to rectification: The Data Subject has the right to request the University to ensure that the Data Subject's Personal Data is accurate, current, complete, and not misleading.

(8) Right to complaints: The Data Subject has the right to lodge a complaint with the Office of the Personal Data Protection Commission if the University does not comply with the Personal Data Protection Act. However, by exercising this right according to this section, the University seeks for cooperation from the Data Subject to file a complaint with the Personal Data Controller or the University's Personal Data Protection Officer in order to acknowledge, correct, or alleviate a problem of the Data Subject in the first place.

No.16 Penalties for noncompliance with the Personal Data Protection Policy

Failure to comply with this policy may result in an offense and a disciplinary action according to the University's rules. (For those assigned under item 3 or staffs or the University's operators) or according to Personal Data Processing agreement (for the Personal Data Processor). This depends on the case and the relationship the Data Subject has with the University and the penalty is by the Personal Data Protection Act B.E. 2562 (2019), including secondary law, rules, regulations, and related orders.

No.17 Amendment of the Personal Data Protection policy

The University may consider updating, amending or changing this policy as it deems appropriate and shall notify the Data Subject via the website www.au.edu including the marked effective date of each revised. Nevertheless, the University advises the Data Subject to regularly check and be aware of the updated policy, especially before the Data Subject's disclosure of Personal Data to the University.

No.18 Contacts for inquiries or use of rights

If the Data Subject has questions, suggestions, or concerns about the collection, use, and disclosure of Personal Data by the University or about this policy; or the Data Subject would like to exercise his/her rights under personal data protection laws, the Data Subject can contact and inquire at:

(1) Data Controller

- Name: Assumption University
- Contact location: Assumption University
- Contact channel: email : abac@au.edu

2) Data Protection Officer (DPO)

- Contact location: Office of the Vice President for Legal and Privilege Affairs
- Contact channel: email : audpo@au.edu
- Phone number: 081 8409068 , ,

Announced on August 7, 2023

Rev. Bro. Bancha Saenghiran, f.s.g., Ph.D.

Rev. Bro. Bancha Saenghiran, f.s.g., Ph.D.
President - Rector Magnificus

Note: If this announcement is to be interpreted, the Thai version shall prevail.