

Data Subject Request Policy

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(Draft)

Data Subject Request Policy

This Data Subject Request Policy acts as a guideline for processing a request by a data subject who seeks to exercise their rights under the Personal Data Protection Act B.E. 2562.

1. Personal Data

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.

2. Data Controller

Data Controller is Bangkok Dusit Medical Services Public Company Limited. The Data Protection Officer (DPO) is <Name of the Department>.

3. Lawful Basis for Processing Personal Data

Lawful basis for processing personal data contains the following basis:

- (1) Legal Obligation
- (2) Contract
- (3) Public Task
- (4) Legitimate Interest
- (5) Vital Interest
- (6) Consent

4. Rights of the Data Subject under the Personal Data Protection Act B.E. 2562

The data subject is provided with the following rights:

- (1) Right to withdraw consent: the data subject has the right to withdraw consent for the Company to process their personal data any time that such personal data is retained with the Company;
- (2) Right of access: the data subject has the right to access their personal data and to request that the Company makes copies of the same, as well as request that the Company discloses any acquisition of their personal data for which they had not given consent;
- (3) Right to rectification: the data subject has 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: the data subject has the right to request that the Company erases their personal data, for certain reasons;

(5) Right to restriction of processing: the data subject has the right to request that the Company suspends the use of their personal data, for certain reasons;

(6) Right to data portability: the data subject has the right to request for a transfer of personal data to another data controller, or to themselves, for certain reasons;

(7) Right to object: the data subject has the right to object to the processing of their personal data, for certain reasons;

Table of summary of rights of a Data Subject stipulated under Personal Data Protection Act B.E. 2562

Lawful basis for processing personal data	(1) Right to withdraw consent (Section 19)	(2) Right to access (Section 30)*	(3) Right to rectification (Section 36)	(4) Right to erasure (Section 33)*	(5) Right to restriction of processing (Section 34)*	(6) Right to data portability (Section 31)*	(7) Right to objection (Section 32)
Consent (Section 24 or Section 26)	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Research or statistics (Section 24(1))	N/A	Yes	Yes	No	Only in the case that it is no longer necessary to use such personal data	No	Yes***
Vital interest (Section 24(2))	N/A	Yes	Yes	Only in the case that it is no longer necessary to use such personal data	Only in the case that it is no longer necessary to use such personal data	No	No
Contract (Section 24(3))	N/A	Yes	Yes	Only in the case that it is no longer necessary to use personal data	Only in the case that it is no longer necessary to use personal data	Yes	No
State authority or public interest (Section 24(4))	N/A	Yes	Yes	Only in the case that it is no longer necessary to use such personal data**	Only in the case that it is no longer necessary to use such personal data	No	Yes***
Legitimate interest (Section 24(5))	N/A	Yes	Yes	Only in the case that it is no longer necessary to use such personal data**	Only in the case that it is no longer necessary to use such personal data	No	Yes***
Legal obligations (Section 24(6))	N/A	Yes	Yes	Only in the case that it is no longer necessary to use such personal data	Only in the case that it is no longer necessary to use such personal data	No	No
Direct marketing	Yes	Yes	Yes	Yes	Yes	No	Yes

Table 1: Summary of Rights of the Data Subject Stipulated Under the Personal Data Protection Act, B.E. 2562

N/A = Not Applicable

* Personal Data Protection Committee may prescribe further rules.

** If the request will be rejected, the rejection of the request shall be recorded with reasons of such rejection.

*** Unless there are more important lawful grounds or it is required by legal obligations or it is to create legal claims., the Data Controller can reject the request. In such case, the rejection of the request shall be recorded with reasons of such rejection.

5. Procedures for Submitting Request to Exercise the Data Subject Rights

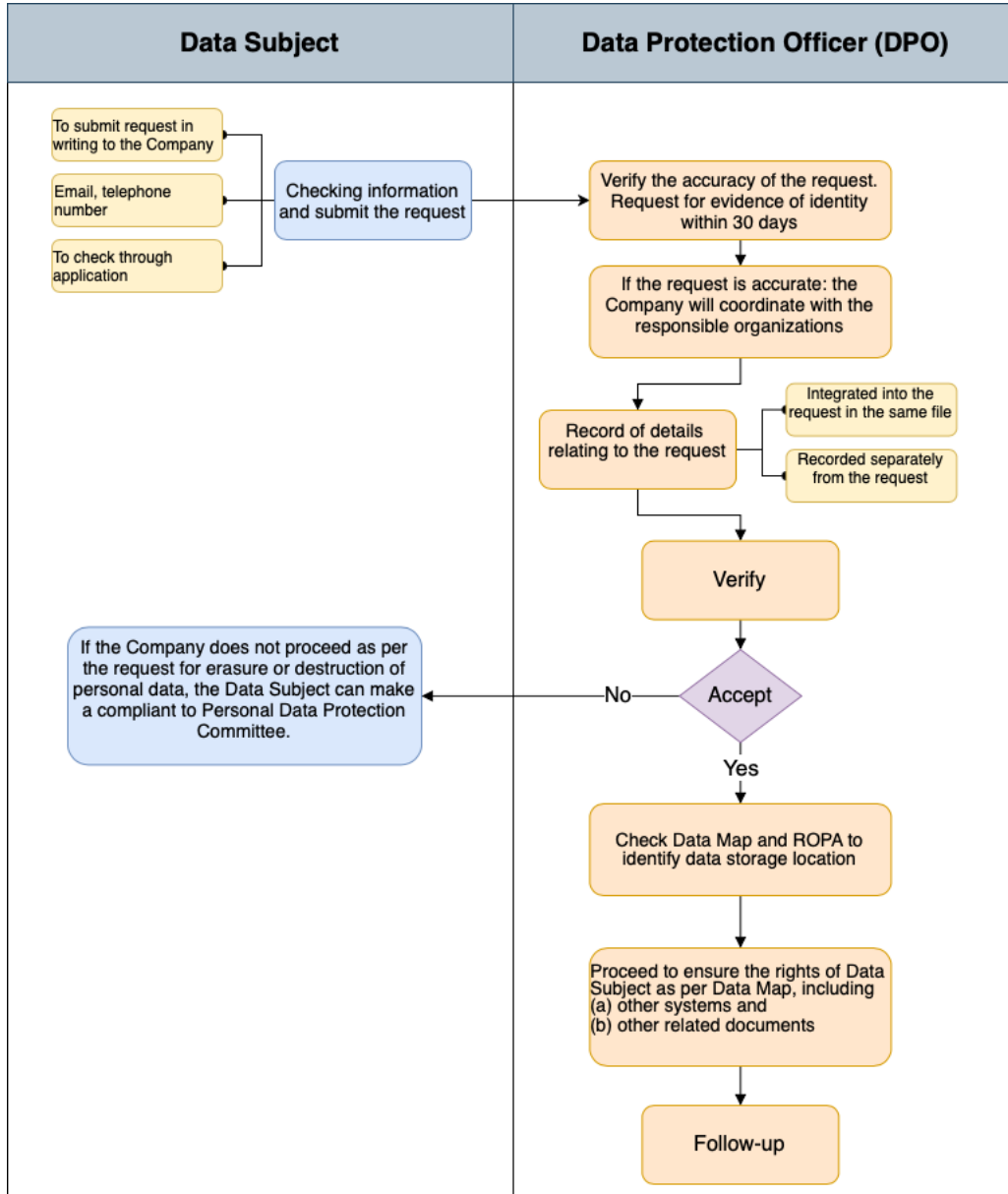


Figure 1 Procedures for Submitting Request to Exercise the Data Subject Rights

A Data Subject can exercise their rights in accordance with the law and request that Bangkok Dusit Medical Services Public Company Limited process their request with the following procedures:

- (1) A Data Subject can exercise their rights through the following channels:
 - (1) Submitting a request in writing to Bangkok Dusit Medical Services Public Company Limited
 - (2) Submitting a request through [Name of the channel], including <email> Telephone <Telephone number>

- (3) Check his or her personal data by himself or herself through <Name of mobile application or website>

Upon receipt of the request, the officer or <Name of department> department shall forward such request to Data Protection Officer (DPO) and provide a record of such request in <Name of device> to proceed the next steps immediately.

- (2) DPO will to proceed to verify the accuracy of the request and will verify the identity of Data Subject from the verification documents received.
- (3) If the request of the Data Subject is accurate, DPO shall contact responsible organizations to check the requested personal data and to collect necessary data.
- (4) DPO records the requested details, such as receipt date, name of the requesting Data Subject, name of the officer who receives the request, etc. Record of the requested details may be provided and prepared in the form of:
 - 1) Being integrated in the same file as the request of the Data Subject; or
 - 2) Being recorded in a document or in a system separately from the request of the Data Subject, which may be prepared in tables having details of receipt date, name of the requesting Data Subject, name of the officer who receives the request, the request's progress, etc.
- (5) In a case that DPO accepts the request, the relevant department shall check Data Map in order to record that the rights of the Data Subject have been responded in the Data Map, including other systems and other related documents.
- (6) DPO will follow up responses to the request of each Data Subject to check if the Data Subject is sufficiently responded or not.
- (7) In a case that the request is rejected, DPO shall provide a record of the rejection of the request and reasons in accordance with Section 39 of the Personal Data Protection Act B.E. 2562.
- (8) DPO shall respond the decision (accept or reject the request) to the Data Subject within 30 days upon the receipt of such request. In addition, this data subject right request process will also be recorded in the quality assessment system.

Guidelines for Privacy Champion

1. Being assigned to as a Privacy Champion, he or she needs to be familiar with rights of the Data Subject in order to understand various rights prescribed by law.
2. If the Privacy Champion has received a request, he or she shall inform the Data Subject of a formal channel which will be used for proceeding his or her request. In case that the Data Subject cannot gain access to such channel, the Privacy Champion shall submit the request on behalf of the Data Subject.
3. If the Data Champion is required by the DPO to proceed as per the request of the Data Subject, he or she shall proceed as such immediately since proceeding as per the request is subject to the strictly limited timeframe.

Additional Issues

1. Timeframe for proceeding a request

The organization shall proceed as per the request of a Data Subject within the maximum timeframe of 30 days as from the date of the receipt of such request.

2. Expenses for proceeding a request

The organization shall not charge any expenses on the Data Subject who submits a request relating his or her privacy rights. Exception may apply in case that it is a request for a special and complicated matter; however, will be considered by the DPO.

3. Third-party organization who is a Data Controller

The DPO shall contact Customer Relations Manager of the third-party organization to ask for help in coordinating with a supplier to obtain information necessary for proceeding as per the request of the Data Subject.

4. What will happen if personal data has been bought by a third party?

In case the any third parties can control and/or process personal data of the Data Subject who submits the request to the DPO, the DPO shall proceed as it deems appropriate to inform such third party and submit the request for erasure, destruction, or change of such personal data to the third party.