

## Privacy Policy

Thai Institute of Directors (“**IOD**”) considers the privacy of your Personal Data and commits to treat all Personal Data with security and confidentiality, and collect, retain, use, and disclose the Personal Data in accordance with this Privacy Policy (“**Privacy Policy**”), conform with the Personal Data Protection Act B.E 2562 (2019) (“**PDPA**”) and the applicable laws.

You should review this Privacy Policy together with the Privacy Statement which IOD has prepared for to a specific data subject, which are the persons related to IOD as follows: (a) personnel (b) members, representatives of the juristic members, participants or authorized representatives, and coordinators (c) directors who are members of committees; (d) vendors, including persons related to (a) – (d) (collectively referred to as “**Privacy Statements**”), and will provide to you for your consideration by any means. In this regard, the terms of this Privacy Policy will apply in addition to the Privacy Statements and does not cancel, supersede, or change any provision of the Privacy Statements. If there are conflicts or inconsistencies, the terms of this Privacy Statement shall prevail, as IOD has specifically provided it to you for your consideration whether to give your consent to these specific purposes or not.

### 1. Types of Personal Data

“**Personal Data**” means any data relating to an individual which can identify such individual, directly or indirectly, excluding the data of a deceased individual or any other term, under its definition of the PDPA.

IOD may collect and use your Personal Data as follows:

- 1.1. Identity Data e.g., name, last name, nickname, gender, age, date of birth, nationality, photo, video record, identification or passport number, marital status, position, company or organization’s name, vehicle registration, details of related persons e.g., family members or any other identity data with the similar nature.
- 1.2. Sensitive Data e.g., health data and medical conditions.
- 1.3. Contact Details e.g., registered address, workplace location, telephone number, email, social application e.g., Lind ID/Facebook or any other details with the similar nature.
- 1.4. Membership Data e.g., membership number, class of membership, activities history, and the start and end date of membership.
- 1.5. Employment Data e.g., position, salary or other compensation, welfare and benefits under the employment contract, reimbursement history, working time record, working duration, overtime, absenteeism and leaves, performance appraisals results and any other assessment results, complaints, petitions, investigations, and disciplinary action.
- 1.6. Financial Data e.g., bank account number, account details, compensation, credit or debit card details, tax details, tax allowance, and transaction with IOD.
- 1.7. Preference and Lifestyle Data e.g., preferred sport or activities.
- 1.8. Qualification Data e.g., education background, work experience and record, skills, expertise, achievements/honorable awards, and any other details with the similar nature.
- 1.9. Security Data e.g., CCTV record or any other similar nature for the IOD’s security.
- 1.10. Information Technology Data means log files, IP address, Cookies, and any other with the similar nature.

If you wish to work with, become a member, carry out activities, enter into a contract or perform any actions with IOD, IOD is required to collect your Personal Data. If you deny to provide the Personal Data, IOD may not be able to enter into a contract with you, perform any actions requested by you or comply with the obligations under contracts, and IOD may fails to comply with its legal obligations.

If you provide the Personal Data of the third parties to IOD, you affirm that this Privacy Policy have been reviewed by such third parties, and that such third parties have consented to the processing of their Personal Data in line with this Privacy Policy. You have to present the consent letter of such third parties to IOD, as may be requested.

For the Personal Data collected before 1 June 2021, IOD will process such Personal Data in compliance with the PDPA. If you do not wish for IOD to further collect and use such Personal Data, you can withdraw your consent at any time by contacting IOD or the Personal Data Protection Officer as detailed in Paragraph 15.

## 2. Collection of Personal Data

IOD may, directly collect your Personal Data or other means, including the following:

- 2.1. **Application Form, Acceptance Form, Registration Form and/or any other documents:** e.g. membership and chartered director registration application, membership renewal application, and course, training, seminar or any other activities registration form, business card, ID card, passport as well as sponsorship confirmation letter, participation confirmation in attending IOD's activities, any order forms, including any other documents you have submitted to IOD; or through the IOD's website or applications or other social medias.
- 2.2. **Any communication with IOD:** e.g., direct conversation or via telephone, email, fax, post or messaging applications e.g., Line/Facebook or other social media, etc., including contacting via any internet network such as the IOD's website or applications or which is administered by IOD.
- 2.3. **Website and Application:** IOD may collect your Personal Data when you visit the IOD's website and applications by collecting Cookies or similar technologies, including when you use the service or access to the IOD's internet network.
- 2.4. **Persons Associated with You:** IOD may collect your Personal Data from your coordinator, secretary, contact person or any other person related to you, such as an attorney, legal representative, family members including referrals or persons working with you.
- 2.5. **Other Persons, Companies or Entities:** e.g., members of IOD, certified companies, sponsors of IOD, including any other service providers working with IOD. The Personal Data may be acquired by direct requests or from available for public, including other agencies or organizations such as the Federation of Accounting Professions under the Royal Patronage of His Majesty the King, the Stock Exchange of Thailand, and the Securities and Exchange Commission.
- 2.6. **Public Resources:** IOD may collect your personal information from public sources such as government agencies, competent authorities, or public websites.

## 3. Retention Period

IOD will retain your Personal Data within the period appropriate and necessary to achieve the purposes specified in this Privacy Policy, however, no longer than 10 (ten) years from (a) the termination of legal relation between you/your related persons; (as the case may be) and IOD; or (b) the date on which IOD received the Personal Data from you.

Nevertheless, IOD may continue to retain your Personal Data as long as (a) it is permitted by PDPA and/or any applicable laws, (b) IOD is under certain legal relation with you, (c) IOD complies with the legal obligation to retain the Personal Data, (d) you have given your consent to IOD, or (e) it is lawfully necessary to complete the purposes of this Privacy Policy.

## 4. Purposes of Personal Data Processing

The Personal Data shall be collected, used and disclosed only for the purposes stated below, including any other purposes as stated in the Privacy Statements, or you have granted your consent to such purposes, or any other purposes as required in the PDPA and/or any applicable laws.

### 4.1 Lawful Basis

- (a) To comply with the legal requirements of relevant laws such as the PDPA, Civil and Commercial Code concerning the IOD's obligations, Revenue Code, Accounting Act. B.E. 2543 (2000), Labor Protection Act B.E. 2541 (1998), Social Security Act. B.E. 2533 (1990), Occupational Safety, Health and Environment Act B.E. 2554 (2011), Communicable Disease Control Act B.E. 2558 (2015), etc.
- (b) To comply with the court's decisions.

### 4.2 Contractual Basis

- (a) To process your request prior to entering into a contract such as assessment, consideration and recruitment of personnel or vendors of IOD.

- (b) To enter into a contract or have transaction with you, and to perform any obligation thereunder or comply with your instructions as you are entitled by such contract, such as coordination, assignment under contractual obligation, and payment.
- (c) To carry out a membership application, such as membership registration and payment of membership fee, preparation, and delivery of membership cards, including membership renewal, change of membership status, preparation of activities history, etc.
- (d) To conduct activities of which the data subject applied for a participation such as training, seminars, lectures, projects, or any other activities, including necessary procedures required for such activities such as preparation of participants list, preparation of food and parking area, and preparation of name tags for the participants, etc.
- (e) To disclose the Personal Data of participants to third parties such as venue providers and caterers, to provide services to the participants for that event.
- (f) To select directors and members of the working teams for IOD's activities, upon the confirmation or voluntary of such directors or working team members at that time.

#### 4.3 Legitimate Interest Basis

- (a) To recruit qualified person to work with IOD.
- (b) To perform personnel tasks, such as to collect and use candidate's information for future employment and for management and development of human resources.
- (c) To publish photos and videos of IOD's activity compilation for general public through the IOD's website or social medias or administered by IOD which is not targeted advertisement.
- (d) To disclose your Personal Data as a lecturer, speaker, article author to promote IOD's activities through the IOD's website or social medias or administered by IOD, including to send newsletters to members or a guest.
- (e) To verify the identity of vendors before entering into or performing the contract.
- (f) To collect information of representatives of the juristic person and communicate with business partners through such representatives of juristic person e.g., notification of payment.
- (g) To prevent, encounter and manage potential risks, supervise, and internally manage within IOD, including internally audit within IOD and to consult with legal, accounting, and tax advisors on relevant issues.
- (h) To maintain the security and information technology of IOD, prevent accidents and crimes, including to investigate illegal or harmful acts.

#### 4.4 Consent Basis

- (a) To perform personnel tasks, such as assigning personnel to hold the position with third parties or engaging with any activity with third parties, to certify employee status with third parties such as financial institutions or a new employer of personnel, and to supervise or act upon your request after a termination of employment.
- (b) To transfer your Personal Data to sponsors of IOD for their information and sponsorship disbursement.
- (c) To contact your referral to verify your information before entering into a contract.
- (d) To collect and disclose information of chartered directors on the IOD's website as public information and via the IOD Director Search system, which is limited to members of IOD to access information, including to disclose to those who are interested to contact with chartered directors.
- (e) To collect participants' information from the registration of trainings, seminars or any other activities and disclose to lecturers or speakers of such activities for the benefit of the activity management.
- (f) To collect and send or transfer information of participants from training, seminars, or any other activities, including project supports to sponsors of IOD for disbursement and/or for their information.

- (g) To collect and use for direct marketing, or advertising news or details of trainings, seminars, or any other activities for the purpose of marketing research to develop IOD's activities.
- (h) To proceed direct marketing, send newsletter or advertise activity details that might be your interesting.
- (i) To process the Personal Data for marketing research to develop IOD's activities.
- (j) To process the sensitive personal data, e.g., to process reimbursement or refund requests for medical expenses, and to keep evidence.

## **5. To Whom Personal Data is Disclosed**

Pursuant to the purposes stated in the Privacy Policy, Privacy Statements, the consent given by you, and any other purposes as permitted or required under the PDPA and/or any applicable laws, your Personal Data may be disclosed, or transferred to the third parties and/or government authorities as follows:

- 5.1. IOD's know-how sponsors and those who are interested in contacting with chartered directors.
- 5.2. organizations or agencies giving sponsorship to or associating with IOD e.g., UNDP-International, the Stock Exchange of Thailand, the Securities and Exchange Commission, etc.
- 5.3. organizations or agencies that IOD has carried out lectures, seminars, or trainings.
- 5.4. participants in trainings, lectures, seminars, or any other activities of IOD.
- 5.5. general guest or IOD's website visitors, including visitors of IOD's social medias and social applications.
- 5.6. various committees outside of IOD, e.g., the CAC committee, the CAC's certification committee, etc., including the secretary or coordinator of such committees.
- 5.7. government agencies and state enterprises e.g., the Revenue Department, Thailand Post, etc.
- 5.8. financial institutions such as commercial banks providing financial services to you or IOD and provident funds office.
- 5.9. insurance companies, including insurance brokers and other similar vendors and service providers.
- 5.10. service providers, vendors, suppliers, contractors, or sub-contractors who work with IOD to provide and supply IOD with services and products, such as information technology service providers, web and software development providers, airline operators and hotel operators, travel agents, couriers, marketing or data analysis or marketing research service providers, transaction service or payroll service providers, event organizers, location or food and goods services providers or other services
- 5.11. agents, agencies, representatives, marketing companies, and marketing research companies who work with IOD.
- 5.12. professional consultants such as accountants, lawyers and legal advisors, auditors, and internal auditors.
- 5.13. persons related to you, such as contact persons, secretaries, coordinators, including family members.

## **6. Cross-Border Transfer**

IOD may disclose or transfer your Personal Data to persons or entities located overseas, e.g., organizations supporting or conducting activities in association with IOD. This cross-border transfer shall be required only for the purposes stated in this Privacy Policy and Privacy Statements. IOD shall implement required and appropriate security measure for the cross-border transfer e.g., investigation of reliability and Personal Data protection standard of the overseas data receivers or enter into non-disclosure agreement with the overseas data receiver in the destination country.

In the event that the destination countries do not have the sufficient Personal Data protection standard, IOD shall ensure that the transfer of your Personal Data will be in accordance with the exemption as stated in the PDPA or other applicable laws.

## **7. Cookies**

Cookies are small data stored in your computer for collecting your log files e.g., your preferred language, system user or other setting preferences. IOD may collect Cookies and similar technologies when you interact or have any transaction with IOD via the internet network including the IOD's website or application.

Cookies and such similar technologies do not cause any harmful effects to your computer. Cookies are set its function by IOD and will terminate after connecting the log files with IOD. In this regard, collection, and preservation of Personal Data by IOD may use Cookies and similar technology for the purposes as follows:

- 7.1. to provide services and/or accesses to the IOD's website or application functions;
- 7.2. to increase effectiveness of the IOD's website or applications in providing online service;
- 7.3. to enhance IOD' effectiveness in recognizing and responding to you e.g., to recognize username, account, password or setting preferences when you visit or for your next visitation to the IOD's website or applications;
- 7.4. to analyze, improve and develop the operation of the IOD's website or applications;
- 7.5. to analyze your behavior for direct marketing;
- 7.6. to verify your identity and accuracy of your request on the IOD's website; and
- 7.7. to remain security of the information technology.

You may delete or deny Cookies to cease its function (for more detail, please visit [AboutCookies.org](http://AboutCookies.org)). If you delete or deny Cookies of its function, this may cause inconvenience to all or part of your website using.

## **8. Minors, Incompetent Persons or Quasi-Incompetent Persons**

To obtain consent for the collection, use and disclosure of Personal Data of minors in order to carry out any purposes that minors may not be able to perform independently as stipulated in the Civil and Commercial Code, IOD must obtain consent from the lawful parent. Unless the minor is under 10 years of age, IOD must obtain the consent from the lawful parent in all cases.

To obtain consent for the collection, use and disclosure Personal Data of incompetent persons, IOD must obtain consent from custodian who has the authority to act on his behalf only.

To obtain consent for the collection, use and disclosure of Personal Data of a quasi-incompetent person, IOD must obtain the consent from the curator who has the authority to act on his behalf only.

IOD may not know if the persons visiting the IOD's website and application are considered as a minor, incompetent person, or quasi-incompetent person and does not intend to collect the information of such persons. If IOD is aware that any person is a minor, incompetent person or quasi-incompetent person, IOD therefore will proceed without delay to obtain consent from the lawful parent, guardian, or curator (as the case maybe).

## **9. Surveillance Camera**

IOD uses surveillance cameras to capture footage of various events of visitors of IOD's office area for safety purpose, the prevention and detection of harms and accidents, and the investigation of crimes. However, IOD shall limit an access to the surveillance records only for the relevant persons.

## **10. Personal Data Security Measure**

IOD concerns the importance of maintaining the security of your Personal Data. Therefore, IOD has implemented appropriate security measures in order to protect your Personal Data, including control of an access, encryption, and storage with lock.

## **11. Data Subject's Rights**

Where permitted by the PDPA or applicable laws and under the relevant criteria/requirements specified thereunder, you have the rights with respect to your Personal Data to:

- 11.1. **Access and Obtain:** You have the right to access or request a copy of your Personal Data, which IOD is collecting, using, or disclosing of such Personal Data, including to disclose the acquisition of your Personal Data which IOD obtained without your consent.
- 11.2. **Data Portability:** You have the right to obtain your Personal Data, which IOD holds, in a structured, electronic format which is generally readable and applicable to tools or devices with automatic function to use or disclose the Personal Data by automatic means, and to send or transfer such Personal Data to third parties, or obtain the Personal Data which IOD has sent or transferred to the third parties, unless it is impossible to do so because of technical circumstances. The Personal Data shall be collected, used, or disclosed on the basis of your consent or to perform a contract with you, or the legal requirements.
- 11.3. **Objection:** You have the right to object the collection, use, and disclosure of the Personal Data in the case where your Personal Data is being processed for purposes of public task, legitimate interest, direct marketing or scientific, historical or statistic research.
- 11.4. **Deletion ('right to be forgotten'):** You have the right to request IOD to delete or destroy or de-identify your Personal Data.
- 11.5. **Restriction:** You have the right to restrict the processing of your Personal Data if IOD is under examination of your right exercising to rectify the Personal Data or object to the collection, use or disclosure of your Personal Data, or request IOD to restrict the use of Personal Data instead of deleting or destroying, or your Personal Data is no longer necessary but you request IOD to retain such Personal Data to establish, comply, exercise or defend legal claims.
- 11.6. **Rectification:** You have the right to have incomplete, inaccurate, misleading, or not up-to-date Personal Data which IOD collects, uses, or discloses about you rectified.
- 11.7. **File a complaint:** You have the right to file a complaint with the Personal Data Protection Committee if IOD or its personnel has violated or failed to comply with the PDPA.
- 11.8. **Withdraw Consent:** You have the right to withdraw consent to certain or all purposes given to IOD at any time, in accordance with the steps and procedure as stipulated by IOD. However, the withdrawal of consent shall not affect to the collection, use or disclosure of the Personal Data which you have lawfully consented before such withdrawal.

You may exercise these rights by contacting IOD or the Data Protection Officer as detailed in Paragraph 15.

If the withdrawal of consent causes any effect to you, IOD will inform such effect to you accordingly. Your withdrawal of any given consent shall not cause any impact on a conformity of the collection, use or disclosure on the basis of your consent prior to such withdrawal.

For the benefit of the Data Subject that IOD takes into account and commits to procure the security and protect the Personal Data, IOD may refuse to comply with your request if (a) the person submitting the request does not have evidence to verify that he/she is the data subject or does not has the authority to submit such request, (b) such request is unreasonable, e.g. the person submitting the request does not have legal grounds to exercise the rights or the Personal Data is not in the possession of IOD, (c) such request is superfluous, i.e. requests of the same nature or of the same content repeatedly without justifiable reason, (d) IOD has compelling legitimate grounds to reject such request as required or permitted by the PDPA and/or any applicable laws.

## 12. Privacy Policy of other Websites

This Privacy Policy applies only for the activities of IOD and the use of the IOD's website or applications. The IOD's website or applications may contain links to other websites or applications. If you access to other websites or application through such links, you must review the privacy policy of other websites or applications separately before filling out and submitting any Personal Data. IOD is not responsible for the processing of the Personal Data or the use of Cookies of such other websites that you have accessed through the IOD's website.

## 13. Amendment and Review

IOD will review this Privacy Policy on a regular basis to comply with the amendments to the PDPA and other relevant laws and review this Privacy Policy when necessary or there is any change in technology, in order to increase effectiveness of security. IOD will publish any change or revision of this Privacy Policy on the IOD's website as soon as possible.

#### **14. Miscellaneous**

This Privacy Policy is governed by and shall be construed in compliance with the PDPA and the applicable laws of Thailand.

#### **15. Contact Us**

Regarding all queries with respect to the Personal Data arising from this Privacy Policy, or the activities of IOD, including the exercise of any rights as set out in Paragraph 11, IOD and the Data Protection Officer can be contacted at the below address:

##### Thai Institute of Directors

To: Thai Institute of Directors Association  
Address: CMA. Building2, 2/9 Moo 4 Northpark Project, Vibhavadi-Rangsit Road, Thung SongHong, Laksi, Bangkok 10210  
Tel: +66-2-955-1155  
Email: iod-pdpa@thai-iod.com

##### Data Protection Officer

To: Ms. Nisa Jirapongwanich  
Address: CMA. Building2, 2/9 Moo 4 Northpark Project, Vibhavadi-Rangsit Road, Thung SongHong, Laksi, Bangkok 10210  
Tel: +66-2-955-1155 ext. 100  
Email: dpo@thai-iod.com

This Privacy Policy has been reviewed and shall be effective on May 5, 2021.