

## **PRIVACY NOTICE FOR PERSONAL DATA PROTECTION**

Kumon (Thailand) Co., Ltd. (“**Company**”) hereby issues this Privacy Notice (“**Privacy Notice**”) to you, as the parent / guardian of a student (“**Student**”) who has enrolled for the program (“**Kumon Program**”), which is under the supervision of the Company and the Kumon center at which the Student has enrolled (“**Kumon Center**”) (the Company and the Kumon center are collectively referred to as “**Kumon.**”) In this Privacy Notice, an explanation will be provided to you about the details of the collection, use, disclosure, and/or otherwise processing of the personal data about you and the Student (collectively referred to as the “**process**” or “**processing**”), in accordance with the Personal Data Protection Act B.E. 2562 (2019), as amended from time to time, as well as any rules, regulations, or notices issued thereunder (hereinafter referred to collectively as the “**Act**”). Since the Student is not yet of legal age, Kumon will ensure that this Privacy Notice includes the details relating to the processing of the Student’s personal data, so that you also know and understand how Kumon processes the Student’s personal data as well.

### **Where do we collect personal data about you and the Student**

#### **(a) Parent**

- (1) Your personal data will be collected from you directly, when you contact Kumon through various channels, such as on social media, email, website, telephone, or applications used for communication purposes, e.g. LINE application, or when you enroll the Student in Kumon Program, or when you give an interview in regard to the Student’s attendance in Kumon Program.
- (2) Your personal data will be collected from a Kumon center by the Company.

#### **(b) Student**

- (1) The Student’s personal data will be collected through you, as a parent / guardian who has enrolled the Student for Kumon Program.
- (2) The Student’s personal data will be collected from a Kumon center by the Company.
- (3) The Student’s personal data will be collected from the Student directly, in the event that the Student has completed certain forms to participate in activities, or gives an interview in regard to the Student’s attendance in Kumon Program.

### **What types of personal data are processed by Kumon**

#### **(a) Parent**

Kumon collects the following personal data about you:

- Personal data, including your first name, last name, signature, information on your identification card/passport, civil servant card number, nationality, date of birth, your relationship with the Student, and marital status;
- Contact information, including the telephone number, mobile phone number, fax number, address, email address, social media handle, and LINE application ID;
- Your work-related information, including occupation, title, work place, and work address;
- Your financial information, including credit card information, monthly income, and monthly expenses;
- Your photographs or videos which are taken by surveillance cameras installed in Kumon’s premises; and
- Audios, videos, and/or photographs.

#### **(b) Student**

Kumon collects the following personal data about the Student:

- Personal data, including the first name, last name, nickname, date of birth, gender, age, title, the Student’s relationship with guardian, number of siblings, and student identification number;
- Contact information, including the telephone number, mobile phone number, address, email address, social media handle, and LINE application ID;
- Education information, including the name of the school (country), level, learning outcomes, test results, curricular activities, record of awards received, language proficiency, date and reason for leaving Kumon Program (if applicable), conduct and behavior at Kumon center, and information regarding the Student’s program completion of Kumon Program;
- The Student’s photographs or videos taken by surveillance cameras which are installed in Kumon’s premises;
- Audios, videos, and/or photographs; and
- Record of mental and physical health, food allergies, and medical certificates.

### **What are the purposes of processing the personal data about you and the Student**

#### **(a) Parent**

- To prepare marketing information and customer information which is related to the provision of Kumon’s instruction and relevant materials;
- To publish and deliver newsletters, marketing materials, or sales promotion materials to you, both in printed and online form;

- To organize or coordinate events or activities, and to send invitations to join such events or activities;
- To prepare testimonials about experiences while in Kumon Program, publications, meetings, and seminars, as well as to publish articles in newspapers (both in printed and online newspapers), newsletters, social media, Kumon's website, and the LINE application;
- For the purposes of billing, collection, and payment;
- To secure or protect Kumon's rights, including any proceedings to demand the payment of outstanding debt to Kumon;
- To contact and communicate in regard to the Student and Kumon Program, and to answer any questions or complaints, and to conduct an inspection in the event of a complaint and conduct that may not be transparent;
- To conduct an act required by the provisions of the applicable laws, rules, or regulations;
- For the purposes of internal control, including auditing, financial, tax, and legal purposes;
- For the purposes of general management, retention of records, preparation of reports, and data analysis;
- To consider an application for partial tuition fee exemption.
- To protect and prevent danger or damage that may occur to Kumon's property, assets, personnel, and interests, and to protect and prevent you from any danger that may occur while you are in Kumon's place of business.

(b) Student

- To enroll the Student in Kumon Program;
- To develop learning materials and instruction which are used in Kumon Program, and to evaluate, analyze, and support the management, and the improvement and development of Kumon centers;
- To provide training and/or seminar sessions and educate Kumon's personnel in several aspects that are related to the provision of Kumon Program, so that such personnel understand the appropriate methods and instruction. The information is also used to improve and develop Kumon Program to ensure the Student fully gains benefit from Kumon Program;
- To provide the required tools and learning materials, and to provide care for the Student in Kumon Program;
- To observe, monitor, and record the Student's learning behavior, progress, and development while in Kumon Program;
- To evaluate learning outcomes and test results, and to assess knowledge and skills for the purpose of attending Kumon Program;
- To prepare marketing information and customer information which are related to the provision of Kumon's instruction;
- To publish and deliver newsletters, marketing materials, or sales promotion materials, both in printed and online form;
- To organize or coordinate events or activities, which may be related to Kumon Program, events or activities arranged by Kumon, or those arranged by a third party, as well as to communicate about the participation in said events or activities;
- To arrange a program completion test for students who complete the final level, and arrange ceremonies to grant awards to Kumon's students who advance beyond their school grade level, or other awards;
- To prepare testimonials about experiences while in Kumon Program, publications, meetings, and seminars, as well as to publish articles in newspapers (both in printed and online newspapers), newsletters, social media, Kumon's website, and the LINE application;
- To prepare and handle awards and souvenirs, which may contain the Student's photographs, videos, and/or audio records, for the purpose of preparing testimonials about experiences while in Kumon Program, marketing schemes, and reinforcement and support in respect to the learning;
- To enroll the Student on a membership (if applicable);
- To contact and communicate in regard to Kumon Program, answer any questions or complaints, and to conduct an inspection in the event of a complaint and conduct that may not be transparent;
- To conduct an act which is required by the provisions of the applicable laws, rules, or regulations;
- For the internal control purposes, including auditing, financial, tax, and legal purposes;
- For the purposes of general management, retention of records, preparation of reports, and data analysis in connection with Kumon Program;
- For business operation and marketing purposes;
- To communicate and report to the Student's Parent in regard to the learning outcomes, test results, or other information relating to the Student, as specified in this Privacy Notice;
- To protect and prevent danger, or damage, that may occur to Kumon's property, assets, personnel, and interests, and to protect and prevent the Student from any danger that may occur while the Student is in Kumon's place of business;
- In certain cases, Kumon may process the Student's personal data, in order to prevent or stop danger from occurring to life, body, or health, such as in the case of an accident or a severe health condition, etc.

In the event that the personal data about you, or the Student, is required for the processing of your request to enter into a contract (such as to enroll the Student in Kumon Program), or for the performance of an obligation under an agreement, and you do not provide such personal data as requested, Kumon may not be able to process your request, or perform its obligations under the agreement. Moreover, in the event

that such personal data is required for the performance of an obligation under the law, and you do not provide such personal data, it may be deemed that Kumon and/or you have breached or violated the applicable law.

### **To whom will the personal data about you and the Student be disclosed**

Kumon may disclose the personal data about you and the Student to the following persons (either in or outside the Kingdom of Thailand):

- Service providers providing services for the purposes stated hereinabove, including information technology service providers, financial service providers, accounting service providers, venue service providers, service providers who provide awards and certificates, legal service providers, auditors, etc.;
- Government officials or relevant government authorities;
- Kumon's assignees or potential assignees, purchasers or potential purchasers of Kumon's business, and Kumon's successors;
- Kumon's affiliated companies (either located in or outside of the Kingdom of Thailand), including, but not limited to, Kumon's Regional Support Office located in Singapore, and Kumon Institute of Education Company Limited located in Japan;
- With respect to the Student, Kumon will disclose the personal data specified hereinabove to the Student's parent / guardian, as well as any other persons that you allow the personal data to be disclosed to.

Moreover, Kumon may disclose the personal data about you and/or the Student (both in and outside the Kingdom of Thailand) in the event that: (1) Kumon needs to comply with the requirements of a government authority, regulatory authority, and any authority that oversees Kumon, or any court order; or (2) the disclosure is required under any relevant legal proceedings; or (3) such disclosure is required or permitted by law.

The destination country in which such third party is located may not have adequate personal data protection standards, as stipulated by the Personal Data Protection Act. However, Kumon will ensure that the disclosure of the personal data about you, or the Student, to a person located outside of the Kingdom of Thailand will be in accordance with the provisions of the Personal Data Protection Act.

### **Your and the Student's rights to personal data**

As the owner of the personal data, you have the following rights to the personal data under the Personal Data Protection Act:

- (a) **The right to access** or obtain a copy of your personal data which is in Kumon's possession, or for the disclosure on how the personal data was obtained, in the event that such personal data was obtained without your consent.
- (b) **The right to request for a transfer of personal data** to request to obtain your personal data in a universally compatible or readable format, using automatic devices or equipment (if applicable), as well as to request for your personal data in such format which can be transferred to other data controllers.
- (c) **The right to object** to the processing of your personal data.
- (d) **The right to request for a deletion** or destruction of your personal data, or for your personal data to be anonymized.
- (e) **The right to request for a suspension** - To request for the processing of your personal data to be suspended.
- (f) **The right to request for a correction of personal data** - To request for your personal data to be corrected or updated. Kumon may ask for additional supporting documents from you, in order to proceed accordingly.
- (g) **The right to revoke consent** - In the event that the processing of your personal data is performed on the basis of your consent, you may revoke such consent at any time, except as otherwise provided by the applicable law.
- (h) **The right to file a complaint** - In the event that you find that Kumon's management of your personal data is in violation of, or is not in compliance with, the Personal Data Protection Act, you may file a complaint to the regulatory authority overseeing the protection of personal data within the Kingdom of Thailand. However, Kumon recommends that you contact us to find a solution to any issues, before filing such complaint.

The exercise of any rights to personal data, as specified above, shall be in accordance with the limitations and conditions of the Personal Data Protection Act.

### **How long is personal data about you and the Student retained**

Kumon shall retain your personal data throughout the period that the Student remains a student in Kumon Program, and thereafter for a maximum period of 3 years, except as otherwise provided by the applicable law, or if Kumon has any other legal basis to retain such personal data.

### **Contact information**

In the event that you have any questions or complaints, or wish to exercise any of your rights to personal data, please contact us at:

- Instructors at the Kumon Center that the Student attends. You can search for the telephone number for each Kumon Center on Kumon's website at: <http://th.kumonglobal.com>
- Kumon (Thailand) Co., Ltd. at telephone number: 0-2626-6555 or email us at: [privacy@kumon.co.th](mailto:privacy@kumon.co.th)

**Amendment to this Privacy Notice**

Kumon may amend this Privacy Notice from time to time, which may be notified to you through an appropriate channel. In the event that this Privacy Notice is amended in a material part, which requires your consent, Kumon will notify you of such amendment, and obtain your consent before such amendment becomes effective.