

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

Kumon (Thailand) Co., Ltd. (“**Company**”) hereby issues this Privacy Notice (“**Privacy Notice**”) to the student (“**Student**”) who has enrolled for the program (“**Kumon Program**”), which is under the supervision of the Company and a 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 how Kumon uses the Student’s personal data, and the purposes of such use.

### **What is personal data**

Personal data is information that can be used to identify the Student, such as the first name, last name, nickname, age, date of birth, etc.

### **Where do we (“Company”) collect personal data about the Student**

- (1) From the Student;
- (2) From the Student’s Parent / Guardian; and/or
- (3) From a Kumon center.

### **Where do we (“Kumon Center”) collect personal data about the Student**

- (1) From the Student; and/or
- (2) From the Student’s Parent / Guardian.

### **What types of personal data are collected, used, and disclosed by Kumon**

Kumon collects and uses the following personal data about the Student:

- First name, last name, nickname, date of birth, age, gender, title, the Student’s relationship with guardian, number of siblings, and the student identification number;
- Telephone number, mobile phone number, address, email address, social media handle, and LINE application ID;
- 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, conduct and behavior at Kumon center, and information regarding the Student’s program completion of Kumon Program;
- The Student’s photographs or videos which are taken by surveillance cameras installed in Kumon’s premises;
- Audios, videos, and/or photographs;
- Record of mental and physical health, food allergies, and medical certificates.

### **What are the purposes for Kumon’s collection, use, and disclosure of personal data about the 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 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 in connection with Kumon Program;
  - For the 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 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 on Kumon's premises;
  - In certain cases, where an accident occurs, or the Student is sick or ill, Kumon may collect, use, and disclose the Student's personal data.
- In the event that the personal data about the Student is required for enrollment in Kumon program, and/or for attending in Kumon Program, and the Student does not provide such personal data as requested, the Student may not be able to attend Kumon program. Moreover, in the event that such personal data is required by law, and the Student does not provide such personal data, it may be deemed that Kumon and/or the Student have violated the law.

#### **To whom will Kumon will disclose the Student's personal data**

Kumon may disclose the personal data about the Student to the following persons, either in or outside Thailand:

- Service providers which provide 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; and
- The Student's Parent / Guardian.

Moreover, Kumon may disclose the personal data about the Student (both in Thailand and in foreign countries) when Kumon is required to comply with the law, or an order of the competent officials or the court.

The disclosure of the Student's personal data to a person who is located in a foreign country will be done in accordance with the provisions of the law.

#### **The Student's rights to personal data**

The Student has the following rights to personal data:

- The right to access** - To request to access or obtain a copy of their personal data, or for disclosure on how the Student's personal data was obtained, in the event that such personal data was obtained without the Student's consent.
- The right to request for a transfer of personal data** - To request to obtain personal data in a universally compatible or readable format using automatic devices or equipment (if applicable), as well as to request for the personal data in such format which can be transferred to other data controllers.
- The right to object** to the collection, use, or disclosure of personal data.
- The right to request for a deletion** or destruction of personal data, or for personal data to be anonymized.
- The right to request for a suspension** - To request for the collection, use, or disclosure of personal data to be suspended.
- The right to request for a correction of personal data** - To request Kumon to correct personal data. In doing so, Kumon may request for additional documents in order to proceed accordingly.
- The right to revoke consent** in the event that the collection, use, or disclosure of personal data is performed on the basis of consent, the Student may revoke such consent.
- The right to file a complaint** - The Student may file a complaint to a regulatory authority which is overseeing the protection of personal data in Thailand. However, Kumon recommends that the Student contacts Kumon to find a solution to any issues, before filing such complaint.

The exercise of any rights to personal data specified above shall be in accordance with the limitations and conditions of the law.

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

Kumon shall retain personal data throughout the period that the Student remains a student in Kumon Program, and thereafter for a maximum period of 3 years after the Student has ceased to be a student in Kumon Program. However, Kumon may retain such personal data for longer than specified, if permitted to do so by law.

**Contact information**

In the event that you have any questions or complaints, or wish to exercise any of your rights, 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 will be notified to you through an appropriate channel or through your Parent. In the event that the amendment of this Privacy Policy requires a consent, Kumon will obtain the Student's consent before making such amendment.