



## DATA PRIVACY POLICY OF KUMON (THAILAND) CO., LTD.

Kumon (Thailand) Co., Ltd. ("**Company**") hereby issues this Data Privacy Policy ("**Data Privacy Policy**") to you, who may be in the capacity of:

- (1) A Kumon Center Manager who is authorized to operate a Kumon Center, an authorized director of a legal entity who operates a Kumon Center, or an authorized representative or any other person related to a Kumon Center, including instructors, assistants, and staff or employees of a Kumon Center (collectively referred to as "**Kumon Center's Personnel**"), as well as any other persons wishing to engage in the business of operating a Kumon Center ("**Person Wishing to Operate a Kumon Center**"). In this regard, a Kumon Center shall mean a person or legal entity authorized by the Company to operate as a Center in which the Kumon Method of Learning Program is provided in Thailand ("**Kumon Program**");
- (2) An employee of the Company, or a family member of an employee of the Company (collectively referred to as "**Kumon's Employee**");
- (3) A candidate of the Company, or a family member of a candidate of the Company (collectively referred to as "**Kumon's Candidate**");
- (4) A third party engaged by the Company as a service provider, product provider, supplier, vendor, partner, contractor, or subcontractor, whether such third party is a natural person ("**Natural Person Service Provider**"), or a natural person who is related to a third-party legal entity ("**Legal Entity Service Provider**"), including the authorized representative, authorized director, attorney, authorized agent, and/or contact person of said Service Provider (collectively referred to as a "**Related Person**". A Natural Person Service Provider, Legal Entity Service Provider, and a Related Person shall be collectively referred to as a "**Third-Party Service Provider**").

In this Data Privacy Policy, Kumon Center's Personnel, Person Wishing to Operate a Kumon Center, Kumon's Employee, and/or Third-Party Service Provider are collectively referred to as "**You**", depending on the context.

This Data Privacy Policy will explain how the Company uses your personal data, and the purposes of such use.

### What is personal data

Personal data is any information that can be used to identify you, whether directly or indirectly, such as your first name, last name, nickname, age, date of birth, etc.

### Where does the Company obtain your personal data

- (1) Kumon Center's Personnel
  - Directly from you;
  - In the event of an assistant, staff, or an employee of a Kumon Center, the Company may obtain your personal data from other persons in the Kumon Center;
- (2) Person Wishing to Operate a Kumon Center
  - Directly from you;
  - From third-party service providers providing marketing, public online resources, search engines, and/or social media services;
- (3) Kumon's Employee
  - Directly from you;
  - From third-party service providers providing marketing, public online resources, search engine, and/or social media services;
- (4) Kumon's Candidate
  - Directly from you;
  - From third-party service providers providing marketing, public online resources, search engine, and/or social media services;
- (5) Third-Party Service Provider
  - Directly from you;
  - From public online resources, such as websites, search engines, and platforms;
  - In the event of a Related Person, the Company may collect your personal data from a relevant Legal Entity Service Provider.

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

- (1) In the event of Kumon Center's Personnel, the Company collects, uses, and discloses the following personal data:
  - First name, last name, nickname, nationality, date of birth, age, gender, title, and identification number;
  - Telephone number, mobile phone number, address, email address, ID for LINE or other communication application;
  - Education background and work experience;
  - Your photographs or videos taken by surveillance cameras installed in the Company's premises;
  - Audios, videos, and/or photographs;
  - Signature;
  - In the event of an instructor, the Company may also collect the following personal data:
    - Identifying data about your property, such as car registration plate, or details of bank account;
    - Information regarding the instructor's health, including a doctor's certificate;
    - Biometric data, such as fingerprints;
    - A copy of your identification card, which may contain sensitive personal data, such as religion and/or blood type. As the Company does not intend to collect, use, or disclose such sensitive personal data, it is requested that you cross out or remove said sensitive personal data from the copy of your identification card, before submitting it to the Company. In the event that you fail to cross out or remove such sensitive personal data, the Company may do so by itself, without the intention to commit a criminal offence.
  - In the event of an assistant, as the Company will provide training and seminar sessions for assistants, the Company may collect information regarding the date and time that you attend such training and seminar sessions.
- (2) In the event of a Person Wishing to Operate a Kumon Center, the Company collects, uses, and discloses the following personal data:
  - Identifying data, such as the name, address or other contact information, gender, age, nationality, marital status, date of birth, passport/identification card number, information regarding your dependents, as well as sensitive personal data about you, such as religious belief, physical wellbeing, and doctor's certificate;
  - Telephone number, mobile phone number, email address, ID for LINE or other communication application;
  - Information regarding your qualifications and work experience, such as certificates issued by schools/universities, school records, academic or language proficiency tests, certificates, and reference letters;
  - Information regarding your attendance at seminars and/or training sessions, whether provided by Kumon or a third party;
  - The Company may collect health-related information of a Person Wishing to Operate a Kumon Center;
  - Your photographs or videos taken by surveillance cameras installed in the Company's premises;
  - Date and time of your attendance at training sessions;
  - Signature; or
  - The Company may collect a copy of your identification card, which may contain sensitive personal data, such as religion and/or blood type. As the Company does not intend to collect, use, or disclose such sensitive personal data, it is requested that you cross out or remove said sensitive personal data from the copy of your identification card, before submitting it to the Company. In the event that you fail to cross out or remove such sensitive personal data, the Company may do so by itself, without the intention to commit a criminal offence.
- (3) In the event of Kumon's Employee, the Company collects, uses, and discloses the following personal data:
  - Identifying data, such as name, address or other contact information, gender, age, nationality, marital status, date of birth, passport/identification card number, identifying data about your properties, such as car registration plate, details of bank accounts, information regarding your dependents, as well as sensitive personal data about you, such as religious belief, physical wellbeing, and biometric data, such as fingerprints;
  - Telephone number, mobile phone number, email address, ID for LINE or other communication applications;
  - Information regarding your qualifications and work experience, such as certificates issued by schools/universities, school records, academic or language proficiency tests, certificates, and reference letters;
  - Information regarding your attendance at seminars and/or training sessions, whether provided by Kumon or a third party;
  - Basic work-related information, such as the contact details relating to your workplace, employee identification number, position, job description, line of command, work hours, and terms and conditions of employment;
  - Information from your hiring process, such as resume, military service records, interview-related information, and supporting documents;

- Information regarding your benefits and wages, such as the details relating to the payment of your wages and provision of other benefits, insurance, social security, information regarding your retirement/pension, provident fund, tax-related information, and information about a third-party beneficiary;
  - Records of performance, including performance evaluation, the Company's comments about the employee's performance, feedback, work rules, complaints, records of annual leaves, sick leave, or absent days, health records, medical records, health and check-up records, including doctor's certificate, or information regarding occupational health and safety, as well as inspections and risk assessments;
  - Visual or audio records of the employee, in the event that such records are required for the purposes of a disciplinary action, as the evidence of an investigation.
- (4) In the event of Kumon's Candidate, the Company collects, uses, and discloses the following personal data:
- Identifying data, such as name, address or other contact information, gender, age, nationality, marital status, date of birth, passport/identification card number, identifying data about your property, such as car registration plate, details of bank accounts, information regarding your dependents, as well as sensitive personal data about you, such as religious beliefs, and physical wellbeing;
  - Information regarding your qualifications and work experience, such as certificates issued by schools/universities, school records, academic or language proficiency tests, certificates, and reference letters;
  - Information from your hiring process, such as resume, military service records, interview-related information, and supporting documents;
  - Telephone number, mobile phone number, email address, ID for LINE or other communication applications.
- (5) In the event of Third-Party Service Provider, the Company collects, uses, and discloses the following personal data:
- First name, last name, nationality, title, identification/passport number, and taxpayer identification number;
  - Telephone number, mobile phone number, address of the place of business, and email address;
  - Bank account details;
  - Your photographs or videos taken by surveillance cameras installed in the Company's premises;
  - Signature;
  - In the event of a Legal Entity Service Provider, the Company may collect corporate documents relating to the Legal Entity Service Provider, or documents issued by government agencies, which may contain the personal data of the relevant persons, such as the certificate of company registration, list of shareholders, etc.;
  - The Company may collect a copy of your identification card, which may contain sensitive personal data, such as religion and/or blood type. As the Company does not intend to collect, use, or disclose such sensitive personal data, it is requested that you cross out or remove said sensitive personal data from the copy of your identification card, before submitting it to the Company. In the event that you fail to cross out or remove such sensitive personal data, the Company may do so by itself, without the intention to commit a criminal offence.

**What are the purposes of collecting, using, and disclosing your personal data**

- (1) The Company collects, uses, and discloses personal data about Kumon Center's Personnel for the following purposes:
- To process your request regarding the operation of a Kumon Center in Thailand, and to perform the obligations under the agreement between you and the Company in connection with the operation of a Kumon Center;
  - To provide the required and appropriate assistance and support to you for the opening, management, improvement, and development of a Kumon Center;
  - To assess your qualifications, readiness, and suitability for the operation of a Kumon Center in Thailand, including the assessment of your health conditions;
  - To collect and record your information in the Company's database;
  - To communicate with Kumon Center's Personnel in regard to, or in connection with, the purposes provided herein;
  - To provide you with documents, worksheets, publications, and/or teaching aids that are related to Kumon Program;
  - To inspect, evaluate, and prepare performance reports of a Kumon Center, and to prepare statistical reports relating to a Kumon Center, in connection with Kumon Program;
  - To invite you to participate in activities arranged by the Company, as well as to attend seminars and training sessions;
  - To experiment and/or test the Company's systems, and to perform experimentation and tests in order to improve Kumon Program;
  - To present your images, audio records, and/or videos to the personnel of other Kumon Centers for their acknowledgement and knowledge, and to exchange knowledge and experience in connection with Kumon Program;

- To present your images, audio records, and/or videos to the personnel of other Kumon Centers for their acknowledgement and knowledge about the correct and appropriate way to work;
  - To present your images, audio records, and/or videos to the personnel of other Kumon Centers, or the Person Wishing to Operate a Kumon Center during a training session, for purposes that are relevant to the Kumon Program;
  - To communicate with the students' parents and/or the students who attend the Kumon Program in regard to Kumon Program, including in the event of a change to Kumon Center's Personnel;
  - To take out insurance for a Kumon Center in certain cases, and to process your request in the event that damage occurred, and you wish to claim for such damage from an insurance company;
  - To process your request in connection with the use of trademarks, or any other intellectual properties of the Company;
  - To be incorporated in advertisements, promotional materials, and/or any other publications, whether in printed or online form, for marketing purposes;
  - In the event that you visit the Company's place of business, the Company will collect your photographs or videos, which are taken by surveillance cameras that are installed in the Company's premises, in order to prevent and suppress damage that may occur to the Company's property, assets, and personnel, as well as any other relevant persons. In addition, the Company may also use such personal data about you to prevent and perform an investigation in respect to misconduct.
- (2) The Company collects, uses, and discloses personal data about a Person Wishing to Operate a Kumon Center for the following purposes:
- For the purpose of registration to attend seminar sessions in connection with the opening of a Kumon Center;
  - To invite you to attend seminar and training sessions;
  - To provide you with documents for seminar and training sessions;
  - To document the provision and receipt of training documents;
  - To record your attendance to training sessions and perform evaluations relating to the training;
  - To communicate in connection with training sessions, the opening of a Kumon Center, and/or Kumon Program;
  - To communicate for marketing purposes;
  - To assess your qualifications, readiness, and suitability for the operation of a Kumon Center in Thailand, including the assessment of your health conditions;
  - To be used as information to support the consideration and approval of other expenses caused by, or in connection with, training sessions;
  - To present your images, audio records, and/or videos to the personnel of other Kumon Centers, or the Person Wishing to Operate a Kumon Center, during a training session, for purposes that are relevant to the Kumon Program;
  - In the event that you visit the Company's place of business, the Company will collect your photographs or videos, which are taken by surveillance cameras installed in the Company's premises, in order to prevent and suppress damage that may occur to the Company's property, assets, and personnel, as well as any other relevant persons. In addition, the Company may also use such personal data about you to prevent and perform an inspection in respect to misconduct.
- (3) The Company collects, uses, and discloses personal data about Kumon's Employees and Kumon's Candidates for the following purposes:
- To administer and manage the Company's employees, business, and business operation; to support the Company's business operation, such as the introduction of curriculums, development of Kumon Program, or execution of agreements with business partners; to communicate for other purposes; to develop and improve products or services; to provide training; to conduct statistical or marketing analysis; and to conduct customer surveys;
  - To carry out human resources management tasks, such as the onboarding process, the planning and execution of the recruitment and training process, the promotion, transfer, and assignment of an employee to work in a different location, and the process of workforce planning, etc.;
  - To ensure that you can attend seminars and/or training sessions, whether arranged by Kumon or third parties;
  - To confirm or verify the identity of an employee upon their access to a digital system, and to monitor the usage thereof;
  - To ensure that the storage and processing of data are carried out in an orderly manner and in compliance with the applicable laws, rules, and regulations, as well as the Company's regulations and any statutes that are related to the Computer-Related Crime Act B.E. 2550, including the ones that are applicable at the present time, and those to be amended or supplemented in the future;
  - To comply with the rules and regulations in connection with wages, compensation, benefits, remuneration, and welfare payable to you;

- To communicate internally and to notify appointment schedules to the persons who are inside and outside of the organization, whether through telephone calls, texts, emails, posts, or other electronic means, such as communication applications, or through any other channels used for the purposes of communicating with the employees;
  - To assess job applications for new job openings and to make decisions in respect to the hiring process, as well as to conduct promotion evaluations;
  - To investigate complaints and misconduct issues, or as part of a disciplinary action, as well as to inspect the Company's business (both internal and external);
  - To be incorporated in the Company's promotional materials, both internal and external;
  - To make employee records for the purposes of the provision of welfare by the Company, based on, as the case may be, the employee group entitlements, such as for the purposes of taking out insurance, insurance planning, provident fund management, health checkup, etc.;
  - To evaluate your performance, including performance evaluation, the Company's comments on the employee's performance, feedback, work rules, complaints, records of annual leave, sick leave, or absent days, health records, or information regarding occupational health and safety, as well as inspection and risk assessments;
  - To verify any reference and background provided by any employee of the Company, or a third party, in order to avoid a conflict of interest, or a potential conflict of interest thereof, and to comply with the applicable rules and regulations, and to verify the terms of employment of the Company;
  - To comply with the applicable procedures, laws, rules, and regulations, in order to comply with the provisions of the law, court order, or order of the relevant government agency for the benefit of an investigation which is carried out by law enforcement officers, and to provide assistance for the purposes of law enforcement, perform an investigation by or on behalf of the Company, or by police officers, government agencies, or other regulatory authorities in any countries or jurisdictions, and to perform an obligation to report and to comply with various requirements provided by law, or as agreed with government agencies or other regulatory authorities in any countries or jurisdictions, as well as to investigate, prevent, or take any action in connection with a violation of the law, to prevent risks in the event that there is a reason to suspect that there could be fraud, money laundering, national security issue, or an unlawful matter, or there is a reason to believe that there is unlawful conduct, or an event that may affect the life, health, or body of another person;
  - To process payment information, to demand or make a payment, and for the purposes of accounting, account management, and auditing of the Company's accounts, or for the purposes of debt collection in the event that the employee owes money to the Company;
  - To ensure the Company's security;
  - For the purposes of the Company's restructuring and transactions, which may cause your personal data to be transferred or disclosed as part of a business sale or purchase, or an offer to sell or purchase the business;
  - To carry out other necessary actions, which are directly related to any of the aforementioned purposes.
- (4) The Company collects, uses, and discloses personal data about Third-Party Service Providers for the following purposes:
- To enter into an agreement with you, and to evaluate your qualification and carry out any relevant acts, before the execution of such agreement;
  - To perform and comply with contractual obligations;
  - To pay for services, products, or any other expenses that are related to the agreement or contract;
  - To collect and record your information in the Company's database;
  - To communicate with you in regard to the purposes provided herein;
  - To monitor, prevent, and investigate a fraud and/or criminal offence;
  - To establish, comply with, exercise, or defend the right of claims available to the Company at law;
  - To comply with obligations under the law and regulations in connection with tax including, but not limited to, disclosing information to government organizations or agencies, i.e. the Revenue Department, in the event that such disclosure is required by the applicable law or regulation;
  - In the event that you visit the Company's place of business, the Company will collect your photographs or videos taken by surveillance cameras installed in the Company's premises, in order to prevent and suppress damage that may occur to the Company's properties, assets, and personnel, as well as any other relevant persons. In addition, the Company may also use such personal data about you to prevent and perform an inspection on a misconduct or crime.

In the event that your personal data is required in order to process your request to enter into an agreement with the Company, or for the performance of an obligation under an agreement, and you do not provide your personal data as

requested, the Company may not be able to process your request or perform the obligation under the agreement, whether in whole or in part. Moreover, in the event that such personal data is required for the compliance with the law, and you do not provide your personal data as requested, it may be deemed that the Company and/or you violate the law.

### **To whom will the Company disclose your personal data**

The Company may disclose your personal data to the following persons, either in or outside Thailand:

- Service providers providing services for the purposes stated hereinabove, including information technology service providers, financial service providers, accounting service providers, legal service providers, auditors, etc.;
- Government officials or relevant government authorities;
- The Company's assignees or potential assignees, or a purchaser or a potential purchaser of the Company's business, and the Company's successors;
- The Company's affiliated companies (either located in or outside the Kingdom of Thailand), including, but not limited to, Kumon Regional Support Office located in Singapore and Kumon Institute of Education Company Limited located in Japan;
- The students' parents and/or students attending Kumon Program; and
- Personnel of other Kumon Centers and/or Persons Wishing to Operate a Kumon Center, for the purposes stated hereinabove.

Moreover, the Company may disclose your personal data (both in Thailand and in foreign countries) when the Company is required to comply with the law, or the order of competent officials or the court. Any disclosure of your personal data will be done in accordance with the provisions of the law.

### **Your rights to personal data**

You have the following rights to personal data:

- (a) **The right to access**, to request to access, or obtain a copy of your personal data, or for the Company's disclosure on how your 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 the personal data in such format to be transferred to other data controllers.
- (c) **The right to object** to object to the collection, use, or disclosure of personal data.
- (d) **The right to request for a deletion**, to request for a deletion or destruction of personal data, or for personal data to be anonymized.
- (e) **The right to request for a suspension** to request for the collection, use, or disclosure of personal data to be suspended.
- (f) **The right to request for a correction of personal data**, to request the Company to correct the personal data, so that it is accurate, updated, complete, and not misleading. In doing so, the Company may request for additional documents to proceed accordingly.
- (g) **The right to revoke consent** in the event that the collection, use, or disclosure of your personal data is performed on the basis of consent, you may revoke such consent at any time.
- (h) **The right to file a complaint** you may file a complaint to a regulatory authority overseeing the protection of personal data in Thailand. However, the Company recommends that you contact the Company 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 your personal data retained**

- (1) Kumon Center's Personnel
  - The Company shall retain your personal data throughout the period that you remain a Kumon Center's Personnel, and thereafter for a maximum period of 10 years after you have ceased to be a Kumon Center's Personnel.
  - However, if otherwise provided by law, the Company may retain your personal data longer than specified.
- (2) Person Wishing to Operate a Kumon Center
  - In the event that you enter into an agreement with the Company to operate as a Kumon Center, the Company will retain your personal data for the period specified for Kumon Center's Personnel hereinabove.

- In the event that you do not enter into an agreement with the Company to operate as a Kumon Center, the Company will retain your personal data for a maximum period of 1 year from the date that your personal data is provided to the Company, except as otherwise provided by law.
- (3) Kumon's Employee
- The Company shall retain your personal data throughout the period that you remain a Kumon's Employee, and thereafter for a maximum period of 10 years after you have ceased to be a Kumon's Employee.
  - However, if otherwise provided by law, the Company may retain your personal data longer than specified.
- (4) Kumon's Candidate
- In the event that you enter into an agreement with the Company to become a Kumon's Employee, the Company will retain your personal data for the period specified for a Kumon's Employee hereinabove.
  - In the event that you do not enter into an agreement with the Company to become a Kumon's Employee, the Company will retain your personal data for a maximum period of 1 year from the date that you applied for the job with the Company.
- (5) Third-Party Service Provider
- The Company will retain your personal data throughout the period required for the performance of the agreement, and thereafter for a maximum period of 10 years after the contractual relationship between you and the Company has ended, or after the last communication between you and the Company, except otherwise provided by law.

### **Contact information**

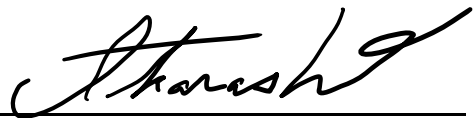
In the event that you have any questions, queries, or wish to exercise any of your rights in connection with your personal data, please contact us at:

**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 Data Privacy Policy**

The Company may amend this Data Privacy Policy from time to time, which will be notified to you through our website or any other channels that the Company deems appropriate. In the event that the amendment to this Data Privacy Policy requires consent, the Company will notify you of said amendment, and obtain your consent before such amendment takes effect.

Date of issuance: January 4, 2022



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Mr. Takehiro Ikarashi  
President of Kumon (Thailand) Co., Ltd.