# PERSONAL DATA POLICY



BOL supports personal privacy, the Thailand 'Personal Data Protection Act' (PDPA) and its legal requirements. BOL undertakes to remain in compliance with the provisions by the use of clear guidelines expressed via this policy, approved procedures and relevant supporting forms such as written consent to access an individuals personal data and related information.

### "Personal Data"

Means any information relating to a Person, which enable the identification of such Person, whether directly or indirectly

## "Data Controller"

Means a Person having the power and duties to make decisions regarding the collection, use, or disclosure of the Personal Data

### "Data Processor"

Means a Person who operates in relation to the collection, use or disclosure of the Personal Data pursuant to the orders given by or on behalf of a Data Controller

#### "Person"

Means a natural person who is the Data Subject

### **BOL Personal Data - Key Commitment(s):**

- The 'Data Controller' will be clearly nominated by BOL Management, understand their responsibilities and provide the 'Person' with the 'Data Controllers' direct contact details
- Data collection shall be limited to the lawful purpose of the 'Data Controller'
- The 'Person' shall be informed about the purpose, the use, the expected retention period of the data being managed and the categories of Persons or entities to whom the collected Personal Data may be disclosed
- The Person must be able to give or withhold their consent before their data is collected
- The person shall also be informed regarding possible effects where consent or required data is not provided and their rights under the Act. (PDPA. 2019)

The Data Controller shall not collect Personal Data without the consent of the data subject, unless:

- It is necessary for the performance of a contract to which the 'Person' is a party
- Or in order to take steps at the request of the 'Person' prior to entering into a contract
- It is necessary for compliance with a law to which the Data Controller is subjected

The Data Controller shall not collect Personal Data from any other source, apart from the 'Person' directly, except where:

• The 'Person' is informed of the collection of Data from the other source, has given consent and it happens within 30 days of the consent being given

The Data Controller shall not use or disclose Personal Data without the consent of the 'Person', unless it is in accordance with the Act (PDPA 2019) and or the BOL approved procedure(s).

Stuart Walker BOL Managing Director 24 May 2022