



Thailand Charitable Organization Registration #350 under the Ministry of Finance

Kenan Foundation Asia

External Personal Data Protection Policy

1. Purpose

Kenan Foundation Asia (“**Kenan**”) recognizes the importance of respecting each individual’s privacy and the need to treat Personal Data (as defined below) in an appropriate and lawful manner. Accordingly, Kenan has adopted this External Personal Data Protection Policy (the “**Policy**”) to protect your rights in relation to the processing (as defined below) and management of Personal Data by Kenan, and will take all reasonable and necessary measures to safeguard Personal Data in accordance with the Personal Data Protection Act B.E. 2562 and other applicable Personal Data protection laws and regulations (collectively, the “**Law**”), and to uphold good data protection practices.

For the purpose of this Policy, Kenan will, for you, act as the Data Controller (as defined under the Law) for processing of your Personal Data.

2. Scope

- 2.1 This Policy shall be effective as of **1 June 2022**, and is subject to further changes or revisions (which shall be notified to you.) Kenan shall continue to review the effectiveness of this Policy from time to time.
- 2.2 This Policy applies to the processing of Personal Data by Kenan within Thailand or processed in the context of our office in Vietnam. Any breach of the Law or this Policy will be taken very seriously, and disciplinary action may be taken.
- 2.3 This Policy shall supersede all prior Personal Data protection policies and protocols belonging to Kenan which apply to external parties, if any, unless specified otherwise by Kenan.
- 2.4 This Policy works in tandem with the applicable External Consent Form which you have signed. Please study such External Consent Form carefully to understand how we use your Personal Data under consent basis.

3. External Personal Data

3.1 Personal Data and Uses

“**Personal Data**” means any data about an individual which can be used to trace back to any such individual, whether by such data alone or in combination or in conjunction with other data available for any particular processing.

“**Processing**” and all of its derivatives mean any type of treatment of Personal Data, including collection, transfer, disclosure, use, etc.

List of Personal Data that Kenan is using and/or will use and their purposes and other details are described in the table below. Please study them carefully to understand how we process your Personal Data. Please note that the list below is not exhaustive, although we have afforded our utmost ability to provide as complete a list as possible.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
General				

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
Government officers	Government document: To obtain the government documents for Kenan operation.	Legitimate interest	<ul style="list-style-type: none"> • Name • Position • Signature • Contact information 	Retain for ten years after collection.
Human Resource (HR)				
Kenan Vietnam employees	Power Vision program: To record new employee's data into Kenan's system.	Contract	<ul style="list-style-type: none"> • Name • National ID Card • Address • Photos • Position • Fingers print 	During the employment and for ten years after.
Employee's family member	Visa application: To facilitate foreign employees' family members to obtain visas.	Legitimate interest	<ul style="list-style-type: none"> • Name • Gender • Passport • Contact number • Email address 	Retain for ten years after collection.
Interns and university staffs	Internship: To liaise with partner universities and to arrange for internship programs for university students.	Legitimate interest	<ul style="list-style-type: none"> • Name • Profile description • Contact number • Email address • National ID Card 	During the internship and for ten years after.
Kenan Vietnam employees	Payroll management: To manage and arrange salary payment to employees and deduct the tax and social security fund.	Contract	<ul style="list-style-type: none"> • Name • Organization's deductions • Bank account numbers 	During the employment and for ten years after.
		Legal obligation	<ul style="list-style-type: none"> • Legal deductions such as social security and court's judgement 	
Kenan Vietnam employees	Leave management: To manage and regulate leaves for employees including record the employees' leave such as sick leave, personal leave, vacation etc.	Contract	<ul style="list-style-type: none"> • Name • Position • Contact information • Date of leave • Reason for leave 	During the employment and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
Kenan Vietnam employees	Insurance claim management: To apply for and manage life and health insurance claim and benefits regarding IPD, OPD, personal accident, and dental policies, for employees including review the employees' insurance claims for all year.	Contract	<ul style="list-style-type: none"> Name Position Details of insurance and incidents Contact information 	During the employment and for ten years after.
Kenan Vietnam employees	Tax application: To assist employees to file tax and social security fund for executives and employees through electronic system.	Contract	<ul style="list-style-type: none"> Name Gender Contact information Address National ID Card Salary Nationality 	During the employment and for ten years after.
Kenan Vietnam employees	Compensation fund: To help Kenan Vietnam office manage the compensation for its employees.	Contract	<ul style="list-style-type: none"> Name Position Expense details 	During the employment and for ten years after.
Kenan Vietnam employees	Training arrangement: To arrange training sessions for employees.	Contract	<ul style="list-style-type: none"> Name Position Contact information Training details 	During the employment and for ten years after.
General Administration (GA)				
Vendors	Vendor account: To manage and update vendor list such as hotels, hospitals, and accounting companies.	Legitimate interest	<ul style="list-style-type: none"> Name Name of company Contact number Email address 	Retain for ten years after collection.
Kenan Vietnam employees	Sharing employee's information with donors: To liaise with and send employees' information to some donors such as USAID as required.	Contract	<ul style="list-style-type: none"> Name Profile description Contact number Email address Educational background Portfolio Past experiences Nationality Licenses Certificates 	During the employment and for ten years after.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
Kenan Vietnam employees	Official documents management: To submit and obtain the documents and to deal with relevant government authorities.	Contract	<ul style="list-style-type: none"> • Name • Name of foundation • Address • Position 	During the employment and for ten years after.
Kenan Vietnam employees and relevant external parties	Documents Storage Management: To keep copy of project agreements and related documents for internal use and process.	Legitimate interest	<ul style="list-style-type: none"> • Contact details of responsible persons • Email address 	During the employment and for ten years after.
Communication and Sponsorship				
Beneficiaries	Kick-off meeting: To arrange a meeting with project teams regarding content for marketing and campaigning for such projects.	Legitimate interest	<ul style="list-style-type: none"> • Contact information of potential beneficiaries such as name, phone number, and Email addresses 	Retain for ten years after collection.
Clients	Kick-off meeting: To arrange a meeting with project teams regarding content for marketing and campaigning for such projects.	Contract	<ul style="list-style-type: none"> • Contact information of clients such as name, phone number, and Email addresses 	
Beneficiaries	Processing feedback: To process the feedbacks from beneficiaries to improve the new project.	Legitimate interest	<ul style="list-style-type: none"> • Name • Organization • Beneficiaries' feedback 	Retain for ten years after collection.
Clients	Processing feedback: To process the feedbacks from clients to improve future projects.	Contract	<ul style="list-style-type: none"> • Name • Organization's name • Clients' feedback 	During the contract term and for ten years after.
Individual outsource workers	Hiring outsource: To hire outsource workers to help with the preparation of the marketing content such as photos, videos etc.	Contract	<ul style="list-style-type: none"> • Name • Contact number • Email address 	During the contract term and for ten years after.
Corporate outsource workers	Hiring outsource: To hire an outsource worker to help with the production of marketing contents such as photos, videos etc.	Legitimate interest	<ul style="list-style-type: none"> • Name • Organization's name • Contact number • Email address 	Retain for ten years after collection.
Beneficiaries	Interview: To arrange the interview with beneficiaries regarding the opinion and impact of the project.	Legitimate interest	<ul style="list-style-type: none"> • Nonspecific contents such as photos and comments 	Retain for ten years after collection.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
			<ul style="list-style-type: none"> • Contact information such as Email address 	
Beneficiaries	Marketing material publication: To manage the marketing material such as an annual report and project leaflets.	Legitimate interest	<ul style="list-style-type: none"> • Nonspecific contents such as photos and comments • Contact information such as Email address 	Retain for ten years after collection.
External parties	Newsletter and updates: To send newsletters and contents to the audiences through various channels such as email, LinkedIn, etc.	Legitimate interest	<ul style="list-style-type: none"> • Name • Business card • Contact number • Email address 	Retain for ten years after collection.
Beneficiaries	CSR Event: To arrange an interview and take photos from the CSR events.	Legitimate interest	<ul style="list-style-type: none"> • Nonspecific contents such as photos and comments • Contact information such as email address 	Retain for ten years after collection.
Beneficiaries	Press release and website management: To undertake press release and publish the contents of CSR events and marketing materials on Kenan's website.	Legitimate interest	<ul style="list-style-type: none"> • Nonspecific contents such as photos and comments • Contact information such as Email address 	Retain for ten years after collection.
Beneficiaries	Information in SharePoint: To input information of project information to SharePoint.	Legitimate interest	<ul style="list-style-type: none"> • Name • Nonspecific contents such as photos and comments • Contact information such as Email address 	Retain for ten years after collection.
Donors and Beneficiaries	Annual reception event: To arrange for the annual reception event.	Legitimate interest	<ul style="list-style-type: none"> • Name • Nonspecific contents such as photos, videos, and comments • Project information 	Retain for ten years after collection.
Information Technology (IT)				

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
Visitors	Monitoring: To monitor internet log use, CCTV, file use, device logs.	Legitimate interest	<ul style="list-style-type: none"> • Name • IP address • Website history • Files • Device logs • CCTV records 	Retain for ten years after collection.
Vendors	Purchase: To prepare the PR and PO account for accounting team	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address • Organization name 	Retain for ten years after collection.
Kenan Vietnam employees	Password and access control: To administer and manage password database and access control.	Contract	<ul style="list-style-type: none"> • Name • Employee ID • Position • Email address • Password information 	During the employment and for ten years after.
Kenan Vietnam employees	Premise server: To manage the server for basic network operation.	Legitimate interest	<ul style="list-style-type: none"> • Name • Employee ID • Position • Email address 	During the employment and for ten years after.
Clients	Input information to Salesforce: To manage for keeping the record of client's information to Salesforce.	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address 	Retain for ten years after collection.
Vendors	Office 365: To liaise with the third-party vendors to prepare and arrange for the use of the software with Microsoft.	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address 	Retain for ten years after collection.
Kenan Vietnam employees and relevant external parties	Office 365: To provide basic software for basic operation in Kenan.	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address 	Retain for ten years after collection.
Kenan Vietnam employees and relevant external parties	Azure cloud: To store basic information necessary for the interaction between Kenan and relevant parties.	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address • Organization's name • Position 	During the contract term and for ten years after.
Visitors	Wi-fi connection verification: To verify a new device upon a request.	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact information 	Retain for ten years after collection.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
			<ul style="list-style-type: none"> • Details of uses in device • IP address 	
Finance and Accounting				
Corporate donors and partners	Funding: To liaise with and undertake funding for project from donors.	Legitimate interest	<ul style="list-style-type: none"> • Entity's Name • Keys contact person • Contact number • Email address 	Retain for ten years after collection.
Individual donors	Funding: To liaise with and undertake funding for project from donors.	Legitimate interest	<ul style="list-style-type: none"> • Name • National ID Card • Payment documents 	Retain for ten years after collection.
Vendors	Investment profit: To undertake funding from investment profit from vendors such as Morgan Stanley in Hong Kong.	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address • Payment documents 	Retain for ten years after collection.
Vendors	Payment of office basic expense: To manage the office expense with recorded PO and PR, including petty cash, corporate credit cards, catering, etc.	Legitimate interest	<ul style="list-style-type: none"> • Name • Keys contact person • Contact number • Email address 	Retain for ten years after collection.
Corporate vendors	Payment of project's expense: To liaise with the vendors and manage the project's expense.	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address • Bank account number 	Retain for ten years after collection.
Individual vendors	Payment of project's expense: To liaise with the vendors and manage the project's expense.	Contract	<ul style="list-style-type: none"> • Name • Contact number • Email address • Bank account number 	Retain for ten years after collection.
Vendors	Payment record: To manage the storage of files and hard copies of payment documents.	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address • Bank account number 	Retain for ten years after collection.
Donors	Budget management report: To arrange for the budget management report for donor.	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address 	Retain for ten years after collection.
Project Implement				

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
External trainers and speakers	Hiring external trainer: To hire external trainers for a project such as CLMV experts and teachers.	Contract	<ul style="list-style-type: none"> • Name • National ID Card • Resume • Certificates • Bank account number 	During the contract term and for ten years after.
Corporate service providers	Hiring service provider: To hire services provider for a project such as translator, event organizer, hotel, catering, travel agency.	Contract	<ul style="list-style-type: none"> • Name • Organization's name • Contact number • Email address • Bank account number 	During the contract term and for ten years after.
External parties (Individual service provider)	Hiring service provider: To hire service provider for a project such as translator, photographer, MC, moderator, speaker, driver.	Contract	<ul style="list-style-type: none"> • Name • National ID Card • Resume • Bank account number 	During the contract term and for ten years after.
		Legitimate interest	<ul style="list-style-type: none"> • Name • National ID Card • Resume • Bank account number 	Retain for ten years after collection.
Interns	Hiring intern: To hire interns to support a project.	Contract	<ul style="list-style-type: none"> • Name • National ID Card • Contact number • Email address • Bank Account number 	Retain for ten years after collection.
External parties	Accommodation arrangement; To arrange for an accommodation, travel booking and visa for speaker and participants	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address 	Retain for ten years after collection.
Beneficiaries	Training project: To arrange training sessions for beneficiaries such as villagers, SMEs business owner.	Legitimate interest	<ul style="list-style-type: none"> • Name • Contact number • Email address 	Retain for ten years after collection.
Beneficiaries	Pre-test and Post-test of training: To conduct pre-test and post-test of training.	Legitimate interest	<ul style="list-style-type: none"> • Name • Test results • Contact information such as email address 	Retain for ten years after collection.

Category of Data Subjects	Purposes and Processing	Legal Basis	Examples of Personal Data	Retention Period
Beneficiaries	Innovation camp project: To arrange the innovation camp for students.	Legitimate interest	<ul style="list-style-type: none"> • Name • Guardian's name • Contact number • Email address • Photos 	Retain for ten years after collection.
External parties (Beneficiaries)	Photo and video recording: To record videos and photos of participants of training and innovation camp.	Legitimate interest	<ul style="list-style-type: none"> • Non-specific videos and photos 	Retain for ten years after collection.
Beneficiaries	Project report: To conduct the project report for the donor and/or government officers.	Legitimate interest	<ul style="list-style-type: none"> • Name of participant • Photos • Survey results 	Retain for ten years after collection.
Other Activities under Consent				
All parties in this policy	Various activities undertaken under consent basis. See applicable External Consent Form for more details.	See applicable External Consent Form		

3.2 Formats

Your Personal Data may, upon discretion of Kenan, be collected on hardcopies, electronic median, or other formats. Kenan shall do it best to afford appropriate safety measures to protect these files and documents.

3.3 Consent and Withdrawal of Consent

- (a) Your consent will be obtained (via the External Consent Form) before Kenan collects, uses, or discloses your Personal Data which requires consent.
- (b) You may choose to withdraw your consent (but not retrospectively) by providing Kenan with a written notice at least fourteen (14) days in advance. All communications on your withdrawal of consent should be directed to Kenan's Data Protection Officer (as defined below), whose business details are set out below. However, please note that there may be consequences of withdrawing the consent, which Kenan will determine and notify to you before the withdrawal or as soon as possible after the withdrawal. Kenan will cease (and cause any of Kenan's data intermediaries and agents to cease) collecting, using, or disclosing such Personal Data unless it is required or authorized under applicable laws.

3.4 Updating and Correcting Personal Data

- (a) You must ensure that all Personal Data provided to Kenan by you is true, accurate, and complete at all times. Any change to Personal Data shall be notified to the Data Protection Officer (as defined below) or the Human Resources Department or any personnel specially designated to deal with this change within seven (7) days after the change has taken effect.
- (b) Kenan shall correct your Personal Data as soon as practicable and provide confirmation of such correction to you, and if it is unable to do so within thirty (30) days of receiving your request, Kenan shall notify you of the time within which it will respond.

3.5 Transfer and Sharing of Your Personal Data

- (a) Kenan may transfer your Personal Data to external service providers in Thailand so these service providers can perform certain tasks on our behalf, such as for cloud and non-cloud storage, recruitment, payroll, analytics, and general assistance, or when there is legal obligation or legitimate interest to do so, such as for audits and corporate sale or restructuring. We will rely on the same basis as notified or consented by you for these domestic transfer and processing activities. In such cases, we will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Law and our standards.
- (b) Kenan may transfer your Personal Data to external service providers throughout the world so these service providers can perform certain tasks on our behalf, such as for cloud and non-cloud storage, recruitment, payroll, analytics, and general assistance, or when there is legal obligation or legitimate interest to do so, such as for audits and corporate sale or restructuring. If we have contract basis for any such processing, we will also rely on such for offshore transfer or processing. However, for non-contract basis transfer or processing, we will rely on your consent as given in your respective Consent Form. In such cases, we will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Law and our standards.

3.6 Retention of Personal Data

- (a) Your Personal Data will be retained for period(s) as are necessary to meet Kenan's legal and/or business purposes, and Kenan will cease to retain your Personal Data as soon as it is reasonable to assume that the purpose for collection such Personal Data is no longer being served by such retention, and such retention is no longer necessary for legal and/or business purposes. Our current policy is to retain certain Personal Data of you for up to ten (10) years after they cease to be necessary, subject to the applicable anonymization procedures and at all times in accordance with our document retention and disposal policy, and applicable laws and regulations.
- (b) We will notify you if there is any change in policy or specific retention of any of your Personal Data that is not in line with the current policy, or is in any way relevant and warrants your special attention.

4. Data Protection Officer

4.1 Details of the Data Protection Officer of Kenan ("**Data Protection Officer**") is: Kenan DPO Committee

4.2 The procedure for receiving and responding to queries and/or complaints relating to data protection is set out below:

If there are any concerns or problem related to the personal data has been handled, the queries/complaints can be raised and send to dpo@kenan-asia.org. To assist in dealing with the queries/complaint, the following information should be provided.

1. Name and Surname or company's name
2. Contact details; telephone number and e-mail
3. Details of queries/complaint
4. Date and time which suspected the concerns or problem occurred
5. Document evidence to support (if any)

Upon receiving the queries/complaints, The Kenan DPO Committee will confirm that complaints will be investigated and provided an estimate of time expected for the process of investigation. The

committee will notified the outcome of the investigation in writing with the committed time and any action taken.

5. Your Rights

- 5.1. Right to be notified: If we wish to collect, store, use, or disclose your Personal Data in any manner beyond the scope of your given consent or the scope already outlined to you herein, we will notify and/or seek your prior consent with respect to such additional scope.
- 5.2. Right to access: You may, at any time, request to have access to your Personal Data in order to review it and also request to know about how we have come to possess your Personal Data.
- 5.3. Right to copies: You may request for a copy of your Personal Data in a form that can be reasonably accommodated.
- 5.4. Right of portability of data: You may request us to transfer your Personal Data in a format that is reasonable and acceptable to another entity of your choice.
- 5.5. Right to rectification: If your Personal Data has been changed or is not up-to-date, you have the obligation to ensure that your Personal Data is accurate, up-to-date, complete, and not misleading by submitting a request to rectify it in accordance with the procedures announced by us. This, besides being your obligation, is also your right.
- 5.6. Right to withdraw consent: You may withdraw your consent at any time. We may deny your withdrawal only if the law or the contract does not allow so. Your withdrawal will not have any effect on our previous collection, usage, and disclosure of your Personal Data. If your withdrawal will affect any part of your Personal Data, rights, or benefits, we will notify you of such effect before your withdrawal if it is possible, or as soon as practicable thereafter.
- 5.7. Right to erasure: You may request to erase or make your Personal Data pseudonymised under any of the following circumstances: (a) your Personal Data is no longer needed for the intended purposes, (b) you withdraw your consent and we no longer have any legal right to collect, store, use, or disclose your Personal Data, (c) you object to the collection, storage, use, or disclosure of your Personal Data and we do not have any legitimate reason to reject your objection, or (d) your Personal Data was collected, stored, used, or disclosed in contravention of the Law. However, we may deny your request if our collection of your Personal Data is made for the purposes authorized by the Law, which include a data collection for statistical research purpose with appropriate protective measures, or for establishment of legal claims, legal compliance, or exercise of legal rights or defences.
- 5.8. Right to suspension: You may request us to suspend the use of your Personal Data in any of the following events: (a) when we are in the process of verifying certain information for the purpose of rectifying or updating your Personal Data under your request, (b) when your Personal Data is to be erased but you instead request to suspend its use, (c) when it is no longer necessary to store your Personal Data, but you request us to continue the storage of your Personal Data for establishing legal claims, legal compliance, or exercise of legal rights or defences, or (d) when we are in the process of verifying our legitimate interests, against your objection or, in our collection, storage, use, or disclosure for various purposes including the statistical research, as may be permitted by the Law.
- 5.9. Right to object the processing of Personal Data: You may object to the collection, storage, use, or disclosure of your Personal Data in any of the following events: (a) in case where your Personal Data was collected for the purpose of (i) public interest,) ii (our compliance with a governmental order, or iii(any legitimate interest of ours or other legal entity (we may object to such request if)aa(your objection will lead to a non-compliance with the law, or (bb) it relates to an establishment of legal claims, legal compliance, or exercise of legal rights or defences, (b) in case where we have collected, stored, used, or disclosed your Personal Data for the purpose of direct marketing, or (c)

in case where we have collected, stored, used, or disclosed your Personal Data for any research purposes as specified in the Law, including for statistical purpose.

6. Language

In the event of any conflict or inconsistency between any term of this Policy or any Thai translation version, this English version shall prevail.