



Privacy Policy on the Use of CCTV

St. Mark's Australian International School uses closed-circuit television (CCTV) in and around our premises to monitor a specific space for the safety and security of our premise, assets, staff, students and visitors. This privacy notice provides information on the collection, use and disclosure of your personal data collected in our use of CCTV. We may update this notice from time to time.

1. TYPES OF PERSONAL DATA WE COLLECT

Our CCTV cameras captures images all individuals and their belongings (e.g., vehicles) entering the monitored area in and around our premises and facilities and may collect photos or videos of you.

2. HOW WE PROCESS YOUR PERSONAL DATA

2.1 We may collect, use, disclose or process your personal data for the following purposes:

- (a) to protect individuals' life, body, health, personal safety and belongings;
- (b) to protect and prevent our premises, facilities and assets from damage, disruption, vandalism and other crimes;
- (c) to support law enforcement agencies in the prevention, detection and prosecution of crime and to act as a deterrent of crime;
- (d) to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- (e) to in the investigation or proceedings concerning any whistle blower complaint; and
- (f) to assist in the establishment or defense of any civil litigation, including but not limited to employment proceedings.

2.2 Our CCTV is in operation 24 hours a day, except in case of system failure or maintenance.

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2.3 We place appropriate signage in the monitored areas to alert you that CCTV is in use and your personal data is recorded.

3. LEGAL BASES

We may collect, dispose and process your personal data on any of the following legal bases.

1. **Vital interest.** The collection, use, disclosure and processing is necessary to the prevention or suppression of a danger to a person's life, body or health.
2. **Legitimate interest.** It is in our legitimate interest to collect, use, disclose and process your personal data to achieve any of the purposes described above.
3. **Legal obligations.** We owe a duty to comply with the legal obligations prescribed by applicable laws, including but not limited to laws regarding safety and environment in the workplace. We consider the use of CCTV a necessary measure to enables us to meet those obligations.

4. DISCLOSURE OF YOUR PERSONAL DATA TO THIRD PARTIES

- 4.1 We may disclose your personal data to third parties (including our affiliates and service providers) if we decide the disclosure is necessary for purposes described above.
- 4.2 We may disclose your personal data to law enforcement agencies if the disclosure is necessary for the compliance with our legal obligations and to support and assist them in the prevention, detection or prosecution of a crime.

5. PERIOD OF RETENTION

- 5.1 We may retain your personal data no longer as is necessary to achieve the purposes described in this notice or as is required by applicable law. We may need to retain your personal data for as long as is necessary to deal with any disputes or legal proceedings that may arise.
- 5.2 If we no longer need your personal data we may destroy, delete, remove or anonymize your personal data.



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6. YOUR RIGHTS

You have the following rights pursuant to the laws:

- (a) **Your right of access.** You have the right to access and obtain a copy of your personal data or request to disclose your personal data. The request must be in writing and sent through the channel in the "CONTACT US" section. Your request will be processed within the period required by law. We may, to the extent required by law or a court order, refuse to act upon your request where such a request could affect the rights and freedom of another person.
- (b) **Right to rectification.** You have the right to have inaccurate, incomplete, misleading or not up-to-date personal data that we process rectified.
- (c) **Right to portability.** You may have the right to obtain your personal data that we hold in a structured electronic format, and transmit that data to another data controller, where there is (a) a personal information that you have provided to us and, (b) if we are processing that data at your request.
- (d) **Right to object.** You have the right to object to the collection, use or disclosure of your personal data for the purposes of achieving our legitimate interest (or that of another person). We may refuse to comply with your request if we can demonstrate compelling legitimate grounds for such collection, use or disclosure, which may override your own interests, or if such collection, use or disclosure is for the purposes of establishment, compliance, exercise or defense of legal claims.
- (e) **Right of erasure.** You may have the right to request us to erase or destroy your personal data or to anonymize your personal data if you believe that (i) the personal data is no longer needed for the purposes described in this notice or (ii) the collection, use or disclosure of your personal data is unlawful. We may refuse to comply with your request of erasure or destroy for the purposes of establishment, compliance, exercise or defense of legal claims or compliance with laws.
- (f) **Right to restrict processing.** You may have the right to request us to suspend the use of your personal data if you believe that we no longer need to retain that personal data for the purposes described in this notice, but you still require the retention purposes of establishment, compliance, exercise or defense of legal claims or compliance with laws.



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- (g) **Right to withdraw consent.** If you have consented to our collection, use or disclosure of your personal data, you have the right to withdraw that consent at any time.
- (h) **Right to lodge a complaint.** You have the right to file a complaint against us to the relevant data protection supervisory authority if you believe we breach or do not comply with any of our obligations under the applicable data protection laws.

7. CONTACT US

If have any questions about this notice or wish to exercise your rights, please contact the Data Protection Officer at privacy@stmarks.ac.th



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