

**Privacy Policy for Patients of The Dental Hospital,
Faculty of Dentistry, Chulalongkorn University**

This document is translated from the Thai version of The Privacy Policy for Patients of The Dental Hospital, Faculty of Dentistry, Chulalongkorn University, Latest Revision: 6/12/2022. If any problems arise, the Dental Hospital will refer to the original document for verification.

Summary

The Dental Hospital, Faculty of Dentistry, Chulalongkorn University, analyzes your personal data in accordance with the provisions of this Personal Data Protection Policy, in compliance with the Personal Data Protection Act B.E. 2562. You can access the policy details through the QR Code, which may be summarized for convenience as follows:

Topic	Summary
What data do we process?	We process patient's data as necessary, including ID data, contact and address information, medical history, biometric data, IT data, financial data, treatment rights data, health data, disease diagnosis data, third-party data, and relevant documents, among other types of other information.
How do we use the data?	We use patient's personal data for various purposes based on the objectives of Chulalongkorn University, with the necessary justifications.
Who do we share the data with?	We may need to share patient's personal data with external organizations, as explained below, along with a list of agencies receiving data.
What can patients do?	Patients, as data owners, have the right to access, modify, or delete data as explained.
Policy Changes	We will inform you of significant changes to this policy and may periodically notify you about the processing of your personal data.



Full Version

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A. SCOPE AND OBJECTIVES OF THE POLICY

We emphasize the significance of safeguarding your personal data's security. For this reason, we will appropriately manage your personal data to ensure its security, in compliance with the Personal Data Protection Act B.E. 2562. This document represents the Personal Data Protection Policy for The Dental Hospital, Faculty of Dentistry, with Chulalongkorn University acting as the Data Controller under the Personal Data Protection Act B.E. 2562. It will elucidate how Chulalongkorn University has collected, compiled, and used the personal data of patients and other individuals who have contacted The Dental Hospital, Faculty of Dentistry, as per the scope and objectives outlined by Chulalongkorn University.

Contact Details of the Data Controller The Dental Hospital, Faculty of Dentistry, Chulalongkorn University Assoc. Prof. Dr. Kasekarn Kasevayuth 34 Henri Dunant Road, Wang Mai Subdistrict, Pathum Wan District, Bangkok 10330 Phone: 02-218-8646, 02-218-8839 Email: PDPADent@chula.ac.th	Contact Details of the Personal Data Protection Officer: Prof. Dr. Boonchai Stitmannaitum, D.Eng. Phone: 02-218-3341 Email: DataBreach@chula.ac.th
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This policy encompasses the patients and other individuals who have contacted The Dental Hospital, Faculty of Dentistry.

In this policy, the following terms will be used:

"Processing" refers to any operation carried out by Chulalongkorn University regarding personal data of The Dental Hospital, Faculty of Dentistry's service recipients, including collection, use, retention, disclosure, and deletion of personal data.

"Lawful Processing" means the necessary justification for processing personal data as per Sections 24 and 26 of the Personal Data Protection Act B.E. 2562.

"Personal Data" refers to information about an individual that can directly or indirectly identify that person, as defined by the Personal Data Protection Act B.E. 2562.

"You" refers to the service recipients of The Dental Hospital, Faculty of Dentistry.

"We" refers to The Dental Hospital, Faculty of Dentistry, Chulalongkorn University.

B. WHICH PERSONAL DATA DO WE PROCESS?

We process the following categories of personal data:

- ID Numbers: Such as national identification numbers, passport numbers, and patient identification numbers.
- Contact and Address Information: Such as addresses, telephone numbers, and email addresses.
- Personal Information: Such as marital status, nationality, date of birth, photos, and occupation.
- Names, surnames, and titles
- IT Data.
- Financial Information: Such as bank account numbers.
- Health Benefits Information: Such as Civil Servant Medical Benefit Scheme, Social Security Scheme, or Universal Coverage Scheme.
- Supporting Documents: Such as copies of identification card, copies of house registration book, copies of bankbook, copies of certificate of student status.
- Third-Party Information: Such as data related to spouses, parents, children, and other related individuals.

Additionally, we may process special categories of sensitive data in certain cases. These sensitive data categories may include:

- Medical Records: Including medical certificates, medical treatment histories, drug or food allergy histories, medical visit histories, physical therapy histories, and special healthcare needs.
- Diagnosis Records: Such as accident information, lifestyle behaviors, consumption behaviors, sleep behaviors, diagnostic data obtained from examinations such as drawings, photographs, radiographic images, electronically recorded data, dental modeling data, and other relevant information.
- Biometric Data: Such as blood type, fingerprints, genetic data, and sexual activity data.
- Criminal Records.
- Religious Beliefs.

C. HOW DO WE COLLECT PERSONAL DATA?

Generally, we collect personal data directly through the following processes:

- Patient registration.
- Medical history and patient screening.
- Medical examinations, diagnosis, and treatment.
- Financial transactions, such as payment for healthcare services.
- Data obtained directly through the use of our website services. We use cookies to collect personal data as outlined in our Cookie Policy (<http://www.dent.chula.ac.th/wp-content/uploads/2023/10/20221129-dent-chula-cookies-policy.pdf>).

However, additional data may be collected from external sources, including:

- Website usage data, user account information, or data that you have modified or updated in your user account with The Dental Hospital, Faculty of Dentistry, Chulalongkorn University.

- Identity verification and authentication obtained from other user accounts that you control, including but not limited to access through Facebook or Google accounts.

Regarding additional data from other organizations, its Personal Data Protection Policy should not contradict the provisions of this policy.

D. HOW DO WE USE PERSONAL DATA?

We use personal data for various purposes of Chulalongkorn University and the healthcare service provided by The Dental Hospital, Faculty of Dentistry. We process your personal data for the following objectives: dental patient treatment, support for research and academic pursuits, and addressing community dental health issues, all in accordance with the Personal Data Protection Act B.E. 2562. This processing of personal data is for the benefit of the data owners and can be summarized as follows:

A = Patients	B = Parents
C = Caregivers	D = Legal representatives
E = Dentists/Physicians	F = Dental students
G = Postgraduate dental students	H = Nurses
I = Dental assistants/Nursing assistants	J = Dental assistant students
K = Medical Technologists	L = Pharmacists
M = Screening Officer	N = Public Relations/Entitlement Verification Officer
O = Medical Records Officer	P = Unit Medical Records Officer
Q = Dental Information Resource Officer	R = Radiological Officer
S = Dental Laboratory Officer	T = Pathological Officer
U = Appointment Scheduling Officer	V = Finance Collection/Finance and Treasury Officer
W = Administrative Panel (Dean/Vice Dean)	X = Departmental Director
Y = Researchers	MED = Personnel from Type E to Type J
Z = External parties	ALL = Personnel from Type E to Type V

Purposes	Personal Data Used	Lawful Processing
Patient Registration and Entitlement Verification (A, B, C, D, N, O, P)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Supporting Documents - Occupation - Third-Party Information - Religious Beliefs - Health Benefits - Medical/Dental Records 	Contract Lawful Basis for medical purposes under Section 26(5)(A).
Medical History Taking and Patient Screening (A, B, C, D, MED, M)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Medical/Dental Records - Diagnosis Records - Biometric Data - Health Benefits 	Contract Lawful Basis for medical purposes under Section 26(5)(A).
Examination and Diagnosis (A, B, C, D, E, F, G, H, R)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Medical/Dental Records - Diagnosis Records - Biometric Data - Health Benefits 	Contract Lawful Basis for medical purposes under Section 26(5)(A).
Outpatient dental treatment (A, B, C, D, E, F, G, H)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Medical/Dental Records - Diagnosis Records - Biometric Data - Health Benefits 	Contract Lawful Basis for medical purposes under Section 26(5)(A).

Purposes	Personal Data Used	Lawful Processing
Inpatient dental treatment (A, B, C, D, E, F, G, H)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Medical/Dental Records - Diagnosis Records - Biometric Data - Health Benefits 	Contract Lawful Basis for medical purposes under Section 26(5)(A).
Dispensing medicines, medical supplies, and dental products (A, B, C, D, E, F, G, H, L)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Medical/Dental Records - Diagnosis Records - Biometric Data - Health Benefits 	Contract Lawful Basis for medical purposes under Section 26(5)(A).
Sending to external laboratory/dental laboratory (A, B, C, D, E, F, G, H, K, S)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Medical/Dental Records - Diagnosis Records 	Contract Lawful Basis for medical purposes under Section 26(5)(A).
Appointment (A, B, C, D, MED, U)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Medical/Dental Records 	Contract Lawful Basis for medical purposes under Section 26(5)(A).
Finance (A, B, C, D, E, F, G, H, V)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Supporting Documents - Medical/Dental Records - Health Benefits 	Contract Lawful Basis for medical purposes under Section 26(5)(C).

Purposes	Personal Data Used	Lawful Processing
Research (A, B, C, D, MED, Y)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Supporting Documents - Medical/Dental Records - Religious Beliefs - Diagnosis Records - Biometric Data 	Research Chulalongkorn University regulations concerning the internal division of departments within the Faculty of Dentistry, 2011
Teaching (A, B, C, D, MED)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Supporting Documents - Occupation - Third-Party Information - Religious Beliefs - Health Benefits 	Chulalongkorn University regulations concerning the internal division of departments within the Faculty of Dentistry, 2011
Hospital Public Relations (A, B, C, D, ALL)	<ul style="list-style-type: none"> - Names, Surnames, and Titles 	Legitimate Interest
Mobile dental unit or off-site dental service (A, B, C, D, ALL, Z)	<ul style="list-style-type: none"> - ID Numbers - Names, Surnames, and Titles - Personal Information - Contact and Address Information - Supporting Documents - Occupation - Third-Party Information - Religious Beliefs - Health Benefits - Medical/Dental Records 	Contract Lawful Basis for medical purposes under Section 26(5)(A).

We will process your personal data only for the purposes you have informed us. In some cases, we may consider processing your personal data for other reasons related to and not exceeding the original purpose. However, in cases where we need to process data for new purposes unrelated to the original purpose, we will seek your consent again for the use of that data.

E. USE OF PERSONAL DATA WITH EXTERNAL ORGANIZATIONS

We may need to share data with other parties, which are personal data processors, for example, medical record software companies, external dental laboratories, and more, in order to fulfill hospital duties.

Furthermore, there may be a need to transfer data to external organizations as follows to process data as stipulated in contracts or laws:

- Individuals who work with us or third parties, such as information system developers, individuals we have hired to perform tasks related to personal data to enhance various services further.
- Dental laboratories both domestic and foreign.
- Other examination laboratories.
- Financial institutions, such as commercial banks.
- Contractual agencies, such as Government Savings Bank, Bank of Thailand, and The Crown Property Bureau.
- Government agencies, such as the National Health Security Office and The Comptroller General's Department.
- Patient's insurance companies.
- Other individuals necessary for us to operate and provide services to you, including any activities within the scope and objectives as specified in this policy.

In cases where we use or transfer personal data to external organizations, we will do so to the extent necessary and minimize the data provided. We may consider using techniques such as anonymization and pseudonymization to ensure data security. For external individuals who act as personal data processors for Chulalongkorn University, they must provide appropriate data protection measures in accordance with this policy, and we will not allow them to use the data for purposes other than those specified by us.

F. SENDING OR TRANSFERRING DATA ABROAD

We may need to send your data abroad, such as to external dental laboratories to produce dental work. In such cases, we will only send data abroad under at least one of the following conditions:

- The destination country that receives the data has been deemed to provide adequate protection of personal data by the Office of the Personal Data Protection Committee.
- The recipient organization abroad operates under a personal data protection policy that has been audited and certified by the Office of the Personal Data Protection Committee.
- The recipient organization abroad has implemented appropriate measures to protect personal data that can be enforced according to the data subject's rights, including effective legal remedies, following criteria and methods as determined by the Personal Data Protection Committee, such as standard clauses, processing methods, certified standards, etc.
- It is necessary for the exercise of rights under the law.
- You have given consent and are aware of the inadequate personal data protection standards of the destination country or international organization receiving the data.
- It is necessary for the performance of a contract to which you are a party or for taking steps at your request before entering such contract.
- It is an action taken in accordance with a contract between the University and individuals or legal entities for your benefit.
- It is necessary to protect or prevent a threat to your life, body, or health or that of others when you are unable to provide consent at that time.
- It is necessary for the performance of tasks for an important public interest.

G. ENSURING THE SECURITY OF PERSONAL DATA

Chulalongkorn University has implemented measures to safeguard the security of personal data for the patients of The Dental Hospital, Faculty of Dentistry. External parties who act as data processors for us are required to comply with orders and agreements aimed at maintaining the security of personal data. Additionally, access to your personal data by personnel not involved in the processing of such data is restricted.

You can find more details about our security standards for personal data protection at <https://www.it.chula.ac.th/security-standards-pdpa/>.

H. DURATION OF PERSONAL DATA RETENTION

We will retain personal data for the necessary duration to fulfill the objectives of Chulalongkorn University, as well as any legal, accounting, and audit-related tasks. You can find details about the duration of personal data retention in the schedule of personal data processing activities for the patients of The Dental Hospital, Faculty of Dentistry.

I. RIGHTS OF DATA OWNERS

You have the following rights regarding personal data:

1. Right to be Informed: You have the right to be informed about the details of the collection of your personal data.
2. Right of Access: You can request and verify copies of your data to ensure that we process your data in compliance with the law.
3. Right to Data Portability: In cases where we process your data in a format that can be read or used automatically and can be sent or transferred to another organization either automatically or directly, you have the right to request that such data be transferred automatically to another organization, unless it is technically infeasible.
4. Right to Object: You can object to the processing of your data in the following cases:
 - When it is for a public task or legitimate interests.
 - For direct marketing purposes.

- For scientific, historical, or statistical research purposes, unless it is necessary for the public interest.

5. Right to Erasure: You can request the deletion or destruction of your personal data when:

- It is no longer necessary for processing.
- You withdraw your consent to the processing, and there is no legal basis for further processing.
- You object to the processing of your data, and there are no overriding legitimate grounds.
- Your data has been processed unlawfully.

6. Right to Restrict Processing: You can request the suspension of the processing of your data in the following cases:

- When we are verifying your request to correct your data.
- When your data must be deleted or destroyed, but you request suspension instead.
- When your data is no longer necessary, but you need it for establishing, exercising, or defending legal claims or for public interest reasons.
- When your request to object is being verified or investigated.

7. Right to Rectification: You can request the correction of your data to be accurate, complete, and up-to-date when you find that your data is inaccurate, incomplete, or not current, as we are unable to verify and correct such data ourselves.

Please note that in some cases, we may not be able to fulfill your requests due to operational requirements, contractual obligations, or legal obligations. If you have consented to the processing of personal data, you can withdraw your consent at any time by contacting the relevant department. However, withdrawing consent will not affect the legality of any data processing that has already occurred.

Please be informed that we will keep a record of various actions taken regarding your requests to address any issues that may arise. If you have any doubts about the details of our data protection practices, you can refer to the data protection guidelines (TDPG3.0 EXTENSION) available at <https://www.law.chula.ac.th/event/10316/>.

If you wish to exercise the aforementioned rights or have any complaints regarding the processing of personal data, please contact The Dental Hospital, Faculty of Dentistry at 02-

218-8646. We will promptly and in accordance with the law address your requests. Additionally, you have the right to file a complaint regarding any breaches of personal data protection laws with the Office of the Personal Data Protection Committee.

J. REVIEW AND AMENDMENT TO THE POLICY

This document is the personal data protection policy for the patients of The Dental Hospital, Faculty of Dentistry, Chulalongkorn University, last updated on December 6, 2022. We reserve the right to amend, modify, or add to certain parts of the personal data protection policy for patients of The Dental Hospital, Faculty of Dentistry, Chulalongkorn University. In case of significant changes, you can review the updated policy, and we will notify you through appropriate channels.