



DATA PROTECTION POLICY

Guiding Statements

To provide a safe, welcoming and affirming environment promoting staff well-being; recruiting and retaining a balanced, diverse mix of well qualified international and local staff who offer a blend of academic rigour and internationalism in our unique Singapore international school environment through provision of professional development to model and enhance a continuous love of learning and effective performance.

ACS (International) recognises the importance of personal data entrusted to us.

We strongly believe and are committed to discharging our duty to ensure that your personal data is properly managed, protected and processed.

This Data Protection Policy is intended to assist you in understanding how we collect, use, disclose, protect and process any personal data that we receive from you, and designed in accordance with the requirements under the Personal Data Protection Act 2012 (**"PDPA"**).

Introduction to the Personal Data Protection Act 2012

"Personal Data" is hereinafter defined as data, whether true or not, about an individual who can be identified from that data or from that data and other information to which the organisation has or is likely to have access.

Various examples of Personal Data may include full names, NRIC/FIN numbers, passport numbers, mobile telephone numbers, photographs or video images of an individual, and personal email.

In general, before we collect any personal data from you, we will notify you of the purposes for which your Personal Data may be collected, used and/or disclosed, as well as obtain your consent for the collection, use and/or disclosure of your Personal Data for the intended purposes.

Purposes for Personal Data

Depending on the type of relationship you have with us (e.g. student, parent, alumnus, staff, applicant, vendor, service provider), the Personal Data that we gather from you may be collected, used and/or disclosed for the following purposes.

- Evaluating suitability for admission or employment, enrolling or employing, providing educational courses and training, including sending materials on course/study/assignment/lecture materials, information on time tables and examination details via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;
- Administering and/or managing relationships with ACS (International) (including responding to enquiries, the mailing of correspondence, statements or notices which could involve the disclosure of certain Personal Data to bring about delivery of the same);
- Carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or put in place by ACS (International), including the obtaining of references and/or other information from prior educational institutions and employers;

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- Processing application(s) for scholarships and/or financial aid, and research support, and administering and managing scholarship/financial aid/grant and other support programmes, which may include use of Personal Data for development and fund raising activities and disclosure of Personal Data to donors, grantors, external evaluators and/or external organisations for purposes of periodic reports, event invitations, surveys and/or publicity of ACS (International)'s related programmes;
- Investigating possible fraud, misconduct, unlawful action or omission, and utilizing electronic access and video systems to maintain campus security of persons or property, control access and investigate suspicious or inappropriate activities;
- Responding to requests for information from government or public agencies, ministries, statutory boards or other similar authorities or non-government agencies authorised to carry out specific Government services or duties;
- Carrying out market-related, evaluative or similar research and analysis for ACS (International)'s operational strategy and policy planning purposes, including providing data to external parties for university programme evaluation and to students' former academic institutions and to partner institutions for jointly administered programmes;
- Outreach and engagement to garner support and resources for ACS (International), its community and affiliated institutions;
- Supporting ACS (International) functions including, but not restricted to, the teaching and personal and professional development of students, research and administration of ACS (International);
- Processing and administering applications for overseas exchange programmes, summer school, overseas internships and other overseas activities and administering such programmes including disclosure of information to overseas universities, employing and training organisations;
- Processing, administering and conferring awards of prizes, medals, scholarships, classes of honours and other marks of distinction, and student or graduation status, and publication or releasing of information on the same;
- Engaging alumni including but not limited to notification on ACS (International) and alumni-related initiatives and activities, invitation to ACS (International) and alumni-related events, updating of alumni information, invitation to participate in alumni surveys and sending of communication collaterals;
- Processing applications and enrolment activities related to health, life and travel insurance and service provision as well as concession cards, and campus accommodation and administering matters related to use of these services;
- Processing applications for and administering local and overseas career related activities, events, programmes, internships, employment opportunities, and career coaching, and sharing information with companies (whether local or overseas) for purposes of recruitment, internship, industrial attachment, job placement and research support;
- Facilitating participation in student life and alumni development opportunities which may include social, cultural, athletic, and educational activities, events, volunteering and training programmes, student membership and leadership positions in clubs, societies, halls and residences, and orientation/reception activities;
- Taking of photographs and/or videos (whether by ACS (International) staff or third party photographers and/or videographers) during school programmes, events or seminars organised by ACS (International) or its affiliates for publicity purposes;

- For record keeping (including and not limited to campus video surveillance, visitor registration);
- To provide updates on ACS (International) events;
- If consented to in the registration form and/or other methods of consent notification, providing marketing, advertising and promotional information via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;
- Any other purposes which ACS (International) may inform you of in writing from time to time, but for which ACS (International) will seek your separate consent.

In order to conduct our operations more smoothly, we may also be disclosing the Personal Data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, which may be sited locally or outside of Singapore, for one or more of the above-stated Purposes. This is because such third party service providers, agents and/or affiliates or related corporations would be processing your Personal Data on our behalf for one or more of the above-stated Purposes.

Specific Issues for the Disclosure of Personal Data to Third Parties

We respect the confidentiality of the Personal Data you have provided to us.

In that regard, we will not disclose any of your Personal Data to any third parties without first obtaining your express consent permitting us to do so. However, please note that we may disclose your Personal Data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:

- Situations in which the disclosure is required based on the applicable laws and/or regulations;
- Situations in which the purpose of such disclosure is clearly in your interests and consent cannot be obtained in a timely way;
- Situations in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- There are reasonable grounds to believe that the health or safety of yourself or another individual will be seriously affected and consent for the disclosure of the data cannot be obtained in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;
- Situations in which the disclosure is necessary for any investigation or proceedings;
- Situations in which the Personal Data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the Personal Data is necessary for the purposes of the functions or duties of the officer; and/or
- Situations in which the disclosure is to a public agency and such disclosure is necessary in the public interest.

Where Personal Data is disclosed to third parties with your express consent, we will provide for adequate forms of protection over such Personal Data and employ our best efforts to require such third parties to protect your Personal Data in compliance with the PDPA and our data protection policies.

Request for Access, Correction and/or Withdrawal of Personal Data

You may request to access and/or correct the Personal Data currently in our possession, or have the option to withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession or under our control at any time by submitting a written request to our PDPA Contact Person (See Below).

For a request to access your Personal Data, we will provide you with the relevant Personal Data within a reasonable time from such a request being made.

For a request to correct your Personal Data, once we have sufficient information from you to deal with the request, we will send the corrected Personal Data to every other organisation to which the Personal Data was disclosed by us within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

For a request to withdraw consent, we will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your Personal Data in the manner stated in your request.

The withdrawal of your consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your Personal Data, it may mean that we will be unable to continue with your existing relationship with us.

We may also be charging you a reasonable fee for the handling and processing of your request to access and/or correct your Personal Data. You will be notified in advance of such cost, and we will provide you with a written estimate of the fee we will be charging.

Administration and Management of Personal Data

We will take reasonable efforts to ensure that your Personal Data is accurate and complete and updated.

Reasonable security arrangements will be made to ensure that your Personal Data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your Personal Data. However, we cannot assume responsibility for any unauthorized use of your Personal Data by third parties which are wholly attributable to factors beyond our control.

We will also take reasonable efforts and measures to ensure that the Personal Data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that Personal Data was collected is no longer being served by the retention of such Personal Data; and (ii) retention is no longer necessary for any other legal or business purposes.

Updates on Data Protection Policy

As part of our efforts to ensure that we properly manage, protect and process your Personal Data, we will be reviewing our policies, procedures and processes from time to time.

We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. You may request for the latest version of the Data Protection Policy at any time.

You are strongly encouraged to check and/or request for the latest version of the Data Protection Policy from time to time on our website, www.acsinternational.edu.sg to ensure that you are well informed of our latest policies in relation to Personal Data Protection.

Complaint Process and Feedback

If you have any complaint, grievance or feedback regarding how we are handling your Personal Data or about our compliance with the PDPA, you are welcome to contact us with your complaint, grievance or feedback.

Kindly contact us through one of the following methods with your complaint, grievance or feedback:

- Singapore Telephone Number: (65) 6472 1477, (65) 6472 0477
- Email: (enquiries@acsinternational.edu.sg) Attention it to the 'Data Protection Officer'
- Office Address: (61, Jalan Hitam Manis Singapore 278475)

We will certainly aim to deal with any complaint, grievance or feedback that you may have efficiently and fairly.