

Write-up: Policy Details

Objective

The Personal Data Protection Policy is built upon the Personal Data Protection Act, which governs the collection, use and disclosure of personal data. The act addresses these concerns, by ensuring that individuals' personal data are safe guarded against misuse by regulating the processing and management of personal data

Responsibility

Kingston is responsible for the personal data in its possession or under its control, and will develop and implement policies and practices that are necessary for Kingston to meet the obligations under the Act.

Kingston is to ensure that individual data is secure at all times and safe from unauthorized access, alteration, use or loss. It is the responsibility of all staff to adhere to the policy of data collection, to provide a supportive environment and culture of best practice processing of personal data.

Policy Statements

1. Introduction

"Personal Data" is defined under the PDPA to mean personal information, whether true or not and whether in electronic or other form, about an individual who can be identified:

- i. From that data; or
- ii. From that data and other information to which we have access to or are likely to have access to.

Examples of personal data include name, address, NRIC/FIN/Passport number, photograph or video image, telephone numbers and email addresses.

To find out more about PDPA, you may visit the Singapore Personal Data Protection Commission's website.

2. Purposes for Collection, Use & Disclosure of Personal Data

Depending on your relationship with us (e.g. as an applicant, student, alumni of Kingston, staff, academic staff, donor, vendor, service provider, parents, guardians, recruitment agents and / or any other person relating to our organization), the personal data, photographic images, videos, etc., which we collect from you may be collected, used and/or disclosed for the following purposes:

- a. Evaluating suitability for admission or employment, enrolling or employing, providing educational courses and training, including sending materials on course / study / assignment / course materials, information on time tables and examination details via

- postal mail, electronic mail, SMS or MMS, fax and/or voice calls;
- b. Administering and/or managing relationships with the Kingston (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);
 - c. Assessing, monitoring and reporting on individual student performance, attendance and disciplinary records;
 - d. Supporting students' learning through curricula and extra-curricular activities including but not limited to outdoor trips and inter-school competitions;
 - e. Providing pastoral care and counseling where appropriate;
 - f. Providing healthcare and wellness services;
 - g. Application of student passes where appropriate;
 - h. Application for Ministry of Education approval for Singapore Citizens and Permanent Residents;
 - i. Facilitating payment for goods and/or services provided by Kingston and/or a third party on the Kingston's behalf including verification of bank and credit card details with third parties and using the Personal Data provided to conduct matching procedures against databases of known fraudulent transactions (maintained by us or third parties);
 - j. Responding to any complaints, feedback, requests and enquiries by student / parents / guardians;
 - k. Disclosing your records to your parent(s) or guardian(s) at their request
 - l. Informing student / parents / guardians/ related parties of events, talks, seminars and updates;
 - m. Maintaining and updating our student, alumni, and academic staff records;
 - n. Generating financial, regulatory, management or survey reports and statistics for the Kingston's business and administrative purposes;
 - o. Promoting Kingston to prospective students, including but not limited to the school's prospectus, magazine and website;
 - p. Sending promotional and marketing information by post, email and SMS about the School, activities and events as well as carefully selected third parties;
 - q. Taking of photographs and/or videos (whether by Kingston staff or third party

photographers and/or videographers) during events or seminars organised by Kingston or its affiliates for publicity purposes;

- r. Engaging alumni including but not limited to notification on Kingston and alumni- related initiatives and activities, invitation to Kingston and alumni-related events, updating of alumni information, invitation to participate in alumni surveys and sending of communication collaterals;
- s. 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;
- t. Meeting or complying with Kingston's internal policies and processes / procedures and any applicable laws, rules, regulations, codes of practice or guidelines, orders or requests issued by any court, legal or regulatory bodies (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation);
- u. 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 Kingston, including the obtaining of references and/or other information from prior educational institutions and employers;
- v. Preventing, detecting and investigating crime, offences or breaches including that related to the security of Kingston's premises (including but not limited to the use of security cameras);
- w. Conducting checks with the DO NOT CALL Registry;
- x. Purposes, which are reasonably related to the above.

By providing the Personal Data, including those related to a third party (e.g.:- information of your parents) to us through the various channels (e.g.:- written form, webpage, email, etc.), you represent and warrant that consent, including that of the third party, has been obtained for collection, use and disclosure of the Personal Data for the respective purposes. In the event the personal data is to be used for a new purpose, Kingston will notify you and seek your consent.

Kingston ensures that your Personal Data held by us shall be kept confidential. When transferring personal data to our third party service providers, agents and/or our affiliates or related corporations whether in Singapore or elsewhere in order to carry out one or more of the purposes listed above, we will require them to ensure that your Personal Data disclosed to them is kept confidential and secure.

3. 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 (unless otherwise for the purposes stated above) without first obtaining your expressed 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:

- a. The disclosure is required based on the applicable laws and/or regulations;
- b. The purpose of such disclosure is clearly in your interests and consent cannot be obtained in a timely way;
- c. The disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- d. 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;
- e. The disclosure is necessary for any investigation or proceedings;
- f. The personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorization 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
- g. The disclosure is to a public agency and such disclosure is necessary in the public interest.

The instances listed above are not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to peruse the PDPA, which is publicly available at <http://statutes.agc.gov.sg>.

4. Withdrawal of Consent

You may withdraw your consent to any or all use of Personal Data for any or all of the purposes set out in this policy in writing and submitting through our DPO. If you withdraw your consent to the use of your Personal Data for any or all purposes, depending on the nature of your request, Kingston may not be in a position to continue to provide our services to you or administer any contractual relationship in place, in which case Kingston reserves the right to cease providing the services and/or terminate the contractual relationship with you.

Without prejudice to the foregoing, you agree and acknowledge that any withdrawal of your consents in accordance with the terms set out in this notice will not affect any consent which you may have provided to Kingston in respect of the use of your Singapore telephone number(s) for the receiving of marketing or promotional information.

5. Administration & Management of Personal Data

As Kingston relies on your Personal Data to provide services to you, you shall ensure that at all times the information provided by you to us are correct, accurate and complete. Student shall update us in a timely manner of all changes to the information provided to us through the relevant form from the Staff Office. Alumni and Stakeholders shall update their Personal Data to our relevant departments as and when necessary or through our annual update.

You can view your personal data, which Kingston has collected and stored at any time. In order to do so, you will need to submit in writing to DPO email or Staff Office (for student) for access to view your personal data. Your right to view your personal data is limited to your personal data only. Kingston is not permitted to reveal any personal data about any other individual. Kingston reserves the right to refuse access to your personal data if it will reveal or lead to the revelation of another individual's personal data, cause harm to you or another individual or is contrary to the national interest.

Your Personal Data is retained to the extent one or more of the purposes for which it was collected remains valid and/or for other legal or business purposes for which retention may be necessary.

Kingston will take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that the electronic storage and transmission of your personal data is adequately protected and secured with the appropriate security arrangements and that our data intermediary are aware of the requirements of PDPA. 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.

If you have any feedback or enquiries relating to our PDPA related policies and procedures or would like to obtain access and make corrections to your personal data, please do not hesitate to contact our Data Protection Officer (DPO*)

- Address : Block 6A Woodlands Centre Road #03-280 Singapore 731006
- Telephone : 62699916
- Email : dpo@kingston.edu.sg

Kingston reserves the right to amend this Policy with or without notice from time to time.

6. Notice

Please note that this Policy does not derogate from the terms and conditions governing your relationship with Kingston and its related corporations. Kingston's rights under this Policy shall be without prejudice to other rights of collection, use and disclosure available pursuant to the terms and conditions or under the law and nothing herein is to be construed as limiting any of these other rights.