

# Innova Primary School: Personal Data Protection Policy

## 1. PURPOSE AND SCOPE OF THE POLICY

- 1.1 The purpose of this document (“Data Protection Policy”) is to inform you of Innova Primary School’s (referred to herein as “IPS”, “us”, “we” or “our”) policies on data collection, usage, disclosure, processing and protection, which are subject to the Singapore Personal Data Protection Act 2012 (“PDPA”).
- 1.2 This Data Protection Policy is effective as of **1 January 2018**.
- 1.3 This Data Protection Policy supplements but does not supersede or replace any other consent you may have previously provided to IPS in respect of your personal data, and your consent, herein, is additional to any rights which IPS may have at law to collect, use or disclose your personal data.
- 1.4 IPS may also use, disclose or process personal data about you collected before **1 January 2018** for the purposes for which the personal data was collected unless consent for such use is withdrawn in accordance with the PDPA or you have otherwise indicated to IPS, whether before, on or after the coming into force of the PDPA, that you do not consent to the use of the Personal Data.
- 1.5 IPS may from time to time update this Data Protection Policy at its absolute discretion, to ensure that it is consistent with any changes in legal or regulatory requirements. 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](#), to ensure that you are well informed of our latest policies in relation to Personal Data Protection.

## 2. DEFINITIONS

- 2.1 In this policy, “**Personal Data**” refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which IPS has or is likely to have access, including data in our records as may be updated from time to time.
- 2.2 Examples of such Personal Data may include full names, NRIC/FIN numbers, passport numbers, mobile telephone numbers, photographs or video images of an individual, and/or personal emails which when taken would be able to identify the individual.

### **3. COLLECTION OF PERSONAL DATA**

- 3.1 Generally, IPS collects Personal Data in the following ways:
- a) When you submit an application to be enrolled with the school or submit forms for school activities;
  - b) When you submit a job application for employment with IPS;
  - c) When you interact with our staff (whether via telephone calls, letters, emails or during face-to-face meetings);
  - d) When you are contacted by, and respond to, our staff;
  - e) In the course of providing educational services to your child; and
  - f) When you submit your Personal Data to us for any other reasons.
- 3.2 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. IPS does not collect any Personal Data, which is not reasonably necessary for the purpose for which it is collected.
- 3.3 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, family members or your employees etc.), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes set out herein.
- 3.4 You must ensure that all Personal Data submitted to us is complete, accurate and up to date.

### **4. PURPOSES FOR COLLECTION, USE AND/OR DISCLOSURE OF PERSONAL DATA**

- 4.1 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 stated below.
- 4.1.1 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;
  - 4.1.2 Administering and/or managing relationships with IPS (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);

- 4.1.3 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 IPS, including the obtaining of references and/or other information from prior educational institutions and employers;
- 4.1.4 Processing application(s) for scholarships and/or financial aid, and research support, and administering and managing scholarship/financial/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 IPS-related programmes;
- 4.1.5 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;
- 4.1.6 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;
- 4.1.7 Carrying out market-related, evaluative or similar research and analysis for IPS' operational strategy and policy planning purposes, including providing data to external parties and to students' former academic institutions and to partner institutions for jointly administered programmes;
- 4.1.8 Supporting IPS' functions including, but not restricted to, the teaching and personal and professional development of students, research and administration of IPS;
- 4.1.9 Processing and administering applications for overseas exchange programmes, overseas immersion trips and other overseas activities and administering such programmes including disclosure of information to overseas institutions, employment and training organisations;
- 4.1.10 Processing, administering and conferring awards of prizes, medals, scholarships, and other marks of distinction, and student or graduation status, and publication or releasing of information on the same;
- 4.1.11 Engaging alumni including but not limited to notification on IPS and alumni-related initiatives and activities, invitation to IPS and alumni-related events, updating of alumni information, invitation to participate in alumni surveys and sending of communication collaterals;

- 4.1.12 Processing applications and enrolment activities related to health, life and travel insurance and service provision as well as concession cards, and administering matters related to use of these services;
  - 4.1.13 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;
  - 4.1.14 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 etc., and orientation/reception activities;
  - 4.1.15 Taking of photographs and/or videos (whether by IPS staff or third party photographers and/or videographers) during school programmes, events or seminars organised by IPS or its affiliates for publicity purposes;
  - 4.1.16 For record keeping (including and not limited to campus video surveillance, visitor registration);
  - 4.1.17 To provide updates on IPS events;
  - 4.1.18 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;
  - 4.1.19 Any other purposes which IPS may inform you of in writing from time to time, but for which IPS will seek your separate consent.
  - 4.1.20 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.
- 4.2 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:
- 4.2.1 Situations in which the disclosure is required based on the applicable laws and/or regulations;

- 4.2.2 Situations in which the purpose of such disclosure is clearly in your interests and consent cannot be obtained in a timely way;
  - 4.2.3 Situations in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual 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;
  - 4.2.4 Situations in which the disclosure is necessary for any investigation or proceedings;
  - 4.2.5 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
  - 4.2.6 Situations in which the disclosure is to a public agency and such disclosure is necessary in the public interest.
- 4.3 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.

## **5. WITHDRAWAL OF CONSENT AND/OR REQUEST FOR ACCESS, CORRECTION OF YOUR PERSONAL DATA**

- 5.1 If you would like to a) withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession; or b) obtain access and make corrections to your Personal Data records in our possession, please submit a written request to our PDPA Contact Person (See Below).

### Withdrawal of Consent

- 5.2 You may at any time withdraw any consent already given, or deemed to have been given under the PDPA, in respect of the collection, use or disclosure by IPS of Personal Data about you for any purpose on giving reasonable notice to IPS.
- 5.3 IPS does not prohibit an individual from withdrawing his consent to the collection, use or disclosure of Personal Data about the individual but this shall not affect any legal consequences arising from such withdrawal.

- 5.4 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter cease (and cause its data intermediaries and agents to cease) collecting, using or disclosing the Personal Data, as the case may be, unless such collection, use or disclosure, without the consent of the individual is required or authorized under the PDPA or other written law.
- 5.5 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, IPS may not be in a position to continue to provide its services to you, administer any contractual relationship in place, which in turn may also result in the termination of your agreements with IPS, and your being in breach of your contractual obligations or undertakings. IPS' legal rights and remedies in such event are expressly reserved.

#### Request to Access or Correct Personal Data

- 5.6 For a request to access personal data, we will provide you with the relevant personal data within a reasonable time from such a request being made.
- 5.7 For a request to correct personal data, we will process your request, including undertaking necessary verification activities, as soon as possible, after the request has been made.
- 5.8 We will send the corrected personal data to every other organization to which the personal data was disclosed by IPS within a reasonable time from such a request being made, unless that other organization does not need the corrected personal data for any legal or business purpose, or if you so consent, only to specific organizations to which the personal data was disclosed by us within a year before the date the correction was made.

## **6. MANAGEMENT AND CARE OF PERSONAL DATA**

- 6.1 We will take reasonable and appropriate measures to ensure that your Personal Data is accurate, complete and updated.
- 6.2 We will protect Personal Data in its possession or under its control by making reasonable security arrangements to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage, alteration and/or similar risks.
- 6.3 We do not assume responsibility for any unauthorized use of your Personal Data by third parties which are wholly attributable to factors beyond our control.
- 6.4 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 (such that the data cannot be associated with particular individuals) as soon as it is reasonable to assume that (a) the purpose for which that Personal Data was collected is no longer being served by the retention of such Personal Data; and (b) retention is no longer necessary for any other legal or business purposes.

## **7. COMPLAINT PROCESS AND FEEDBACK**

- 7.1 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.
- 7.2 Kindly contact us through one of the following methods with your complaint, grievance or feedback:
  - 7.2.1 Singapore Telephone Number: 6894 4693
  - 7.2.2 Email: [innova\\_pri@moe.edu.sg](mailto:innova_pri@moe.edu.sg)
  - 7.2.3 Office Address: 80, Woodlands Drive 17, Singapore 730352
- 7.3 We will certainly aim to deal with any complaint, grievance or feedback that you may have efficiently and fairly.

**END OF POLICY**