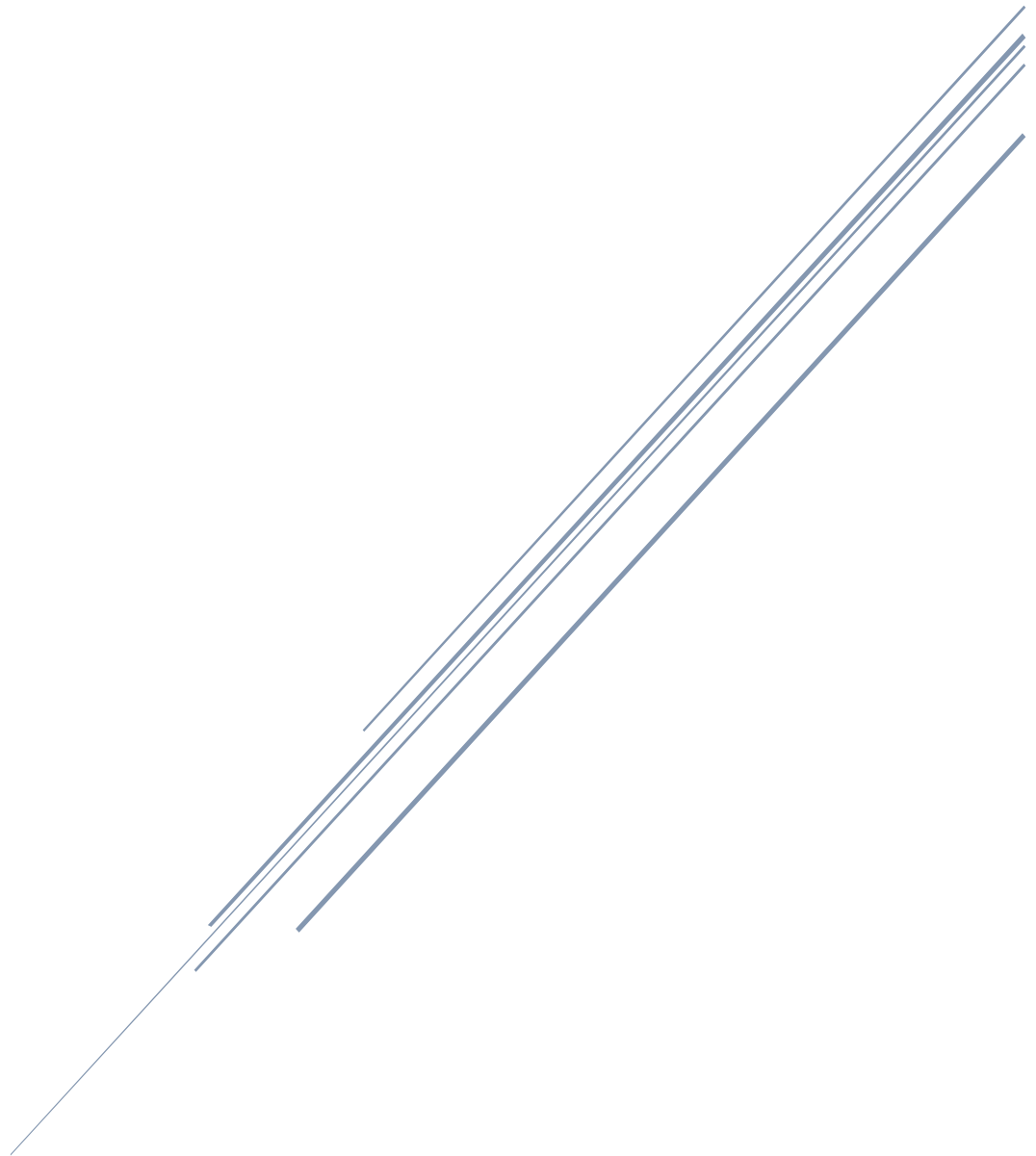


PERSONAL DATA PROTECTION POLICY

Version 1 01Mar2021



Insworld Institute
PDPA

Personal Data Protection Policy

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PART I: INTRODUCTION AND OVERVIEW

Insworld Institute respects the privacy of individuals and recognizes the importance of the personal data you have entrusted to us. We believe that it is our responsibility to manage any data we have collected appropriately, in full compliance with organisation policy and Singapore Law. We are committed to protecting any stakeholders' personal data we collect, to processing them accurately, and to restricting any disclosure of such data to those that need to access them for legitimate and necessary purposes.

We are committed to compliance at all times with the Singapore Personal Data Protection Act 2012 ("PDPA") as it relates to the collection, use, disclosure and security of personal data.

All Insworld employees are briefed on PDPA and sign a Confidentiality Agreement for Data Management before the commencement of their employment by Insworld Institute.

We recognise the rights of individuals to protect their personal data, including rights of access and correction, and the needs of organisations to collect, use or disclose personal data for legitimate and reasonable purposes.

Insworld Institute 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.

PART II: GUIDING PRINCIPLES

Insworld Institute collects personal data through the School website, enquiries forms, application forms, surveys, in addition to publicly available communication channels (such as social media platforms).

Personal data that are collected (including, but not limited to identification documents, contact details, date of birth, marital status, past and present academic qualifications or employment information, medical information, bank information, images - personal photographs) may be collected, used, disclosed or processed for the following purposes:

- a. Safeguarding and promoting the welfare of students, parents and staff
- b. Ensuring full compliance with all regulations and legislation dealing with the rights and responsibilities of the school, parents, students and staff

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- c. Employment-related purposes; appointment administration, human resource management including payroll, leave and benefits administration, review and disciplinary matters and staff development;
- d. Enrolment-related purposes;
 - Determining eligibility for enrolment
 - Assessing, monitoring and reporting students' progress
 - Providing online services, such as Furlong SchoolBase, to students and parents
 - Responding to questions and feedback
 - Applying to the relevant Singapore authorities for documents /permissions (e.g. Student's Pass) needed for enrolment at the school
 - Teaching, or school-led activities such as field trips, camps, extra-curricular activities or inter-school activities
 - Providing academic references or educational history to a third party
 - Billing and finance
 - Any other purpose relating to the student's enrolment and education at the school, or to the operation of the school, if deemed necessary or reasonable by the school.
- e. Alumni communications;
- f. Conduct of statistical studies and analyses;
 - Conducting surveys of parents and students, whether by the school or a third party on behalf of the school to assess the performance of the School as a whole;
- g. Promotional and marketing purposes relating to the school
 - Making use of photographs, videos or sound recordings of students in school publications, websites or other external media
 - Maintaining relationships with present and past students and their parents/guardians for marketing and promotional purposes
- h. Any other matters relating to the mission, practice or operation of the school that the school may consider to be necessary or appropriate.

The PDPA recognises your rights to access and correct your personal data held by the school, as well as the need for the school to collect, use and disclose your personal data for its legitimate purposes.

PART III: CONSENT

Insworld Institute may (with some exceptions) collect, use or disclose personal data only with the knowledge and consent of the individual(s) whose personal data are being used or

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disclosed. This consent to collect, use, disclose, transfer or process personal data may be withdrawn at any time.

Insworld Institute will not use personal data for any purpose other than the purpose for which they were originally collected, unless the express consent of the individual(s) whose data are being used has been obtained.

PART IV: ACCESS AND CORRECTION

You have the right to request access to and/or to correct the personal data held about you and your child/ward by the school. The school shall respond to any such request as soon as reasonably possible. You may contact the school in writing (together with proof of your identity) to confirm whether and in what way(s) the School has used or disclosed any information relating to you and/or child/ward's personal data (for the calendar year dating back from the date of the request). You may also request that any errors or omissions in personal data regarding you or your child/ward be rectified. The PDPA policies of the school are available on request, as is information concerning complaints procedures that may arise in relation to PDPA matters.

You may also withdraw your consent to the collection, use, disclosure and processing of your personal data at any time. The school will advise you of any consequences of withdrawing your consent. The School must be able to verify your identity before it can accept any access or correction request from you. The School reserves the right to decline access if the burden or expense of providing access would be unreasonable or disproportionate, if the School is satisfied on reasonable grounds that a correction should not be made or if any of the exemptions under the PDPA are applicable. Written requests for access and corrections can be made to the School at admissions@insworld.edu.sg.

PART V: SECURITY AND RETENTION

The School will ensure that your personal data are always secure by implementing appropriate security measures to prevent any unauthorised access, collection, use, disclosure, copying or modification of your personal data, in particular when processing data involving third parties. The School will retain personal data only so long as there is a legitimate business or legal reason for retaining them, or if required to do so by law.

Insworld Institute Data Protection Officer

Ms. Cheh Wuei Tan

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