

PERSONAL DATA PROTECTION ACT POLICY FOR RAFFLES GIRLS' SCHOOL (SECONDARY)

Our Commitment

1. Raffles Girls' School (collectively "RGS", "us, "we" or "our") is committed to protecting your personal data.
2. This is our PDPA Policy that sets out how we collect, use, disclose and protect any Personal Data (defined below) that you give to us, and it is designed to meet the requirements of personal data protection laws in Singapore.
3. In general, prior to the collection of any personal data, we will notify wherever possible, the purpose for which Personal Data may be collected, used and disclosed.
4. Please read this PDPA Policy before submitting any information requested by us, or participating in or signing up for any activities, services or products offered by us, so that you are aware of and understand the purposes for which we collect, use and disclose your Personal Data.
5. From time to time, we may review and update this PDPA Policy to ensure that it is consistent with any changes in legal requirements. We encourage you to check this web page and our web site from time to time for any updated versions of this PDPA Policy that is posted and date stamped so that you are aware of when the PDPA Policy was last updated.

What We Collect

6. The types of personal data that we collect depend on the circumstances of collection and on the nature of the transaction undertaken with us.
7. The personal data that we may request includes but is not limited to (individually and collectively referred to as "**Personal Data**"):
 - 7.1 personal identification information, including name, identification and passport numbers, gender, date of birth, photographs, video recordings, closed circuit television (CCTV) footage, voice recordings;
 - 7.2 contact information, including postal address, email address, fixed-line telephone phone number and mobile phone number;
 - 7.3 personal records and demographic information, including academic history, academic qualifications, medical history, health and sickness reports, employment history and records;
 - 7.4 payment information, namely, credit or debit card information, including the name of cardholder, card number, billing address and expiry date;

- 7.5 technical and statistical data, such as your internet protocol (IP) address, browser type, domain names, access times and referring web site addresses, which will automatically be collected by us to maintain quality of the service and to compile general statistics regarding use of our web sites.

What We Do With the Personal Data

8. The Personal Data you provide helps us to understand your needs, maintain our relationship with you, process transactions, fulfil our obligations for any activities, services or products you undertake with us, and improve our service delivery. In particular, we collect your Personal Data for the following purposes, including without limitation:

- 8.1 to process, use and disclose of the information for, among other activities, the following:
- 8.1.1 school related activities, training, events, competition, scholarships/awards nominations and exchange programmes;
 - 8.1.2 evaluation of any applications and notifying of any awards and grants;
 - 8.1.3 evaluation and notification of student related matters, such as candidature matters, exchange programmes, achievements, placements, programmes or courses;
 - 8.1.4 fulfilment of student related activities (e.g. festival celebrations, orientation, student camps, conferences, student benefit activities) as may be provided by RGS to enhance student's life, create networking opportunities, foster community spirit, and holistic development of students;
 - 8.1.5 publicising, updating and/or reporting on the activities of and developments in RGS to students, staff, stakeholders and members of the public in any media, including media interviews by the general media, our school's web sites, newsletters, collaterals, posters and publications;
- 8.2 to respond to feedback from you;
- 8.3 to provide updates on RGS events;
- 8.4 to develop content of this web site and our related network of web sites;
- 8.5 for record keeping;
- 8.6 to market activities, services and products offered by us, our partners as well as our appointed agents, and to conduct product or satisfaction surveys and market research, which you will always have the option of opting out from receiving such information;

8.7 to ensure safety, security, conduct investigations and legal compliance, including disclosures as may be allowed or required by law, government ministries, government agencies and organs of state

(collectively referred to as “**Purposes**”).

9. We may also use and disclose your Personal Data within RGS, and with and to third parties:

9.1 In order to fulfil the Purposes listed above, in which case, we may:

9.1.1 disclose, transfer, and jointly use your Personal Data to and with such third parties in Singapore and overseas, and your Personal Data may also be transmitted to data storage facilities or our offices and appointed agents in Singapore or other countries in connection with our performance of the transaction with you;

9.1.2 share your Personal Data with our trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your Personal Data except to provide these services to us, and they are required to maintain the confidentiality of your Personal Data;

9.2 If required or authorised to do so by law or pursuant to a court order, including but not limited to circumstances where use and/or disclosure is:

9.2.1 necessary for any investigation or legal proceedings, including but not limited to fraud, intellectual property infringement or personal data;

9.2.2 necessary for establishing, exercising or defending our legal rights, or obtaining legal services;

9.2.3 necessary for responding to an emergency that threatens the life, health or safety of an individual;

9.2.4 in connection with or forms part of any purchase, sale, lease, merger or amalgamation of RGS, including business or assets, or any other acquisition, disposal or financing of RGS, but otherwise it is not in our usual course of business to sell, rent or lease your Personal Data to third parties.

Consent

10. Your express consent will be sought when collecting your Personal Data, for the Purposes, uses and disclosures set out above. There will also be instances where your consent for the collection or use of your Personal Data will necessarily be implied from the circumstances by nature of the task or transaction, including your interaction with us or in the course of signing up for, or accepting, any of our activities, services or products.

11. Where you are supplying the Personal Data of another individual (e.g. information of your child, parent, spouse, and/or employees, etc.), you shall ensure that the individual whose Personal Data is supplied to us has consented to provide us with their Personal Data for the respective purposes, and is informed of and consents to the terms of this PDPA Policy.

12. This PDPA Policy shall supplement any other policies that you may have previously provided consent to us in respect of your Personal Data.

Withdrawal of Consent

13. You have the option of withdrawing your consent to the use and disclosure of your Personal Data by making a written request to our PDPA Contact Person (see contact details and requirements below). Depending on the scope of your withdrawal, you will not be able to receive any updates on, and/or participate in, our activities, but your Personal Data may continue to be used and disclosed for other purposes such as processing of transactions you have with us.

Access

14. We will, upon your written request to our PDPA Contact Person (see contact details and requirements below), allow you to enquire about the ways in which your personal data has been or may have been used or disclosed within a year before the request. Where required or authorised to do so by law, we reserve the right to charge a reasonable administrative fee for this service and/or deny your request for access to your Personal Data.

Correction

15. You should ensure that all Personal Data submitted to us is current, complete and accurate. Failure on your part to do so may result in our inability to provide you with the products, services and activities you have requested.

16. If you believe that any Personal Data we are holding on you is incorrect or incomplete, please write to our PDPA Contact Person (see contact details and requirements below).

Security

17. We are committed to ensuring the security and protection of your Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying modification, disposal or similar risks.

18. While we strive to protect your Personal Data, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that no harmful code will enter our web sites and computer systems (for example viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with disclosing any information or transacting over the Internet or when using online portals, and we urge you to take every

precaution when using the Internet to disclose your Personal Data to us, including using strong passwords, changing your password regularly and using a secure browser.

19. If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person, and to inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorised transactions have taken place. We are not liable for any loss or damage resulting from your act or omission to safe-keep your username and password from unauthorised use.

Retention

20. Personal Data will be held for as long as it is necessary to fulfil the purpose for which it was collected. We will cease to retain the personal data or remove the means by which the personal data can be associated with individuals when it is no longer necessary for legal or business purposes.

Governing Law

21. This PDPA Policy and your use of this web site shall be governed in all respects by the laws of the Republic of Singapore.

Contacting Us – Feedback, Withdrawal of Consent, Access and Correction of your Personal Data

22. If you:

- 22.1 have any questions or feedback relating to your Personal Data or our PDPA Policy;
- 22.2 would like to withdraw your consent to any use of your Personal Data;
- 22.3 would like to obtain access and make corrections to your Personal Data; or

23. Please contact us by e-mail to rgss@moe.edu.sg with the subject title '**PDPA Policy**' and addressed to **PDPA Contact Person, Raffles Girls' School**.

24. To protect your personal data and security, we will also require you to verify your identity before we can respond substantially to your request.

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