



Personal Data Protection Policy

1	OVERVIEW	2
2	GUIDING PRINCIPLES	2
3	OBJECTIVES OF THIS POLICY.....	3
4	PURPOSES FOR WHICH PERSONAL DATA IS COLLECTED, USED AND DISCLOSED	3
5	ACCURACY AND DURATION OF RETENTION OF PERSONAL DATA	4
6	PROTECTION OF PERSONAL DATA	4
7	TRANSFER OF PERSONAL DATA.....	4
8	ACCESS AND CORRECTION	4
9	WITHDRAWAL OF CONSENT	5
10	ENQUIRIES	5

Prepared By	Approved By	Reviewed & Revised	Reviewed By	Next Review
Corp. Legal Director	ESC	Jun 2020	Corp. Legal Director	Jan 2021

1 Overview

- 1.1 At Tanglin Trust School, we are committed to observing the Personal Data Protection Act 2012 and all applicable personal data protection laws in our data management policies and practices.
- 1.2 We have issued Data Protection Guidelines to our staff to provide guidance on the collection, use, disclosure and processing of personal data of our staff, students, parents, alumni, and prospective students and employees of the School.
- 1.3 We may from time to time update this Policy to ensure that it is consistent with our growth, industry trends, and/or changes in the law.

2 Guiding Principles

- 2.1 We generally collect personal data through the School website, Portal, application forms, surveys, and/or other channels (including in the course of an individual's interaction with the School. Personal data may also be collected from participants taking part in various activities associated with delivering the mission of the School and its related entities or affiliates.
- 2.2 The types of personal data collected may include, but are not limited to:
 - Personal information such as name, NRIC/FIN/Passport number, date of birth, marital status, gender;
 - Contact information such as postal addresses, email addresses, telephone and fax numbers;
 - Past and present employment information such as company name, company type, sector, designation, business telephone and fax numbers;
 - Past and present academic qualifications such as schools attended, courses of study, period of study and academic results;
 - Billing information, including name of the credit/debit cardholder, credit/debit card number, security code and expiry date;
 - Images, including photographs, videos, film or illustrations;
 - Bank details.
- 2.3 Where applicable, the individual concerned will be informed explicitly, prior to or upon collection of the data, of the purposes for which the personal data are to be collected and the parties to whom the data may be transferred. They will also be informed of their right to request access to and correction of such personal data, and the contact details of the School's Data Protection Officer.

Prepared By	Approved By	Reviewed & Revised	Reviewed By	Next Review
Corp. Legal Director	ESC	Jun 2020	Corp. Legal Director	Jan 2021

3 Objectives of this Policy

- 3.1 To ensure that personal data is collected, stored and managed in accordance with the Personal Data Protection Act 2012.

4 Purposes for which Personal data is Collected, Used and Disclosed

- 4.1 We will collect, use and disclose personal data only for reasonable purposes. We may collect, use and disclose any personal data provided for the following purposes, including, but not limited to:
 - 4.1.1 employment-related purposes (appointment administration, human resource management including payroll, leave and benefits administration, review and disciplinary matters and staff development);
 - 4.1.2 enrolment-related purposes (admission assessment, registration, planning of curricula, communication with student and parents, provision of references, pastoral care, meal planning, disciplinary matters, extracurricular activities and provision of healthcare services);
 - 4.1.3 alumni communications;
 - 4.1.4 conducting of statistical studies and analyses;
 - 4.1.5 promotional and marketing purposes relating to the School and carefully selected third parties (including our related entities and affiliates) and their activities and events;
 - 4.1.6 outreach and engagement in support of the School, our mission and community, whether conducted by us or our related entities or appointees (including the fundraising activities of Tanglin Trust School Foundation Limited); and
 - 4.1.7 all other matters relating to the mission, function or operation of the School as we may consider to be necessary or appropriate.
- 4.2 We will not use the personal data for any purpose other than the purpose for which the personal data was originally collected, without the additional consent of the individual.
- 4.3 Where consent has been given by the individual concerned, we may contact that individual concerning the promotion and marketing of matters as envisaged in Clause 4.1.5 by post, email, SMS, telephone, fax and any other means of communication.
- 4.4 We may disclose personal data collected for the purposes above to the following persons:
 - 4.4.1 any person participating in outreach and engagement activities in support of the School, our mission and community, whether conducted by us or our related entities,

Prepared By	Approved By	Reviewed & Revised	Reviewed By	Next Review
Corp. Legal Director	ESC	Jun 2020	Corp. Legal Director	Jan 2021

- affiliates or appointees (including participants in fundraising activities of Tanglin Trust School Foundation Limited);
- 4.4.2 any person to whom the School is compelled or required to do so under law or in response to a request by a government agency, or where the public interest or the School's interests so require.
 - 4.4.3 any third party (1) service or product provider providing services to the School or (2) seeking academic references, in each case whether in Singapore or overseas and as we may determine to be necessary or appropriate;
 - 4.4.4 any persons as considered by the School to be necessary or appropriate in order to support the enrolment and education of students with the School as well as for the School's operation.

5 Accuracy and Duration of Retention of Personal Data

- 5.1 All reasonably practicable steps will be taken to ensure that personal data held by the School is accurate, complete and kept up to date, particularly if the personal data is to be used to make a decision that affects the individual to whom the personal data relates or likely to be disclosed by the School to another organisation.
- 5.2 Personal data shall not be retained for longer than is necessary for legal, business or record purposes. We will ensure that when obsolete information is destroyed that it is done so appropriately and securely.

6 Protection of Personal Data

- 6.1 All reasonably practicable steps will be taken to ensure that personal data we hold are protected against unauthorised or accidental access, collection, use, disclosure, copying, modification, disposal or similar risks. We will ensure that clear and robust safeguards are in place to protect personal data, irrespective of the format in which it is recorded.

7 Transfer of Personal Data

- 7.1 Personal data will not be transferred to a country or territory outside Singapore unless that country or territory ensures a comparable level of data protection, in accordance with the requirements prescribed under the Personal Data Protection Act 2012.

8 Access and Correction

- 8.1 An individual has the right to make a request to access and/or correct the personal data held about them by the School. The individual will be notified of the outcome as soon as reasonably practicable, and will be given a reason if a request is refused.
- 8.2 For access to personal data being held by the School, or to update and/or correct the personal data previously provided, please write to:

Prepared By	Approved By	Reviewed & Revised	Reviewed By	Next Review
Corp. Legal Director	ESC	Jun 2020	Corp. Legal Director	Jan 2021

Data Protection Officer
Tanglin Trust School Ltd
Email: DataProtection@tts.edu.sg

- 8.3 The School reserves the right to charge a minimal fee for the processing of any data access request.

9 Withdrawal of Consent

- 9.1 On giving reasonable notice to the School, an individual may at any time withdraw any consent given, or deemed to have been given under the Personal Data Protection Act 2012.
- 9.2 Within reasonable time from receipt of notice from the individual, we will inform the individual of the likely consequences of withdrawing their consent.
- 9.3 We will not prohibit an individual from withdrawing their consent to the collection, use or disclosure of personal data about the individual, although this does not affect any legal consequences arising from such withdrawal.
- 9.4 Upon withdrawal of consent, we will cease and cause our data intermediaries and agents to cease collecting, using or disclosing the personal data, as the case may be, unless the collection, use or disclosure of the personal data without the consent of the individual is required or authorised under the Data Protection Act 2012 or any written law.

10 Enquiries

- 10.1 For enquiries on our data protection policy, please write to:

Data Protection Officer
Tanglin Trust School Ltd
Email: DataProtection@tts.edu.sg

- 10.2 Tanglin Trust School reserves the right to change this policy without notice.

Prepared By	Approved By	Reviewed & Revised	Reviewed By	Next Review
Corp. Legal Director	ESC	Jun 2020	Corp. Legal Director	Jan 2021