



PERSONAL DATA PROTECTION NOTICE

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PERSONAL DATA PROTECTION NOTICE

I. OVERVIEW

This Personal Data Protection Notice (“Notice”) sets out the basis which Tanglin Trust School Ltd and Tanglin Trust School Foundation Ltd (collectively “we”, “us”, “our” or “School”) may collect, use, disclose or otherwise process personal data in accordance with the Personal Data Protection Act (“PDPA”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

As used in this Notice:

1. “Personal data” means data, whether true or not, about an individual who can be identified:
 - (1) from that data; or
 - (2) from that data and other information to which we have or are likely to have access.
2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your name and identification information such as your NRIC number, contact information such as your address, email address or telephone number, nationality, gender, date of birth, marital status, photographs and other audio-visual information, computer IP addresses, medical or health records, biometric data, employment information and financial information such as credit card numbers, debit card numbers or bank account information.
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

II. COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We generally collect your personal data under the following circumstances:
 - a. it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”) after
 - i. you (or your authorised representative) have been notified of the purposes for which the data is collected, and
 - ii. you (or your authorised representative) have provided consent to the collection and usage of your personal data for those purposes, or
 - b. collection and use of personal data without consent is permitted or required by the PDPA or other laws, such as where there is a legitimate interest to you or us in the

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processing of your personal data (i.e. Legitimate Interests Exception). We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

5. We may collect and use your personal data for any or all of the following purposes:
 - a. performing obligations in the course of or in connection with our provision of our services to you, including student academic and other support services;
 - b. verifying your identity and contact details;
 - c. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you, including evaluating applications for student enrolment, and applications for employment and carrying out pre-employment checks;
 - d. managing your relationship with us;
 - e. for revenue collection or debt recovery;
 - f. providing services to our alumni;
 - g. sending you promotional and marketing information about our education services (where you have provided consent) and notifying you of events and activities including fund-raising activities;
 - h. complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - i. maintaining security on School premises;
 - j. any other purposes for which you have provided the information;
 - k. transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
 - l. any other incidental business purposes related to or in connection with the above for which you will be notified, and consent obtained as far as possible.
6. We may disclose your personal data:
 - a. where such disclosure is required for performing obligations in the course of or in connection with our provision of school services; or
 - b. to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in clause 5 above for us.
7. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

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III. WITHDRAWING YOUR CONSENT

8. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by completing and submitting a Withdrawal of Consent Request Form, which may be found on our website.
9. Upon receipt of your request to withdraw your consent, we may require reasonable time (up to 10 business days, depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us.
10. Depending on the nature and scope of your request, we may not be in a position to continue providing our services to you and we shall, in such circumstances, notify you before beginning the processing of your request and proceed only upon your confirmation. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 8 above.
11. Please note that withdrawing consent does not affect our right to continue to collect, use, disclose and retain personal data where such collection, use, disclosure and retention without consent is permitted or required under applicable laws.

IV. ACCESS TO AND CORRECTION OF YOUR PERSONAL DATA

12. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request by completing and submitting the Access Request and Correction Form, which may be found on our website.
13. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
14. We will, in general, respond to you within thirty (30) days upon receiving your request. Should we not be able to respond to your request within thirty (30) days, we will inform you in writing of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

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V. PROTECTION OF PERSONAL DATA

15. To safeguard your personal data, we have implemented appropriate administrative, physical and technical measures to secure use, storage and transmission of personal data by us, and disclose personal data both internally and to our authorised third-party service providers and agents only on a need-to-know basis, so as to protect your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.
16. As no method of transmission over the Internet or method of electronic storage is completely secure, security of the data cannot be guaranteed, nonetheless we strive to protect the security of your information and are regularly reviewing and enhancing our information security measures.

VI. ACCURACY OF PERSONAL DATA

17. We generally rely on the accuracy of the personal data provided by you (or your authorised representative). To ensure that your personal data is current, complete, and accurate, please update us of all changes to your personal data. For enrolled students and their families, the annual update allows you to review your information before a new academic year, during the year please update changes as follows:
- contact details in My School Portal;
 - health related information to the respective school Health Centre;
 - immigration information to the Admissions Department;
 - marital and family status to the Deputy Head of the respective school.

Any other information must be notified to the school offices.

VII. RETENTION OF PERSONAL DATA

18. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
19. We will cease to retain your personal data or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected and is no longer necessary for legal or business purposes.

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II. TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

20. Where we need to transfer your personal data to countries outside of Singapore, we will, as far as possible, obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

IX. DATA PROTECTION OFFICER

21. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, wish to make any request, or report any potential incidents that may have impacted you, in the following manner:

“Personal Data Protection” as the subject, addressed to “Data Protection Officer”, email to DataProtection@tts.edu.sg.

X. EFFECT OF NOTICE AND CHANGES TO NOTICE

22. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
23. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. The continued enrolment of your child, use of our services or other dealings with us constitutes your acknowledgement and acceptance of such changes.

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