

## **SMMIS Data Protection Policy**

### **1. General Statement**

- 1.1 SMMIS undertakes, in its data management policies and practices, to observe the spirit of data protection laws, and is committed to full implementation and compliance with the requirements of the Personal Data Protection Act 2012.

SMMIS has issued Data Protection Guidelines to its staff to provide guidance on the collection, use, disclosure and processing of personal data of its staff, students, parents, alumni, and prospective students and employees of SMMIS.

- 1.2 SMMIS may from time to time update this Data Protection Policy to ensure that it is consistent with our growth, industry trends, and/or changes in the law.

### **2. Collection of Personal Data**

- 2.1 SMMIS generally collects personal data through the SMMIS website, SMMIS Portal, application forms, surveys, and/or other channels (including in the course of an individual's interaction with SMMIS, including as a participant in various activities associated with delivering the mission of SMMIS, its related entities or affiliates).

- 2.2 The types of personal data collected may include, but are not limited to:

2.2.1 Personal information such as name, NRIC/FIN/Passport number, date of birth, marital status, gender;

2.2.2 Contact information such as postal addresses, email addresses, telephone and fax numbers;

2.2.3 Past and present employment information such as company name, company type, sector, designation, business telephone and fax numbers;

2.2.4 Past and present academic qualifications such as schools attended, courses of study, period of study and academic results;

2.2.5 Billing information, including name of the credit/debit cardholder, credit/debit card number, security code and expiry date;

2.2.6 Images, including photographs, videos, film or illustrations;

2.2.7 Bank details.

- 2.3 The individual will be informed explicitly prior to or upon collection, of the purposes for which the personal data are to be collected and the parties to whom the data may be transferred, the right of the individual to request access to and correction of such personal data, and the contact details of the SMMIS Data Protection Officer. Policy Title: SMMIS Data Protection Policy (Relevant to Staff, Students and Parents of Students)

## **SMMIS Data Protection Policy**

### **3. Purposes for which Personal Data is Collected, Used and Disclosed**

- 3.1 SMMIS will collect, use and disclose personal data only for reasonable purposes, with notification to the individual concerned where applicable. SMMIS may collect, use and disclose any personal data provided for the following purposes, including, but not limited to:
- 3.1.1 employment-related purposes (appointment administration, human resource management including payroll, leave and benefits administration, review and disciplinary matters and staff development);
  - 3.1.2 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);
  - 3.1.3 alumni communications;
  - 3.1.4 conducting of statistical studies and analyses;
  - 3.1.5 promotional and marketing purposes relating to SMMIS and carefully selected third parties (including SMMIS' related entities and affiliates) and their activities and events;
  - 3.1.6 outreach and engagement in support of SMMIS, its mission and community, whether conducted by SMMIS, its related entities or appointees (including the fundraising activities of Tanglin Trust School Foundation Limited); and
  - 3.1.7 all other matters relating to the mission, function or operation of SMMIS as SMMIS may consider to be necessary or appropriate.
- 3.2 Without the consent of the individual, SMMIS will not use the personal data for any purpose other than the purpose for which the personal data was originally collected.
- 3.3 Where consent has been given by the individual concerned, SMMIS may contact that individual concerning the promotion and marketing of matters as envisaged in Clause 3.1.5 by post, email, SMS, telephone, fax and any other means of communication.
- 3.4 SMMIS may disclose personal data collected for the purposes above to the following persons:
- 3.4.1 any person participating in outreach and engagement activities in support of SMMIS, its mission and community, whether conducted by SMMIS, its related entities, affiliates or appointees (including participants in fundraising activities of Tanglin Trust School Foundation Limited);

## **SMMIS Data Protection Policy**

3.4.2 any person to whom SMMIS 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 SMMIS' interests so require;

3.4.3 any third party (1) service or product provider providing services to SMMIS or (2) seeking academic references, in each case whether in Singapore or overseas and as SMMIS may determine to be necessary or appropriate; Policy Title: SMMIS Data Protection Policy (Relevant to Staff, Students and Parents of Students)

3.4.4 any persons as considered by SMMIS to be necessary or appropriate in order to support the enrolment and education of students with SMMIS as well as for the operation of SMMIS.

### **4. Accuracy and Duration of Retention of Personal Data**

4.1 All reasonably practicable steps will be taken to ensure that personal data held by SMMIS 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 SMMIS to another organisation.

4.2 Personal data shall not be retained for longer than is necessary for legal, business or record purposes. SMMIS will ensure that when obsolete information is destroyed that it is done so appropriately and securely.

### **5. Protection of Personal Data**

5.1 All reasonably practicable steps will be taken to ensure that personal data held by SMMIS are protected against unauthorized or accidental access, collection, use, disclosure, copying, modification, disposal or similar risks. SMMIS will ensure that clear and robust safeguards are in place to protect personal data, irrespective of the format in which it is recorded.

### **6. Transfer of Personal Data**

6.1 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.

### **7. Access and Correction**

7.1 An individual has the right to make a request to access and/or correct the personal data held about them by SMMIS. The individual will be notified of the outcome as soon as reasonably practicable and will be given a reason if a request is refused.

## **SMMIS Data Protection Policy**

- 7.2 For access to personal data being held by SMMIS, or to update and/or correct the personal data previously provided, please write to:  
SMMIS Data Protection Officer  
Email: DataProtection@SMMIS.edu.sg
- 7.3 SMMIS reserves the right to charge a minimal fee for the processing of any data access request.

### **8. Withdrawal of consent**

- 8.1 On giving reasonable notice to SMMIS, an individual may at any time withdraw any consent given or deemed to have been given under the Personal Data Protection Act 2012. Policy Title: SMMIS Data Protection Policy (Relevant to Staff, Students and Parents of Students)
- 8.2 Within reasonable time from receipt of notice from the individual, SMMIS will inform the individual of the likely consequences of withdrawing his/her consent.
- 8.3 SMMIS will not prohibit an individual from withdrawing his/her 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.
- 8.4 Upon withdrawal of consent, SMMIS will cease and cause its 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.

### **9. Enquiries**

For enquiries on our data protection policy, please write to:  
SMMIS Data Protection Officer  
Email: DataProtection@SMMIS.edu.sg

SMMIS reserves the right to change this policy without notice.

**Prepared by: Elaine Robinson**

**Updated: 11<sup>th</sup> October 2019**