

Personal Data Protection Policy

➤ Introduction

Kingston International College (“Kingston”) respects your privacy and assures that your personal data will be kept securely. Personal information is collected with your consent. We seek your understanding of our Privacy Policy to collect and use your personal data (i.e. Name, NRIC, contact numbers, mailing and email addresses) to improve our products and service offerings, and enhancing our customer service level (“Purposes”).

We are also committed to adhering to the provisions and principles of the Personal Data Protection Act 2012. As such, this Personal Data Protection Statement is to assist you in understanding how we collect, use and/or disclose your personal data.

Kingston will also collect and use your personal data to provide you with information on our activities such as upcoming events, seminars, workshops, conferences and training programmes organised by Kingston and its affiliated organisations which may be relevant to you (“Services”).

While the supply of the information by you is voluntary, if you cannot provide or do not wish to provide the information sought, Kingston may be unable to meet the purposes for which the information was collected.

Kingston will not reveal customer information to any external organization unless required by law. We do not sell, trade or rent your personal information to others.

Although every reasonable effort has been made to ensure that all personal information shall be so protected, Kingston cannot be responsible for any unauthorized wilful use or misuse of such information and from risks that are inherent in all internet communications.

Speak to Us

For access, correction and/or withdrawal of personal data, and any queries about Kingston International College’s policy on Personal Data Protection Act, please contact the PDPA officer-in-charge at this email address:

info@kingston.edu.sg or dpo@kingston.edu.sg

➤ Purpose for the Collection, Use & Disclosure of Personal Data

Depending on your relationship with us (e.g. as an applicant, student, alumni of Kingston, staff, academic staff, donor, vendor, service provider, parents, guardians, recruitment agents and / or any other person relating to our organization), the personal data, photographic images, videos, etc., which we collect from you may be collected, used and/or disclosed for the following purposes:

- a. Evaluating suitability for admission or employment, enrolling or employing, providing educational courses and training, including sending materials on course / study / assignment / course materials, information on time tables and examination details via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;

- b. Administering and/or managing relationships with Kingston (including responding to enquiries, the mailing of correspondence, statements or notices which could involve the disclosure of certain personal data to bring about delivery of the same);
- c. Assessing, monitoring and reporting on individual student performance, attendance and disciplinary records;
- d. Supporting students' learning through curricula and extra-curricular activities including but not limited to outdoor trips and inter-College competitions;
- e. Providing pastoral care and counseling where appropriate;
- f. Providing healthcare and wellness services;
- g. Application of student passes where appropriate;
- h. Application for Ministry of Education approval for Singapore Citizens and Permanent Residents;
- i. Facilitating payment for goods and/or services provided by Kingston and/or a third party on Kingston's behalf including verification of bank and credit card details with third parties and using the Personal Data provided to conduct matching procedures against databases of known fraudulent transactions (maintained by us or third parties);
- j. Responding to any complaints, feedback, requests and enquiries by student / parents / guardians;
- k. Disclosing your records to your parent(s) or guardian(s) at their request
- l. Informing student / parents / guardians/ related parties of events, talks, seminars and updates;
- m. Maintaining and updating our student, alumni, and academic staff records;
- n. Generating financial, regulatory, management or survey reports and statistics for Kingston's business and administrative purposes;
- o. Promoting Kingston to prospective students, including but not limited to the College's prospectus, magazine and website;
- p. Sending promotional and marketing information by post, email and SMS about the College, activities and events as well as carefully selected third parties;
- q. Taking of photographs and/or videos (whether by Kingston staff or third party photographers and/or videographers) during events or seminars organised by Kingston or its affiliates for publicity purposes;
- r. Engaging alumni including but not limited to notification on Kingston and alumni- related initiatives and activities, invitation to Kingston and alumni-related events, updating of alumni information, invitation to participate in alumni surveys and sending of communication collaterals;
- s. Processing applications for and administering local and overseas career related activities, events, programmes, internships, employment opportunities, and career coaching, and sharing information with companies (whether local or overseas) for purposes of recruitment, internship, industrial attachment, job placement and research support;
- t. Meeting or complying with Kingston's internal policies and processes / procedures and any applicable laws, rules, regulations, codes of practice or guidelines, orders or requests issued by any court, legal or regulatory bodies (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation);
- u. Carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or put in place by Kingston, including the obtaining of references and/or other information from prior educational institutions and employers;
- v. Preventing, detecting and investigating crime, offences or breaches including that related to the security of Kingston's premises (including but not limited to the use of security cameras);
- w. Conducting checks with the DO NOT CALL Registry;

[Updated] Do Not Call Provisions

Kingston International College complies with the Do Not Call Provisions of the Personal Data Protection Act. This means:

1. We will not send marketing messages to Singapore telephone numbers registered with the Do Not Call Registry, unless we have received clear and unambiguous consent in written or other accessible form.

2. All marketing messages will include information identifying the College and how recipients can contact us to stop receiving such messages.
3. We maintain an internal Do Not Call list for individuals who have withdrawn consent or indicated they do not wish to receive marketing messages.
4. We will honor any request to withdraw consent for receiving marketing messages promptly.
5. If you wish to receive marketing messages from us, you can provide express consent that will override your Do Not Call Registry listing.
- x. Purposes, which are reasonably related to the above.

➤ **Disclosure of Personal Data to Third Parties**

By providing the Personal Data, including those related to a third party (e.g.:- information of your parents) to us through the various channels (e.g.:- written form, webpage, email, etc.), you represent and warrant that consent, including that of the third party, has been obtained for collection, use and disclosure of the Personal Data for the respective purposes. In the event the personal data is to be used for a new purpose, Kingston will notify you and seek your consent.

Kingston ensures that your Personal Data held by us shall be kept confidential. When transferring personal data to our third party service providers, agents and/or our affiliates or related corporations whether in Singapore or elsewhere in order to carry out one or more of the purposes listed above, we will require them to ensure that your Personal Data disclosed to them is kept confidential and secure.

➤ **Request for Access, Correction and/or Withdrawal of Personal Data**

Subject to certain exceptions in the Act, you may request to access and/or correct the personal data currently in our possession or withdraw your consent for the collection, use and disclosure of your personal data in our possession at any time by submitting your request to the PDPA officer-in-charge. For a request to withdraw consent, we will process your request within a reasonable time from such a request for withdrawal of consent being made. In some cases, requests for withdrawal of consent may adversely impact your relationship with Kingston as it may hinder Kingston's ability to continue to interact with you. We will notify you in advance of such impact, if any.

➤ **Administration and Management of Personal Data**

We will take appropriate measures to keep your personal data accurate, complete and updated.

We will also take reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data.

We will also take reasonable efforts to ensure that the personal data in our possession or under our control is destroyed as soon as it is reasonable to assume that (i) the purpose for which that personal data

was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

Our websites may contain links to other websites not maintained by Kingston. Such third-party websites are subject to their own data protection and privacy practices and you are encouraged to examine the data protection policies of those websites.

➤ **Responsibility of Employees, Students and Other Stakeholders**

The Act also imposes certain responsibilities on all those who process personal data Kingston, whether you are a member of staff holding, using and sharing personal data in your teaching, research or administration, or a student accessing and recording personal data in your studies or other activities.

These obligations include holding and using data in a secure manner, making sure that data is handled in line with what individuals have been told, having appropriate arrangements in place for the access to (and sharing of) data, and making sure that individuals' data is accurate and retained for a suitable period. If a data breach occurs (e.g. personal data held by the Kingston is lost, stolen, inadvertently disclosed to an external party, or accidentally published), this should be reported immediately to your seniors and the Data Protection Officer so that we may review the circumstances and liaise as necessary with colleagues internally and the relevant external authorities.