

## Appendix 3

### PERSONAL DATA PROTECTION NOTIFICATION AND CONSENT

This Personal Data Protection Notification and Consent ("**Notification**") sets out how the school ("**School**", "**we**", "**us**", or "**our**") collects, uses, records, holds, stores, processes, discloses, and protects (collectively referred to as "**Process**") Personal Data (defined herein) of its students and parents and such other persons whose Personal Data have been provided to the School ("**Data Subject**", "**you**", or "**your**"). This Notification further deals with the security and retention of your Personal Data, and your rights and obligations in respect of your Personal Data.

This Notification has been prepared by taking into consideration the requirements of the Personal Data Protection Act 2010 ("**PDPA**"). If you have received a similar notice before from us, please be informed that this Notification supersedes the earlier notice.

#### 1. Categories of Personal Data

In connection with your engagement with us, we will Process your personal information for various legitimate purposes including academic, educational, marketing and administrative purposes. In particular, we will Process some, one or all of the following categories of personal information:

- (a) master data: name, age, passport/identification number, address, photographs and images, nationality, ethnicity, gender, date of birth, qualification, marital status, health condition and medical history;
- (b) contact details: contact numbers, email address, work address, home number, work number, emergency contact person(s) details;
- (c) other information for the performance of our services including but not limited to:
  - i. assessment-related information, special educational needs information, exclusions /behavioral information and psychological reports and assessments;
  - ii. attendance information such as lessons attended, number of absences and absence reasons;
  - iii. logging and audit in the use of IT systems and education technology applications, other applications and cloud systems;
  - iv. photographs and videos taken by us throughout the school year to record and share learning at the School; and
  - v. photographs taken for identification purposes, e.g. for identification cards and annual school yearbook.
- (d) any such information as we deem necessary or appropriate from time to time in connection with your engagement with us,

(collectively, "**Personal Data**").

To the extent that you disclose to us any personal data (whether or not coming within the definition of Personal Data above) of another individual, we shall assume, without independent verification, that you have obtained such individual's consent for the disclosure of such personal data as well as the Processing of the same in accordance with the terms of this Notification.

## **2. Sources of Personal Data**

In general, the School will collect your Personal Data directly from you, either from the following sources or from any other information you have provided, and this may include:

- (a) Inquiry Form;
- (b) various types of Application and/or Registration Forms;
- (c) other School related and/or supporting documents including Request Forms, Logbooks, reports;
- (d) the School's website or through telephonic communications, emails and facsimiles with the School; and
- (e) such other written or verbal communications or documents delivered to us prior to and during the course of our contractual or pre-contractual dealings with you.

In some instances, your Personal Data may have been obtained from external sources including:

- (a) third parties including educational institutions, law enforcement and government agencies, third party service providers and administrators;
- (b) publicly available or publicly accessible information; and
- (c) professional and personal reference.

As the accuracy of your Personal Data depends largely on the information you provide to us, kindly inform us as soon as practicable if there are any errors in your Personal Data or if there have been changes to your Personal Data.

## **3. Purposes of Processing**

We will process your Personal Data for various legitimate purposes, including but not limited to:

- (a) to undertake and manage admissions and enrolment;
- (b) to provide a safe learning environment;
- (c) to support and enable the academic, pastoral and personal objectives of children, including the monitoring and reporting of progress;
- (d) to manage and respond to inquiries;
- (e) to be used for newsletter, promotional emails and other materials from the School;
- (f) to maintain students' personal details, academic and non-academic records;
- (g) to facilitate the internships, placement or work experience as well as co-curricular related activities and other school events;
- (h) to maintain a student/class register;
- (i) to provide the relevant administrative support, counseling and pastoral services;
- (j) to manage the use of facilities including the library, laboratories and so on;
- (k) to administer graduation and alumni-related events;
- (l) to administer the payment of tuition fees and other fees/payments;
- (m) to communicate with students on any important announcements;
- (n) to collect information for relevant local or international statutory authorities or exam boards;
- (o) to contact student's emergency contact person/next of kin in case of an emergency;
- (p) to comply with any regulatory, audit or security-related requirements;
- (q) to pursue/collect any sums in arrears by parents/guardians;
- (r) to care for the medical needs of students;

- (s) to help investigate any concerns or complaints;
- (t) internal record keeping;
- (u) protection against injury, theft, legal liability, fraud, abuse, and other misconduct/risk;
- (v) discharging obligations imposed on the School under applicable law, regulations, guidelines and/or relevant regulatory authorities;
- (w) for marketing and/or advertising related purposes;
- (x) for all and any other ancillary purposes relating to our provision of service (e.g. the supply of computers, iPads, other forms of telecommunications and technology services, the engagement of third party vendors for the provision of relevant services); and
- (y) such other legitimate purposes as we deem necessary or appropriate from time to time.

#### **4. Disclosure and Transfer of Personal Data**

In processing Personal Data for the purposes in Clause 3 ("**Purposes**"), it may be necessary for us to disclose and/or transfer your Personal Data to our affiliates and group companies, business partners or to any third parties providing services to us, located within or outside Malaysia (as the case may be) for the purposes of fulfilling our obligations to you in respect of the Purposes and/or all such other purposes that are related to the Purposes.

Please note that it may be necessary for us to disclose and/or transfer your Personal Data:

- (a) where required by any regulatory authority or court/tribunal of competent jurisdiction;
- (b) to discharge any legal obligation imposed on us by law;
- (c) on our website or such other website or promotional/ marketing material as we may deem necessary or appropriate from time to time;
- (d) to our partners, advisors, consultants and service providers including those provide school-related services; and
- (e) if we deem that such disclosure and/or transfer is necessary including to prevent or mitigate a serious and imminent threat to your life or health or the life or health of another person.

Rest assured that we will only disclose the minimum amount of information which we deem necessary and will take all reasonable steps to ensure that such information is kept confidential.

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

We store your Personal Data in hard and/or soft copy. There are security policies, safeguards and procedures in place to protect and restrict access to your Personal Data. Access is restricted to authorised personnel/organisation on a "need to know" basis, and all authorised personnel will hold your Personal Data with strict confidentiality.

We may keep the Personal Data and that of other individuals that you provide to us for a reasonable period in accordance with legal requirements following the termination or completion of your services with us.

#### **6. Your Rights to Personal Data**

Subject to such conditions which we may impose and/or legal requirements (as the case maybe), you have the following rights with respect to your Personal Data:

- (a) to withdraw, in full or in part your consent, or to request a change to the scope of your consent;
- (b) to request that we confirm to you whether we have in possession any Personal Data that is related to you, to access or to obtain a copy of any such Personal Data;
- (c) to request that we correct or update any Personal Data that is related to you;
- (d) in certain circumstances, to request that we delete or destroy your Personal Data;
- (e) in certain circumstances, to request to object the processing of your Personal Data; and
- (f) in certain circumstances, to request that we transfer your Personal Data.

Please note that it is obligatory for you to provide all of the categories of Personal Data which we request from you. In the event you elect not to provide categories of Personal Data as required, it may affect our ability to provide our services or fulfil the Purposes.

## **7. Contact**

If you have any inquiries in relation to your Personal Data, or you would like to exercise any of your rights, you may contact us at:

Designated Contact Person:

Data Protection Officer

Mailing address:

**Tenby Educare Sdn Bhd**  
Unit 16.01, Level 16, 1 First Avenue,  
Bandar Utama, 47800  
Petaling Jaya, Selangor

Email address:

[malaysiadpo@ispschools.com](mailto:malaysiadpo@ispschools.com)

## **8. Changes to this Notification**

The School reserves the right to amend, change, or update this Notification from time to time. In the event that the amendment, change, or update will affect the purposes for which your Personal Data has originally been collected, the School will notify you about such changes, and obtain your consent (if required by law), prior to any such change becoming effective.

## **9. Inconsistency**

In the event of any inconsistencies between the English version and the Bahasa Malaysia version of this Notice, the English version shall prevail over the Bahasa Malaysia version.