

# Personal Data Privacy Policy

In this Personal Data Privacy Policy, the words "School", "HWA", "we" and "us" refer to HWA International School. It is located at 6 Raffles Blvd, #02-100 Marina Square, Singapore 039594

## BACKGROUND

HWA International School is committed to protecting and respecting the privacy of its students, parents, staff and visitors to its website and campus. All collection, use, disclosure, or processing of personal data is undertaken in compliance with Singapore's Personal Data Protection Act 2012("PDPA").

This Personal Data Privacy Policy is designed to help you understand how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

## PERSONAL DATA

1. Under the Personal Data Protection Act, personal data is defined as "data, whether true or not, about an individual who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access."
2. Some examples are, but not limited to, name, age, date of birth, gender, citizenship, nationality, identification numbers such as nric, fin, passport number and birth certificate, academic status and results, medical and disability information, residential address, mobile and residential telephone number, personal email address, bank account, photograph or video image and etc.

## COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

3. HWA generally do not collect your personal data unless (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 written 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. 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).

4. We will/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 the goods and/or services requested by you;
  - (b) verifying your identity;
  - (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
  - (d) managing your relationship with us;
  - (e) processing payment or credit transactions;
  - (f) 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;
  - (g) any other purposes for which you have provided the information;
  - (h) 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
  - (i) any other incidental business purposes related to or in connection with the above.
5. 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 the goods and services requested by you; or
  - (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above-mentioned purposes.
6. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us has been terminated or altered in any way, for a reasonable period thereafter. The school will not disclose any extend greater than necessary which we determine in good faith.

## **WITHDRAWAL OF CONSENT**

7. 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 collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

8. Upon receipt of your written request to withdraw your consent, we may require reasonable time (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. In general, we shall seek to process your request within ten (10) business days of receiving it.
9. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 7 above.
10. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

## **ACCESS TO AND CORRECTION OF PERSONAL DATA**

11. 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 in writing or via email to our Data Protection Officer at the contact details provided below.
12. 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.
13. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days 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 generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

## **PROTECTION OF PERSONAL DATA**

14. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and

technical measures such as up-to-date antivirus protection, disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis, and disposal of confidential documents which are no longer needed, through shredding.

15. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

### **ACCURACY OF PERSONAL DATA**

16. HWA generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

### **RETENTION OF PERSONAL DATA**

17. The school 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.
18. HWA 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.

### **TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

19. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will 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.

### **DATA PROTECTION OFFICER**

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

Contact No. : 6254 0500  
Email Address : [dpo@hwa.edu.sg](mailto:dpo@hwa.edu.sg)

