

#### **DATA PROTECTION POLICY**

This Data Protection Notice ("**Notice**") sets out the basis which ACTS College Limited ("**we**", "**us**", or "**our**") may collect, use, disclose or otherwise process personal data of our students, faculty and alumni 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.

We collect Personal Data to properly perform the teaching, learning, research, administration and other functions of the College. Personal Data collected through our website or other channels is handled in accordance with guidelines set out in the government's data management policy. ACTS College Limited will comply with the relevant requirements under the government's data management policy.

### **PERSONAL DATA**

1. As used in this Notice:

"personal data" means data, whether true or not, about an individual (whether a prospective student, current student, staff, alumni or otherwise) 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. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, identification numbers such as nric, fin, work permit and birth certificate, photographs, video recordings, contact information such as residential address, email address or telephone number, nationality, gender, date of birth, marital status, employment information, religious background and home church details.
- 3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

# COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We 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).



- 5. We may collect and use your personal data for any or all of the following purposes:
  - establishing or managing your relationship with us. This includes:
  - Where you are a prospective student,
    - processing and evaluating your application for our services
  - Where you are a student, staff or alumni,
    - Evaluating suitability of your application
    - Maintaining your records as a student/staff
    - Participating in student life activities such as celebrations, graduation exercises, orientation, retreat, study group and various student activities as specified in student handbook
    - Fostering alumni connections through periodic updates and notifications of alumni events and activities.
  - providing you with information on our upcoming events or activities, where you have specifically requested to receive such information.
  - 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; and
  - o any other purposes for which you have provided the information.
- 6. We may disclose your personal data:
  - where such disclosure is required for, or in connection with, the provision of the services requested by you; and
  - any other party to whom you authorised us to disclose your personal data to, or where necessary to undertake any action requested by you.
  - government agencies for student and work pass application, CPF and tax matters.
  - vendors or service providers in connection with training, insurance or medical matters.
  - our professional advisers such as accreditation bodies, auditors or lawyers.
  - relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines; and
  - any other person/organisations in connection with the purposes set forth above.
- 7. 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 (including, where applicable, a period to enable us to enforce our rights under a contract with you).

## 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 or your authorised representative in writing. You or your authorised representative 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 via email or otherwise in writing to our Data



Protection Officer at the contact details provided below. If you are unable to submit your request in writing or if you require any assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.

- 9. 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 fourteen (14) business days of receiving it.
- 10. 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 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 the manner described above.
- 11. 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**

- 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 via email or otherwise in writing, to our Data Protection Officer at the contact details provided below. If you require assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.
- 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 are entitled to refuse your request if it is prohibited by law, or in circumstances where we are permitted by law to refuse, including if the request is frivolous, or the release of your Personal Data could reasonably be expected to threaten or harm the safety, physical or mental health of another person or reveal the Personal Data of another person.

#### PROTECTION OF PERSONAL DATA

15. 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 authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), encryption of data, and usage of one time password(otp)/2 factor authentication (2fa)/multi-factor authentication (mfa) to secure access.

16. 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**

17. We 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 us at the contact details provided below.

#### 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.

#### TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

20. We may need to store or process your Personal Data in a jurisdiction other than Singapore or transfer your Personal Data out of Singapore for any of the purposes mentioned above. We will not transfer your Personal Data to another party or to another country or territory without your consent unless the recipient of the Personal Data is bound by law or contract to maintain a level of protection that is at least comparable to the standards laid down by the PDPA or where we are permitted or required by the law or relevant authority of any jurisdiction.

# **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, or if you wish to make any request, in the following manner:

Contact No. : 68411770

Email Address: enquiry@acts.edu.sg



# **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. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Last revised: 25 March 2025