



Personal Data Protection Policy

1. PURPOSE AND SCOPE OF THE POLICY

- 1.1 The purpose of this document (“Data Protection Policy”) is to inform you of CORDOVA EDUCATION CENTRE PTE LTD’ (referred to herein as “Cordova”, “us”, “we” or “our”) policies on data collection, usage, disclosure, processing and protection, which are subjected to the Singapore Personal Data Protection Act 2012 (“PDPA”).
- 1.2 This Data Protection Policy is effective as of 1 September 2019.
- 1.3 This Data Protection Policy supplements but does not supersede or replace any other consent you may have previously provided to Cordova in respect of your personal data, and your consent herein, is additional to any rights which we may have at law to collect, use or disclose your personal data.
- 1.4 Cordova may also use, disclose or process personal data about you collected before 1 September 2019 for the purposes for which the personal data was collected unless consent for such use is withdrawn in accordance with the PDPA or you have otherwise indicated to Cordova, whether before, on or after the coming into force of the PDPA, that you do not consent to the use of the Personal Data.
- 1.5 Cordova may from time to time update this Data Protection Policy at its absolute discretion, to ensure that it is consistent with any changes in legal or regulatory requirements. You are strongly encouraged to check for the latest version of the Data Protection Policy from time to time on our website, to ensure that you are well informed of our latest policies in relation to Personal Data Protection.

2. DEFINITIONS

- 2.1 In this policy, “**Personal Data**” refers to any data, whether true or not, about an individual who can be identified (i) from that data; or (ii) from that data and other information to which Cordova has or is likely to have access, including data in our records as may be updated from time to time.
- 2.2 Examples of such Personal Data are unique identifiers (e.g. NRIC or FIN number, passport number etc.) as well as any set of data (e.g. name, age, address, photo or video image, personal email address, thumbprint, telephone number, occupation, etc.) which when taken together would be able to identify the individual.

3. COLLECTION OF PERSONAL DATA

- 3.1 Generally, Cordova collects Personal Data in the following ways:
 - a) When you submit an application to be enrolled with the institution or submit forms for class activities;
 - b) When you submit a job application for employment with Cordova;

- c) When you interact with our staff (whether via telephone calls, teleconferencing, letters, emails or during face-to-face meetings);
 - d) When you are contacted by, and respond to, our staff;
 - e) In the course of providing educational services to you and/or your child; and
 - f) When you submit your Personal Data to us for any other reasons.
- 3.2 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, family members or your employees etc.), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes set out herein.
- 3.3 You must ensure that all Personal Data submitted to us is complete, accurate and up to date.
- 3.4 Cordova only collects Personal Data to the extent that it is required for the specific purpose for which it is collected and which has been notified to the individual from whom the Personal Data is collected. Cordova does not collect any Personal Data, which is not reasonably necessary for the purpose for which it is collected.

4. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL DATA

- 4.1 Depending on the type of relationship you have with us (e.g. student, parent, alumnus, staff, applicant, vendor, service provider), the Personal Data that we gather from you may be collected, used and/or disclosed for the following purposes stated below.
- a) Evaluating suitability for admission or employment, enrolling or employing, providing educational courses and training, including sending materials on course/study/assignment/lesson materials, information on time tables and examination details via postal mail, electronic mail, SMS or MMS, fax and/or voice calls or other electronic means;
 - b) Administering and/or managing relationships with CORDOVA (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) Carrying out due diligence in accordance with legal or regulatory obligations or risk management procedures that may be required by law or put in place by CORDOVA, including the obtaining of references and/or other information from prior educational institutions and employers;
 - d) Processing application(s) for financial aid, and/or other support programmes, which may include disclosure of Personal Data to donors, grantors, external evaluators and/or external organisations.
 - e) Investigating possible fraud, misconduct or unlawful action to maintain security of persons or property, control access and investigate suspicious or inappropriate activities;
 - f) Responding to requests for information from government or public agencies, ministries, statutory boards or other similar authorities or non-government agencies authorised to carry out specific Government services or duties;

- g) Carrying out market-related, evaluative or similar analysis for CORDOVA's operational strategy and policy planning purposes, including providing data to external parties and to partner organisations or individuals for jointly administered programmes;
- h) Supporting Cordova's functions including, but not restricted to, the teaching and personal and professional development of students, staff and administration;
- i) Processing, administering and conferring awards of prizes, medals and other marks of distinction, and student or graduation status, and publication or releasing of information on the same;
- j) Processing applications and enrolment activities related to co-curricular, health, life as well as concession cards, and administering matters related to use of these services;
- k) Facilitating participation in student life which may include social, cultural, sports, and educational activities, events, volunteering and training programmes, student membership and orientation activities;
- l) Taking of photographs and/or videos (whether by CORDOVA staff or third-party photographers and/or videographers on behalf of CORDOVA) during study programmes, events or seminars organised by CORDOVA or its affiliates for publicity purposes;
- m) In order to conduct our operations more smoothly, we may also be disclosing the Personal Data you have provided to us to our third-party service providers, agents and/or our affiliates or related corporations, which may be sited locally or outside of Singapore, for one or more of the above-stated purposes. This is because such third-party service providers, agents and/or affiliates or related corporations would be processing your Personal Data on our behalf for one or more of the above-stated purposes.
- n) For emergency contact and/or emergency services.
- o) Facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales);
- p) Any other purposes which CORDOVA may inform you of in writing from time to time, but for which we will seek your separate consent.

4.2 We respect the confidentiality of the Personal Data you have provided to us. However, please note that we may disclose your Personal Data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:

- a) Situations in which the disclosure is required based on the applicable laws and/or regulations;
- b) Situations in which the purpose of such disclosure is clearly in your interests and consent cannot be obtained in a timely way;
- c) Situations in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual and consent for the disclosure of the data

cannot be obtained in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;

- d) Situations in which the disclosure is necessary for any investigation or proceedings;
- e) Situations in which the Personal Data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the Personal Data is necessary for the purposes of the functions or duties of the officer; and/or
- f) Situations in which the disclosure is to a public agency and such disclosure is necessary in the public interest.

5. WITHDRAWAL OF CONSENT AND/OR REQUEST FOR ACCESS, CORRECTION OF YOUR PERSONAL DATA

5.1 By accepting the conditions above, you have agreed to consent for the collection, use and/or disclosure of your Personal Data in our possession. If you would like to a) withdraw your; or b) obtain access and make corrections to your Personal Data records in our possession, please submit a written request to our PDPA Contact Person (See part 7.2 below).

5.2 Withdrawal of Consent

- a) You may at any time withdraw any consent already given, or deemed to have been given under the PDPA, in respect of the collection, use or disclosure by CORDOVA of Personal Data about you for any purpose as above, on giving reasonable notice to CORDOVA.
- b) CORDOVA does not prohibit an individual from withdrawing his consent to the collection, use or disclosure of Personal Data about the individual and/or whom he represents, but this shall not affect any legal consequences arising from such withdrawal.
- c) We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter cease (and cause its data intermediaries and agents to cease) collecting, using or disclosing the Personal Data, as the case may be, unless such collection, use or disclosure, without the consent of the individual is required or authorized under the PDPA or other written law.
- d) If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Cordova may not be able to continue to provide its services to you, administer any contractual relationship in place, which in turn may also result in the termination of your agreements with Cordova, and your being in breach of your contractual obligations or undertakings. Cordova's legal rights and remedies in such event are expressly reserved.

5.3 Request to Access or Correct Personal Data

- a) For a request to access personal data, we will provide you with the relevant personal data within a reasonable time from such a request being made, subject to reasonable purpose to be evaluated and decided upon for the request approval.

- b) For a request to correct personal data, we will process your request, including undertaking necessary verification activities, as soon as possible, after the request has been made.
- c) We will send the corrected personal data to every other organization to which the personal data was disclosed by Cordova within a reasonable time from such a request being made, unless that other organization does not need the corrected personal data for any legal or business purpose, or if you so consent, only to specific organizations to which the personal data was disclosed by us within a year before the date the correction was made.

6. MANAGEMENT AND CARE OF PERSONAL DATA

- 6.1 We will take reasonable and appropriate measures to ensure that your Personal Data is accurate, complete, and updated.
- 6.2 We will protect Personal Data in our possession or under our control by making reasonable security arrangements to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage, alteration and/or similar risks.
- 6.3 We do not assume responsibility for any unauthorized use of your Personal Data by third parties which are wholly attributable to factors beyond our control or are not contractually bounded by us.
- 6.4 We will also take reasonable efforts and measures to ensure that the Personal Data in our possession or under our control is destroyed and/or anonymized (such that the data cannot be associated with particular individuals) as soon as it is reasonable to assume that (a) the purpose for which that Personal Data was collected is no longer being served by the retention of such Personal Data; and (b) retention is no longer necessary for any other legal or business purposes.

7. COMPLAINT PROCESS AND FEEDBACK

- 7.1 If you have any complaint, grievance, or feedback regarding how we are handling your Personal Data or about our compliance with the PDPA, you are welcome to contact us with your complaint, grievance or feedback.
- 7.2 Kindly contact us through one of the following methods with your complaint, grievance or feedback:
Attention to: Siti Juliana Shafif, PDPA Officer
 - a) Telephone Number: 65850564
 - b) Email: maklumbalas@cordova.com.sg
 - c) Office Address: Blk 474 Pasir Ris Drive 6, #B1-568, Singapore 510474
- 7.3 Any complaint, grievance, or feedback that you may have will be investigated efficiently and fairly.

END OF POLICY