

SECURA TRAINING ACADEMY STUDENT DATA PROTECTION POLICY

We, at the SECURA TRAINING ACADEMY PTE LTD (“STAPL”), take our responsibilities under the Personal Data Protection Act 2012 (the “PDPA”) seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Student Data Protection Policy is designed to assist you in understanding how we collect, use and/or disclose 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. If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the “DPO”) at:

Telephone number: +65 6813 9564
Email address: dpo@securagroup.com.sg

1. INTRODUCTION TO THE PDPA

- 1.1. “Personal Data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video image.
- 1.2. We will collect your personal data in accordance with the PDPA. In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used and/or disclosed, as well as obtain your consent for the collection, use and/or disclosure of your personal data for the intended purposes.

2. PURPOSES FOR COLLECTION, USE & DISCLOSURE OF PERSONAL DATA

- 2.1. The personal data which we collect from you may be collected, used and/or disclosed for the following purposes:
 - 2.1.1. Enrolling you in and providing you with the courses in STAPL and sending you materials on your courses or subject enrolments (including course / study / assignment / course materials, information on your time table and examination details) and such materials and information on courses in STAPL, general student-related activities within STAPL, as well as related talks, seminars and/or events via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;
 - 2.1.2. Administering and/or managing your relationship with STAPL (including the mailing of correspondence, statements or notices to you, which could involve the disclosure of certain personal data about you to bring about delivery of the same, as well as on the external cover of envelopes / mail packages);

- 2.1.3. 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 that may have been put in place by STAPL, including the obtaining of references and/or other information about you from your previous education institute(s);
- 2.1.4. Responding to any enquiries by you;
- 2.1.5. Processing your application(s) for grants, and if successful, administering and/or managing your grant programmes, which may include use of personal data for development and fund-raising activities and disclosure of personal data to donors, external evaluators and/or external organisations for purposes of periodic reports as may be required, event invitations, surveys and/or publicity of STAPL' grant (if any) and/or financial aid programmes;
- 2.1.6. Maintaining training premises safety and security of persons and property (including the use of CCTVs), as well as investigating fraud, misconduct, any unlawful action or omission by you, and whether or not there is any suspicions of the aforementioned;
- 2.1.7. Responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (including but not limited to the Ministry of Defence, Ministry of Education and Ministry of Health), SkillsFuture Singapore or non-government agencies authorised to carry out specific Government services of duties from time to time;
- 2.1.8. Carrying out market related, evaluative or similar research and analysis for STAPL' operational strategy and policy planning purposes;
- 2.1.9. Outreach and engagement to garner philanthropic support for STAPL, its community and affiliated institutions, upon your successful enrolment into STAPL and/or as alumnus after certification from STAPL;
- 2.1.10. Invitation to participate in publicity materials, feature stories, events and other engagement activities relating to academic support, student support, grants, financial assistance, programmes and merit-based awards made possible by donors, where you may be a successful recipient, beneficiary and/or participant, after successful enrolment into STAPL;
- 2.1.11. Inclusion as appropriate in accountability reports to donors where you, upon successful enrolment to STAPL, is a recipient or beneficiary of the donors' philanthropic support to STAPL, and for disclosure to donors for engagement purposes;
- 2.1.12. Supporting STAPL functions including, but not restricted to, the teaching and personal and professional development of students, research and administration of STAPL;

- 2.1.13. Sharing with your previous education institute(s) information on their former students;
- 2.1.14. Sharing information on students with companies for purposes of recruitment, internship, industrial attachment and job placement;
- 2.1.15. Processing, administering and conferring awards of prizes, medals, grants, scholarships and other marks of distinction, and student or certification status, and publication or releasing of information on the same;
- 2.1.16. Upon certification, to engage you as an alumnus of STAPL, which includes but is not limited to notification on STAPL and alumni-related initiatives and activities, invitation to STAPL and alumni-related events, updating of alumni information, invitation to participate in alumni surveys and sending of communication collaterals;
- 2.1.17. If consented by you in the registration form and/or other methods of consent notification, sending you materials related to marketing, advertising and promotional information, via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;
- 2.1.18. Sharing your personal data for the purposes of STAPL' participation in course provider ranking exercises and / or renewal of licensing purposes;
- 2.1.19. Taking of photographs and/or videos (whether by STAPL staff or third-party photographers and/or videographers) during events or seminars organised by STAPL or its affiliates for publicity purposes (including in STAPL' publicity and communications materials); and/or
- 2.1.20. Facilitating the provision of support and/or assistance in relation to health and general well-being of yourself and others.

(collectively, the "Purposes")

2.2. 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 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.

3. SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

3.1. We respect the confidentiality of the personal data you have provided to us, and will use your personal data only for the above-stated Purposes.

3.2. 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:

- 3.2.1. cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- 3.2.2. cases in which the purpose of such disclosure is required based on the applicable laws and/or regulations;
- 3.2.3. cases in which the purpose of such disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- 3.2.4. cases in which there are reasonable grounds to believe that the health or safety of yourself or another individual will be seriously affected 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;
- 3.2.5. cases in which the disclosure is necessary for any investigation or proceeding;
- 3.2.6. cases 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
- 3.2.7. cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest

3.3. The instances listed above at paragraph 3.2 is not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

3.4. In all other instances of disclosure of personal data to third parties with your express consent, we will endeavour to provide adequate supervision over the handling and administration of your personal data by such third parties, as well as to provide for adequate forms of protection over such personal data.

4. REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

4.1. You may request to access and/or correct the personal data currently in our possession at any time by submitting your request through the following methods:

Singapore Telephone Number:	+65 6813 9564
E-mail:	dpo@securagroup.com.sg
Office Address:	Secura Building, 38 Alexandra Terrace, Singapore 119932

- 4.2. 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.
- 4.3. For a request to correct personal data, we will undertake the following:
- 4.3.1. we will correct your personal data as soon as practicable after the request has been made; and
 - 4.3.2. subject to paragraph 4.4, we will send the corrected personal data to every other organisation to which the personal data was disclosed by STAPL within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.
- 4.4. Notwithstanding paragraph 4.3(b), we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.
- 4.5. We may also be charging you a reasonable fee for the handling or processing of your request to access and/ or correct your personal data.

5. REQUEST TO WITHDRAW CONSENT

- 5.1. You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control at any time by submitting your request through the following methods:

Singapore Telephone Number:	+65 6813 9564
E-mail:	dpo@securagroup.com.sg
Office Address:	Secura Building, 38 Alexandra Terrace, Singapore 119932

- 5.2. We will process your request within a reasonable time from such a request for withdrawal of consent being made.

6. ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 6.1. We will take appropriate measures to keep your personal data accurate, complete and updated.
- 6.2. We will also take commercially 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. However, we cannot assume responsibility for any

unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.

6.3. We will also take commercially reasonable efforts to ensure that the personal data in our possession or under our control is destroyed and/or anonymized 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.

7. UPDATES ON DATA PROTECTION POLICY

7.1. As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.

7.2. We reserve the right to amend the terms of this Student Data Protection Policy at our absolute discretion. Any amended Student Data Protection Policy will be posted on our website and can be viewed at: www.securatraining.sg

7.3. You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

Last Updated on 16 November 2017