

## **EtonHouse Personal Data Protection Policy Statement**

EtonHouse respects the privacy of individuals and recognizes the importance of the personal data you have entrusted to us and believes that it is our responsibility to properly manage, protect, process and disclose our students, their parent's'/guardian's' personal data.

At EtonHouse, we are also committed to adhering to the provisions and principles of the Personal Data Protection Act 2012. As such, this Personal Data Protection Statement is to assist us our in understanding how we collect, use and/or disclose personal data.

EtonHouse will collect, use and disclose our student's personal data in accordance with the Personal Data Protection Act 2012 ("Act"). The Act establishes a data protection law that comprises various rules governing the collection, use, disclosure and care of personal data.

EtonHouse 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.

EtonHouse recognises both the rights of individuals to protect their personal data, including rights of access and correction, and the needs of organisations to collect, use or disclose personal data for legitimate and reasonable purposes.

This Data Protection Policy supplements but does not supersede or replace any other consent you may have previously provided in respect of your Personal Data, and your consent herein is additional to any rights which EtonHouse may have at law to collect, use or disclose your Personal Data.

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, DNA profile, telephone number, occupation, etc.) which when taken together would be able to identify the individual.

Parents/Guardians on behalf of a student must ensure that all Personal Data submitted to us is complete, accurate and up to date. Please update the school if there are any changes to your Personal Data by informing our school Parent liaison Office/General Office within thirty (30) days of such change by person or by email or by telephone.

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 for student and/or Employees/Staff Generally and/or For The Public and Other Third Parties Generally.

**EtonHouse International Holdings Pte. Ltd.**

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The Act takes into account the following concepts:

## Consent

Organisations may collect, use or disclose personal data only with the individual's knowledge and consent (with some exceptions) and you may, at any time, withdraw your consent to the collection, use, disclosure, transfer and/or processing of Personal Data;

## Purpose

Organisations may collect, use or disclose personal data in an appropriate manner for the circumstances, and only if they have informed the individual of purposes for the collection, use or disclosure; and

## Reasonableness

Organisations may collect, use or disclose personal data only for purposes that would be considered appropriate to a reasonable person in the given circumstances.

In projecting the three main concepts above, the Act contains nine main obligations which organisations are expected to comply with if they undertake activities related to the collection, use and/or disclosure of personal data:-

1. The Consent Obligation
2. The Purpose Limiting Obligation
3. The Notification Obligation
4. The Access and Correction Obligation
5. The Accuracy Obligation
6. The Protection Obligation
7. The Retention Limitation Obligation
8. The Transfer Limitation Obligation
9. The Openness Obligation

While EtonHouse will not be going into the details of these Obligations in this Personal Data Protection Statement, you can be rest assured that EtonHouse is constantly mindful of them in our collection, use and disclosure of personal data.

Should you wish to know more about these obligations, summary can be found in the Advisory Guidelines of the Personal Data Protection Commission at:

<https://sso.agc.gov.sg/Act/PDPA2012>.

In general, subject to applicable exceptions permitted in the Act, before EtonHouse collects any personal data from our parents/guardians (on behalf of students), EtonHouse will notify our parents/guardians (on behalf of the students) of the purposes for which their personal data may be collected, used and/or disclosed, as well as obtain consent for the collection, use and/or disclosure of their personal data for the intended purpose by referring parent/guardian (on behalf of student) to the school PDPA Policy available on the website during Pre-Course Counselling and/or Parent Handbook.

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Depending on our student relationship with EtonHouse, the personal data that which the school collects from our student may be used and/or disclosed for the following purpose:

## For Students Generally

Most of our students will have consented to EtonHouse using their personal data in the manner set out in the hard copy and/or online Application Form used when our student first enrolled into our schools/centres; or when our parents/guardians/students use specific services and facilities offered by the school; or when parents/guardians (on behalf of the students) are notified by the school administration of new rules and policies applicable to the student body and are deemed to have consented to the same.

The information below serves only to supplement and clarify this matter, without limiting the scope of the our student's earlier consent:

- *Evaluating suitability for admission, enrolling, providing educational courses and training, including sending materials on course / study / assignment / lecture and project materials, information on time tables and examination/test details via various means, including postal mail, electronic mail, SMS or MMS, fax and/or voice calls;*
- *Administering and/or managing relationships with EtonHouse (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);*
- *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 put in place by EtonHouse, including the obtaining of references and/or other information from prior admission of the student;*
- *Processing application(s) for financial course fees/payment collection, aid and administering and managing financial aid/grant/discounts and other support programmes which may include use of personal data for development and disclosure of personal data to donors, grantors, external evaluators and/or external organisations for purposes of assessment, periodic reports, event invitations, surveys and/or publicity of EtonHouse related programmes;*
- *Investigative purposes, including possible fraud, misconduct, unlawful action or omission, and utilizing electronic access and video systems to maintain campus security of persons or property, control access and investigate suspicious or inappropriate activities;*
- *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;*
- *Carrying out market-related, evaluative or similar research and analysis for EtonHouse's operational strategy and policy planning purposes, including providing data to external parties for school programme evaluation and to students' former institutions of study and to partnering/affiliated institutions/centres for jointly-administered programmes;*

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- *Facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales;*
- *Outreach and engagement to garner support and resources for EtonHouse, its community and affiliated centres/institutions;*
- *Supporting EtonHouse functions including but not restricted to, the teaching and personal and professional development of students, research and administration of the schools/centres/HQ functions;*
- *Processing and administering applications for inter-school/overseas exchange/transfer programmes, ECAs/CCAs, short courses and other overseas activities and administering such programmes including disclosure of information to overseas institutions, companies and training organisations;*
- *Processing, administering and conferring awards of prizes, medals, scholarships/sibling discounts, classes of honours and other marks of distinction, and student or graduation status, and publication or releasing of information on the same;*
- *Engaging Parent Committee (Parent School Association) including but not limited to notification on EtonHouse and committee-related initiatives and activities, invitation to EtonHouse and committee-related events, updating of committee information, invitation to participate in committee surveys and sending of communication collaterals;*
- *Processing applications and enrolment activities related to health, life and travel insurance and service provision as well as school-related student support services and administering matters related to use of these services (e.g. transportations and ECAs/CCAs);*
- *Facilitating participation in student life and community development opportunities which may include social, cultural, athletic, and educational activities, events, volunteering and training programmes in clubs, societies, halls and residences, and orientation/reception activities;*
- *Taking of photographs and/or videos (whether by staff or third party photographers and/or videographers) during events or seminars organised by EtonHouse or its affiliates for publicity purposes;*
- *If consented to in the registration form and/or other methods of consent notification, providing marketing, advertising and promotional information via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;*
- *Any other purpose arising in respect of the environment within which an IB World School/CIE Approved Centre such as EtonHouse operates which is reasonable given your relationship with EtonHouse;*

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- *Any other purposes not related to those listed above or in the hard copy and/or online Application Form to which you consented, which EtonHouse may inform our student of in writing from time to time, but for which EtonHouse will seek our student's parents/guardians separate consent.*

## **For Employees/Staff Generally**

In order to comply with its contractual, statutory, and management obligations and responsibilities, EtonHouse is required to process personal data relating to its employees.

All such data will be processed in accordance with the provisions of the Act and the relevant Group and School's rules and policies, including those on data protection, as may be amended from time to time.

Our employees relationship will in almost all cases, be governed primarily by an employment contract, and our employee agreement to be bound by the Employee Handbook and/or Governance and Academic Policies Handbook (which may be revised from time to time), any of which will very often inform you expressly or impliedly the purposes for, and the manner in, which our employee personal data will be used.

The purposes listed below serve only to supplement and clarify the matter, without limiting, superseding or supplanting any express or implied terms in the above mentioned documents:

- *for managing your employment relationship with EtonHouse;*
- *for using our employee bank account details to deposit salaries and other payments;*
- *for monitoring the use of school/centres/HQ computer network resources;*
- *for posting your photographs on intranet and website, staff pass, newsletters and the like;*
- *for managing staff benefit, training and professional development schemes;*
- *for disclosing your personal data where necessary to external parties for purposes of school administration, and to Government agencies for official purposes and disclosed to external third parties for, or in connection with, the above purposes, or where required by Law;*
- *any other purpose arising in respect of the environment within which an IB World School such as EtonHouse operates which is reasonable given your relationship with the school/centre/HQ;*
- *any other purposes not related to those listed above or in your employment contract, which EtonHouse may inform our employee of in writing from time to time, but for which EtonHouse will seek our employee separate consent.*

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## For The Public and Other Third Parties Generally

EtonHouse is committed to engaging and embracing its surrounding community, ecosystem as well as society at large. As a result, EtonHouse often organise a lot of activities in which external stakeholders or the general public are invited to participate.

While it is impossible to list all the events in which EtonHouse hope the public will participate, some events that you as a member of the public can look forward to include community outreach course, exhibitions, road shows (locally and/or international), extra-curriculum activities, performances and many others (Events).

Naturally, in encouraging a vibrant interaction with the public, there will be opportunity, and often a need to collect, use and/or disclose personal data from members of the public.

Some of the reasons/ purposes are as follows:

- *For security/ verification purposes for certain Events;*
- *For logistical/ administrative purposes for certain Events; (e.g. catering and transportations)*
- *To keep our student/parents/guardians and employees updated of future EtonHouse Events/ products which we feel may interest them;*
- *For marketing/ publicity purposes (e.g. Photographs)*
- *For any other purpose arising in respect of the environment within which an IB World School/CIE Approved Centre such as EtonHouse operates which is reasonable given your relationship with EtonHouse.*

In almost all of the above situations, it will be totally up to our students (parents/guardians) and employees as to whether, and to what extent, they wish to provide us with their personal data.

For Events where such provision of personal data is a pre-requisite to attendance, our students (parents/guardians) and employees shall be informed in advance so that they may make an informed decision as to whether to attend. EtonHouse will also endeavour at all times to inform our students (parents/guardians) and employees of the purposes for which personal data collected from them will be used.

Should our students (parents/guardians) and employees at any time feel that the manner in which EtonHouse has acted, or seeks to act, in respect of the collection, use or disclosure of personal data for an Event is inappropriate, please feel free to make their concerns known to the school/centre principal.

EtonHouse will not disclose our students / (parents/guardians) and employees personal data to any third parties without first obtaining our students / (parents/guardians) and employees consent permitting EtonHouse to do so or unless any such disclosure is permitted under any of the statutory exemptions under the Act.

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In this respect, please note that EtonHouse may disclose our students / (parents/guardians) and employees' personal data to third parties in certain circumstances without first seeking our students / (parents/guardians) and employees consent, if such disclosure is either required or permitted under the Act, including without limitation, if the disclosure is required by Law and/or regulations or if there is an emergency.

Subject to certain exceptions in the Act, our students / (parents/guardians) and employees may request to access and/or correct the personal data currently in our possession or withdraw their consent for the collection, use and disclosure of our students / (parents/guardians) and employees personal data in EtonHouse possession at any time by submitting their request here.

For a request to access personal data, EtonHouse will provide our students / (parents/guardians) and employees with the relevant personal data within a reasonable time from such request being made.

For a request to correct personal data, EtonHouse will process their request, including undertaking necessary verification activities, as soon as practicable after the request has been made. EtonHouse will send the corrected personal data to every other organisation to which the personal data was disclosed by EtonHouse 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, or if our students / (parents/guardians) and employees so consent, only to specific organisations to which the personal data was disclosed by EtonHouse within a year before the date the correction was made.

Our students / (parents/guardians) and employees may be charged a reasonable fee for the handling and processing of their requests to access and/or correct their personal data, but our students / (parents/guardians) and employees will be notified in advance of such costs.

For a request to withdraw consent; EtonHouse will process our students / (parents/guardians) and employees request within a reasonable time from such a request for withdrawal of consent being made. In some cases, requests for withdrawal of consent may adversely impact our students / (parents/guardians) and employees' relationship with the school/centre/HQ as it may hinder EtonHouse's ability to continue to interact with our students / (parents/guardians) and employees. EtonHouse will notify our students / (parents/guardians) and employees in advance of such impact, if any.

EtonHouse will take appropriate measures to keep our students / (parents/guardians) and employees' personal data accurate, complete and updated.

EtonHouse will also take reasonable efforts to take appropriate precautions and preventive measures to ensure that our students / (parents/guardians) and employees 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 our students / (parents/guardians) and employees' personal data.

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EtonHouse will also take reasonable efforts to ensure that the personal data in our possession or under our control is destroyed as soon as it is reasonable to assume that:

- *the purpose for which that personal data was collected is no longer being served by the retention of such personal data;*
- *and retention is no longer necessary for any other legal or business purposes.*

EtonHouse websites may contain links to other websites not maintained by EtonHouse. Such third party websites are subject to their own data protection and privacy practices and our students / (parents/guardians) and employees are encouraged to examine the data protection policies of those websites.

The Act also imposes certain responsibilities on all those who process personal data at the school whether you are a member of staff holding, using and sharing personal data in your teaching, research or administration, or a student accessing and recording personal data in your studies or other activities.

These obligations include holding and using data in a secure manner, making sure that data is handled in line with what individuals have been told, having appropriate arrangements in place for the access to (and sharing of) data, and making sure that individuals' data is accurate and retained for a suitable period.

If a data breach occurs (e.g. personal data held by the school/centre/HQ is lost, stolen, inadvertently disclosed to an external party, or accidentally published), this should be reported immediately to your seniors and the school/centre Principal and/or the below EtonHouse Data Protection Officer so that EtonHouse may review the circumstances and liaise as necessary with colleagues internally and the relevant external authorities.

**EtonHouse Data Protection Officer**

Mr William Cheang

(E): [william.cheang@etonhouse.com.sg](mailto:william.cheang@etonhouse.com.sg)

*Updated as of May 2020*

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