



DATA PROTECTION POLICY

The Hollandse School Limited (hereinafter "HSL") is an educational institution with a history of over 93 years, and is one of the largest Dutch language schools abroad where the International Primary Curriculum (IPC) is taught. HSL is committed to protect the personal data and respects the privacy and importance of proper protection of the personal data you entrusted us with. As such we would like to inform you of how we process your personal data when you interact with us. Personal Data (as defined hereinafter) will generally only be collected, used and disclosed for HSL's administrative and business purposes as further set out in this policy and only to the extent necessary to achieve those purposes.

If you have any questions, remarks or comments on this policy or any other queries in relation to how we may manage, collect, use, disclose and/or process your personal data, please do not hesitate to contact our Data Protection Officer at: adminhsl@hollandseschool.org.

1 DEFINITIONS AND INTERPRETATION

The following terms shall have the following meanings:

Individual	mean a natural person, whether living or deceased, and in any event, the students of HSL and their parents; and the staff of HSL as the case may be;
Organisation	means any individual, company, association or body of persons, corporate or unincorporated, whether or not formed or recognised under the law of Singapore; or resident, or having an office or a place of business in Singapore, as defined under section 2 of the PDPA;

Personal Data

means the data whether true or not, about an individual who can either be identified from that data; or from that data and other information to which HSL has or is likely to have access, as defined under section 2 of the PDPA;

2 PURPOSE OF THE COLLECTION, USE, DISCLOSURE OF THE PERSONAL DATA

2.1 HSL respects all Individuals' privacy and generally collects Personal Data for administrative and security purposes, necessary to maintain the records of its students and their parents, and its staff. HSL will collect, use and disclose your personal data in accordance with the Personal Data Protection Act 2012 ("PDPA").

2.2 From time to time, HSL may need to collect, use and/or disclose Personal Data for its activities and functions which are held for the benefit of the relevant Individual. Where appropriate, HSL shall take reasonable steps to inform and obtain consent from the respective Individual, and safeguard the integrity of the Personal Data.

2.3 Depending on your relationship with HSL (e.g. as an applicant, student, alumnus, staff, donor, vendor, service provider, or other person relating to our organisation), the personal data which HSL collect from you may be collected, used and/or disclosed for the following purposes:

2.4 Personal Data for Administrative Purposes e.g.:

- Name
- Private contact details
- Emergency contact data
- Date of birth
- Nationality
- Immigration details
- Passport details
- Family details
- Parents' employer details
- Education history and records



- Processing student applications

2.5 Data for Security Purposes e.g.:

- Video surveillance data from HSL premises

2.6 Data for other Purposes e.g.:

- Auditing
- Student's medical details
- Student's behavioural details
- Photographs, videos and other forms of multi-media

2.7 The abovementioned purposes are examples of personal data which HSL typically collects, uses, and discloses (where appropriate and necessary) and are not intended to be exhaustive. These purposes and any other specific purposes which may arise in due course shall be communicated to the Individual from whom the data is being collected, processed, disclosed and used, before such collection, processing, disclosure or use.

3. CONSENT OBLIGATION

3.1 HSL shall obtain, where so required, the consent of the Individual before collecting, using, processing, disclosing or using the Personal Data of the respective Individual.

3.2 Individuals may choose to abstain from giving such consent or withdraw their consent at any time. Individuals may withdraw their consent by notifying HSL at **adminhsl@hollandseschool.org**. In the event where consent has been withdrawn or the provision of the same is abstained, HSL shall not be responsible and/or liable for any loss, damage or harm resulting from, directly or indirectly, its inability to retrieve, use and/or disclose such Personal Data.

3.3 For the avoidance of doubt, where consent is not necessary under the PDPA 2012, including but not limited to the following instance:



- the collection, disclosure and/or use is necessary for any purpose that is clearly in the interest of the respective Individual, if consent for its collection, disclosure and/or use cannot be obtained in a timely way or the respective Individual would not reasonably be expected to withhold consent; or
- the collection, disclosure and/or use is necessary to respond to an emergency that threatens the life, health or safety of the respective Individual or other Individuals;

HSL shall have the discretion to decide what appropriate action to take and need not consult the relevant Individual accordingly.

4. PROTECTION OF PERSONAL DATA IN ANY COMPLAINTS

- 4.1 The Complaints procedure is set out in the “Complaints Procedure for Personal Data Issues”, which is also found on HSL's website.
- 4.2 All information and Personal Data involved in any such complaints which follows the Complaints procedure shall be kept confidential and shall not be used and/or disclosed to other persons without the consent of the involved Party, unless as permitted by the PDPA and/or required by Law.

5. ACCESS AND CORRECTION OF DATA

- 5.1 HSL shall upon request, provide the respective Individuals access to their Personal Data, which is under HSL's control.
- 5.2 HSL shall also upon request, provide the respective Individuals with information regarding the ways such Personal Data was used or disclosed during the past year.
- 5.3 HSL shall upon request, correct any error or omission in the respective Individuals' Personal Data that is under HSL's control.



6. ACCURACY OF DATA

- 6.1 HSL shall take reasonable measures to ensure that the Personal Data in its possession is accurate and complete if the Personal Data is likely to be used to make a decision that affects the respective Individuals the Personal Data relates to, or if the Personal Data is likely to be disclosed to another Organisation.
- 6.2 While HSL shall take reasonable steps to update and ensure the accuracy of the Personal Data in its database, Individuals are ultimately responsible for the submission of correct Personal Data and to inform HSL of any changes to such Personal Data as HSL shall not be obliged to carry out checks to determine the accuracy of the Personal Data provided.

7. DATA RETENTION PERIODS

- 7.1 HSL shall not retain the Personal Data in its possession and/or database if the Personal Data is no longer required to meet the purposes for which they were collected and/or no longer serves a legal and/or business purpose.
- 7.2 For the avoidance of doubt, HSL shall be entitled to retain and/or use such Personal Data as long as it serves an evaluative purpose.

8. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

Potential Transfers

- 8.1 Personal Data may be transferred to law enforcement, governmental agencies, or authorised third parties sited in Singapore or overseas, in response to a verified request relating to a criminal investigation or alleged illegal activity or any other activity that may expose HSL to legal liability.



8.2 *Specific Third Party Transfers*

In order to conduct operations more smoothly, HSL may also be disclosing the personal data that is provided to HSL to 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 the personal data on behalf of HSL for one or more of the above-stated Purposes, and not for any commercial gain. Examples of such services may include without limitation, transport, food and beverages catering, travel services, accommodation and medical.

HSL shall enter into contracts with such third party service providers which shall expressly state the third party service providers' obligation to use the Personal Data in question solely for the intended purpose of providing the required service, and to undertake appropriate measures to safeguard the Personal Data in their respective possession.

8.3 *Restrictions of Data Transfer Outside of Singapore*

Personal Data transferred out of Singapore shall be protected with a standard of protection that is comparable to the protection under the PDPA.

9. TECHNICAL AND ORGANISATIONAL METHODS TO SECURE DATA

HSL will take appropriate measures to keep the personal data accurate, complete and updated.



HSL will also take reasonable efforts to take appropriate precautions and preventive measures to ensure that the 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 the personal data. However, HSL cannot assume responsibility for any unauthorized use of the personal data by third parties which are wholly attributable to factors beyond HSL's control.

HSL will also take reasonable efforts to ensure that the personal data in their possession or under their 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.

10. UPDATES TO THIS POLICY

HSL reserves the right to update this policy from time to time. Consent to prior versions of this policy is deemed consent to a newer version, too, if not objected within ten (**10**) days of such update.

Augustus 2015