

DATA PROTECTION POLICY

Marketing Institute of Singapore Business School and our affiliates, respect your privacy and recognize the importance of data protection.

We may be obliged to collect and use your personal information during your interactions with us, such as when we provide services to you, when you sign up for or participate in a program, course, or activity, or during any other interactions with you that are summarized in the sections below.

Purpose

This document ("Data Protection Policy") is intended to inform you of Marketing Institute of Singapore Business School's (hereinafter referred to as "MISBS", "us", "we", or "our") policies on data collection, usage, disclosure, processing, and protection, which are subject to the Singapore Personal Data Protection Act 2012 and to obtain your consent for such activities. Personal Data (as defined below).

Personal Data

"Personal Data" is defined under the PDPA to mean personal information, whether true or not and whether in electronic or other form, about an individual who can be identified:

- From that data; or
- From that data and other information to which we have access to or are likely to have access to.

Examples of personal data include name, age, address, NRIC / FIN / Passport number, photograph or video image, telephone numbers, email addresses, thumbprint, DNA profile, occupation, as well as any set of data which when taken together would be able to identify the individual.

To find out more about PDPA, you may visit the Singapore Personal Data Protection Commission's website.

Purposes for Collection, Use and Disclosure of Personal Data

In general, subject to applicable exceptions permitted in the Act, we will notify you of the purposes for which your personal data may be collected, used, and/or disclosed before we collect any data from you and obtain your consent before we collect, use, or disclose your personal data for those purposes.

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Your relationship with us (e.g., as an applicant, student, alumni of MISBS, staff, academic staff, donor, vendor, service provider, parents, guardians, recruitment agents and / or any other person relating to our organization), will determine how we use and/or disclose the personal information we gather from you.

- General administration of your application and/or registration and/or enquiry, including those personal data collected by our recruitment agents, for any programme offered by us or our University partners.
- Evaluating suitability for admission or employment, enrolling, or employing, providing educational courses, and training, including sending materials on course / study / assignment / course materials, information on timetables and examination details via postal mail, electronic mail, SMS or MMS, fax and/or voice calls.
- Administering and/or managing relationships with MISBS (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).
- Application of student passes where appropriate.
- Providing student support and administrative services to you.
- Assessing, monitoring, and reporting on individual student performance, attendance, and disciplinary records.
- Responding to any complaints, feedback, requests, and enquiries by students / parents / guardians.
- Disclosing your records to your parent(s) or guardian(s) at their request.
- Informing students / parents / guardians/ related parties of events, talks, seminars, and updates.
- Promoting MISBS to prospective students, including but not limited to the MISBS's prospectus, magazine, and website.
- Sending promotional and marketing information by post, email, and SMS about MISBS, activities and events as well as carefully selected third parties.
- Taking of photographs and/or videos (whether by MISBS staff or third-party photographers and/or videographers) during events or seminars organised by MISBS or its affiliates for publicity purposes.
- Conducting checks with the DO NOT CALL Registry.

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- Maintaining and updating our student, alumni, and associate lecturer records.
- Generating financial, regulatory, management or survey reports and statistics for MISBS's business and administrative purposes.
- 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 the College, including the obtaining of references and/or other information from prior educational institutions and employers.
- Meeting or complying with MISBS's internal policies and procedures and any applicable laws, rules, regulations, codes of practice or guidelines, orders or requests issued by any court, legal or regulatory bodies (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance, and investigation).
- Preventing, detecting, and investigating crime, offences or breaches including that related to the security of MISBS's premises (including but not limited to the use of security cameras).
- Purposes which are reasonably related to the above.

By providing the Personal Data, including those related to a third party (e.g., information of your parents) to us through the various channels (e.g., written form, webpage, email, etc.), you represent and warrant that consent, including that of the third party, has been obtained for collection, use and disclosure of the Personal Data for the respective purposes. In the event the personal data is to be used for a new purpose, MISBS will notify you and seek your consent.

MISBS ensures that your Personal Data held by us shall be kept confidential. When transferring personal data to our third-party service providers, agents and/or our affiliates or related corporations whether in Singapore or elsewhere in order to carry out one or more of the purposes listed above, we will require them to ensure that your Personal Data disclosed to them is kept confidential and secure.

Disclosure of Personal Data to Third Parties

We respect the confidentiality of the personal data that you have provided to us.

We will not disclose your personal data to any third parties (unless otherwise for the purposes stated above) without first obtaining your consent permitting us to do so or unless any such disclosure is permitted under any of the statutory exemptions under the Act. In this respect, please note that we may disclose your personal data to third parties in certain circumstances without first

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seeking your consent, if such disclosure is either required or permitted under the Act, including without limitation, the following:

- The disclosure is necessary in accordance with the relevant laws and / or regulations.
- The disclosure's goal is obvious in your best interests and timely consent cannot be obtained.
- Disclosure is required to respond to an emergency that endangers your own or another individual's life, health, or safety.
- There are reasonable grounds to believe that you or another individual's life, health, or safety will be seriously affected and permission to disclose the data cannot be obtained in a timely manner, we shall, as soon as it is possible, inform you of the disclosure and the purpose of the disclosure.
- The disclosure is necessary for any investigation or proceedings.
- The personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorization 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.
- The disclosure is to a public agency and such disclosure is necessary in the public interest.

The instances listed above are not exhaustive. For an exhaustive list of exceptions, you are encouraged to peruse the PDPA, which is publicly available at <https://sso.agc.gov.sg/Act/PDPA2012> .

Request for Access, Correction, and / or Withdrawal of Personal Data

Subject to certain exceptions in the Act, you may submit a request to the PDPA officer-in-charge for access to, correction of, or withdrawal of consent to the collection, use, and disclosure of your personal data in our possession at any time.

You must always ensure that the information you give to MISBS is true, accurate, and full because we rely on your Personal Data to offer services to you. Student is responsible for promptly notifying us of any changes to the data they have given us via the appropriate means. Alumni and stakeholders must update their personal information as needed and provide it to the appropriate departments.

Your personal information is kept as long as necessary to fulfill the original objectives for which it was obtained and/or for any additional legitimate business or legal needs that may arise. MISBS will take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure

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that the electronic storage and transmission of your personal data is adequately protected and secured with the appropriate security arrangements and that our data intermediary are aware of the requirements of PDPA. 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.

For a request to withdraw consent, we will process your request within a reasonable time from such a request for withdrawal of consent being made. If you withdraw your consent to the use of your Personal Data for any or all purposes, depending on the nature of your request, MISBS may not be in a position to continue to provide our services to you or administer any contractual relationship in place, in which case MISBS reserves the right to cease providing the services and/or terminate the contractual relationship with you.

Without limiting the aforementioned, you agree and acknowledge that you may withdraw your consents at any time in accordance with the terms of this notice, and that doing so will not affect any consent you may have given to MISBS regarding the use of your Singapore telephone number(s) to receive marketing or promotional information.

If you have any feedback or enquiries relating to our PDPA related policies and procedures or would like to obtain access and make corrections to your personal data, please do not hesitate to contact our Data Protection Officer (DPO*).

- Address: 229 Mountbatten Road #03-02, Mountbatten Square, Singapore 398007
- Email: education@mis.edu.sg
- Tel: 6327 7580

END OF POLICY