

## PERSONAL INFORMATION COLLECTION STATEMENT

All personal data collected from students and/or their parents/guardians in connection with their education at Dover Court International School ("School") will be handled by our staff, kept confidential and used by Nord Anglia Education Limited ("NAE") and/or our affiliates ("we" or "us") for lawful and relevant purposes including but not limited to:

- verification of a student's academic and other information;
- school administration and operation;
- the organisation, administration and operation of extra-curricular expeditions and activities, including but not limited to making arrangements with third parties for relevant insurance cover, medical assistance, supervision and execution of activities;
- sending communications to parents and students including newsletters and information about events and extra-curricular activities provided by the School or third-party providers;
- statistical and research purposes (including development and improvement of our educational products and services) ;
- other school related purposes, including marketing; and
- alumni activities.

We may disclose some of the data to third parties such as agencies (including governmental bodies), service providers (including insurance providers, security/medical service providers and third party activity/expedition organisers) and contractors appointed by us (whether within or outside the jurisdiction in which the personal data was collected) to undertake some of our academic, pastoral, extra-curricular and administrative functions or to assist us with the development of our products and services. This includes transferring data between affiliates. We will not disclose any personal data to any external bodies or organisations unless:

- such disclosure is expressly provided for under this Statement;
- permitted to do so by the Student or Parent; and/or
- permitted or required by law and/or for Student safeguarding reasons.

Personal data may be stored in our vendors or our affiliates' database systems (which may be located within or outside the jurisdiction in which the personal data was collected) and online portals and will form part of the applicant's official student records. It may also be stored in online student resources such as the global classroom.

We may provide such personal data to the Dover Court Association ("DCA"), the School's Parent association, for inclusion in the DCA directory, Class Parent contact list and other DCA activities. If a Student or Parent does not wish for such data to be included in the DCA directory, the Parent will inform the Data Protection Officer in writing.

In the event that a student already has a sibling at the School, the records of such sibling will be updated according to the data provided on the new student's enrolment form where relevant.

The consent that is provided for the collection, use and disclosure of personal data will remain valid until such time as it is withdrawn by informing the Data Protection Officer in writing (see below). Please note that failure to provide the requested data may affect the Students' ability to participate in certain events, activities and expeditions arranged by the School.

All practicable steps will be taken to ensure that personal data held by us is accurate. We will take all practicable and reasonable steps to ensure security of the personal data and to avoid unauthorised or accidental access, collection, use, disclosure, copying, modification, disposal, erasure or other use.

Students and Parents have the right to access or correct personal data held by us under applicable law. Requests for access and correction should be addressed in writing to the Data Protection Officer. We may levy a charge for accessing the information.

To safeguard your personal data from unauthorised access, collection, use, disclosure or similar risks, we have introduced appropriate administrative, physical and technical measures to secure all storage and transmission of personal data by us. Disclosing personal data both internally and to our authorised third party service is only on a need-to-know basis.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

We will cease to retain your personal data or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected and is no longer necessary for legal or business purposes.

If any of our communications constitute direct marketing we will separately seek your consent where required by law. In addition, NAE will (1) honour any request we may receive from you to stop receiving such communications and (2) assist in ensuring that you do not receive targeted advertising that is unlikely to be of interest to you.

Where you do not consent to direct marketing, or where we do not wish to target specific ads to you, we will sometimes meet these requirements by sharing your email address with our advertising service providers, to ensure that such communications are not issued to you. Your email address will be irreversibly encrypted by them and will not be used for any other purpose. We rely on legitimate interests (managing the advertising of our services) for this purpose.

We may (with the assistance of a contractor where appropriate) analyse your personal data on an aggregated pseudonymised basis in order to develop and improve our products and services. Learnings taken from this analysis (but not the personal data itself) may be used for education related commercial purposes by either ourselves or the relevant contractor.

The terms of NAE's privacy policy can be found at <u>https://www.nordangliaeducation.com/privacy-policy</u>.

You may contact our Data Protection Officer as follows:

Dover Court International School 301 Dover Road Singapore 139644 Phone: +65 6775 7664 DataProtection@dovercourt.edu.sg

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