

**SINGAPORE UNIVERSITY OF SOCIAL SCIENCES (“SUSS” or “We” or “Us”)
DATA PROTECTION POLICY (“Policy”)**

1. Introduction

SUSS is committed to protecting the rights and privacy of individuals in accordance with the Personal Data Protection Act 2012 (the “PDPA”).

To properly perform the functions of a university and to comply with its legal obligations, we will need to process and keep certain personal data about all individuals with whom it has dealings, including its employees, associates and students.

2. Key Terminologies

2.1 *“personal data”* This is information held either electronically or in paper form that can identify a living person directly or indirectly. It can include student/associate records, staff employment details, information on prospective students, associates and employees, audio recordings of lectures, telephone recordings and images recorded on CCTV. It does not include business contact information.

Examples of Personal Data
Unique identifier: NRIC number, eg. S1234567C
Set of data which when put together would identify an individual: Name, age, occupation, address, eg. "Johnson Lim, 28 years old, civil servant, lives at Blk 1 Ang Mo Kio Street 5"
Personal data may include the following: Full name Personal email address NRIC, FIN or passport number Thumbprint DNA Profile Photograph or video image of an individual Mobile telephone number Name and residential address Name and residential telephone number

2.2 *“processing”* In relation to personal data, this means the act of collecting, recording, holding or storing personal data and carrying out any operation or set of operations on the personal data.

3. Collection of Personal Data

- 3.1 SUSS will collect personal data only if the information is necessary for one or more of its functions or activities. It will do so only by lawful and fair means and not in an unreasonably intrusive way. We will not collect excessive or irrelevant information.
- 3.2 When we collect personal data from you, we will take reasonable steps to ensure that you are aware of:
- 3.2.1 the identity of SUSS and how to contact us; and
 - 3.2.2 the fact that you are able to gain access to your personal data; and
 - 3.2.3 the purposes for which the personal data is collected (the “primary purpose”, more specifically set out under paragraph 4.1); and
 - 3.2.4 to whom (or the types of individuals, organizations or entities to which) SUSS usually discloses such personal data; and
 - 3.2.5 any law that requires the personal data to be collected; and
 - 3.2.6 the main consequences (if any) for you if all or part of the personal data is not provided.
- 3.3 If it is reasonable and practicable to do so, SUSS will collect your personal data from you directly. However, there will be instances where we will obtain such information from other sources, e.g. references for employment purposes; results data for prospective students, verification of formal qualifications of staff/associates and students etc. In such instances, SUSS will take reasonable steps to ensure that you have been made aware of the matters listed in paragraph 3.2, except to the extent that making you aware of the matters would pose a serious threat to the life or health of any individual.

4. Use and Disclosure of Personal Data

- 4.1 The personal data which SUSS collects from you may be used and/or disclosed for the purposes set out in this Policy, depending on your relationship with SUSS (i.e. whether you are an applicant, student, alumnus, staff, donor, vendor, service provider or other person dealing with SUSS). Your personal data may also be used and/or disclosed for any other legitimate purpose of SUSS arising in respect of the environment within which SUSS operates as an institution of higher learning and which is reasonable given your relationship with SUSS.

4.1.1 Student

Most of you will have consented to SUSS using your personal data in the manner set out in the online application or enrolment form when you first applied to/enrolled into SUSS; or when you use specific services and facilities offered by SUSS; or when you are notified by SUSS 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 your earlier consent:

- (a) administration of applications (including receiving and processing queries and applications for programmes/courses/training; sending materials on courses/modules via postal mail, electronic mail, SMS, MMS, OTT messaging apps, facsimile or voice calls; compilation of statistics; evaluating your eligibility and interviews including offers at different stages of progression);
- (b) administration and/or managing relationships with SUSS (including programme/course/training registration; progress monitoring; sending

assignment/lecture materials, information on time tables and examination details via various means; calculation and publication of assessments and results; provision of references, conferring awards or prizes, medals, scholarships, classes of honours and other marks of distinction, and student or graduation status and publication or releasing of information on the same; mailing of correspondence, statements or notices which could involve the disclosure of certain personal data to bring about delivery of the same);

- (c) carry out due diligence or other screening activities (including background checks) in accordance with legal and regulatory obligations or risk management procedures and policies required by law or put in place by SUSS, including the obtaining of references and/or other information from prior educational institutions and/or employers;
- (d) process application(s) for scholarships and/or financial aid and research support; administering and managing scholarship/financial aid/grant and other support programmes which may include use of personal data for development and fund-raising activities 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 SUSS-related programmes;
- (e) provision of library and information services (e.g. administration of membership, cards, loans and fines) and recreational facilities;
- (f) provision and maintenance of computing facilities (e.g. email accounts and internet access);
- (g) financial administration (e.g. payment of tuition fees and other services administered by the relevant departments of SUSS, provision of loans and bursaries, and the use of debtor information to make decisions about withholding bursary payments, preventing re-registration of returning students and inviting students to graduation ceremonies);
- (h) administration of student welfare/pastoral care services (e.g. contact with tutor, counselling service, disability services, careers service and financial advice services);
- (i) process and administer applications for health, life and travel insurance and service provision (e.g. counselling service) as well as university-related concession cards;
- (j) provision of student ID card;
- (k) promotion of SUSS outreach and engagement activities to garner support and resources for SUSS, its community and affiliated institutions; (e.g. providing information about programmes that may be of interest to you, events hosted, co-hosted or supported by SUSS on and off-campus) and supporting SUSS functions including, but not restricted to the teaching and personal and professional development of students, research and administration of SUSS;
- (l) handle complaints, appeals and disciplinary actions;
- (m) maintain campus security of persons and property (e.g. the use of regulated CCTV, security incident reports, control access and investigate suspicious or inappropriate activities);
- (n) dealing with student experience activities (e.g. festival celebrations, graduation ceremonies, orientation and student group camps, conferences, programmes, student benefit activities) which may be organized by SUSS to enhance or enrich your student life with us, create networking opportunities for you, foster

community spirit, encourage holistic development of students both inside and outside the classroom and to assist you in planning and preparing for your journey after graduation;

- (o) complying with any request or direction of any government authority or public agencies, ministries, statutory boards or other similar authorities or non-governmental agencies authorized to carry out specific Government service or duties; or responding to requests for information from hospitals, embassies, public agencies, ministries, statutory boards or other similar authorities;
- (p) carry out market-related, evaluative or similar research and analysis for SUSS's operational strategy and policy planning purposes, including providing data to external parties for university programme evaluation and to students' former academic institutions and to partner institutions for jointly-administered programmes;
- (q) process and administer applications for overseas exchange programmes, summer school, overseas internships and other overseas activities and administering such programmes including disclosure of information to overseas universities/institutions, employment and training organisations;
- (r) process applications for and administer local and overseas career-related activities, events, programmes, internships, employment opportunities, and career coaching and sharing information with companies (whether local or overseas) for purposes of recruitment, internships, industrial attachment, job placement and research support;
- (s) taking of photographs and/or videos (whether by SUSS staff or third-party photographers and/or videographers engaged by SUSS) during events or seminars organized by SUSS or its affiliates for publicity purposes;
- (t) if consented to in the registration form and/or other methods of consent notifications, provide marketing, advertising and promotional information via postal mail, electronic mail, SMS, MMS, OTT messaging apps, fax and/or voice calls; and
- (u) any other purposes not related to those listed above or in the application or enrolment form to which you consented, which SUSS may inform you of in writing from time to time, but for which SUSS will seek your separate consent.

4.1.2 Alumnus

- (a) engaging and maintaining a lifelong relationship with SUSS alumni including but not limited to notifying you on SUSS and alumni-related initiatives and activities as well as programmes and courses, invitation to SUSS and alumni-related events, updating of alumni information, invitation to participate in alumni surveys and sending of communication collaterals;
- (b) promoting alumni relations including informing you of promotions, benefits and services available to alumni;
- (c) facilitating alumni participation in student life and alumni development opportunities which may include social, cultural, athletic, and educational activities, events, volunteering and training programmes, student membership and leadership positions in clubs, societies and orientation/reception activities; and
- (d) studying the profile of the alumni community for our policy making and planning.

4.1.3 Employee

SUSS is required to process personal data relating to its employees in order to comply with its contractual, statutory and management obligations and responsibilities. All personal data will be processed in accordance with the provisions of the PDPA and the relevant SUSS' rules and policies, including those on data protection, as may be amended from time to time. Your relationship with SUSS will, in almost all cases, be governed primarily by an employment contract and your agreement to be bound by the SUSS staff policies and procedures as well as Associate Handbook (as may be revised from time to time), any of which expressly or impliedly inform you of the purposes for, and the manner in, which your 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 abovementioned documents:

- (a) evaluating your employment application;
- (b) administering and managing your relationship as our employee, including secondments with or transfer to affiliates, related corporations or associated companies, and secondments with third-party organisations;
- (c) dealing with and/or administering employment benefits and other employee welfare programs;
- (d) using your bank account details to deposit salaries and other payments;
- (e) monitoring your use of SUSS' computer network resources;
- (f) posting your photograph(s) on SUSS' intranet and website, staff pass, newsletters and the like;
- (g) disclosing your personal data where necessary to external parties for purposes of University administration; and to Government agencies for official purposes and disclosing to external third parties for, or in connection with, the above purposes; or where required by law; and
- (h) any other purposes not related to those listed above or in your employment contract which we may inform you of in writing from time to time, but for which we will seek your separate consent.

4.1.4 The Public and Third Parties

On an on-going basis, SUSS organizes activities in which external stakeholders or the general public may be invited to participate, including without limitation, community outreach programmes, talks, exhibitions, movie screenings and concerts ("Events"). Personal data from members of the public at Events will often be collected, used and/or disclosed for some of the following reasons/purposes:

- (a) security/verification purposes for certain Events;
- (b) logistical/administrative purposes for certain Events, including food catering;
- (c) responding to any enquiry given by you or on your behalf and to keep you updated of future SUSS Events/products which we feel may interest you via various modes of communication such as postal mail, electronic mail, SMS, MMS, OTT messaging apps, facsimile or voice calls; and
- (d) marketing or publicity purposes (e.g. photographs, video recordings);

In almost all of the abovestated situations, it will be totally up to you as whether, and to what extent, you wish to provide us with your personal data. For Events where provision

of personal data is a pre-requisite to attendance, you will be informed in advance so that you may make an informed decision as to whether to attend. We will also endeavor at all times to inform you of the purposes for which personal data collected from you will be used. If you feel that the manner in which we have acted, or seek to act, in the collection, use or disclosure of personal data for an Event is inappropriate, please make your concerns known to the Data Protection Officer at DPO@suss.edu.sg.

4.1.5 Statutory Exemptions under PDPA

SUSS will not disclose your personal data to any third parties without first obtaining your consent or unless any such disclosure is permitted under any of the statutory exemptions under the PDPA, e.g.:

- (a) the disclosure is required by law; or is necessary for any investigation or proceedings;
- (b) the purpose of such disclosure is clearly in your interest and consent cannot be obtained in a timely manner; or
- (c) the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual.

For the full list of exemptions, please refer to the PDPA which is publicly available at <https://sso.agc.gov.sg/Act/PDPA2012>. Any disclosure under any of the statutory exemptions will only be made by the authority of the Registrar or the President of SUSS and a written record will be made of the reasons for that decision.

- 4.2 To conduct our operations more smoothly, we may disclose the personal data you have provided to us to our third-party service providers, agents and/or affiliates or related corporations (“External Parties”) for such External Parties to process your personal data on our behalf for one or more of the abovestated reasons or purposes. An External Party may be sited locally or outside of Singapore.

5. Accuracy of Personal Data

- 5.1 SUSS will take reasonable steps to make sure that the personal data it collects, uses or discloses is accurate, complete and up to date. To enable us to ensure the quality and accuracy of personal data, you have an obligation to provide relevant and accurate information to SUSS.

6. Protection and Retention

- 6.1 SUSS will take commercially reasonable steps to protect the personal data it holds from misuse and loss and from unauthorised access, modification or disclosure.
- 6.2 We will take commercially reasonable steps to destroy or permanently de-identify personal data if it is no longer needed for any purpose. Destruction of personal data will be carried out in accordance with SUSS’s prevailing policies and procedures for records retention and management.

7. Access and Correction

- 7.1 If SUSS holds personal data about you, we will provide you with access to the personal data on request by you, unless:

- 7.1.1 providing access would pose a serious and imminent threat to the life or health of any individual; or
- 7.1.2 providing access would have an unreasonable impact on the privacy of other individuals; or
- 7.1.3 the request for access is frivolous or vexatious; or
- 7.1.4 the personal data relates to existing legal proceedings between SUSS and you, and the personal data would not be accessible by the process of discovery or subpoena in those proceedings; or
- 7.1.5 providing access would reveal the intentions of SUSS in relation to negotiations with you in such a way as to prejudice those negotiations; or
- 7.1.6 providing access would be unlawful; or
- 7.1.7 denying access is required or authorised by or under law; or
- 7.1.8 providing access would be likely to prejudice an investigation of possible unlawful activity; or
- 7.1.9 providing access would be likely to prejudice:
 - (a) the prevention, detection, investigation, prosecution or punishment of criminal offences or breaches of a law imposing a penalty or sanction; or
 - (b) the enforcement of laws relating to the confiscation of the proceeds of crime; or
 - (c) the prevention, detection, investigation or remedying of seriously improper conduct; or
 - (d) the preparation for or conduct of, proceedings before any court or tribunal, or
 - (e) the implementation of its orders by or on behalf of a law enforcement agency
- 7.2 Where providing access would reveal evaluative information generated within SUSS in connection with a commercially sensitive decision-making process, we may give you an explanation for the commercially sensitive decision rather than direct access to the information.
- 7.3 SUSS reserves the right to charge for providing access to personal data, and if it does so it will advise you that we will provide access on the payment of the prescribed fee; and that we may refuse access to the personal data until the fee is paid. Request for access to personal data may be made to DPO@suss.edu.sg.
- 7.4 If you requests access to, or the correction of, your personal data held by SUSS, we will:
 - 7.4.1 provide access or reasons for the denial of access; or
 - 7.4.2 if you are able to establish to the satisfaction of SUSS that the information is not accurate, complete and up to date, we will take reasonable steps to correct the information so that it is accurate, complete and up to date, or provide reasons for the refusal to correct the personal data; or
 - 7.4.3 provide reasons for the delay in responding to the request for access to or for the correction of personal data as soon as practicable, but no later than forty five (45) days after receiving the request.
- 7.5 If SUSS and you disagree on whether the personal data is accurate, complete and up to date, and you asks SUSS to associate with the information a statement from you claiming that the information is not accurate, complete or up to date, we will take reasonable steps to do so.
- 7.6 SUSS is not required to provide you with access to personal data about you if that information is generally available to the public.

8. Unique Identifiers

- 8.1 SUSS will assign unique identifiers to staff, associates, students and alumni members if this is considered necessary for SUSS to carry out its functions efficiently. We may also assign a numerical code to a participant in SUSS research in order to protect the privacy of that person.
- 8.2 Unless required by law, SUSS will not adopt as its own unique identifier of an individual the unique identifier of the individual that has been assigned by another organization.
- 8.3 SUSS will not require you to provide a unique identifier in order to obtain a service unless the provision of the unique identifier is required or authorised by law or the provision is in connection with the purpose (or a directly related purpose) for which the unique identifier was assigned.

9. Transfer of Personal Data

- 9.1 SUSS will only transfer your personal data to someone or an entity (other than SUSS or you) who is outside Singapore if:
 - 9.1.1. SUSS reasonably believes that the recipient of the personal data is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the personal data that are substantially similar to the principles set out in this Policy; or
 - 9.1.2 you consent to the transfer; or
 - 9.1.3 the transfer is necessary for the performance of a contract between you and SUSS, or for the implementation of pre-contractual measures taken in response to your request; or
 - 9.1.4 the transfer is necessary for the conclusion or performance of a contract concluded in your interest between SUSS and a third party; or
 - 9.1.5 the transfer is for your benefit and it is impracticable to obtain your consent to that transfer and if it were practicable to obtain consent, you would be likely to give it; or
 - 9.1.6 SUSS has taken reasonable steps to ensure that the personal data which it has transferred will not be held, used or disclosed by the recipient of the personal data inconsistently with this Policy.

10. Collection of Personal Data during Student/Alumni/Associate Activities

- 10.1 All student, alumni and associate activities organized by the respective student/alumni/associate bodies that require collection of Personal Data will require prior approval by the SUSS Data Protection Officer.
- 10.2 Please refer to the student handbook, associate handbook and alumni portal for more information.

11. Updates to this Policy

- 11.1 Any changes SUSS may make to this Policy in the future will be posted on this page and, where appropriate, notified to you via email.