

DATA PROTECTION NOTICE FOR STUDENTS

This Privacy Notice (“Notice”) sets out the basis upon which Singapore Raffles Music College Pte. Ltd. (“SRMC”, “College”, “we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data of students in accordance with the Personal Data Protection Act (“PDPA”) and all associated regulations and guidelines which may from time to time be issued by the Personal Data Protection Commission (PDPC) of Singapore. This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

Application of This Notice

1. This Notice applies to all students enrolled with us, whether on a full-time or part-time courses (collectively referred to as ‘students’), and shall also apply to students undertaking secondments or internship under the College’s programmes.

Personal Data

2. As used in this Notice, “personal data” means data, whether true or not, about a student who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.
3. As our student (including alumni), personal data which we may collect in the context of your placement with us includes, without limitation, your:
 - a) name or alias, gender, NRIC/FIN or passport number, date of birth, nationality, and country and city of birth;
 - b) mailing address, telephone numbers, email address and other contact details;
 - c) education history, examination results and disciplinary records;
 - d) bank account details;
 - e) health issues and disabilities;
 - f) counselling records;
 - g) photographs and other audio-visual information;

- h) personal data of third party (for the purpose of emergency contact person).
- i) personal data of parents/guardians (for student aged below 18 years old).

4. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

Collection, Use and Disclosure of Personal Data

5. We generally collect personal data that:

- a) you knowingly and voluntarily provide in the course of or in connection with your enrolment with us, or via a third party who has been duly authorised by you to disclose your personal data to us (your authorised representative, your parent or legal guardian if you are minor), after (i) you (or your authorised representative, your parent or legal guardian if you are minor) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative, your parent or legal guardian if you are minor) have provided written consent to the collection and usage of your personal data for those purposes, or
- b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law), or
- c) collection of third party's personal data from you for the purpose of emergency contact person, you represent to us that you have obtained the consent of the third party (him/her) to you providing us with their personal data.

6. You have choices regarding our collection, use or disclosure of your personal data. If you choose not to provide us with the personal data described in this notice, we may not be able to perform our obligations under or in connection with your enrolment with us or facilitate the purposes listed in Section 7 below. You have the right to object to the processing of your personal data and withdraw your consent in the manner described in Section 11 below.

7. As our student (including alumni), your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:

- a) Evaluating your application to be a student with us;and
- b) Maintaining a lifelong relationship with SRMC as our alumni and for professional learning arrangements;and
- c) Administering and managing your relationship as our student, including enrolment, academic progression, student support and external placements (collectively, the "Student Administration Matters"); and
- d) Dealing with student experience activities, including events, programmes, campus tours and open days (including relevant testimonials or referee communications);and
- e) Liaising with educational institutions (including overseas partners), referees, government bodies, medical or insurance providers, and professional or academic bodies, in connection with Student Experience and Student Administration Matters;and
- f) Arranging and administering your participation in the research or survey, including following up on specific issues or findings following from the same; and
- g) for follow-up action regarding any complaints, feedback, queries or requests received via our website or any other communication channels; and
- h) assisting in law enforcement and investigations conducted by any governmental and/or regulatory authority; and
- i) For students who are minors, dealing or communicating with their parent or legal guardian as necessary in relation to the above purposes.

8. The purposes listed in the above clauses may continue to apply even after your enrolment engagement with us has ended or been altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under your enrolments and related arrangements with the College).

9. We may disclose your personal data:

- a) with your consent, where such disclosure is required in connection with the purposes listed in Paragraph 7;
- b) to comply with any applicable laws, regulations, codes of practice, guidelines, or rules; or
- c) with your consent, to third party service providers, agents, and other organisations we have engaged to perform any of the functions listed in Paragraph 7 above for us. We will ensure that any third parties engaged by us provides sufficient guarantees to us to have implemented the necessary security measures to protect your personal data.

10. We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law such as during the following situations:
 - a) To respond to an emergency that threatens your life, health and safety or of another individual; and
 - b) Necessary in the national interest, for any investigation or proceedings.

Withdrawing Consent by Students

11. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. If you wish to withdraw your consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed in Paragraph 7 above, you may do so by contacting our Data Protection Officers in writing or via email at the contact details provided in Paragraph 26 below.
12. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process and effect your request within 10 business days of receiving it. Should we require more time to give effect to a withdrawal notice, we will inform you of the time frame by which the withdrawal of consent will take effect.
13. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and extent of your request, we may not be able to continue your enrolment with us. We shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us via email in the manner described in Paragraph 11 above.
14. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

Access to and Correction of Personal Data

15. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold, you may submit your request in writing or via email to our Data Protection Officers at the contact details provided in Paragraph 26 below.
16. Before we accede to your access or correction request, we may need to verify your identity by checking identification document, and the legitimacy of your request.
17. We will respond to your access request as soon as reasonably possible. Should we not be able to respond to your access request within thirty (30) days after receiving your access request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).
18. Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organisation has on record, if the record of your personal data forms a negligible part of the document.

Protection of Personal Data

19. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection and encryption to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

20. 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.

Accuracy of Personal Data

21. We generally rely on personal data provided by you (or your authorised representative, and your parent or legal guardian if you are minor). We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete, not misleading and kept up-to-date. In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officers in writing or via email to our Data Protection Officer at the contact details provided in Paragraph 26 below.

Retention of Personal Data

22. It is our policy to retain certain personal data of students upon the termination, cessation or withdrawal of their studentship and/or the termination or cessation of their Student Relationship and/or Alumnus Relationship, so long as such personal data is still relevant for the purpose(s) for which it was collected and/or we have a legal or business purpose to keep the same. Without limiting the foregoing, such personal data may be required for any post-Relationship related activities including but not limited to processing your requests and allowing us to fulfil contractual or statutory obligations.

23. 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 purposes for which the personal data were collected, and are no longer necessary for legal or business purposes.

24. We dispose of or destroy such documents containing your personal data in a secure manner when the retention limit is reached and it is reasonable to assume that the permitted purpose is no longer being served by their retention.

Cross-Border Transfer of Personal Data

25. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA, including entering into an agreement with the receiving party to accord similar levels of data protection as those in Singapore where possible.

Data Protection Officer

26. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures; or if you wish to make any request, in the following manner:
DPO Email: DPO@srmc.edu.sg

Effect of Notice and Changes to Notice

27. This Notice applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

28. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued enrolment constitute your acknowledgement and acceptance of such changes.