



PERSONAL DATA PROTECTION POLICY & PROCEDURE

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Objective

MAGES Institute of Excellence respects the privacy of individuals and recognizes the importance of the personal data you have entrusted us with and believe that it is our responsibility to properly manage, protect, process and disclose your personal data. We are also committed to adhering to the provisions and principles of the Personal Data Protection Act 2012. As such, this policy is to ensure that individuals' personal data is safeguarded against misuse by regulating the processing and management of personal data and to assist you in understanding how we collect, use and/or disclose your personal data.

Introduction to Personal Data Protection Act (PDPA)

Personal Data Protection Act 2012 (the "PDPA") passed by Parliament on 15th October 2012 marks the beginning for the protection of personal data in Singapore governed by the Personal Data Protection Commission (the "PDPC"). The Personal Data Protection Act is applicable to MAGES Institute of Excellence ("MAGES") and MAGES aims to comply with the obligations meted.

The PDPA establishes a data protection law that comprises various rules governing the collection, use, disclosure and care of personal data. It recognises both the rights of individuals to protect their personal data, including rights of access and correction, and the needs of organisations to collect, use or disclose personal data for legitimate and reasonable purposes.

Under the PDPA Act, "Personal Data" refers to data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which the organisation has or is likely to have access.

The PDPA takes into account the following concepts:

- Consent – Organisations may collect, use or disclose personal data only with the individual's knowledge and consent (with some exceptions);
- Purpose – Organisations may collect, use or disclose personal data in an appropriate manner for the circumstances, and only if they have informed the individual of purposes for the collection, use or disclosure; and
- Reasonableness – Organisations may collect, use or disclose personal data only for purposes that would be considered appropriate to a reasonable person in the given circumstances.

Taking into consideration the aforementioned concepts, the PDPA contains two main sets of provisions which organizations are required to comply with, covering

1. Data Protection Provisions and
2. The Do Not Call Registry

While MAGES will not be going into the details of these Obligations, you can be rest assured that we are constantly mindful of them in our collection, use and disclosure of personal data. Should you wish to know more about these obligations, an excellent summary can be found in the Advisory Guidelines of the Personal Data Protection Commission at: [https://www.pdpc.gov.sg/docs/default-source/advisory-guidelines/overview-of-the-data-protection-provisions-\(chapter-10\).pdf?sfvrsn=0](https://www.pdpc.gov.sg/docs/default-source/advisory-guidelines/overview-of-the-data-protection-provisions-(chapter-10).pdf?sfvrsn=0)

MAGES Personal Data Protection Policy

A. Data Protection Provisions

MAGES shall adhere to the PDPA act by protecting our stakeholders' (including but not limited to students, members, partners and graduates) data by abiding the nine main obligations of the PDPA:

The Consent Obligation

MAGES will obtain the consent of the individual before collecting, using or disclosing his personal data for a purpose;

The Purpose Limitation Obligation

MAGES may collect, use or disclose personal data about an individual only for purposes that a reasonable person would consider appropriate in the circumstances and, if applicable, have been notified to the individual concerned;

The Notification Obligation

MAGES will notify the individual of the purpose(s) for which it intends to collect, use or disclose the individual's personal data on or before such collection, use or disclosure of the personal data;

The Access and Correction Obligation

MAGES will, upon consent, make known to the individuals, methods of how their data has been used, collected or disclosed as well as to allow the individuals to correct any errors found or for which data has not been included;

The Accuracy Obligation

MAGES will make a reasonable effort to ensure that the data collected is accurate and complete.

The Protection Obligation

MAGES will strive to protect the personal data by preventing unauthorized access, collection, usage, disclosure or being exposed to other risks.

The Retention Limitation Obligation

Collection, usage or disclosure of personal data shall be ceased by MAGES for any business or legal purposes once the data is deemed no longer required or the purpose for which the personal data was collected is no longer being served by retention of the personal data.

The Transfer Limitation Obligation

MAGES will not transfer personal data to another country or territory outside Singapore unless the standard of data protection is comparable to that of the data protection under the PDPA.

The Openness Obligation

MAGES will implement the necessary policies and procedures in order to meet its obligations under the PDPA and the information about its policies and procedures are available on request.

B. DNC registry

In addition, if you have registered your telephone number with the national Do Not Call (DNC) Registry, we will not send you promotional and marketing messages via your telephone number unless you have provided MAGES consent to do so.

Details on the policy and procedures about data protection at MAGES are available upon request.

MAGES Personal Data Protection Procedure

MAGES shall cover the following points under its Data Protection policy:

- A. Purpose of collection, use and disclosure of personal data
- B. Purpose limitation
- C. Disclosure of personal data to third parties
- D. Request for access and correction of personal data
- E. Request for withdrawal of consent
- F. Administration and management of personal data
- G. Contact MAGES Data Protection Officer (DPO)

A. Purpose of collection, use and disclosure of personal data

Your personal data is collected when you provide your personal data to use the services offered on the MAGES website (the “Services”), enter into a transaction for such services permitted under the law or provide us with your feedback, programme enquiry, overseas study enquiry and/or general enquiry through MAGES website/ email/ feedback forms/ any such written document /any digital media to indicate your interest.

MAGES will only use or disclose the transaction that has been entered with us as by using or transacting the services or providing us with your feedback, you consent and agree that MAGES may do the aforementioned.

When MAGES has been provided with the data, MAGES will generally use the data to reply to your feedback, answer your questions with regards to the programme enquiries and respond to the general enquiry, registration of training courses, providing you with updates and confirmation of our training courses, processing payments, addressing questions and feedback, improving our products and services, as well as where permitted under law, sending you marketing and promotional offers on products and services, and personalized content and advertising based on your preferences or demographics.

In lieu of the notification obligation, MAGES shall notify you if any collection, usage or disclosure of personal data is being made prior to the release and usage for purposes additional to that stated in this Personal Data Protection Policy. MAGES will only collect, use or disclose the personal data for such additional purposes upon consent.

Depending on your relationship with MAGES such as Students and their Parents/Guardians (prospective, current, alumni), Employees (Academic and Non-Academic staff), Vendors, Service Providers, External Recruitment Agents, Partners (Academic, Industry) or any other person related to MAGES Institute of Excellence the personal data, photographic images, videos, etc. will be collected, used and/or disclosed taking into account the aforementioned points. Examples of personal data include but are not limited to name, address, NRIC/FIN/Passport number, photograph or video image, telephone numbers and email addresses.

To find out more about PDPA, you may visit the Singapore Personal Data Protection Commission’s website at <http://www.pdpc.gov.sg>.

B. Purpose Limitation

MAGES shall collect, use or disclose the personal data only for the purposes disclosed unless the disclosure of the personal data is made in the following circumstances:

- a) Where the disclosure is permitted by you;
- b) Where the disclosure is permitted and/or pursuant to this Personal Data Protection Policy and/or under the particular terms of the contract governing the transaction that has been entered with MAGES and is reasonably appropriate in the circumstances;
- c) Where the disclosure is necessary under the law or to prevent fraud or to protect any personal safety, right or property, we may at our discretion, disclose your personal data to any appropriate investigative third party; and/or
- d) In the event that MAGES employs the other companies to provide services for us in connection with the Services on your feedback.
- e) In the event MAGES believes that you are involved in any illegal or harmful conduct, or if MAGES is required or permitted to do so by law or by regulatory authorities, or if MAGES believes that the disclosure is necessary under the law or to prevent fraud or to protect personal safety, right or property, MAGES may at our discretion disclose personal data to any appropriate investigative third party.

C. Disclosure of Personal Data to Third Parties

MAGES will not disclose your personal data to any third party/parties 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 seeking your consent, if such disclosure is either required or permitted under the Act, including without limitation, if the disclosure is required by law and/or regulations or if there is an emergency.

D. Request for Access and Correction of Personal Data

Subject to certain exceptions in the Act, you may request to access and/or correct the personal data currently in our possession or withdraw your consent for the collection, use and disclosure of your personal data in our possession at any time. For a request to access personal data, we will provide you with the relevant personal data within a reasonable time from such request being made.

For a request to correct personal data, we will process your request, including undertaking necessary verification activities, as soon as practicable after the request has been made. We will send the corrected personal data to every other organisation to which the personal data was disclosed by MAGES within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose, or if you so consent, only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made. You may be charged a reasonable fee for the handling and processing of your requests to access and/or correct your personal data, but you will be notified in advance of such costs.

E. Request for Withdrawal of Consent

You may withdraw your consent to any or all use of personal data for any or all of the purposes set out in this policy in writing (email/fax/letter) and submitting it through our DPO – Data Protection Officer. For a request to withdraw consent, we will process your request within 5 working days from the date of request received by MAGES' DPO.

F. Administration and Management of Personal Data

We will take appropriate measures to keep your personal data accurate, complete and updated. As MAGES relies on your personal data to provide services to you; you shall ensure that at all times the information provided by you to us are correct, accurate and complete. Students, staff members and all stakeholders shall update us in a timely manner of all changes to the information provided through the relevant form to our relevant departments from the MAGES office as and when necessary.

We will also take reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data storage and transmission (electronic and/or otherwise) is adequately protected and secured with appropriate security arrangements and that our data intermediaries are aware of the requirements of PDPA. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data.

We will also take reasonable efforts to ensure that the personal data in our possession or under our control is destroyed 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.

Our websites may contain links to other websites not maintained by MAGES. Such third party websites are subject to their own data protection and privacy practices and you are encouraged to examine the data protection policies of those websites.

Your right to view your personal data is limited to your personal data only. MAGES is not permitted to reveal any personal data about any other individual. MAGES reserves the right to refuse access to your personal data if it will reveal or lead to the revelation of another individual's personal data, cause harm to you or another individual or is contrary to the national interest.

G. MAGES' Data Protection Officer (DPO) and your Feedback

MAGES has appointed a Personal Data Protection Officer to ensure that it complies with the Personal Data Protection Act of Singapore. If you have any feedback or enquiries relating to our PDPA related policies and procedures or would like to obtain access and/or make corrections to your personal data, please do not hesitate to contact our Data Protection Officer (DPO) through email/fax/letter.

For general inquiries and feedback related to MAGES policies, you should expect a reply within 2 working days of MAGES receiving the feedback. For other feedback requiring further investigations and/or evaluation you should expect a reply within 5 working days of MAGES receiving the feedback.

Telephone: +65 6592 6736, **Email:** dpo@mates.edu.sg

Address: MAGES Institute of Excellence Pte. Ltd., Orchard Central, #06-11, 181, Orchard Road, S (238896)

MAGES shall regularly review and update (if required) its data protection policy and procedures. For more information about PDPA generally, please visit the Personal Data Protection Commission's website at <http://www.pdpc.gov.sg>