



PERSONAL DATA PROTECTION POLICY

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Document Sign-off via email communication

Role	Appointment	Date
Prepared By	Administrative & Sales Executive	16/11/2017
Revised By	Chief Data Protection Officer (CDPO)	11/11/2019
Reviewed By	Senior Manager	11/11/2019
Approved By	Chief Executive Officer (CEO)	11/11/2019

We, at SECURA TRAINING ACADEMY PTE LTD (“**STAPL**”), hereby take our responsibilities seriously under the Personal Data Protection Act 2012 (“**PDPA**”). We also recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly collect, use, store and disclose your personal data.

A Personal Data Protection Policy is formulated to help you understand how we collect, use, store and disclose your personal data as well as to help you make an informed decision before providing us with any of your personal data. If you have any queries on this policy at any time, please do not hesitate to contact us at:

Contact Number: +65 6813 9573

Email Address: trainingacademy@securagroup.sg

1. Introduction to PDPA

- 1.1 “Personal Data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Common personal data would include persons’ names, identification numbers, contact information, medical records, photographs and video image.
- 1.2 We will collect your personal data in accordance with the PDPA guidelines. In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used, stored and disclosed, as well as obtain your consent for the collection, usage, storage and disclosure of your personal data for the intended purposes.

2. Purposes for Collection, Usage, Storage & Disclosure of Personal Data

- 2.1 The personal data which we ask from you may be collected, used, stored and disclosed for the following purposes:
 - (a) Enrolling you in and providing you with the courses in STAPL and sending you materials on your courses or subject enrolments (including course / study / assignment / course materials, information on your time-table and examination details) and such materials and information on courses in STAPL, general student-related activities within STAPL, as well as related talks, seminars and/or events via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;
 - (b) Administering and/or managing your relationship with STAPL (including the mailing of correspondence, statements or notices to you, which could involve the disclosure of certain personal data about you to bring about delivery of the same, as well as on the external cover of envelopes / mail packages);

- (c) 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 that may have been put in place by STAPL, including the obtaining of references and/or other information about you from your previous education institute(s);
- (d) Responding to any enquiries by you;
- (e) Processing your application(s) for grants, and if successful, administering and/or managing your grant programmes, which may include use of personal data for development and fund-raising activities and disclosure of personal data to sponsors, external evaluators and/or external organisations for purposes of periodic reports as may be required, event invitations, surveys and/or publicity of STAPL's grant (if any) and/or financial aid programmes;
- (f) Maintaining training premises safety and security of persons and property (including the use of CCTVs), as well as investigating fraud, misconduct, any unlawful action or omission by you, and whether or not there is any suspicions of the aforementioned;
- (g) Responding to requests for information from public agencies, ministries, statutory boards or other government authorities (including but not limited to the Ministry of Defence, Ministry of Education and Ministry of Health), SkillsFuture Singapore or non-government agencies authorised to carry out specific Government services of duties from time to time;
- (h) Carrying out market related, evaluative or similar research and analysis for STAPL's operational strategy and policy planning purposes;
- (i) Outreach and engagement to garner philanthropic support for STAPL, its community and affiliated institutions, upon your successful enrolment into STAPL and/or as alumnus after certification from STAPL;
- (j) Invitation to participate in publicity materials, feature stories, events and other engagement activities relating to academic support, student support, grants, financial assistance, programmes and merit-based awards made possible by sponsors, where you may be a successful recipient, beneficiary and/or participant, after successful enrolment into courses at STAPL;
- (k) Inclusion as appropriate in accountability reports to donors where you, upon successful enrolment to STAPL, is a recipient or beneficiary of the sponsors' philanthropic support to STAPL, and for disclosure to sponsors for engagement purposes;
- (l) Supporting STAPL functions including, but not limited to, the teaching and personal and professional development of students, research and administration of STAPL;
- (m) Sharing with your previous education institute(s) information on their former students;

- (n) Sharing information on students with potential employers for purposes of recruitment, internship, industrial attachment and job placement;
- (o) Processing, administering and conferring awards of prizes, medals, grants, scholarships and other marks of distinction, and student or certification status, and publication or releasing of information on the same;
- (p) Upon certification, to engage you as alumnus of STAPL, which includes but not limited to notification on STAPL and alumni-related initiatives and activities, invitation to STAPL and alumni-related events, updating of alumni information, invitation to participate in alumni surveys and sending of communication collaterals;
- (q) If consented by you in the registration form and/or other methods of consent notification, sending you materials related to marketing, advertisement and promotional information, via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;
- (r) Sharing your personal data for the purposes of STAPL's participation in course provider ranking exercises and / or renewal of licensing purposes;
- (s) Taking of photographs and/or videos (whether by STAPL staff or third-party photographers and/or videographers) during events or seminars organised by STAPL or its affiliates for publicity purposes (including in STAPL's publicity and communications materials); and/or
- (t) Facilitating the provision of support and/or assistance in relation to health and general well-being of yourself and others.

All the above are collectively hereby known as the "**Purposes**".

- 2.2 In order to conduct our operations more smoothly, we may also be disclosing your personal data to us to our third-party service providers, agents and/or our affiliates or related corporations, which may be sited in overseas, for one or more of the above-stated Purposes. This is because such third-party service providers, agents and/or affiliates or related corporations would be collecting, using, storing and disclosing your personal data on our behalf for one or more of the above-stated Purposes.

3. Specific Issues for Disclosure of Personal Data

- 3.1 We respect the confidentiality of the personal data you have provided to us, and will use them only for the above-stated Purposes.
- 3.2 However, we may disclose your personal data to third parties without first obtaining your consent in certain situations, including the following cases without limitation:
- (a) Cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained timely;

- (b) Cases in which the purpose of such disclosure is required based on the applicable laws and/or regulations;
 - (c) Cases in which the purpose of such disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
 - (d) Cases in which there are reasonable grounds to believe that the health or safety of yourself or another individual will be seriously affected and consent for the disclosure of the data cannot be obtained timely, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of such disclosure;
 - (e) Cases in which the disclosure is necessary for any legal investigation or proceeding;
 - (f) Cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation 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 that officer; and/or
 - (g) Cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest.
- 3.3 The cases listed above at paragraph 3.2 are not intended to be 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>
- 3.4 In all other instances of disclosure of personal data to third parties with your expressed consent, we will endeavour to provide adequate supervision over the handling and administration of your personal data by such third parties, as well as to provide for adequate forms of protection over such personal data.

4. Request for Access and/or Correction of Personal Data

- 4.1 You may request to access and/or correct the personal data currently in our possession at any time by submitting your request through the following methods:

Contact Number:	+65 6813 9573
E-mail Address:	trainingacademy@securagroup.sg
Office Address:	Secura Building, 38 Alexandra Terrace, Singapore 119932.

- 4.2 For a request to access personal data, we will provide you with the relevant personal data within a reasonable time from such a request being received by us.

- 4.3 For a request to correct personal data, we will undertake the following:
- (a) We will correct your personal data as soon as practicable after the request has been received by us; and
 - (b) Subject to paragraph 4.4, we will send the corrected personal data to every other organisation to which the personal data was disclosed by STAPL within a year before the date of correction was requested, unless the other organisation does not need the corrected personal data for any legal or business purpose.
- 4.4 Notwithstanding paragraph 4.3(b), we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date of correction was requested.
- 4.5 We may also be charging you a reasonable fee for the handling or processing of your request to access and/or correct your personal data.

5. Request to Withdraw Consent

- 5.1 You may withdraw your consent for the collection, usage, storage and disclosure of your personal data in our possession or under our control at any time by submitting your request through the following methods:

Contact Number:	+65 6813 9573
E-mail Address:	trainingacademy@securagroup.sg
Office Address:	Secura Building, 38 Alexandra Terrace, Singapore 119932.

- 5.2 We will process your request within a reasonable time from such a request for withdrawal of consent being received by us.

6. Administration and Management of Personal Data

- 6.1 We will take appropriate measures to keep your personal data accurate, complete and updated.
- 6.2 We will also take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised collection, usage, storage and disclosure of your personal data. However, we cannot assume responsibility for any unauthorised collection, usage, storage and disclosure of your personal data by third parties which are wholly attributable to factors beyond our control.
- 6.3 We will also take commercially reasonable efforts to ensure that the personal data in our possession or under our control is disposed and/or anonymized as soon as it is reasonable to assume that:
- (a) The purposes of which that personal data collected are no longer served by the retention of such personal data; and/or

- (b) Retention is no longer necessary for any other legal requirements or business purposes.

7. Updates on Personal Data Protection Policy

- 7.1 As part of our efforts to ensure that we properly collect, use, store and disclose your personal data, our Chief Data Protection Officer will be reviewing our policies and procedures periodically and whenever it is required in order to continuously comply with the PDPA.
- 7.2 We reserve the right to amend the terms of this Personal Data Protection Policy at our absolute discretion. Any amended Personal Data Protection Policy will be publicly posted on our website and can be viewed publicly at: www.securatraining.sg
- 7.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies relating to personal data protection.

8. Contact Us

If you have any comments or queries on this policy, please contact our Chief Data Protection Officer in writing at the address below referencing "Personal Data Protection Act":

Secura Group Limited

Secura Building

38 Alexandra Terrace

Singapore 119932

Email: dpo@securagroup.sg

Attn: Chief Data Protection Officer