Personal Data Protection Act

XCL Education Malaysia

Approved by:	**Cassie Fleming**	**Date: 01/09/2024**
Last reviewed on:	**01/09/2024**	
Next review due by:	**01/09/2025**	

SRI KDU International School SUBANG JAYA

PRIVACY NOTICE (CLIENTS – PARENTS / GUARDIANS OF STUDENTS)

Dear Parents/ Guardians of Students

This privacy notice ("**Privacy Notice**") is issued to all our clients, including parents / guardians of students of our Sri KDU International Schools, under XCL Education (which includes all its subsidiaries, related and/or associated companies) ("**Company**", "**we**", "**us**" or "**our**"), pursuant to the statutory requirements of the Personal Data Protection Act 2010 ("**PDPA**").

What Kind Of Personal Data We Collect

Personal data means any information in our possession that relates directly or indirectly to an individual to the extent that the individual can be identified from that and from other information in our possession, which for the purpose of this Privacy Notice, includes:

- **information that you provide to us** through enquiry forms, admission or application forms and all other forms prepared by the school, education related documentation and/or certificates. This may include your and your child's name, address, telephone numbers, NRIC No. and/or passport number, date of birth, email address, photograph, parents/guardian information and/or marital status, details of emergency contact person(s), billing-related information etc;

- **information collected in the ordinary course of your relationship with us** which may include emergency contact numbers, information that you provide when you make inquiries about our services or support by telephone, email, internet, etc;

- **information collected from third parties or other permissible or authorised sources**, such as where you have given your consent to third parties to disclose to us information relating to you;

- **information collected by technology** when you subscribe or use our services by visiting our website or creating an online account with us, your username and passwords, your web browser type, Internet Protocol (IP) address, operating system, domain name, user profiles, geolocation, cookies, etc.

Personal data for purposes of this notice may, where applicable, include sensitive personal data which means any personal data consisting of information as to the physical or mental health or condition of a data subject, his political opinions, religious beliefs or other beliefs of a similar nature, the commission or alleged commission by him of any offence or any other personal data as the Minister may determine.

SRI KDU International School SUBANG JAYA

How We Use Your Personal Data

The personal data (including sensitive personal data) collected from you will be used to:

- assess and process the admission of students;
- manage and respond to enquiries;
- provide education services to students including the administration of the school curriculum and timetable; monitoring academic progress and educational needs; administration of students' entries for relevant local or international statutory authorities or exam boards;
- provide references for students including past students;
- contact student's next of kin in case of an emergency;
- care for the medical needs of students;
- comply with legislation and regulatory or security related requirements;
- ensure the management of operations including the compilation of students' records; management of school property, security and safety arrangements; management planning and forecasting; statistical analysis; and other operational purposes;
- promote the Company through its websites, other publications and communications (including through our social media channels);
- administer graduation and alumni related events;
- process your payments, including provide billing to you; maintain financial records, assess or verify credit/debit card details; and facilitate payments of any amount due to us; collect any sums in arrears due;
- promote our services, or promote products and/or services of third parties which we think may be of interest to you;
- carry out market surveys and research to further personalise our products and/or services for you, including directing certain advertisements to make them more relevant to you;
- send you seasonal greetings and offers; and
- any other purposes that are necessary or related to your relationship with us. (collectively referred to as "**Purposes**").

Please note that we may also anonymize or aggregate your personal data by excluding information (such as your name) that make the data personally identifiable to you ("**Anonymous Information**"). This Anonymous Information may be used to analyze request and usage patterns so that we may and improve our products and/or services or for any related market research purposes, either internally or through third parties.

We may obtain your personal data from yourself and from a variety of sources, including from third parties connected with you (e.g. previous educational institutions), and from such other sources to which you have given your consent to disclose your personal data (e.g. information collected when you visit our website).

We will process your personal data in accordance with the PDPA, its applicable regulations, guidelines and/or orders, taking into account the latest amendments to the foregoing, this Privacy Notice and any privacy terms contained in your agreement(s) or terms of use with us. We may process your personal data by collecting, recording, holding, storing, using and/or disclosing it.

Disclosure of Your Personal Data

We will not disclose any of your personal data to any third party without your consent, whether within or outside Malaysia, except to:

- the Company's group of companies (including the Company's subsidiaries, related and/or associated schools, institutions and/or companies);
- The Ministry of Education; other relevant departments/ agencies, statutory authorities and industry regulators;
- Malaysian Immigration Department and its appointed agencies;
- Foreign embassies and their appointed agencies; our professional advisers, vendors, suppliers, agents, contractors, service providers, business partners, insurance companies, banks, financial institutions, in connection with any of the Purposes above, including third party service providers who personalize the types of information that we receive from you and to customise, improve and develop content and functionality to help us provide you with better products and/or services;
- successor in title to us;
- parties (including but not limited to its advisers/representatives) in connection with any corporate exercise, e.g. any proposed or actual mergers and/or acquisitions, joint venture, funding exercise, asset sale or for any other matter of such nature which relates to the Company;

and where necessary, to any party who undertakes to keep your personal data confidential in carrying out the Purposes mentioned above or to persons whom we are compelled or required under the law to make such disclosure to.

What If Personal Data Provided By You Is Incomplete?

It is necessary for us to collect and process your personal data. If you do not provide us with your personal data, we will not be able to effectively process your request or your personal data for any of the Purposes, if at all.

Your Rights to Access and Correct Your Personal Data

We are committed to ensuring that your personal data is stored securely and will store your personal data only for such duration as necessary and/or as per the PDPA permits. You have the right to request for access to, request for a copy of and request to update or correct, your personal data held by us. You also have the right at any time to request us to limit the processing and use of your personal data (for example, requesting us to stop sending you any marketing and promotional materials or contacting you for marketing purposes), subject to our right to rely on any statutory exemptions and/or exceptions to collect, use and disclose your personal data.

Your written requests or queries should be addressed to:

[Privacy Officer/Legal Officer/Customer Service Officer] Person in Charge: The Principal
Address : Jalan MP2, Tropicana Metropark, 47500, Subang Jaya, Selangor
Contact No. : 603-5036 8900
Fax No. : 603-5036 8999
Email Address : info.subang@srikdu.edu.my

By providing your personal data to us, you consent to us processing your personal data in accordance with this Privacy Notice, and you confirm that all personal data provided by you is accurate and complete, and that none of it is misleading or out of date. You will promptly update us in the event of any change to your personal data.

To the extent that you have provided (or will provide) personal data about your family members, spouse, other dependents and/or other individuals, you confirm that you have explained (or will explain) to them that their personal data will be provided to, and processed by, us and you represent and warrant that you have obtained their consent to the processing (including disclosure and transfer) of their personal data in accordance with this Privacy Notice.

In respect of minors (i.e. individuals under 18 years of age) or individuals not legally competent to give consent, you confirm that you are the parent or guardian or person who has parental responsibility over them or the person appointed by court to manage their affairs or that they have appointed you to act for them, to consent on their behalf to the processing (including disclosure and transfer) of their personal data in accordance with this Privacy Notice.

Amendments to This Privacy Notice

We reserve the right to update and amend this Privacy Notice from time to time. We will notify you of any amendments to this Privacy Notice via announcements on our website or other appropriate means. If we amend this Privacy Notice, the amendment will only apply to personal data collected after we have posted the revised Privacy Notice.

In accordance with Section 7(3) of the PDPA, this Privacy Notice is issued in both English and Bahasa Malaysia. In the event of any inconsistencies or discrepancies between the English version and the Bahasa Malaysia version, the English version shall prevail.

Date of issuance of this Privacy Notice: **20 April 2022**