



Data Protection Policy

Revision History

Version	Date	Author/ Owner	Summary of Change
1.0	22-10-2015	DPO	Approved by the BoG
2.0	24-05-2021	DPO	Updated to reflect new Policy Template and other changes (see summary table) Reviewed by the Compliance Manager on 20-01-2021 Approved by the ITSC on 16-03-2021 Approved by the SDSC on 23-04-2021 Approved by the Board on 24-05-2021

Summary of changes version 1.0 to 2.0:

- 3.1 Updated parental consent age from below 13 to below 18.
- 3.1 Removed “either campus”
- 3.1 Added Subscriber privacy notice
- 3.1 Removed Parent Consent and Student Consent Clause
- 3.1 Added “and/or video footage”
- 3.3 Replaced admissions@gess.sg with school@gess.sg.
- 3.4 Added Clause “Withdrawal of Consent”
- 3.8 Added Clause “Transfer of Personal Data”



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1 Introduction / Purpose

The Singapore Personal Data Protection Act - 2012 (PDPA) establishes a data protection law that comprises various rules governing the collection, use, disclosure, and care of personal data. It recognizes both the rights of individuals to protect their personal data, including rights of access and correction, and the needs of organizations to collect, use or disclose personal data for legitimate and reasonable purposes.

The PDPA takes into account the following concepts:

- **Consent**
Organizations may collect, use, or disclose personal data only with the individual's knowledge and consent (with some exceptions).
- **Purpose**
Organizations 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**
Organizations may collect, use, or disclose personal data only for purposes that would be considered appropriate to a reasonable person in the given circumstances.

German European School Singapore (GESS) collects and uses personal data about staff, students, and families in accordance with the Singapore Personal Data Protection Act - 2012 (PDPA) and other relevant laws and requirements on private education institutions in Singapore.

2 Scope / Applicability

This policy covers all personal data collected, processed, and disclosed by GESS, on any GESS owned or personal device, by any person with access to personal data. All employees, affiliated consultants, contractors, and evaluation teams are bound by this policy.

3 Policy

3.1 Consent

It is reasonable and accepted that parental consent is sufficient for student's underage of 18.

The consent may be agreed to as a separate form or as part of the general terms and conditions of enrollment.

Implied Consent

Where a person has made a free decision to opt into a process or situation where the collection or use of personal data can be reasonably expected, then implied permission can be assumed, but should still be highlighted.

Situations where implied consent should be highlighted:

- Employment applications submitted online (when applications are submitted)
- Student Admissions Applications (the admissions process prior to acceptance)
- Events on campus
- CCTV on campus

Subscriber privacy notice

By clicking "Subscribe" to a School-managed list / GESS magazine, you are agreeing that GESS may use the personal data collected for the purpose of managing your subscription to our magazine and to provide information on our services based on the information you have provided.

3.2 Data Collected and Purpose

GESS holds personal data on its students, including contact details, assessment/examination results, attendance information, behavior, characteristics such as ethnic group, special educational needs, any relevant medical information, photographs and/or video footage.

The data is used in order to support the education of the students, to monitor and report on their progress, to provide appropriate personal and social care, and to assess the performance of GESS, together with any other uses normally associated with this provision in an independent school environment.

GESS recognizes that whilst we hold personal data about individuals it is normal for schools to interact with families as a whole and not as separate individuals. So, whilst we will obtain individual consent to use data from parents, we will share data between family members as a matter of routine and allow family members to update each other's information without further permission. The family in this case will be defined as a group of individuals identified to us as a single family during the application process and normally related as wife/husband, mother/father, brother/sister or any similar step relationship or legal guardianship.

Any changes to these relationships should be notified to GESS in writing.

GESS may make use of limited personal data (such as contact details) relating to students, their parents, or guardians to maintain relationships with students of GESS and for fundraising, marketing, or promotional purposes.

Data is shared as necessary with third party companies to provide extended services. Examples include transport, medical, catering, travel services and online services such as email.

In particular, GESS may:

- a. Make available information to any internal organization or society set up for the purpose of maintaining contact with students or for administration, fundraising, marketing, or promotional purposes relating to GESS, e.g., Alumni. GESS will remain as the data controller and this policy will govern data usage.
- b. Make use of photographs, videos, or sound recordings of students in GESS publications, the GESS website and other official GESS communication channels, as well as in external media.
- c. Make personal data, including sensitive personal data, available to staff for planning activities and school trips, both in and outside of Singapore.
- d. Retain and use personal data after a student has graduated to provide references, meet German educational requirements, educational history, and alumni services consistent with an independent school environment.

3.3 Right of Access and Correction

Individuals have a right to see the data held about them (subject to the exemptions listed below) and to request for data to be corrected if it is incorrect.

Parents will be provided access to data held about their children whilst they are students at GESS within the limitations of this policy.

Families can access the majority of personal data held about them via communications with the GESS admissions department.

To request for data to be changed, the individual need to contact school@gess.sg. To request access to other data that may be recorded the individual needs to contact School Services with details of the data that you would like to see and your reasons. GESS will

consider the request and respond within five working days. The response may be to decline the request with reasons or to provide a time scale in which the data will be supplied.

Exemptions to Right of Access

The PDPA does not provide the right of access to any and all information held by an organization. Therefore, GESS retains the right to refuse access to:

- Opinion data kept for evaluative purposes
- Examination papers or the results of examinations
- Confidential references written to support a student's application to other educational institutions or courses

Data or material that would provide personal data about other individuals in contravention of this policy or the PDPA.

3.4 Withdrawal of Consent

- On giving reasonable notice to GESS, an individual may at any time withdraw any consent given or deemed to have been given under the Personal Data Protection Act 2012.
- Within reasonable time from receipt of notice from the individual, GESS will inform the individual of the likely consequences of withdrawing their consent.
- GESS does not prohibit an individual from withdrawing his consent to the collection, use or disclosure of Personal Data about the individual but this shall not affect any legal consequences arising from such withdrawal.
- On withdrawal of consent, GESS shall cease (and cause its data intermediaries and agents to cease) collecting, using, or disclosing the Personal Data, as the case may be, unless such collection, use or disclosure, as the case may be, without the consent of the individual is required or authorized under the PDPA or other written law.

3.5 Data Security

GESS undertakes to implement appropriate security measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure, or access, in particular when the processing of data involves the transmission or storage on or within a network.

These security measures will include:

- industry standard firewall and other network security features
- clear guidelines for staff on the device and network security expectations placed on them
- robust data backup and recovery processes

- periodic external security audits of online systems

3.6 Data Retention & Removal

GESS undertakes that it shall only keep the data collected as long as is necessary to provide the services outlined above.

3.7 Sharing Data with Third Parties

GESS shares personal data with a variety of third parties for the purposes of the third party providing a relevant service to the institution and the members of its community. Examples of these services include transport, catering, travel services, accommodation, and medical care.

GESS will only share data for the purposes of eliciting a necessary service from these third-party organizations and not for commercial gain.

Where GESS shares data, GESS will ensure that:

- GESS remains the owner of the data
- the service provider is not entitled to use any data held on its service for any purpose other than to provide the required service
- the service provider is taking reasonable precautions to ensure the security of the data
- once GESS terminates its agreement with the service provider, that any and all data held will be deleted and not used for any other purpose

3.8 Transfer of Personal Data

Personal data will not be transferred to a country or territory outside Singapore unless that country or territory ensures a comparable level of data protection, in accordance with the requirements prescribed under the Personal Data Protection Act 2012.

3.9 Point of Contact

In the event of any queries or complaints in relation to data protection, please contact dpo@gess.sg.

4 Definitions

Personal Data refers to any data, whether true or not, about an individual who can be identified (i) from that data; or (ii) from that data and other information which GESS has or is likely to have access and all other data deemed protected under the PDPA.

5 Policy authority

Policy Owner: DPO

Governing school subcommittee: School Development Subcommittee

Next required review date: May 2022

Final Approval: Board of Governor

6 Related policies/references/processes

Personal Data Protection Act - 2012 (PDPA)

Appendix A - Contracts with third parties

7 Policy Compliance

7.1 Compliance Measurement

Compliance / Audit will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner.

7.2 Non-Compliance

Any employee in violation of this policy will be subject to appropriate disciplinary action, in accordance with GESS Disciplinary Policy, up to and including termination and notifying the appropriate law enforcement authorities.