

# **Data Protection Guidelines**

## **Introduction**

1 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 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.

2 The purpose of this document is to inform users how Spectra Secondary School ('the School') manages Personal Data which is subjected to the Singapore Personal Data Protection Act (2012). This Data Protection Policy supplements but does not supersede nor replace any other consent you may have previously provided to the School.

## **Data Collected, Usage, Disclosure and Purpose**

3 The School collects data on its staff employment and students enrolment including (but not limited to):-

- a. Staff: personal details, contact information, household information, payroll related information, resume, educational information, performance indicators, attendance information, training records, terms of employment details, any relevant medical information and photographs.
- b. Student: personal details, contact information, family details, household information, assessment/examination results, attendance information, behavior, any relevant medical information and photographs.

4 The data is used in order to:-

- a. Determine the suitability, eligibility or qualifications for employment, promotion in employment and/or continuance in employment, and any other uses to support the School's operational needs.
- b. Support the education of the students, monitor and report on their progress, provide appropriate personal and social care, and assess the performance of the student and the School as a whole, together with any other uses normally associated with this provision in a specialised school environment. The School may make use of limited personal data (such as contact details) relating to students, their parents or guardians to maintain relationships with them.

5 Data may be 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, the School may:

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

### **Consent and Implied Consent**

6 For the purposes of the School's students (as minors), it is reasonable and accepted that parental/guardian consent is sufficient.

7 By voluntarily providing the School with your personal data, you shall be deemed to consent the School to collect, use and disclose the data for the purpose that you have provided for. The School shall highlight such situation and seek to obtain explicit consent. Examples of such situation are staff employment and student enrolment.

### **Data Security and Retention**

8 The School undertakes to:

- a. Implement appropriate security measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular when the processing of data involves the transmission or storage on or within a network.
- b. Notify data subjects about any accidental or unauthorised access of their data that may lead to damage or harm.

- c. Keep the data collected for as long as there is a necessity to provide the services specified or outlined above.

### **Sharing Data with Third Parties**

9 The School shares personal data with a variety of third parties for the purposes of the third party providing a relevant service to the school. Examples of these services include transport, catering, travel services, accommodation and medical.

10 The School will only share data for the purposes of eliciting a necessary service from these third party organisations and not for commercial gain.

11 Where the School signs explicit contracts with these organisations, it will include clauses from Appendix A1 - Contracts with Third Parties to ensure that the organisation is using the data purely for the intended purpose of providing the required service and that it is taking appropriate precautions to safeguard the data.

12 In some instances, for example for online services provided by companies outside of Singapore, explicit signed contracts do not exist. In these instances the School will ensure that the terms & conditions of the service include clauses that:

- The School 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; and
- Once the School terminates its agreement with the service provider, that any and all data held will be deleted and not used for any other purpose.

### **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data**

13 If you:

- a. Have any question or feedback relating to your Personal Data or our Data Protection Policy;
- b. Would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy;
- c. Would like to obtain access and make corrections to your Personal Data records.

Please contact Spectra Secondary School as follows:

- Email: [info@spectra.edu.sg](mailto:info@spectra.edu.sg)

- Write In: Data Protection Officer  
Spectra Secondary School  
1, Woodlands Drive 64  
Singapore 737758