### NATIONAL UNIVERSITY OF SINGAPORE DATA PROTECTION POLICY

We, at the National University of Singapore ("NUS"), take our responsibilities under the Personal Data Protection Act 2012 (the "PDPA") seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use and/or disclose the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the "DPO") at:

Telephone number: +65 67762835

Email address: dpo@nus.edu.sg

### 1 INTRODUCTION TO THE 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 organization has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video images.
- 1.2 We will collect your personal data in accordance with the PDPA. 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 and/or disclosed, as well as obtain your consent for the collection, use and/or disclosure of your personal data for the intended purposes.

## 2 PURPOSES FOR COLLECTION, USE & DISCLOSURE OF PERSONAL DATA

- 2.1 Depending on your relationship with us (e.g. as an applicant, student, alumnus, staff, donor, vendor, service provider, or other person relating to our organisation), the personal data which we collect from you may be collected, used and/or disclosed for the following purposes:
  - (a) Evaluating suitability for admission or employment, enrolling or employing, providing educational courses and training, including sending materials on

course / study / assignment / lecture materials, information on time tables and examination details via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;

- (b) Administering and/or managing relationships with NUS (including responding to enquiries, the mailing of correspondence, statements or notices which could involve the disclosure of certain personal data to bring about delivery of the same);
- (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 put in place by NUS, including the obtaining of references and/or other information from prior educational institutions and employers;
- (d) Processing application(s) for scholarships and/or financial aid, and research support, and administering and managing scholarship/financial aid/grant and other support programmes, which may include use of personal data for development and fund raising activities and disclosure of personal data to donors, grantors, external evaluators and/or external organisations for purposes of periodic reports, event invitations, surveys and/or publicity of NUS' related programmes;
- Investigating possible fraud, misconduct, unlawful action or omission, and utilizing electronic access and video systems to maintain campus security of persons or property, control access and investigate suspicious or inappropriate activities;
- (f) Responding to requests for information from government or public agencies, ministries, statutory boards or other similar authorities or non-government agencies authorised to carry out specific Government services or duties;
- (g) Carrying out market-related, evaluative or similar research and analysis for NUS' operational strategy and policy planning purposes, including providing data to external parties for university programme evaluation and to students' former academic institutions and to partner institutions for jointly-administered programmes;
- (h) Outreach and engagement to garner support and resources for NUS, its community and affiliated institutions;
- (i) Supporting NUS functions including, but not restricted to, the teaching and personal and professional development of students, research and administration of NUS;

- (j) Processing and administering applications for overseas exchange programmes, summer school, overseas internships and other overseas activities and administering such programmes including disclosure of information to overseas universities, employing and training organisations;
- (k) Processing, administering and conferring awards of prizes, medals, scholarships, classes of honours and other marks of distinction, and student or graduation status, and publication or releasing of information on the same;
- (l) Engaging alumni including but not limited to notification on NUS and alumnirelated initiatives and activities, invitation to NUS and alumni-related events, updating of alumni information, invitation to participate in alumni surveys and sending of communication collaterals;
- (m) Processing applications and enrolment activities related to health, life and travel insurance and service provision as well as university-related concession cards, and campus accommodation and administering matters related to use of these services;
- (n) Processing applications for and administering local and overseas career related activities, events, programmes, internships, employment opportunities, and career coaching, and sharing information with companies (whether local or overseas) for purposes of recruitment, internship, industrial attachment, job placement and research support;
- (o) Facilitating participation in student life and alumni development opportunities which may include social, cultural, athletic, and educational activities, events, volunteering and training programmes, student membership and leadership positions in clubs, societies, halls and residences, and orientation/reception activities;
- (p) Taking of photographs and/or videos (whether by NUS staff or third party photographers and/or videographers) during events or seminars organised by NUS or its affiliates for publicity purposes;
- (q) If consented to in the registration form and/or other methods of consent notification, providing marketing, advertising and promotional information via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;
- (r) Any other purposes which NUS may inform you of in writing from time to time, but for which NUS will seek your separate consent.
- 2.2 In order to conduct our operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, which may be sited locally or outside of

Singapore, 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 processing your personal data on our behalf for one or more of the above-stated Purposes.

# 3 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- 3.1 We respect the confidentiality of the personal data you have provided to us.
- 3.2 In that regard, we will not disclose any of your personal data to any third parties without first obtaining your express consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:
  - (a) the disclosure is required based on the applicable laws and/or regulations;
  - (b) the purpose of such disclosure is clearly in your interests and consent cannot be obtained in a timely way;
  - (c) the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
  - (d) 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 in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;
  - (e) the disclosure is necessary for any investigation or proceedings;
  - (f) 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 the officer; and/or
  - (g) the disclosure is to a public agency and such disclosure is necessary in the public interest.
- 3.3 The instances 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 <a href="http://statutes.agc.gov.sg">http://statutes.agc.gov.sg</a>.

3.4 In all other instances of disclosure of personal data to third parties with your express consent, we will provide for adequate forms of protection over such personal data and confidentiality and security in the handling and administration of your personal data by such third parties in compliance with the PDPA and our data protection policies.

## 4 REQUEST FOR ACCESS, CORRECTION AND/OR WITHDRAWAL OF PERSONAL DATA

4.1 You may request to access and/or correct the personal data currently in our possession or withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control at any time by submitting your request through the following methods:

(a) Web link : <u>Personal Data Service Request System</u>

(b) E-mail : dpo@nus.edu.sg

(c) Singapore telephone number: +65 67762835

(d) Office address : 21 Lower Kent Ridge Road,

Lee Kong Chian Wing, Level 6,

Singapore 119077

- 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 made.
- 4.3 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 NUS 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. We may also be charging you 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.
- 4.4 For a request to withdraw consent, we will process your request within a reasonable time from such a request for withdrawal of consent being made. Requests for withdrawal of consent may adversely impact your relationship with NUS. We will notify you in advance of such impacts.

### 5 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 5.1 We will take appropriate measures to keep your personal data accurate, complete and updated.
- 5.2 We will also take 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 unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.
- 5.3 We will also take reasonable efforts to ensure that the personal data in our possession or under our control is destroyed and/or anonymized 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.
- 5.4 This Data Protection Policy applies only to NUS websites. Our websites may contain links to other websites not maintained by NUS. Such third party websites are subject to their own data protection and privacy practices and you are encouraged to examine the privacy policies of those websites.

### **6 UPDATES ON DATA PROTECTION POLICY**

- As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
- 6.2 We may amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our website and can be viewed at <a href="mailto:nus.edu.sg/privacy">nus.edu.sg/privacy</a>
- 6.3 You are encouraged to check the **National University of Singapore Data Protection Policy** at <a href="mailto:nus.edu.sg/privacy">nus.edu.sg/privacy</a> from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

Last Updated on 2 July 2014