



AUSTRALIAN INTERNATIONAL SCHOOL PRIVACY NOTICE FOR PARENTS

1 INTRODUCTION

- 1.1 We are committed to protecting and respecting your privacy. Australian International School (“AIS”) is an independent school which is part of the Cognita global schools’ group. In this privacy notice, references to “**we**”, “**us**”, “**our**” is a reference to Australian International School .
- 1.2 This privacy notice sets out the basis on which any personal data we collect from you or your child, or that you provide to us, is handled, used or disclosed by us. We also have a privacy policy for our pupils, this is also available on our website.
- 1.3 Please read the following carefully to understand our views and practices regarding your and your child’s personal data and how we will treat it.
- 1.4 For purposes of the Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore (“**PDPA**”), we are deemed to be an organisation to which the PDPA would apply.
- 1.5 If you are reading this privacy notice online, we recommend that you print and retain a copy for future reference.

2 INFORMATION WE COLLECT ABOUT YOU AND YOUR CHILD

Information you give us

- 2.1 You may give us personal data about you or your child, in a number of ways; these include:
- 2.1.1 using, visiting or interacting with our website (such as filling out forms or registering on our website);
 - 2.1.2 visiting our school;
 - 2.1.3 corresponding with us by phone, e-mail or post; and
 - 2.1.4 sending information directly to us, for example when paying our fees, giving us medical records or information about your child’s health, completing school admission forms, signing our student contract or providing information as requested by us and/or which is necessary from time to time.
- 2.2 The information you give us may include the following information about you and / or your child:

- 2.2.1 full name;
- 2.2.2 date of birth and year group;
- 2.2.3 contact details (including home address, e-mail address, and mobile, home and/or work phone number);
- 2.2.4 parent login information (i.e. username and password) for the website;
- 2.2.5 financial and credit card information;
- 2.2.6 photograph;
- 2.2.7 passport details, nationality and other information relating to immigration status;
- 2.2.8 education and health records (including special education needs, medical or physical conditions and/or accidents);
- 2.2.9 previous educational records and achievements;
- 2.2.10 (where appropriate) family circumstances (including your relation to the child and your marital status); and
- 2.2.11 race, religion and ethnicity.

Technical information we collect about you when you visit our website

- 2.3 With regard to each of your visits to our website we may automatically collect the following information:
 - 2.3.1 technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - 2.3.2 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.
- 2.4 Our website may contain links to and from the websites of our partner networks, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Information we receive from other sources

- 2.5 We may be working closely with third parties (including, for example, your child's previous or new school(s), medical practitioners, photographers, local authorities, government/national agencies, education authorities, business partners, payment and delivery services, debt collectors, lawyers and credit reference agencies) and may receive information about you from them.

- 2.6 We may also use CCTV footage of the school's premises (which may include footage of individuals on the school's grounds) to ensure the school is safe. We may receive information about you if you use any of the other websites we operate or the other services we provide.

3 COOKIES

- 3.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy which is made available on our website.

4 CONTACT US

- 4.1 Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to our Data Protection Officer at DPO@Cognita.com or Cognita Asia Holdings Pte Ltd, 60 Anson Road, #18-04 Mapletree Anson, Singapore 079914.

5 USES MADE OF THE INFORMATION

Information you give to us

- 5.1 We will use the information you give to us to pursue the following legitimate interests:
- 5.1.1 to deliver educational services to your child;
 - 5.1.2 to protect the welfare of your child, promote the objects and interest of our schools, ensure the most efficient management of the schools and ensure that the schools' legal obligations are adhered to;
 - 5.1.3 to store this information on the school's chosen management information system;
 - 5.1.4 to use your child's photograph as necessary for the administration and the safety of students, such as for identification, CCTV and medical awareness. to use your child's photograph internally within the school for display in school halls or classrooms;
 - 5.1.5 to manage any queries or disputes you or your child may have with us or that we have with you or your child;
 - 5.1.6 to enforce our terms of use with you or any other contract we may have with you (including the student contract);
 - 5.1.7 where your child is attending one of our schools, to provide you with information about other similar services (for example, after school clubs or open days) we offer as part of the education and overall development of your child at the school;
 - 5.1.8 once your child has left the school, to keep you up to date with key school news and upcoming events;
 - 5.1.9 to send out surveys to you by email as part of our Voice of the Parent campaign which is our school improvement tool; and
 - 5.1.10 for business improvement purposes.

- 5.2 In order to pursue the legitimate interests referred to in paragraphs 5.1.1 and 5.1.3, our schools also rely on software applications and other technology to process personal data about you and your children. These include the school's management information system, virtual learning environments (including the setting of tasks and homework), revision tools, parents evening booking systems, text and email messaging communications, assessments of pupils' progress, our group-wide billing system and co-ordination of school trips. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your and your child's personal data is kept secure. For further information on the kind of technology we use, please contact our Data Protection Officer (see paragraph 4).
- 5.3 We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you request from us. For example, we will provide education services to your child and will use personal data where necessary to deliver these services. We will also use your personal information to invoice you for our services pursuant to the contract between you and us. We will also require a certain amount of personal information about you and your child at the pre-contract enquiry and application stage.
- 5.4 In addition, we are required by law to do the following (which is not an exhaustive list):
- 5.4.1 keep records of the administration of the courses we offer or provide;
 - 5.4.2 keep an admissions and attendance register;
 - 5.4.3 keep pupil files (including, where relevant, special education needs and child protection files);
 - 5.4.4 keep a record of behaviour sanctions; and
 - 5.4.5 provide an annual written report on pupil progress and attainment.
- 5.5 Inevitably, there will be an overlap between what we do that is necessary to (a) perform our contract with you, (b) carry out our legal obligations and (c) pursue a legitimate interest although we have tried our best to demarcate these as set out above. If you have any questions about these please contact our Data Protection Officer (see paragraph 4).

Information we collect about you from our website

- 5.6 We will use this information for the following legitimate interests:
- 5.6.1 to contact you if you have made an enquiry to one of our schools via our online enquiry form and/or to inform you about available places in the future;
 - 5.6.2 to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - 5.6.3 to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your computer;
 - 5.6.4 to allow you and your child to participate in interactive features of our service, for example virtual learning environments, when you choose to do so; and

5.6.5 as part of our efforts to keep our website safe and secure.

Information we receive from other sources

- 5.7 We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive). For example, we may receive a court order relating to you which impacts on our use of your and your child's information to protect the welfare of the child. We may also use the information we receive from your child's previous school to access your child's needs and help us to provide appropriate educational services to them.
- 5.8 Also, social services or health practitioners may provide us with information (particularly sensitive personal data) about your child which may need to be added to the school's child protection or special educational needs file. This kind of processing of sensitive personal data may be necessary (a) for the purposes of carrying out our obligations in the field of social security or social protection law, (b) for medical diagnosis or provision of health care and/or (c) to protect the vital interests of your child or another person taking into account the mental and physical capacity of your child.
- 5.9 In order to achieve the purposes described in paragraph 5.8, our schools may do the following:
- 5.9.1 keep a list of your child's allergies or medical requirements within the classroom or staffroom in case of emergency. It is necessary for the school to have a list readily available to our staff so that we are able to look after your child promptly in the event of a medical emergency; and
 - 5.9.2 rely on software applications and other technology to process medical information (such as allergies, accidents and injuries) about you and your children. For further information on the kind of technology we use, particularly in the context of processing sensitive personal data about your child, please contact our Data Protection Officer (see paragraph 4).

When we disclose information

- 5.10 In order to pursue one of the legitimate interests set out above, we may share your and your child's personal information with:
- 5.10.1 Asia Regional Head Office;
 - 5.10.2 A member of the Cognita group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 5, 5A and 5B of the Companies Act (Cap. 50) of Singapore;
 - 5.10.3 local authorities, education authorities (for example, the Council for Private Education of Singapore), the Ministry of Education of Singapore, your special education needs co-ordinators, the Child Protective Service under the Ministry of Social and Family Development (or any of the three community-based Child Protection Specialist Centres (namely Big Love, Heart@Fei Yue or Safe Space) or any Family Service Centre in Singapore) or the police where we have reason to believe there are safeguarding concerns in respect of your child;
 - 5.10.4 your child's new school;

- 5.10.5 where your child is not Singaporean or a Singapore permanent resident, we may have to provide information about you or your child to the Immigration and Checkpoints Authority of Singapore;
 - 5.10.6 business partners, professional advisors, debt collector, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 - 5.10.7 credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
- 5.11 We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use the terms of the parents' contract (between us and you) and other agreements. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we need to get your consent

- 5.12 We will not market services to you (other than in accordance with paragraph 5.1.8 or 5.1.9 above) without your consent and you have the right to ask us not to use your contact details for marketing.
- 5.13 We will also seek your permission if we decide to post any photographs of your child on any of our marketing materials (including our prospectus, advertisements or website).
- 5.14 You or your child do not have to give us details about your child's race, religion or ethnicity if you do not want to. If you do provide us with this information, we only use these details to assist us with the day-to-day running of the school (for example, if your child's religion means that he or she has particular dietary requirements then we will of course be much better informed if we have this information to cater to your child's requirements).
- 5.15 We may let you know the intended purpose for the collection, use or disclosure of your and/or your child's personal data and a reasonable opportunity to opt-out of said collection, use or disclosure. In these circumstances, we ask that you respond within the requested deadline. If you do not respond by opting out, you are deemed to consent to the said collection, use or disclosure of your and/or your child's personal data by us for the purpose we specified.

Where you have given consent to the above, you can withdraw this consent at any time by contacting the school and/or the DPO (see paragraph 4).

6 TRANSMISSION OF PERSONAL INFORMATION OUTSIDE SINGAPORE

- 6.1 The data that we process about you may be transferred to, and stored at, a destination outside Singapore. We try to limit this where possible, but it may be necessary where, for example, one of our suppliers has a data centre outside Singapore. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice. We will also ensure that the appropriate legal safeguards are in place prior to the transfer, for example ensuring that any contracts between us and the recipient of the information oblige the supplier to adhere to a standard equivalent to the level of protection under the PDPA, or the country we are transferring the data to is deemed by the PDPA (as the case may be) as an adequate country.

7 YOUR RIGHTS

7.1 Under the GDPR and the PDPA, you and your child have the following rights:

- 7.1.1 **Right to correction.** You have the right to have inaccurate personal data about you or your child rectified.
- 7.1.2 **Right to restriction.** You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 7.1.5 for more details).
- 7.1.3 **Right to request transfer.** In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format. You also have the right to request that we transmit or port your personal data to another organisation, in accordance with the requirements of the PDPA, upon making a request in writing to our DPO. You may contact our DPO at DPO@Cognita.com or Cognita Asia Holdings Pte Ltd, 60 Anson Road, #18-04 Mapletree Anson, Singapore 079914.
- 7.1.4 **Right to object.** You have the right to raise an objection to any of our processing in paragraphs 5.1 and 5.2. Please tell us if you object to any type of processing that we do and we will work with you to address any concerns you may have.
- 7.1.5 **Right to object to marketing.** If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this.
- 7.1.6 **Right to complain to the Personal Data Protection Commission of Singapore ("PDPC").** Whilst we would always prefer it if you approached us first about any complaints or queries you may have, you always have the right to lodge a complaint with the PDPC.
- 7.1.7 **Right to request access.** You have the right to access personal data we hold about you. Please contact our Data Protection Officer if you wish to do so at DPO@Cognita.com or Cognita Asia Holdings Pte Ltd, 60 Anson Road, #18-04 Mapletree Anson, Singapore 079914.
- 7.1.8 **Right to notice.** You have the right to be notified of the purposes for which we intend to collect, use or disclose your personal data before such collection, use or disclosure unless exemptions apply.

8 HOW LONG WE KEEP PERSONAL INFORMATION

- 8.1 We will not keep any personal data about you for any longer than is necessary for the purposes for which the personal data are processed.
- 8.2 As a general rule, we keep your child's education records until they reach 25 years of age at which point we destroy the file. This is regardless of whether their file has been transferred to another school, in the event that your child transfers schools.

8.3 We follow a personal data retention policy which determines how long we keep specific types of personal information for. For further information about the criteria we use to determine what periods we keep specific information, please contact our Data Protection Officer (see paragraph 4).

8.4 Where you have made a request to access personal data in our control or possession, or a request that we port your data to a third party, we will preserve the personal data requested until at least 30 days after the rejection of the request or until you have exhausted your right of appeal to the PDPC or the Courts. In the case of a data porting request, should we accept your request to port your personal data to a third party, we will still preserve a copy of the data transmitted for a period of not less than 30 days after the transmission.

9 USE OF OUR WEBSITE

9.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

10 CHANGES TO OUR PRIVACY NOTICE

10.1 Any changes we make to this privacy notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

Dated: 14 May 2021