



Personal Data Protection

1. General Statement

1.1 The Chatsworth Personal Data Protection Policy sets out how we (referred to herein as “Chatsworth”, “us”, “we” or “our”) collect, use, disclose, process and protect personal data in accordance with the [Singapore Personal Data Protection Act 2012](#) (“PDPA”).

1.2 The Personal Data Protection Policy is available on the Chatsworth website and we may, from time to time, update the Policy to ensure that it is consistent with our growth, industry trends and/or changes in legal or regulatory requirements.

2. Collection of Personal Data

2.1 Generally, Chatsworth collects Personal Data through admissions application forms, job application forms, forms for school activities, surveys, interactions with our staff (whether via telephone calls, emails, letters or during face-to-face meetings), website, social media sites, external websites where Chatsworth advertised with and/or when you submit your Personal Data to us for any other reasons.

2.2 The types of data collected and that we hold may include, but not limited to, personal information, contact details, employment information, academic information, postgraduate information, medical information, billing/ bank information, siblings information, photographs, assessment/ examination results, attendance information, behaviours, characteristics such ethnic group and special educational needs.

2.3 In providing and submitting to us with any Personal Data relating to a third party (e.g. information of your spouse, children, family members, guardians etc), you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes set out herein.

3. Purposes for the Collection, Use and Disclosure of Your Personal Data

3.1 Chatsworth will collect, use and disclose any personal data provided for the following purposes, including, but not limited to:

- a) enrolment-related purposes and for us to carry out our obligations arising from any contracts entered into between you and us (enrolment assessment, registration, planning of curricula, communication with students and parents/ guardians, extracurricular, field trips and co-curricular activities, provision of references, pastoral care and student services, meal planning, disciplinary matters, provision of healthcare services, processing application for scholarships and administering and managing scholarship and other support programmes;

- b) Monitoring use of ICT including emails and internet usage with Chatsworth email accounts and portals to ensure compliance within our acceptable use policy;
- c) conducting of statistical studies, reports and analysis and surveys of parents, students, postgraduates and staff either by us or third party service providers in Singapore or overseas;
- d) application to the relevant Singapore authorities for relevant approvals or student passes for enrolment at the school;
- e) ensuring that all relevant legal obligations of the school, parents, guardians, students and staff are complied with;
- f) ensuring the ongoing safety of the campus and the ongoing safety and security of our employees and staff;
- g) taking and making use of photographs, videos or sound recordings during events organised and/or co-organised by Chatsworth on our website, social media sites as well as other communication channels and external media;
- h) marketing and promotional, outreach and engagement purposes relating to and in support of Chatsworth and related entities, their activities and events;
- i) alumni communications;
- j) all other matters relating to your child(ren)'s enrolment and education at Chatsworth or operations/function of the school as Chatsworth may consider to be necessary or appropriate; and
- k) any other purposes which Chatsworth may inform you of in writing from time to time, for which Chatsworth will seek your separate consent.

4. Disclosure of Personal Data

4.1 Chatsworth may disclose personal data collected for the aforementioned purposes to third party service providers, agents and/or our affiliates or corporations which may be sited locally or outside of Singapore for one or more of the above-stated Purposes. Such third party providers include our canteen operator, bus transport companies, travel or excursion vendors, IT and data storage or processing service vendors, CEW and extracurricular activities vendors, Fee Protection Scheme insurers, insurance companies, professional advisers etc.

4.2 In addition, we may also disclose your personal data to any persons as considered by Chatsworth to be necessary or appropriate in order to support the

enrolment and education of students with Chatsworth. We may also disclose your personal data to relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules and regulations or schemes imposed by any government authority.

5. Withdrawal of Consent to the Collection, Use and/or Disclosure of Personal Data

5.1 You may at any time withdraw any consent already given or deemed to have been given under the Personal Data Protection Act 2012. You have to notify Chatsworth of your intention to withdraw your consent. You can do so via the following ways.

Email: dpo@chatsworth.com.sg
Post: Data Protection Officer
Chatsworth International School
37 Emerald Hill
Singapore 229313
Attention: Chan Hua Ming

To facilitate processing, the subject header of your email/letter is to be entitled 'Notice of Withdrawal of Consent'.

5.2 Upon the receipt of your notice of withdrawal of consent, depending on the nature of your request, Chatsworth will advise you of your consequences of withdrawing your consent and inform you that we may not be in a position to continue to provide our services to you and/or administer any contractual relationship in place.

5.3 For the withdrawal of consent on image(s), Chatsworth will contact you pertaining to the explicit indication of the specific image(s) within 7 working days from the date of receipt of your notice. Upon your written receipt of confirmation (may be via email) of withdrawal of consent, Chatsworth will cease (and inform its data intermediaries if applicable) to collect, use or disclose your personal data within 21 working days from the date of receipt of your written confirmation. Chatsworth will cease to use or disclose the specific image(s) based on the following:

- Hardcopy version: after the current hardcopy prints have been depleted
- Electronic/ Website based: 21 working days from the date of the individual's confirmation

6. Access and Correction of Personal Data

6.1 You have the right to request to access and/or correct the personal data held about you and your child(ren) by Chatsworth and Chatsworth shall respond to such request as soon as reasonably possible.

6.2 For access to personal data being held by Chatsworth (up to the last one year before the date of your request), or to update and/or correct the personal data previously provided, please write to:

Data Protection Officer
Chatsworth International School
37 Emerald Hill
Singapore 229313
Email: dpo@chatsworth.com.sg

6.3 The school must be able to verify your identity before it can accept any access or correction requests from you and a fee may be charged for such access. The school reserves the right to decline access if the burden or expenses of providing access would be unreasonable or disproportionate.

7. Protection of Personal Data

7.1 Chatsworth shall take reasonably practicable steps to ensure that Personal Data in possession are protected against unauthorised or accidental access, collection, use, disclosure, copying, modification, disposal or similar risks.

7.2 Chatsworth does not assume responsibility for any authorised use of your Personal Data by third parties which are wholly attributable to factors beyond our control.

8. Retention of Personal Data

8.1 Chatsworth undertakes that it shall only keep the data collected as long as is necessary to provide the services. Personal Data shall not be retained for longer than is necessary for legal or business purposes.

8.2 We do not keep copies on file of any information provided to us by teachers or other job applicants for the purposes of finding employment, if they have not been successful in the hiring.

8.3 We shall take reasonable effort to ensure that when obsolete information is destroyed that it is done so appropriately and securely.

9. Data Protection Officer

The Director of Administration is the Data Protection Officer of Chatsworth Group of Schools. He will ensure compliance with the PDPA and will also:

- Put in place policies for handling personal data in electronic or non-electronic forms.
- Ensure these policies are communicated.
- Handle any queries or complaints about personal data