



PERSONAL DATA PROTECTION POLICY

A. General

1. In view of the implementation of the Personal Data Protection Act 2010 ("**Act**"), The Alice Smith Schools Association ("**Alice Smith**") recognises the need to process all personal data obtained in a lawful and appropriate manner. Alice Smith is committed to protecting the personal data supplied by a data subject to ensure compliance with the legal and regulatory requirements in accordance with the Act.
2. This Personal Data Protection Policy ("**Policy**") covers the processing of all personal data and sensitive personal data whose use is controlled by Alice Smith.

B. Policy Status

1. This Policy is applicable to all employees of Alice Smith. For the purposes of this Policy, the term "employees" herein refers to all members of Alice Smith, including teachers, permanent, fixed term and temporary staff, governors, any third party representatives and agents engaged with Alice Smith in Malaysia or overseas. Failure to comply with this Policy may result in disciplinary action.
2. Any questions regarding this Policy may be directed to the PDPA Compliance Officer of Alice Smith at pdpa@alice-smith.edu.my.

C. Data Collected & Purposes

1. During the course of Alice Smith's business and activities, Alice Smith may be required to process information of a data subject, including but not limited to the name of the individual, gender, age, identification number and/or passport number, date of birth, race and nationality, date of incorporation, correspondence address, email address, contact details, financial status, bank account information, key medical information and employment information.
2. The personal data collected by Alice Smith may be used inter alia for the following purposes*:
 - i. Storing and processing of personal data relating to students and their parents in the various data storage systems maintained by Alice Smith;
 - ii. Updating and managing the accuracy of the Alice Smith's internal record;
 - iii. Billing, taxation and/or auditing purposes;
 - iv. Disclosing personal data to the government authorities and/or authorised third party as required by law and/or within the responsibility of Alice Smith as a school; and
 - v. As reasonably contemplated by the nature of any transaction.

*This list is not exhaustive.



D. Roles and Responsibilities

1. The legal responsibility for compliance with the Act lies with Alice Smith who is the "data user" under the Act and is registered as such with the Personal Data Protection Commission. Compliance with this Policy and the Act is the responsibility of all employees of Alice Smith.

E. Consent of Individual

1. Alice Smith may only process personal data with the consent of the data subject whom the data concerns and/or if the processing of the personal data is for the performance of Alice Smith's duty as a school to which the data subject is a party.

F. Data Processing

1. As and when Alice Smith is required to collect personal data, Alice Smith and its employees must abide by the requirements of this Policy and the Act. In the context of the Act, "processing" is defined to include collecting, recording, holding or storing personal data which includes inter alia NRIC numbers, passport details, home address, contact details etc.
2. Alice Smith will be responsible for ensuring that any personal data processed in relation to the Alice Smith's students and/or another individual is accurate. The personal data will be reviewed periodically to warrant that they are up-to-date and to determine whether retention of such personal data is necessary.

G. Disclosure of Information

1. Alice Smith's policy is to exercise its discretion under the Act to protect the confidentiality of those whose personal data it has obtained.
2. Alice Smith requires all employees to be vigilant and exercise reasonable caution when asked to provide any personal data to a third party. In particular, they must ensure that personal data is not disclosed either orally or in writing to any unauthorised employees without express prior consent of the PDPA Compliance Officer stated in Item B(2) and/or any authorised individual as the case may be not contemplated by Item C(2).
3. However, as and when it is reasonably required, the personal data in the possession of Alice Smith may be only disclosed to the following third parties:
 - i. External professional advisors and auditors; and
 - ii. Governmental departments and authorities.
4. Personal data will not be transferred outside Alice Smith and in particular not to a country outside of Malaysia unless:-
 - i. Consent from the data subject is obtained;
 - ii. The country's data protection laws provide an adequate level of data protection; and/or
 - iii. Adequate safeguards have been put in place in consultation with Alice Smith's PDPA Compliance Officer.



H. Data Security

1. Alice Smith will ensure that any personal data which is collected, stored and processed, is stored securely and the appropriate measures are adopted to ensure the following:-
 - i. Source documents are well kept;
 - ii. Paper-based records must not be left where unauthorized employees can gain access to them;
 - iii. Computerized data is protected by passwords; and
 - iv. Individual passwords are kept confidential and not disclosed or shared with other employees to enable log-in under other employee's personal username and password.
2. When physical files or any forms relating to data subject are no longer required, they will be shredded or bagged or destroyed securely, and the hard drives consisting of those records will be erased off via secure electronic deletion pursuant to such standard procedure by the administration department.
3. Any employees of Alice Smith will not process any personal data belonging to any data subjects, whether in soft copy or hard copy, outside of the premises of Alice Smith unless prior approval is provided by the PDPA Compliance Officer or any authorised person.

I. Rights of Data Subject

1. A data subject has the following rights under the Act:-
 - i. Request for access to personal data held on the individual, the purpose for which the personal data is being used and those to whom it has, or can be disclosed to;
 - ii. Prevent data processing that is likely to cause distress or damage;
 - iii. Take action to stop the use of, rectify, erase, and/or dispose of inaccurate personal data.
2. Any individual who intends to exercise the abovementioned rights shall make a written request to Alice Smith together with the prescribed fee. Alice Smith shall, subject to exemptions, comply with the request and/or take reasonable steps not later than 21 days from the date of receipt of such request.

J. Disposal of Data

1. Personal data obtained should not be retained longer than it is required for its purposes. Alice Smith has an obligation to ensure that the personal data of the data subjects are destroyed and/or permanently deleted after a specified period of time. All employees are required to contact the PDPA Compliance Officer and/or any authorised officer should the need to dispose of any personal data arises.
2. Personal and sensitive data will be disposed of by means as listed in Item H(2) above. Appropriate measures will and must be taken by Alice Smith to ensure that the data destroyed are not reconstructed or processed by third party.