

## PRIVACY POLICY

Garden International School (“GIS”) is committed to comply with the Malaysian Personal Data Protection Act (PDPA) 2010 in protecting personal information that has been processed by GIS. This Privacy Policy informs you about GIS’ policy and practices on data privacy matters before you provide your personal data to us when you visit [gardenschool.edu.my](http://gardenschool.edu.my) (the “Site”) or through other methods as stated in the section “Source of your Personal Data” below.

### **Definition**

For the purposes of this Privacy Policy:

“You” or any derivation thereof, as used herein refers to the owner of the personal data, which in a student’s case includes both the student and the parent/legal guardian of the said student.

“Garden International School (“GIS”)” or referred to as either “the Company”, “We”, “Us” or “Our” in this Agreement refers to <insert school>.

“TEG” refers to Taylor’s Education Group.

“Account” means a unique account created for You to access our Service or parts of our Service.

“Website” or “Site” refers to Garden International School Website, accessible from [gardenschool.edu.my](http://gardenschool.edu.my)

“Service” refers to the Website and/or the services that Garden International School provides.

“Service Provider” means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

“Third-party Social Media” Service refers to any website or any social network website through which a User can log in or create an account to use the Service.

“Personal Data” is any information that relates to an identified or identifiable individual. Generally, the personal data that We collect and process, include but is not restricted to:

*Name, Identification number (NRIC), Passport number, Address, Contact numbers, Personal email address, Photo and images, Nationality, Student’s Gender, Date of birth, Previous qualification, Parents’/guardian’s marital status, Emergency contact person(s) details, Billing-related information, Employment/occupation*

“Sensitive Personal Data” under the Act and these include, but not restricted to:

*Race, religion, data relating to health, records of misconduct and disciplinary action, records of criminal offence, family court orders*

As a result of the Covid-19 pandemic, we are collecting and processing new types of information about students, parents, visitors and staff (“Individuals”) including whether individuals are

displaying symptoms of the virus, the health status of individuals within the same household, the results of any COVID-19 testing, and the various locations individuals have visited since the outbreak started.

This sensitive information shall be treated carefully by the School and will only be used for specific purposes. It will not be released to a third party without your explicit consent unless it is necessary to protect your vital interests, health, safety, emergency or in the context of Covid-19 crisis.

“Cookies” are small files that Your web browser stores in Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website.

“Device” means any device that can access the Service such as a computer, mobile phone or a digital tablet.

“Device Information” or “Usage Data” refers to the information We collect when you visit the Site, We automatically collect certain information about Your device, including information about Your web browser, IP address, time zone, and some of the cookies that are installed on Your device. Additionally, as you browse the Site, We collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site.

### **Source of your Personal Data**

Most, if not all, of Your personal data was obtained from you directly, either from the following sources or from any other information you provided, and this may include but not limited to:

- in person over the phone;
- various types of Enquiry, Application and/or Registration Forms;
- all other GIS and/or support services related Request Forms
- previous qualification related documents and/or certificates
- through online tools: such as apps and other software used by our school;
- from electronic and paper documentation: including but not limited to emails, invoices, enrolment forms, letters to our school, consent forms (for example: enrolment, excursion, consent forms), our school’s website or school-controlled social media;
- through any CCTV cameras located at our school.

In some instances, Your Personal Data may have been obtained from external sources including, but not restricted to the following:

- from third parties such as previous educational institutions, law enforcement agencies and other government entities;
- third-party service providers and any other future third parties in relation or incidental to the above;
- Personal Data which are available in the public domain;
- Device Information using the following technologies:
  - “Cookies” are data files that are placed on Your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
  - “Log files” track actions occurring on the Site, and collect data including Your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.

- “Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the Site.

### **Personal Data We Process**

GIS collects and processes student’s and your Personal Data and Sensitive Personal Data for the purposes as stated in the next section.

### **Purpose of Collection and Use of Your Data**

The purpose for which personal data is collected and further processed includes, but not restricted to the following:

<b>Purpose</b>	<b>Example</b>
To provide and maintain Our service and to manage your account	<ul style="list-style-type: none"> <li>• To manage and respond to enquiries;</li> <li>• To process application for admission;</li> <li>• To process applications for financial aid, scholarship and bursaries;</li> <li>• To process applications for any other services provided</li> <li>• For students progress from any of the School to any other institution within Taylor’s Education Group</li> <li>• To administer the tuition fee and other payment;</li> <li>• To pursue/collect any sums in arrears by our parents/guardians;</li> <li>• To educate students;</li> <li>• To maintain a student/class register;</li> <li>• To maintain students’ personal details, academic and non-academic records;</li> <li>• To support students’ social and emotional wellbeing, and health;</li> <li>• To provide the relevant administrative support, counselling and pastoral services;</li> <li>• To care for the medical needs of students;</li> <li>• For all and any other ancillary purposes relating to our provision of service e.g. conducting online classes, the supply of computers, iPads, other forms of telecommunications and technology services</li> <li>• To manage and maintain Your account and facility</li> </ul>
To contact or provide you with news or any other information	<ul style="list-style-type: none"> <li>• To contact student’s next of kin in case of emergency;</li> <li>• To administer the graduation and alumni related events;</li> <li>• To communicate with students or parents on any important announcements;</li> </ul>
To manage Your requests	<ul style="list-style-type: none"> <li>• To manage the use of facilities such as library, laboratories and so on;</li> <li>• To facilitate the internships, placement or work experience as well as co-curricular related activities and other &lt;insert school&gt; events;</li> <li>• To respond to Your enquiries and complaints and to resolve disputes;</li> </ul>
Others	<ul style="list-style-type: none"> <li>• To collect information for relevant local or international statutory authorities or exam boards;</li> <li>• To fulfil and comply with any legal, regulatory, audit or security related requirements, including to:</li> </ul>

Purpose	Example
	<ul style="list-style-type: none"> <li>○ take reasonable steps to reduce the risk of reasonably foreseeable harm to students, staff and visitors (duty of care);</li> <li>○ make reasonable adjustments for students with disabilities (anti-discrimination law);</li> <li>○ provide a safe and secure workplace (occupational health and safety law).</li> <li>● To comply with governmental direction and orders;</li> <li>● To enable the School and various Departments to: <ul style="list-style-type: none"> <li>○ ensure the effective management, resourcing, and administration of our school;</li> <li>○ fulfil statutory functions and duties and comply with reporting requirements;</li> <li>○ plan, fund, monitor, regulate and evaluate the School’s policies, services and functions;</li> <li>○ investigate incidents in schools and/or respond to any legal claims against the School, including any of its departments.</li> </ul> </li> <li>● For internal functions such as evaluate the effectiveness of marketing, market research, statistical analysis and modelling, reporting, audit and risk management and to prevent fraud;</li> <li>● Any other purposes related to the smooth running of GIS</li> </ul>

**Provision Of Information**

The provision of all information requested for in the relevant forms of GIS is mandatory, unless specified otherwise, in enabling us to process Your application/request and offer our Services to you. Any sensitive information shall be treated carefully by GIS and will only be used for specific purposes. It will not be released to a third party without Your explicit consent unless it is necessary to protect Your vital interests.

Should you fail to provide the said information, the School may be unable to process your request and/or provide you with the relevant services.

**Disclosure Of Your Personal Data**

GIS will keep Your personal data confidential unless you have given the written consent to such disclosure, or it is within the ambit of permitted disclosures under prevailing laws/guidelines or by order of a court. GIS may disclose Your information to the categories of third parties as listed below (not restricted to):

- The Ministry of Education, other relevant public authorities such as government departments/agencies, statutory authorities and industry regulators;
- Malaysian Immigration Department and its appointed agencies;
- Foreign embassies and their appointed agencies;
- The student’s sponsors including his/her parents/guardians;
- Your authorised agents, executor, administrator or legal representative;
- Third parties that provide the internships or attachment placements;
- Professional or accreditation bodies;

- Examination boards;
- Third Parties involved in a merger, acquisition or asset sale;
- Third parties appointed by GIS to provide services, such as but not limited to auditors, lawyers, contractors, printing companies, data processors, pass application agents, student recruitment agents, other authorised agents, legal representatives, technology providers (to support the development, implementation and maintenance of the online /virtual environment), travel agencies, training organizer, online classes and insurance companies;
- Other institutions or companies with Taylor’s Education Group within and outside Malaysia.

## **Security of Your Data**

The security of Your Personal Data is important to Us. We ensure that the processing of your personal data is carried out in a secure environment to prevent loss, alteration and destruction and misuse of your personal data. Our standard protocols include

- **Application security:** traffic encryption, strongly hashed passwords, safeguards against vulnerabilities such as cross site scripting, SQL injections, phishing, and others.
- **Network security:** firewalls and systems to detect suspicious behaviour, stop malicious attempts to gain access, or compromise the resilience of the service
- **Organisational security:** access policies, audit logs and confidentiality agreements.
- **Physical security:** preventing unauthorised access to infrastructure processing personal data.
- **Procedural security:** IT management processes to minimise the risk of human errors or testing regimes to identify software weaknesses before releasing new features to our cloud services, or policies to ensure data is only processed on instruction from our customers.

When sensitive information (such as credit or debit card information) is transmitted to the Site or through the Site, we encrypt the information. When credit card details are collected, we simply pass them on to be processed as required. We never permanently store complete credit card details. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

Please help us keep our records updated by informing us of any changes to your email address and other contact details.

## **Retention of Your Data**

Your data will be processed and stored as long as it is necessary for the purposes described in this Privacy Policy as well as for the purposes of ensuring the security and integrity of GIS information systems. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if We are required to retain Your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

GIS will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security of to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

## **Transfer of Your Personal Data**

Your information, including Personal Data, is processed at the GIS operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to, and maintained on computers located outside of Your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

GIS will take all steps reasonably necessary to ensure Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of Your data and other personal information.

### **Right To Access And Data Subject's Obligation**

You have the right to access and correct Your personal information held by the GIS under the Personal Data Protection Act ("Act"). We will attempt to keep Your records complete, accurate and up to date. If You have any reason to believe that Your records with us are inaccurate, incomplete or not updated, please notify GIS in a timely manner. If You wish to request for access to, or to correct data held by the GIS or withdraw Your consent to the data processing/use of Your personal data by us, please forward Your request to the website administrator at:

- (603) 6203 0900 (telephone)
- (603) 6203 0878 (facsimile)
- enquiry@gardenschool.edu.my (email)

GIS reserves the right to charge you an administrative fee for processing any data access request. Any request to exercise Your rights shall be administered as per the Act. Please be informed that pursuant to the Act, Your request may be rejected in certain circumstances.

Although we only process Your personal data for purposes as stated above, in the event that Your personal data is being processed for other purposes (with Your consent), you have the right to request us to stop such processing. However, if you choose not to provide and/or fail to supply us with such personal data (and/or decide not to give Us consent to process Your personal data, including explicit consent for sensitive personal data), We will not be able to perform the contract of enrolment or process Your application for enrolment with us or provide the necessary service to you. Consequently, if you decide not to provide the mandatory information to us, it may necessarily mean that the Contract of Enrolment may have to be terminated or that an offer of a place of enrolment will not be made.

### **Links to Other Websites**

Our Site may contain links to other websites that are not operated/maintained by Us. If You click on a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

A link to another website does not constitute an endorsement of the content, viewpoint, accuracy, opinions, policies, products or services of that other website. Once you navigate from this website

to another site, You are subject to the terms and conditions of that site, including the provisions of its privacy policy.

### **Amendments To This Privacy Policy**

This Policy may be reviewed and amended from time to time. We will communicate such changes along with the updated Policy on the GIS website [gardenschool.edu.my](http://gardenschool.edu.my) and/or other appropriate communication means as may be determined by GIS Parents and students are advised to visit the GIS website on a regular basis to check for any updates and changes on this Notice.