



## **EHL CAMPUS (SINGAPORE) PERSONAL DATA PROTECTION POLICY**

At EHL Campus (Singapore) ("EHL"), we uphold our obligations under the Personal Data Protection Act 2012 (PDPA) with utmost seriousness. We value the personal data you entrust to us and consider it our duty to handle, safeguard, and process it appropriately.

The main objective is to provide clarity on how we collect, utilize, and/or disclose your personal data, to uphold confidence to all individuals on how we manage and handle personal data.

#### 1 INTRODUCTION

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. This generally includes for example (non-exhaustive): names, identification numbers, date of birth, contact information, background (which may include education, family background, residential address, career and financial), medical records, photographs and video images.

#### 2 SCOPE

2.1 Personal data will be collected in compliance with the PDPA. Typically, prior to gathering any personal information from you, we will inform you of the intended purposes for which your data may be collected, used, and/or disclosed. We will also seek your consent for the collection, use, and/or disclosure of your personal data for these stated purposes.

### 3 PURPOSE OF COLLECTION, USE AND DISCLOSURE OF DATA

## **Students**

- 3.1 The personal data gathered from you may be utilized and/or disclosed for the following objectives:
- (a) Enrolling you in undergraduate and/or graduate courses at EHL, and furnishing you with related materials such as course content, study materials, assignments, lecture materials, timetable information, and examination details;
- (b) Addressing any inquiries you may have;
- (c) Processing your application(s) for scholarships and/or financial assistance, and upon approval, overseeing and managing the associated scholarship and/or financial aid programs;
- (d) Ensuring the safety and security of individuals and property on campus (including through the use of CCTVs), as well as investigating instances of fraud, misconduct, or any unlawful actions or omissions, regardless of whether suspicions regarding the aforementioned exist;
- (e) Responding to requests for information from public agencies, ministries, statutory boards, or similar authorized non-governmental agencies tasked with specific government services or duties as required from time to time.
- (f) Processing, administering and granting awards such as prizes, medals, scholarships, distinctions, and student or graduation statuses, as well as disseminating or publishing information regarding these accolades;





- (g) After graduation, to involve you as an EHL alumnus, which encompasses various activities such as informing you about EHL and alumni-related initiatives, inviting you to EHL and alumni-related events, updating alumni information, inviting you to partake in alumni surveys, and sending communication materials;
- (h) Administration and processing of your applications for career-related activities, events, programs, internships, job opportunities, and career coaching both locally and internationally, during your time as a student and later as an alumnus of EHL;
- (i) Facilitating your participation in student life and development opportunities which may encompass participation in activities, events, volunteer work, training programs, student memberships, and leadership roles within clubs, societies, halls, and residences;
- (j) Capturing photographs and/or videos (by EHL staff or third-party photographers and/or videographers) during events or seminars organized by EHL or its affiliates for promotional purposes (including in EHL's publicity and communication materials); and/or;
- (k) Facilitating the provision of support and/or assistance in relation to health and general well-being of yourself and others;

## **Employees/Staff**

To fulfill its contractual, legal, and managerial duties, EHL must handle personal data concerning its staff. This data processing adheres to the Act and EHL's pertinent regulations, including those on data protection, subject to updates.

Your association with EHL is typically governed by an employment contract and your acceptance of the Employee Handbook and/or Governance and Academic Policies Handbook, both subject to periodic revisions. These documents often outline the purposes and methods of personal data utilization, either explicitly or implicitly. The following objectives serve to complement and elucidate the matter, without nullifying any terms in the aforementioned documents:

- (a) Managing your employment relationship with EHL.
- (b) Utilizing your bank account details for salary and other payments.
- (c) Monitoring EHL's computer network usage.
- (d) Publishing your images on EHL's intranet, website, staff passes, newsletters, etc.
- (e) Administering staff benefit programs.
- (f) Disclosing your personal data to external entities for administrative purposes, and to governmental bodies for official use, or as required by law.
- (g) Conducting investigations, ensuring security, and verifying information, which may involve electronic access and video surveillance for campus security.
- (h) Pursuing reasonable purposes within the context of a higher education institution like EHL.





## **The Public and Other Third Parties**

EHL is dedicated to actively engaging with the public and the local community. We frequently host a variety of events that welcome external stakeholders and the public to participate. While it's not feasible to list all potential events, examples include community outreach programs, lectures, exhibitions, and more ("Events").

In fostering dynamic interactions with the public, there arises both opportunity and necessity to collect, utilize, and/or disclose personal data from attendees. For example:

- (a) Investigative, security, and verification purposes, encompassing actions such as fraud prevention, addressing misconduct or harassment, and using electronic access and video systems for campus security and monitoring.
- (b) Administrative purposes for specific Events, such as food catering arrangements.
- (c) Providing updates on future EHL Events or products that may be of interest to you.
- (d) Marketing and publicity endeavors, which may include the capture and sharing of photographs.
- (e) Any other purpose relevant to the operational context of a higher education institution like EHL, deemed reasonable considering your association with EHL.
- 3.2 In order to conduct our operations more smoothly, we may also share the personal data you've provided with our third-party service providers, agents, and/or affiliates or related corporations, which may be located outside of Singapore, for one or more of the Purposes. This is because these third-party service providers, agents, and/or affiliates or related corporations would be handling your personal data on our behalf for one or more of the Purposes.

### 4 WITHDRAWAL OF CONSENT

If an individual does not wish for EHL to use his/her personal data for the above Permitted Purposes or disclose his/her personal data to any of the Parties to whom information may be disclosed, the individual may withdraw his/her consent at any time by giving written notice to EHL, pursuant to the Personal Data Protection Act 2012.

Students: However, based on the circumstances and the extent of the withdrawal, revoking consent could lead to EHL being unable to provide course delivery services as outlined in the Standard PEI-Student Contract. This action may consequently lead to termination of the Standard PEI-Student Contract or other legal ramifications arising from the student's legal relationship with EHL.

# **5 ENQUIRIES**

Should you have any questions regarding this policy or any other concerns about the management, protection, and/or processing of your personal data, please feel free to reach out to our Data Protection Officer (DPO) via the following contact details:

(a) Singapore telephone number: +65 6994 8243

(b) E-mail: <a href="mailto:dpo.sg@ehl.ch">dpo.sg@ehl.ch</a>

(c) Office address: 3 Ladyhill Road, Singapore 258672