

## Privacy Policy

### 1 Preamble

1.1 The confidentiality of our students' data is of great importance to us and we have aligned our Privacy Policy with the Personal Data Protection Act in Singapore.

1.2 We collect, use and disclose our student data for the purpose of enrolment and admission, market research and analyses, and to provide you with an efficient and smooth learning experience to meet your needs and requirements. Student data stored in our school's administration and management system is password protected and confidential. Hard copy confidential documents are secured under lock and key.

1.3 This Privacy Policy summarises our policy and responsibility in relation to the collection, use and disclosure of student data.

1.4 In signing up and agreeing to attend our courses and use our services, you unequivocally signify that you have read, understood and agree to be bound by our Privacy Policy as updated and revised from time to time.

### 2 Policy

2.1 Our Privacy Policy has two parts - Part I and Part II - as follows:

- Part I: General Student Data privacy policy statement
- Part II: Privacy policy statement for Student Data collected through inlingua's websites and mobile services facilities

2.2 The type of Student Data that inlingua collects depends on the circumstances of collection, and on the nature of the service requested, or transaction undertaken.

### 3 Part I: General Student Data Privacy Policy Statement

3.1 The two broad categories of Student Data that inlingua collects are Personal Data and Statistical Data:

3.2 Personal Data, which includes but is not limited to

- i. personal information that links back to an individual e.g., name, gender, date of birth, nationality, religion, identity card/passport or other personal identification numbers;
- ii. contact information e.g., address, telephone number, email address;
- iii. payment information e.g., credit or debit card information, including the name of cardholder, card number, billing address and expiry date;
- iv. course information e.g., course type/title, duration and status, fees, attendance;
- v. health information e.g., medical records or requests;
- vi. technical information e.g., IP address;
- vii. employment information e.g., employer, address, appointment/designation; and
- viii. parent/sibling/guardian information e.g., name, address, contact telephone number.

3.3 Statistical Data e.g., number of students per course/class, hits to webs. This is stored purely for market research and analytical purposes, and is entirely anonymous. This information will not be stored to your student record, and will only be aggregated for statistical analyses so that we can better understand our student profile, improve our course/ service offering and support our marketing efforts.

3.4 In this policy statement, the phrase Student Data includes Personal Data and Statistical Data.

### 3.5 Provision of Student Data

3.5.1 The provision of Student Data is obligatory in order for inlingua to carry out enquiry, consultation and counselling service, enrolment, admission, teaching, administration, management, and other services to you.

3.5.2 Failure to supply such Student Data may result in:

- i. inlingua being unable to contact and inform you on any changes in course schedule, class timetable, classroom, teacher, and matters relating to your course and attendance;
- ii. inlingua being unable to provide you with the courses and services requested; and/or



iii. your inability to be enrolled or admitted for any course, or participate in the School's activities.

3.5.3 inlingua collects Student Data, directly from you or an agent (i.e. persons whom you have authorised, persons who have been validly identified as being you or your authorised representative), from third parties (e.g., your travel agent, employer, friends, relatives, or service provider), or from publicly available sources, through our website, mobile services, and other channels, in order to fulfil the following purposes, which include but are not limited to:

- i. Providing services to you such as answering your enquiries, providing consultation, processing your application, assisting you in the enrolment and admission;
- ii. Sending alert messages through regular mail, telephone, and electronic or mobile services facility;
- iii. Marketing and communicating with you in relation to courses and services offered by inlingua, our service partners, and agents;
- iv. Contacting you for student satisfaction surveys and market research; and
- v. Ensuring safety, security and legal compliance.

3.5.4 If necessary, inlingua may use and disclose your Student Data with, and to third parties in order to fulfil the purposes listed above. In this connection, we may disclose your Student Data to third parties, such as our agents, partners, and local regulatory bodies (e.g., Committee for Private Education, Immigration and Checkpoints Authority). In the event that inlingua intends to use data provided for other purposes beyond the original intent of data collection, inlingua will seek the written permission from the students and/or employee before using the data unless requested by government agencies.

3.5.5 inlingua may also use and disclose your Student Data to persons who have been validly identified as being you or your authorised representative(s), for the purpose of the relevant transaction or enquiry.

3.5.6 inlingua shall endeavour to ensure that its employees, agents, consultants, contractors and such other third parties mentioned above who are involved in the collection, use and disclosure of Student Data will observe and adhere to the terms of this Privacy Policy.

3.5.7 inlingua may disclose your Student Data to law enforcement agencies and the government for security, customs and immigration purposes.

3.5.8 Accordingly, relevant Student Data may be disclosed to the appropriate customs and immigration authorities as required by law. Please be informed that the initial recipients of such information may share your personal data with other government agencies or enforcement authorities.

3.5.9 In addition, inlingua may disclose Student Data to our legal advisors for the purpose of establishing, exercising or defending our legal rights, to our other professional advisors, or as otherwise authorised or required by law.

3.5.10 inlingua reserves the right to share Student Data as and when necessary to prevent a threat to the life, health or security of an individual, or a corporate entity.

3.5.11 inlingua may disclose Student Data, as and when necessary, to investigate suspected unlawful activities including but not limited to theft, illegal employment, drug abuse, or fraud.

3.5.12 inlingua is based in Singapore and Student Data may be transmitted to data storage facilities where we keep our central records or transferred to official storage locations in Singapore or other countries.

3.5.13 Where you enrol on behalf of another person, you undertake and will ensure that the individual whose Student Data is supplied to inlingua has authorised the disclosure, is informed of, and consents to the terms and conditions of this Privacy Policy. You may submit a written request to inlingua to withdraw your consent at any time.

3.6.14 Statistical Data is not linked to a student's record and inlingua does not need to seek consent for the collection, use or disclosure of Statistical Data. Please refer to clause 4 Part II: Privacy Policy



Statement for Student Data for more information on the collection and usage of Student Data obtained from inlingua's websites and through inlingua's mobile services facilities.

3.5.15 Upon your written request, inlingua will allow you to view your stored Personal Data. Where permitted by law, inlingua reserves the right to charge a reasonable administrative fee for this service.

3.5.16 In exceptional circumstances, inlingua reserves the right to deny you access to your Personal Data and may provide an explanation as required by applicable laws. Exceptional circumstances include where:

- i. An investigating authority or government institution objects to inlingua's compliance to a customer's request;
- ii. The information may, in the exercise of inlingua's reasonable discretion and/or assessment, affect the life or safety or security of an individual, and
- iii. Data is collected in connection with an investigation of a breach of contract, suspicion of fraudulent activities or contravention of law.

3.5.17 inlingua will retain Student Data for as long as it is necessary to fulfil the purpose for which it was collected, the legal or business purposes of inlingua, or as required by relevant laws.

3.6.18 When destroying Student Data, inlingua will take commercially reasonable and technically possible measures to make the personal information irrecoverable or irreproducible in accordance with the applicable laws.

3.5.19 inlingua needs your assistance to ensure that your Personal Data is current, complete and accurate. As such, please inform inlingua of changes to your Personal Data by contacting inlingua and submitting your updated particulars in writing.

3.5.20 inlingua takes the security and protection of your Personal Data very seriously. As such, inlingua makes reasonable security arrangements to protect Student Data against loss or theft as well as unauthorised access and undue disclosure. As an example of a procedural safeguard, inlingua has implemented password authentication for access.

#### 4 Part II: Privacy Policy Statement for Student Data

4.1 Student Data collected through inlingua's websites and mobile services facilities includes:

- i. Security safeguards
- ii. Cookies
- iii. Clickstream data
- iv. Links to other websites
- v. Minors
- vi. Google Analytics

4.2 inlingua takes the security and protection of your Student Data collected on our websites and through mobile services facilities very seriously. All Student Data collected through our websites, e.g., <http://www.inlingua.edu.sg> and through mobile services facilities are protected by a secure server. In addition, SSL (Secure Socket Layer) protects the transmission of data from the internet to our systems.

4.3 If we identify evidence on unauthorised attempts to upload or change Student Data, perpetuate fraudulent or illegal activities or otherwise cause damage, such evidence may be provided to appropriate law enforcement authorities or agencies without notice to you.

4.4 Our websites, like most other websites, use cookies to enhance your online experience. Cookies are alphanumeric identifiers that are transferred to your computer's hard drive from your web browser to recognise your preferences and to tailor content to you. The cookies do not contain your Student Data (unless you specifically chose our "Remember Me" feature) but only Statistical Data which is entirely anonymous. Please refer to your browsers documentation to check if cookies have been enabled on your computer or to request not to receive cookies. Information and procedures regarding cookie handling are provided by the respective browsers documentation within the browser itself by clicking on 'help' and performing a search on 'cookies'.



4.5 In order to improve your online experience, inlingua may track online behaviour or clickstream data to advance your use of our web pages and track referrals from other websites. Such data will not be stored in your student record, and will only be aggregated for statistical analysis.

4.6 inlingua provides you with links to other websites for your convenience and information. You access these websites at your own freewill and risk, and inlingua is not responsible for these websites.

4.7 While inlingua will protect your Student Data on our websites, we cannot control or be responsible for the policies of other sites we may link to, or the use of any Student Data you may share with them. Please note that our Privacy Policy does not cover these other websites, and we strongly advise you to be apprised of their specific policies.

4.8 inlingua cannot distinguish the age of persons who access and use its websites. If a minor (according to applicable laws) has provided inlingua with Student Data without parental or guardian consent, the parent or guardian should contact inlingua to remove the relevant Student Data.

4.9 Google Analytics is a web analysis service provided by Google. Google utilises the data collected to track and examine the use of [www.inlingua.edu.sg](http://www.inlingua.edu.sg), to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualise and personalise the advertisements of its own advertising network. For more details, please refer to Google's Privacy Policy.

## 5 Review and Revision

5.1 This Privacy Policy will be reviewed and revised at least once a year and the updated version will be posted on the inlingua website and date stamped so that you are aware of when the Privacy Policy was last updated. The English version of this Privacy Policy will prevail over any version of this Privacy Policy in another language in the event of any inconsistency in interpretation and any translation of this Policy.