

INLINGUA PRIVACY POLICY

- 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 and the European Union General Data Protection Regulation (GDPR).
- 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. The below summarises our policy and responsibility in relation to the collection, use and disclosure of student data.
- 3 We will obtain the consent and agreement of students/guardians to be bound by our Privacy Policy when they make enquiries or enrol for our courses or use our services. The following paragraphs describes inlingua's Student Data Privacy.

Student Data Privacy Policy

- 4 In giving consent to provide my/the student's personal data for the purposes of enquiry or enrolment to inlingua's courses/services or 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. In this policy statement, the phrase Student Data includes Personal Data and Statistical Data.
 - 4.1 Personal Data includes but is not limited to
 - 4.1.1 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;
 - 4.1.2 Contact information e.g., address, telephone number, email address;
 - 4.1.3 Payment information e.g., credit or debit card information, including the name of cardholder, card number, billing address and expiry date;
 - 4.1.4 Course information e.g., course type/title, duration and status, fees, attendance;
 - 4.1.5 Health information e.g., medical records or requests;
 - 4.1.6 Technical information e.g., IP address;
 - 4.1.7 Employment information e.g., employer, address, appointment/designation; and
 - 4.1.8 Parent/sibling/guardian information e.g., name, address, contact telephone number.
 - 4.2 Statistical Data comprises anonymised data stored purely for market research and analytical purposes e.g., number of students per course/class, hits to webs. This information helps Inlingua better understand our student profile, improve our course/ service offering and support our marketing efforts. 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.
- 5 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. Failure to supply such Student Data may result in:
 - 5.1 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;
 - 5.2 inlingua being unable to provide you with the courses and services requested; and/or
 - 5.3 your inability to be enrolled or admitted for any course, or participate in the School's activities.
- 6 inlingua collects Student Data, directly from you in person or via our website or from 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:

- 6.1 Verifying identity of the student;
 - 6.2 Providing services to you such as answering your enquiries, providing consultation, processing your application, assisting you in the enrolment and admission;
 - 6.3 Sending alert messages through regular mail, telephone, and electronic or mobile services facility;
 - 6.4 Marketing and communicating with you in relation to courses and services offered by inlingua, our service partners, and agents;
 - 6.5 Contacting you for student satisfaction surveys and market research; and
 - 6.6 Processing payment or credit transactions;
 - 6.7 Complying with any applicable laws, regulations, codes of practice, guidelines, or rules eg data retention requirements;
 - 6.8 Assisting law enforcement and investigations conducted by any governmental and/or regulatory authority to investigate suspected unlawful activities including but not limited to theft, illegal employment, drug abuse, or fraud where initial recipients of such information may share your personal data with other government agencies or enforcement authorities;
 - 6.9 Analysing statistics and reporting purposes, including website usage analysis, surveys and internal quality control purposes;
 - 6.10 Ensuring safety, security and legal compliance; and
 - 6.11 Any other incidental business purposes related to or in connection with the above.
- 7 If necessary, inlingua may use and disclose your Student Data with, and to third parties in order to fulfil the purposes listed above e.g., Committee for Private Education, Immigration and Checkpoints Authority.
 - 8 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.
 - 9 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.
 - 10 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.
 - 11 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.
 - 12 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.
 - 13 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.
 - 14 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.
 - 15 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. Where there may be differences in various legal regimes, Inlingua will abide by the more stringent retention requirements.
 - 16 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.
 - 17 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.

- 18 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.
- 19 Student Data collected through inlingua's websites and mobile services facilities includes:
 - 19.1 Security safeguards
 - 19.2 Cookies
 - 19.3 Clickstream data
 - 19.4 Links to other websites
 - 19.5 Minors
 - 19.6 Google Analytics
- 20 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.
- 21 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.
- 22 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'.
- 23 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.
- 24 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. 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.
- 25 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.
- 26 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, 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.
- 27 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.