

**SINGAPORE UNIVERSITY OF SOCIAL SCIENCES (“SUSS” or “We” or “Us”)
DATA PROTECTION POLICY**

1. Introduction

SUSS is committed to protecting the rights and privacy of individuals in accordance with the Personal Data Protection Act 2012 (the “PDPA”).

To properly perform the functions of a university and to comply with its legal obligations, we will need to process and keep certain personal data about all individuals with whom it has dealings, including its employees, associates and students.

2. Key Terminologies

2.1 *“personal data”*

This is information held either electronically or in paper form that can identify a living person directly or indirectly. It can include student/associate records, staff employment details, information on prospective students, associates and employees, audio recordings of lectures, telephone recordings and images recorded on CCTV. It does not include business contact information.

Example of Personal Data
<p>Unique identifier: NRIC number, eg. S1234567C</p>
<p>Set of data which when put together would identify an individual: Name, age, occupation, address, eg. "Johnson Lim, 28 years old, civil servant, lives at Blk 1 Ang Mo Kio Street 5"</p>
<p>Personal data may include the following: Full name Personal email address NRIC, FIN or passport number Thumbprint DNA Profile Photograph or video image of an individual Mobile telephone number Name and residential address Name and residential telephone number</p>

2.2 *“processing”*

In relation to personal data, this means the act of collecting, recording, holding or storing personal data and carrying out any operation or set of operations on the personal data.

3. Collection of Personal Data

- 3.1 SUSS will collect personal data only if the information is necessary for one or more of its functions or activities. It will do so only by lawful and fair means and not in an unreasonably intrusive way. We will not collect excessive or irrelevant information.
- 3.2 When we collect personal data about an individual from the individual, we will take reasonable steps to ensure that the individual is aware of:
- 3.2.1 the identity of SUSS and how to contact us; and
 - 3.2.2 the fact that he or she is able to gain access to his/her personal data; and
 - 3.2.3 the purposes for which the personal data is collected (the “primary purpose”); and
 - 3.2.4 to whom (or the types of individuals, organizations or entities to which) SUSS usually discloses such personal data; and
 - 3.2.5 any law that requires the personal data to be collected; and
 - 3.2.6 the main consequences (if any) for the individual if all or part of the personal data is not provided.
- 3.3 If it is reasonable and practicable to do so, SUSS will collect personal data about an individual only from that individual. However, there will be instances where we will obtain such information from other sources, e.g. references for employment purposes; results data for prospective students, verification of formal qualifications of staff/associates and students etc. In such instances, SUSS will take reasonable steps to ensure that the individual is or has been made aware of the matters listed in paragraph 3.2, except to the extent that making the individual aware of the matters would pose a serious threat to the life or health of any individual.

4. Use and Disclosure of Personal Data

- 4.1 We will not, without the prior consent of an individual, use or disclose personal data about that individual for a purpose (the “secondary purpose”) other than the primary purposes of collection except in any of the following situations:
- 4.1.1 the secondary purpose is related to the primary purpose of collection and, if the individual would reasonably expect SUSS to use or disclose the personal data for the secondary purpose;

- 4.1.2 if the use or disclosure is necessary for research, or the compilation or analysis of statistics, in the public interest, other than for publication in a form that identifies any particular individual and:
- (a) it is not practicable for SUSS to seek the individual's consent before the use or disclosure; and
 - (b) in the case of disclosure, SUSS reasonably believes that the recipient of the personal data will not disclose the information; or
- 4.1.3 SUSS reasonably believes that the use or disclosure is necessary to lessen or prevent either:
- (a) a serious and imminent threat to an individual's life, health, safety or welfare; or
 - (b) a serious threat to public health, public safety or public welfare; or
- 4.1.4 SUSS has reason to suspect that unlawful activity has been, is being or may be engaged in, and uses or discloses the personal data as a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities; or
- 4.1.5 the use or disclosure is required or authorised by or under law; or
- 4.1.6 SUSS reasonably believes that the use or disclosure is reasonably necessary for one or more of the following by or on behalf of a law enforcement agency:
- (a) the prevention, detection, investigation, prosecution or punishment of criminal offences or breaches of a law imposing a penalty or sanction;
 - (b) the enforcement of laws relating to the confiscation of the proceeds of crime;
 - (c) the prevention, detection, investigation or remedying of seriously improper conduct; or
 - (d) the preparation for, or conduct of, proceedings before any court or tribunal
- 4.2 Any disclosure under paragraphs 4.1.3 to 4.1.6 can only be made by authority of the Registrar or the President of SUSS, and a written record shall be made of the reasons for that decision.

5. Accuracy of Personal Data

- 5.1 SUSS will take reasonable steps to make sure that the personal data it collects, uses or discloses is accurate, complete and up to date. To enable us to ensure the quality and accuracy of personal data, an individual has an obligation to provide relevant and accurate information to SUSS.

6. Protection and Retention

- 6.1 SUSS will take commercially reasonable steps to protect the personal data it holds from misuse and loss and from unauthorised access, modification or disclosure.
- 6.2 We will take commercially reasonable steps to destroy or permanently de-identify personal data if it is no longer needed for any purpose. Destruction of personal data will be carried out in accordance with SUSS's prevailing policies and procedures for records retention and management.

7. Access and Correction

- 7.1 If SUSS holds personal data about an individual, we will provide that individual with access to the personal data on request by that individual, unless:
- 7.1.1 providing access would pose a serious and imminent threat to the life or health of any individual; or
 - 7.1.2 providing access would have an unreasonable impact on the privacy of other individuals; or
 - 7.1.3 the request for access is frivolous or vexatious; or
 - 7.1.4 the personal data relates to existing legal proceedings between SUSS and the individual, and the personal data would not be accessible by the process of discovery or subpoena in those proceedings; or
 - 7.1.5 providing access would reveal the intentions of SUSS in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
 - 7.1.6 providing access would be unlawful; or
 - 7.1.7 denying access is required or authorised by or under law; or
 - 7.1.8 providing access would be likely to prejudice an investigation of possible unlawful activity; or
 - 7.1.9 providing access would be likely to prejudice:
 - (a) the prevention, detection, investigation, prosecution or punishment of criminal offences or breaches of a law imposing a penalty or sanction; or
 - (b) the enforcement of laws relating to the confiscation of the proceeds of crime; or
 - (c) the prevention, detection, investigation or remedying of seriously improper conduct; or

- (d) the preparation for or conduct of, proceedings before any court or tribunal, or
- (e) the implementation of its orders by or on behalf of a law enforcement agency

7.2 Where providing access would reveal evaluative information generated within SUSS in connection with a commercially sensitive decision-making process, we may give the individual an explanation for the commercially sensitive decision rather than direct access to the information.

7.3 SUSS reserves the right to charge for providing access to personal data, and if it does so it will advise an individual who requests access to personal data that we will provide access on the payment of the prescribed fee; and that we may refuse access to the personal data until the fee is paid. Request for access to personal data may be made to DPO@suss.edu.sg.

7.4 If an individual requests access to, or the correction of, personal data held by SUSS, we will:

7.4.1 provide access or reasons for the denial of access; or

7.4.2 if the individual is able to establish to the satisfaction of SUSS that the information is not accurate, complete and up to date, we will take reasonable steps to correct the information so that it is accurate, complete and up to date, or provide reasons for the refusal to correct the personal data; or

7.4.3 provide reasons for the delay in responding to the request for access to or for the correction of personal data as soon as practicable, but no later than forty five (45) days after receiving the request.

7.5 If SUSS and the individual disagree on whether the personal data is accurate, complete and up to date, and the individual asks SUSS to associate with the information a statement from the individual claiming that the information is not accurate, complete or up to date, we will take reasonable steps to do so.

7.6 SUSS is not required to provide an individual with access to personal data about that individual if that information is generally available to the public.

8. Unique Identifiers

8.1 SUSS will assign unique identifiers to staff, associates and students if this is considered necessary for SUSS to carry out its functions efficiently. We may also assign a numerical code to a participant in SUSS research in order to protect the privacy of that person.

- 8.2 Unless required by law, SUSS will not adopt as its own unique identifier of an individual the unique identifier of the individual that has been assigned by another organization.
- 8.3 SUSS will not require an individual to provide a unique identifier in order to obtain a service unless the provision of the unique identifier is required or authorised by law or the provision is in connection with the purpose (or a directly related purpose) for which the unique identifier was assigned.

9. Transfer of Personal Data

- 9.1 SUSS will only transfer personal data about an individual to someone or an entity (other than SUSS or the individual) who is outside Singapore if:
- 9.1.1. SUSS reasonably believes that the recipient of the personal data is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the personal data that are substantially similar to the principles set out in this policy; or
 - 9.1.2 the individual consents to the transfer; or
 - 9.1.3 the transfer is necessary for the performance of a contract between the individual and SUSS, or for the implementation of pre-contractual measures taken in response to the individual's request; or
 - 9.1.4 the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between SUSS and a third party; or
 - 9.1.5 the transfer is for the benefit of the individual and it is impracticable to obtain the consent of the individual to that transfer and if it were practicable to obtain consent, the individual would be likely to give it; or
 - 9.1.6 SUSS has taken reasonable steps to ensure that the personal data which it has transferred will not be held, used or disclosed by the recipient of the personal data inconsistently with this policy.

10. Collection of Personal Data during Student/Alumni/Associate Activities

- 10.1 All student, alumni and associate activities organized by the respective student/alumni/associate bodies that require collection of Personal Data will require prior approval by the SUSS Data Protection Officer.
- 10.2 Please refer to the student handbook, associate handbook and alumni portal for more information.

11. Updates to this Policy

- 11.1 Any changes SUSS may make to this policy in the future will be posted on this page and, where appropriate, notified to you via email.