



Data Protection Policy

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APPROVAL AUTHORITY	Principal
RESPONSIBLE DEPARTMENT(S)	All
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At the Prince of Wales Island International Schools, we are committed to providing a safe environment for all children. To keep every child safe, a proactive safeguarding culture is encouraged and all members of our community are expected to share this commitment.

1. Understanding Personal Data Protection at POWIIS Tanjung Bungah (POWIIS TB)

POWIIS TB is dedicated to safeguarding your personal information in accordance with the Personal Data Protection (Amendment) Act 2024 and Personal Data Protection Standards 2015. We will keep your personal information confidential unless you have given us written consent to disclose it, or it falls within the scope of permitted disclosures under current laws/guidelines or by court order. At POWIIS, we prioritize the privacy and protection of personal data in accordance with the Personal Data Protection Act (PDPA). The PDPA is a comprehensive data protection law that governs the collection, use, and disclosure of personal data by organizations.

POWIIS TB may, from time to time, update this policy to ensure it remains consistent with Malaysian legal requirements.

2. What is Personal Data?

Personal data refers to any data that can be used to identify an individual. This includes but is not limited to names, identification numbers, contact information, residential addresses, bank accounts, photographs, and any other information that relates directly or indirectly to a specific individual.

3. What Data Do We Collect?

The School needs to collect and process your child's and your personal data for various academic, educational and administrative purposes. Generally, the personal data that we collect and process includes but is not restricted to:

- **Personal information** such as name, NRIC/FIN/Passport number, date of birth, marital status, gender; religion, nationality, physical and mental health records, student SEN assessments, emergency contacts, medical and insurance records
- **Contact information** such as postal addresses, email addresses, telephone and fax numbers; Past and present employment information such as company name, company type, sector, designation, business telephone and fax numbers;
- **Past and present academic qualifications** such as schools attended, courses of study, period of study and academic results;

- **Billing information**, including name of the credit/debit cardholder, credit/debit card number, security code and expiry date;
- **Images**, including photographs, videos, film or illustrations;
- **Bank details**

Providing your personal data is essential for initiating any proceedings with the School. It is used for various academic, educational and administrative purposes. Individuals will be informed explicitly, prior to the collection of data, of the purpose and to the third parties the data may be transferred to. Please contact the Data Protection Officer (as below) in the case of needing to correct or update your personal data.

Farid Ahmad
Email: f.ahmad@powiis.edu.my

4. How We Collect Personal Data

We collect personal data from information provided by you including but not limited to:

- Admission and enrolment administration.
- Regarding medical conditions
- Academic assessments and reports.
- School communication with students, parents/guardians, and staff.
- Information regarding the safety and well-being of students.
- School events- e.g. Residential trips, school trips
- Compliance with legal and regulatory requirements.
- Consent for use of images for school newsletter or marketing purposes

We have implemented appropriate technical and organizational measures to safeguard personal data against unauthorized access, disclosure, alteration, or destruction. Access to personal data is restricted to authorized personnel who require access for legitimate purposes.

5. Purposes for which Personal Data is Collected, Used and Disclosed

The purpose for which personal data is collected and used includes, but is not limited to the following:

- Processing of applications to school
- Connecting to existing school groups- e.g. class, sports

- Access to school third party platforms for things like after school activity programme, reports
- Carrying out organisational administration- e.g. class weekly newsletter, tracking of progress, trips etc
- To keep accurate and up to date medical details
- Facilitating parental participation in groups such a Parent Association
- Conducting relevant statistical studies- parental voice
- Emergency communications
- Financial communications
- To comply with any regulatory, legal, audit or security related requirements

Without consent of the individual, POWIIS TB will not use the personal data for any purpose for which it was collected.

6. Disclosure of Personal Data

We may disclose your personal data with the following parties:

- Employees of POWIIS Tanjung Bungah (where applicable)
- Related legal authorities if required by law
- Ministry of Education
- Ministry of Home Affairs and Immigration
- Malaysian Qualifying Agency
- Related Foreign Embassy
- Related Professional bodies
- Royal Malaysian Police
- Insurance companies (Where Applicable)
- POWIIS Tanjung Bungah service providers
- Business partners (only with your consent)

We do not sell your personal data. We will ask your consent to disclose the data to any other third party other than the one listed in this notice.

7. Usage of Personal Data and Child's Photograph/Video

In compliance with the Personal Data Protection Act (PDPA), we are required to inform you about the collection, use, and disclosure of personal data. As part of our school's activities, we may take photographs or videos of students participating in various school events, such as sports days, performances, and educational activities.

The personal data that may be collected, used, or disclosed include:

- Name of the student.
- Photographs or videos capturing the student's image.
- The event or activity in which the student is participating.
- Date and location of the event or activity.

These photographs or videos may be used for the following purposes:

- Inclusion in school publications such as yearbooks, newsletters, and the school website.
- Display in school premises, including notice boards and digital displays.
- Sharing with parents/guardians through school communication channels.
- Promotion of the school through social media platforms or promotional materials.

By signing the consent form, you are giving permission for the school to collect, use, and disclose your child's personal data as described above. Please note that if you do not provide consent, your child may still participate in school activities, but their images may not be included in publications or shared with parents/guardians. You have the right to withdraw your consent at any time by notifying the school. However, please be aware that withdrawal of consent may not apply retrospectively to images already published or shared.

8. Protection of Personal Data

We have implemented appropriate security measures to protect personal data against unauthorized access, disclosure, alteration, or destruction. Please be noted that no method is 100 percent secure. Access to personal data is restricted to authorized personnel who have a legitimate need to access such information for the purposes stated in this notice. 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
- **Organizational security:** access policies, audit logs and confidentiality agreements.
- **Physical security:** preventing unauthorized access to infrastructure processing personal data.
- **Procedural security:** IT management processes to minimize 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.

9. Changes to PDPA Notice

POWIIS reserves the right to amend this PDPA notice from time to time to ensure compliance with legal and regulatory requirements. Updated versions will be made available on the school's website or through other appropriate channels.

By continuing to engage with POWIIS TB, individuals acknowledge that they have read and understood this PDPA notice and consent to the collection, use, and disclosure of their personal data as described herein.

10. Your Right under the PDPA

Under the PDPA, individuals have the right to:

- Access their personal data held by the school.
- Request correction of inaccurate or outdated personal data.
- Withdraw consent for the collection, use, or disclosure of personal data, subject to legal or contractual restrictions.
- Lodge a complaint with the school or the Personal Data Protection Commission (PDPC) if they believe their personal data rights have been infringed.
- Contact Information

11. Data Retention

Any of your Personal Data provided to us is retained for as long as the purposes for which the Personal Data was collected. Your Personal Data is then destroyed from our records and system in accordance with our retention policy. In the event your Personal Data is no longer required for the said purposes, further retention is required to satisfy a longer retention period to meet our operational, legal, regulatory, tax or accounting requirements.

12. Access and Correction of Personal Data

You may request access to and correction of your personal data held by us by contacting us at 04-893 9999. We will respond to such requests within a reasonable timeframe and may require verification of your identity before processing any request for access or correction.

13. Consent

By providing personal data to us, you consent to the collection, use, and disclosure of your personal data for the purposes outlined in this notice. If you are providing personal data on behalf of another individual, you represent that you have obtained consent from that individual to provide their personal data to us. Please take note that under the Personal Data Protection Act 2024, you have the choice to not consent or withdraw your consent as to the purpose or the disclosure of your personal data. A failure or withdrawal of consent may disrupt or terminate the services provided by POWIIS TB. POWIIS TB will not be liable for such disruption/termination of services.