

## **Data Protection Policy:**

### **Policy Statement:**

ERC Institute (ERCI) collects and uses information about people with whom it communicates. As stipulated by the Personal Data Protection Act (2012) (hereinafter referred to as the Act or PDPA), the personal information we collect, record and use shall be dealt with properly and in a secure manner whether it is collected either on paper, in a computer or any other material.

To this end ERCI fully endorses and adheres to the Principles of Personal Data Protection Act (2012).

### **1. The Purpose:**

The purpose of this Policy ("Data Protection Policy") is to inform you on how ERCI, manages Personal Data which is subject to the PDPA (2012). Please take a moment to read this Data Protection Policy so that you know and understand the purpose for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us, or signing up for any Products and Services offered by us, you agree and consent to ERCI (including its affiliates and University partners) (collectively, the "Schools"), as well as our respective representatives and/or agents (collectively referred to herein as "ERCI", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Schools authorised education providers and relevant third parties in the manner set forth in this Data Protection Policy. All such disclosure referred to herein between ERCI and external stakeholders are carried out in accordance with the rules relating to Transfer Limitation Obligations and the use of Data Intermediaries under the PDPA.

This Data Protection Policy supplements but does not supersede nor replace any other consent you may have previously provided to ERCI in respect of your Personal Data, and your consents herein are additional to any rights which to any of the Schools may have at law to collect, use or disclose your Personal Data.

ERCI may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory regimes. Subject to your rights at law, you agree to be bound

by the prevailing terms of the Data Protection Policy as updated from time to time on our website. Please check back regularly for updated information on the handling of your Personal Data. This policy satisfies the obligations on the part of ERCI under the PDPA (2012) to notify individuals from whom data is collected, used or disclosed.

If you are a member of the European Union, please contact us at [dpo@erci.edu.sg](mailto:dpo@erci.edu.sg), so that we can forward you the relevant documents prior to taking your personal details via a positive opt-in option.

## **2. Principles:**

Principles that govern the Data Protection Policy of ERCI are derived from the PDPA (2012) of Singapore and the Guidelines on good practice that underline the aforesaid Act highlighted by the Personal Data Protection Commission (PDPC). Towards this end ERCI follows the under-mentioned principles outlined in the PDPA (2012).

## **3. Personal Data**

Personal Data for all purposes is defined herein as data whether true or not about an individual from such information contained in the data or in conjunction with other data in the possession of ERCI that could establish the identity of the aforesaid individual. It includes but is not limited to unique identifiers such as NRIC Numbers and Passport Numbers as well as a set of data such as names, age telephone number etc when taken together could identify the individual.

## **4. Collection of Personal Data:**

ERCI will generally collect Personal Data in the following ways but is not limited to the under-mentioned list:

- (a) when you submit an application form, Download Brochure, or other forms relating to any of our Programs ,Services and or Events.
- (b) when you interact with our Program officers, for example, via telephone calls, letters, face-to-face meetings and emails;
- (c) when you request that we contact you, be included in an email or other mailing list;
- (d) when you respond to our Promotions, Initiatives, Career Advisory or to any request for additional Personal Data;

(f) when you are contacted by, and respond to, our Marketing Representatives and Student service Officers;

(i) when you submit your Personal Data to us for any other reasons.

When you browse our website, you generally do so anonymously but please see the section below on cookies. A cookie is a small piece of information that is placed on your computer when you visit certain websites.

We use third party re-marketing technology to market our sites across the Internet. Hence a cookie will be placed on your browser, and then a 3rd party will read these cookies and may serve an ad on a 3rd party site, after you have visited our website.

If you do not want information collected through the use of cookies referred to above, there is a simple procedure in most browsers that allows a customer to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide customers with certain features (e.g., customised delivery of information) available on this web site. In order to opt out of the aforesaid ad serving by third parties used on our website please **click** here. Thereafter, you may choose to 'opt out' by clicking on one or both of the service providers we use depending on your requirements.

In addition, there may be advertisements placed on the ERCI website by third party advertisers and their agencies. These may generate cookies to track how many people have seen a particular advertisement (or use the services of third parties to do this), and to track how many people have seen it more than once. ERCI does not control these third parties and their cookie policies and if you have questions about their cookie policies, please contact us and we will try our best to assist by providing you information about these third party advertising agencies.

ERCI is not responsible for the Personal Data policies (including Personal Data protection and cookies), content or security of any third party websites linked to the ERCI website.

We would not generally accept Personal Data of Third Parties unless it is accompanied by a valid form of authority from the individual concerned or where the individual from whom the data is needed or given is a minor and the data is disclosed from the legal guardian.

You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the Products and Services you have requested.

## **5. Consent Obligations:**

ERCI shall ensure at all times to collect the data referred to above in a manner consistent and in compliance with the statutory requirements. In this respect we will only collect, use or disclose personal data for purposes for which an individual has given his or her consent.

Deemed Consent is where an individual voluntarily provides personal data to ERCI for a particular purpose and it is in the circumstances surrounding the providing of such data is reasonable to accept that that the individual would have voluntarily provided the data and is aware the purpose for which the data is voluntarily given.

We shall also allow individuals to withdraw consent, with reasonable notice, and inform them of the likely consequences of withdrawal. In the event such withdrawal is made, ERCI will cease the use of such data in any manner whatsoever.

## **6. Purpose Limitation Obligation:**

We may collect, use and or disclose personal data about an individual only for the purpose(s) that a reasonable person would consider appropriate in the circumstances and will notify the individual reasons for which such data will be collated.

Generally, ERCI collect, use and disclose your Personal Data inter-alia for the following purposes. But take note that list below is not exhaustive:

- (a) responding to your queries and requests;
- (b) managing the administrative and business operations of ERCI and complying with internal policies and procedures;
- (c) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Schools;
- (d) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (e) resolving complaints and handling requests and enquiries;
- (f) organising promotional and publicity events;

(g) legal purposes (including but not limited to obtaining legal advice and dispute resolution);

(h) conducting investigations relating to disputes, billing or fraud;

(i) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on ERCI (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and

(j) purposes which are reasonably related to the aforesaid.

Furthermore, where permitted under the Act:

(a) ERCI may also collect, use and disclose your Personal Data for the following “Additional Purposes”:

(i) conducting market research and surveys to enable us to understand and determine customer location, preferences and demographics to develop special offers and marketing programmes in relation to ERCI's Products and Services, and to improve our service delivery and your customer experience at our touch points;

(ii) providing additional Products and Services and benefits to you, including promotions, loyalty and reward programmes from ERCI;

(iii) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of Products and Services by ERCI;

(iv) leads generation and management for marketing ERCI's Products and Services;

(v) administering contests, competitions and marketing campaigns, and personalising your experience at ERCI's touch points;

(vi) communicating to you advertisements involving details of our Products and Services, special offers and rewards, either to our customers generally, or which

we have identified may be of interest to you (including but not limited to up selling, cross selling and telemarketing);

(vii) organising promotional events and corporate social responsibility projects;  
and

(viii) purposes which are reasonably related to the aforesaid.

In addition, where permitted under the Act and subject to the provisions of any applicable law, your Personal Data may be disclosed, for Additional Purposes, to the vendors or other third party service providers in connection with promotions and services offered by ERCI. However, all such disclosure will be carried out in accordance within the provision of the PDPA and under a separate contractual agreement between ERCI and the External Partners.

## **7. Disclosure of Personal Data**

ERCI shall take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following:

- (a) ERCI's related corporations and employees to provide content, and Services to you, address your questions and requests in relation to your Enrolment, Admission subscription and billing arrangements with us.
- (b) Institutions providing services relating to insurance and consultancy to ERCI;
- (c) agents, contractors or third party service providers who provide operational services to ERCI, such as courier services, information technology, payment, printing, billing, processing, technical services, training, or other services to ERCI;
- (d) vendors or third party service providers in connection with marketing promotions and services offered by ERCI or its preferred partners;
- (e) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Schools;

- (f) our professional advisers such as auditors and lawyers;
- (g) relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
- (h) any other party to whom you authorise us to disclose your Personal Data to.

## **8. Access and Correction Obligation**

- a) Any individual's whose data has been used or disclosed has the right to require full details of the usage and disclosure up to a period of one year before the date of such request has been made by the individual. However, such right is subject to the following limitations:
  - cause immediate or grave harm to the individual's safety or physical or mental health;
  - threaten the safety or physical or mental health of another individual;
  - reveal personal data about another individual;
  - reveal the identity of another individual who has provided the personal data, and the individual has not consented to the disclosure of his or her identity; or
  - be contrary to national interest.
- b) ERCI shall also take steps to correct any error or omission in an individual's personal data upon his or her request unless there are justifiable grounds to refuse such request made by the individual. It is also the duty of ERCI to ensure that such corrected data is rightfully notified to any relevant parties.
- c) The purpose behind the correction of data is to ensure ERCI's accuracy obligations under the PDPA (2012).
- d) A reasonable fee will be charged to recover incremental costs of responding to access request.

## **9. Protection Obligation**

ERCI confirms that reasonable security arrangements shall be adapted to protect the personal data held by us to prevent such data being used by un-authorised third parties.

## **10. Retention Limitation Obligation**

ERCI will cease retention of personal data or remove the means by which the personal data can be associated with particular individuals, when there is no longer a business or legal reason to associate the Organisation with the individual concerned.

## **11. Transfer Limitation Obligation**

ERCI recognises the need to transfer personal data any one of the “Schools”, Representatives and or Agents based either here in Singapore or outside Singapore. Such transfer of data shall only be carried out in accordance with the requirements prescribed under the regulations of the PDPA.

## **12. Openness Obligation**

In fulfilment of the openness obligations under the PDPA (2012), ERCI’s Data Protection Policy is available for download through our website.

There is further a designated Data Protection Officer (DPO) of the Organisation is appointed to oversee and handle any matters pertaining to Data Protect within the Organization. His/her role will be to ensure that our obligations under the PDPA are complied with.

## **13. Do Not Call Register:**

If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, ERCI may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our Programs or those events offered by our preferred partners (including discounts and special offers).



You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found in our website.

Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 working days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the Program that you hold or have subscribed to with ERCI which is deemed necessary in reasonable circumstances.

#### **14. Governing Law**

This Data Protection Policy and your use of our website shall be governed in all respects by the laws of Singapore and is not limited to the provisions of the PDPA (2012).