

PERSONAL DATA PROTECTION NOTICE AND CHOICE PRINCIPLE
NOTIFICATION AND CONSENT

Pursuant to sections 6 and 7, respectively, of the Personal Data Protection Act 2010

EDUCATION DIVISION

1. Collection and Processing of Personal Data

We hereby inform you that we, which includes but is not limited to the following:

- (i) Sri KDU Sdn Bhd (556354-A);
- (ii) R.E.A.L Education Group Sdn Bhd,

being the related companies (as the term is defined in the Companies Act 1965), affiliates, and associated companies (whether or not controlled by us) ("**Company**", "**we**", "**our**" or "**us**") as data user, as the term is defined in the Personal Data Protection Act 2010, have or will collect, record, hold, store, use, disclose and/or process (collectively referred to as "**Process**") one, or all of the following categories and / or types of personal information about you:

- (a) master data: name, gender, date of birth, citizenship, marital status, nationality, race, ethnic origin, identification card / passport details, qualifications, occupation, employer, former employer(s), photographs or other images, and voice recordings, student identification number, alumni records, university electoral rolls, examination result transcripts, participation in officially recognized activities and sports, weight and height of members of athletic teams, dates of attendance, enrolment status (including active, inactive, full-time, part-time, not enrolled), degrees (pending and received), awards or honors received, the most recent previous educational institution attended;
- (b) contact details: home address and billing address, home phone number and mobile number, email address, work address, work number, emergency contact details, parents and / or guardian details;
- (c) compensation information: such as amount, currency, number of payments per year, bank account details, income range, details of applicable scholarship and compensation plans, types of student loans and / or loans applicable to educational purposes;
- (d) any such information as we deem necessary or appropriate from time to time in connection with your commercial relationship with us.

(collectively, "**Personal Data**").

We may also Process some or all of the following types of sensitive information about you pertaining to your enrolment with us:

- (i) religious or similar beliefs;
- (ii) political opinions;
- (iii) health condition; and / or
- (iv) the commission of crimes, allegations thereof and / or convictions.

(collectively together with (a)-(d) above, "**Personal Data**").

To the extent that you wilfully and voluntarily disclose to us any personal information whether or not coming within the definition of Personal Data above, of any another individual, we shall assume, without independent verification, that you have obtained such individual's consent for the disclosure as well as the Processing of the same in accordance with the terms of this notification.

2. Sources of Information

Your Personal Data has and / or will be obtained from the following sources, where applicable, or such other sources which we may see fit from time to time:

- (a) information provided or submitted by you through, among others, as applicable, Student Profile Form, Enquiry Form, Waiting List Form, Marketing Events Form, Credit Card Authorisation Form, Car Sticker Form, School Events / Trips Form, Parent Consent Forms, Withdrawal Form, Visitor Management System, Data Form, Student Application / Registration Form, Scholarship Form, Survey Form and the Online Form;
- (b) from your usage of our website and any other information you post on our website, email or otherwise send to us;
- (c) as applicable, publicly available or publicly accessible information; and
- (d) such other written or verbal communications or documents delivered to us prior to and during the course of our contractual or pre-contractual dealings with you.

As the accuracy of your Personal Data depends largely on the information you provide to us, kindly inform us as soon as practicable if there are any errors in your Personal Data or if there have been any changes to your Personal Data.

3. Purpose of Processing Personal Data

We will Process the Personal Data that you have provided to us for the following purposes, where and if applicable, including but not limited to:

Purpose A

- (a) the delivery of relevant notices, services or products to you;
- (b) in order for you to enrol and /or register yourself or your child and / or ward in courses offered by us;
- (c) in order for us to manage and / or process your or your child's and / or ward's course application;
- (d) in order to process scholarship applications pertaining to your or your child's and / or ward's enrollment with us;
- (e) to notify you of changes in our services and offerings, if any;
- (f) to enable us to supply you with the services and information which you have requested;
- (g) user and /or student relationship management procedures;
- (h) those purposes specifically provided for in any particular service offered by us;
- (i) background checks of users and / or students as we may determine to be necessary or appropriate;
- (j) our internal record keeping;

- (k) for internal auditing purposes;
- (l) collection of outstanding payments and / or fees from students and / or their parents or guardians;
- (m) prevention of crime including but not limited to fraud, money-laundering, bribery;
- (n) meeting any legal or regulatory requirements relating to our provision of services and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us or any of our member companies;
- (o) conducting marketing and student profiling activities in connection with our services and related products;
- (p) for research, benchmarking, and statistical analysis purposes to develop and evaluate education policies and strategies;
- (q) in order to coordinate lesson planning and support for individual students;
- (r) to enable us to interrogate tests and examination results in order to identify the strength and weaknesses of students;
- (s) to assess special education needs students may have;
- (t) feedback and enquiry purposes in relation to the services offered by us; and / or

Purpose B

to enable us and / or our selected authorised third parties to send you information by e-mail, telecommunication (telephone calls and text messages) or via social media concerning related and unrelated services offered by us and our affiliated business partners which may include but is not limited to enrolment related events, surveys and/or special programmes/courses/events, promotional materials, brochures which we consider will or may interest you and / or your child / ward.

4. Storage and Security

We store your Personal Data in hard and/or soft copy. Soft copy data is stored on, amongst others, the file server, e-mail server, personal computers, notebooks, tapes and compact disc.

There are corporate security policies and procedures in place which among others confines access to your Personal Data to authorised personnel only on a strictly "need to know" basis to the relevant and / or applicable department such as the Academic, Registry (Student and Parent Records), Administration, Security, Finance/Bursary, IMC, Student Services, Business Support Services, Business Development, Examination, Quality Assurance, International Office, Student Alumni Centre, Procurement, Information System, Library, Teaching & Learning Centre, Accommodation, Facilities & Maintenance, Post Graduate and Research Centre, and Human Resource departments.

We may retain the Personal Data and that of other individuals that you provide to us for a reasonable period in accordance with commercial requirements and at all times subject to prevailing legal requirements.

5. Disclosure

Personal Data provided to us will, generally, be kept confidential but you hereby consent and authorise us to provide and / or disclose your Personal Data to the following categories of parties:

- (a) any person to whom we are compelled or required to do so under law or in response to a legitimate instruction from a competent or government agency;

- (b) pursuant to an order of a court of competent jurisdiction;
- (c) to any scholarship and / or student loan providers, organisations and /or institutions, in relation to the enrollment of students pertaining to the courses offered by us;
- (d) any related companies and subsidiaries of Paramount Corporation Berhad, including those established in the future;
- (e) where applicable, third parties who provide related services or products in connection with our business such as insurance agencies/insurers, university partners, PTPTN, MOE, SOCSO, EPF, outsourced external enrichment and co-curricular programme providers, travel agencies / operators, external examination boards, and external school-contracted operators;
- (f) government agencies, statutory authorities and industry regulators;
- (g) our external auditors, consultants, accountants, lawyers or other financial or professional advisers;
- (h) student testimonial and academic results to facilitate the transfer of students to other educational institutions or for scholarship applications;
- (i) our sub-contractors or third party service or product providers as may determine to be necessary or appropriate.

Rest assured that consistent with the law, we will only disclose the minimum amount of information which we deem necessary for the purpose and that we will take all appropriate safeguards to ensure the integrity and security of the personal data.

6. Safeguards

We shall keep and process your data in a secure manner. We will take all reasonable steps to ensure that such information is kept confidential. We will not sell, rent or trade your Personal Data. We shall at all times implement the legally mandated and / or appropriate administrative and security safeguards and procedures in accordance with the applicable laws and regulations in order to prevent the unauthorised or unlawful processing of your Personal Data and the accidental loss or destruction of, or damage to, your Personal Data.

7. Data Transfer & Sharing

In addition, you will appreciate that the nature of our products and services are such that it may be necessary, where we consider it appropriate, for the purposes of data storage or processing or providing any service or product on our behalf to you, to transfer your Personal Data to our affiliates and / or associated companies and/or third party service or product providers within or outside the country in which we are established, under conditions of confidentiality and similar levels of safeguards.

8. Impact resulting from failure to supply Personal Data

- 8.1 It is obligatory for you to provide all of the categories of Personal Data which we request from you for Purpose A. Failure to supply Personal Data in relation to Purpose A will:
- (a) result in us being unable to provide you (i.e students / prospective students) with the information, notices, and / or services requested; and/or
 - (b) affect the ability of the parties to enter into the necessary agreements in relation to the provision of our services.
- 8.2 It is optional for you to provide all of the categories of Personal Data which we request from you for Purpose B. Failure to agree for us to process Personal Data in relation to Purpose B will:

- (a) result in us and /or our selected authorised third parties becoming unable to send you information by e-mail, telecommunication means (telephone calls and text messages) or via social media concerning related and unrelated services offered by us and our affiliated business partners which may include but is not limited to enrolment related events, surveys and / or special programmes / courses / events, promotional materials, brochures, emails, SMS etc. which we consider will or may interest you and /or your child or ward.

9. Your Rights of Access and Correction

9.1 You have the right to, subject to payment of the prescribed fees where applicable, request access to and/or correct your Personal Data and/or limit the processing thereof. In this respect, you may:

- (a) check whether we hold or use your Personal Data and request access to such data;
- (b) request that we correct any of your Personal Data that is inaccurate, incomplete or out-of-date;
- (c) request that your Personal Data is retained by us only as long as necessary for the fulfilment of the purposes for which it was collected;
- (d) request that we specify or explain our policies and procedures in relation to Personal Data and the categories of Personal Data processed by us;
- (e) withdraw in full or in part, your consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period.

9.2 The department to whom written requests for access to Personal Data or correction and/or deletion of Personal Data or for information regarding policies and procedures and types of Personal Data is:

Department Name:	Registry Department
Contact No:	03-6145 3888
Fax No:	03-6156 9011
Email Address:	registry@srikdu.edu.my
Address:	Sri KDU Schools No. 3, 5 & 7, Jalan Teknologi 2/1 Kota Damansara 47810 Petaling Jaya Selangor
