

TCA COLLEGE DATA PROTECTION NOTICE

This Data Protection Notice (“**Notice**”) sets out the basis which TCA College (“**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act 2012 (“**PDPA**”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

PERSONAL DATA

1. As used in this Notice:

“**customer**” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

“**personal data**” means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, NRIC, residential address, email address, telephone number(s), nationality, gender, date of birth, marital status, photograph, employment history, financial information, educational background, church background, and any other information in forms submitted to us.
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).
4. We collect service-related, diagnostic, cookie information and performance information when you use our websites. This includes information about your activity (such as how you use the website, how you interact with other users using the website, etc), log files, and diagnostic, crash and performance logs and reports.
5. Notwithstanding anything to the contrary, we may generate aggregated and statistical data derived from your use of our websites and/or from your information, including, without limitation, aggregated or anonymized data, the number of records, the number and types of transactions, configurations, and reports processed (“**Aggregated Data**”). By using the website and storing data on the website, you agree that we may have access to your data

for the purpose of generating Aggregated Data. Such Aggregated Data shall not include any personally identifiable information.

6. We own the Aggregated Data and the processed data that results from any data analysis and processing by us or our affiliates (“Processed Data”). Nothing herein shall be construed as prohibiting us from utilizing or disclosing the Aggregated Data and/or Processed Data for purposes of operating our business, provided that our use of Aggregated Data and/or Processed Data will not reveal the identity, whether directly or indirectly, of any individual. In no event shall the Aggregated Data and/or Processed Data include any personally identifiable information. As part of our website operations, we may from time to time provide product or service advertisements on the websites from us or our affiliates or partners based on the Aggregated Data and/or Processed Data collected or processed by us.
7. We may take photographs, audio recordings and video recordings for internal and external purposes, in print and digital media. We reserve the right to publicize all and any of such photos, audio or video recordings, and shall have all rights (including copyright and the right to reproduce and broadcast) to all photography, audio recordings and video recordings taken and any transcripts, and that, unless otherwise notified by you in writing, you consent to any reproduction and/or broadcast of such photography, audio recordings, video recordings and transcripts, including through any social media and other online or offline platforms, in print or digital media or otherwise, at our sole discretion without further reference or compensation to you.

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

8. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
9. We may collect and use your personal data for any or all of the following purposes:
 - (a) providing you with education services, to evaluate your suitability for a course, or to administer bursaries, scholarships and relevant financial assistance schemes;
 - (b) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - (c) providing you with accommodation services;
 - (d) providing you with counselling services;
 - (e) verifying your identity;

- (f) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- (g) managing your relationship with us;
- (h) processing payment or donations;
- (i) informing you of courses, events, promotions, news and activities;
- (j) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- (k) any other purposes for which you have provided the information;
- (l) transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes;
- (m) any other incidental business purposes related to or in connection with the above.

10. We may disclose your personal data:

- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you; or
- (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above mentioned purposes.

VIRTUAL EVENTS

11. Without prejudice to all other terms in this Privacy Policy, we may organise, manage or conduct online or virtual events, such as courses, seminars, meetings and services, via video-conferencing services (for example, Zoom). By attending such virtual events, you agree and acknowledge that:

- (a) Virtual events may be recorded at our discretion. Video recordings/screenshots captured during the virtual events may be used by us for administrative, publicity and other media production purposes and/or such other purposes as set out in this Privacy Policy and may be shared with you and/or other attendees at our sole discretion;
- (b) Virtual events may be shared with any person or broadcasted by us through any offline or online platforms, including social media platforms such as Facebook and YouTube for publicity and other media production purposes and/or such other purposes as set out in this Privacy Policy without further reference or compensation to you;
- (c) All personal data in your profile, such as your name, user name, email address, audio, images and/or profile picture, may be seen and collected by us and the other attendees at the virtual events. You should not post or add personal or sensitive data to your profile that you would not want to be shared with us or the other attendees.

WITHDRAWING YOUR CONSENT

12. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
13. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us.
14. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 12 above.
15. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

16. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
17. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
18. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

PROTECTION OF PERSONAL DATA

19. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), encryption of data, up-to-date antivirus protection, regular patching of operating system and other software, securely erase storage media in devices before disposal, web security measures against risks, usage of one time password to secure access, and security review and testing performed regularly.

20. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

21. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

RETENTION OF PERSONAL DATA

22. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

23. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

24. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

DATA PROTECTION OFFICER

25. You may contact our Data Protection Officer at admin@tca.edu.sg if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request.

EFFECT OF NOTICE AND CHANGES TO NOTICE

26. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

27. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Last update: Feb 9, 2022.