# Personal Data Protection Policy for ACE EdVenture Group

ACE EdVenture Group respects and is committed to the protection of your personal information and your privacy. This Personal Data Protection Policy provides a framework detailing how we collect and handle your personal information in accordance with the Malaysian Personal Data Protection Act 2010 [Act 709] (hereinafter referred to as the Act).

For the purpose of this notice, the word "You" or any derivation thereof, shall mean the owner of the personal data which shall include both the student and the parent/legal guardian of the student. The terms used herein shall have the meanings ascribed to them in the Act.

ACE EdVenture Group shall mean ACE Ed-Venture (M) Sdn. Bhd., ACE Ed-Venture Edu-Services Sdn. Bhd., Sirius Scholar Study Skills Sdn. Bhd., Sirius International (M) Sdn. Bhd., its affiliates, subsidiaries, associated entities, branches and offices (collectively or individually).

Kindly note that ACE EdVenture Group may amend this Personal Data Protection Policy at any time without prior notice and will notify you of any such amendment via our website or by email.

# 1. Personal Data

# 1.1 Type of Personal Data

Personal data means any information which relates to you and which was collected or provided to ACE EdVenture Group for the purposes stated in Section 2 of this policy.

Your personal data includes but is not limited to:

- Name
- Identification number (NRIC)
- Passport number
- Contact details
- Photos and images
- Nationality
- Gender
- Date of birth
- Previous qualifications
- Parents'/guardian's marital status
- Emergency contact person(s) details
- · Billing-related information
- Employment/occupation
- Previous examination results
- Academic records
- Information in audio and/or video format (including voice, video recording, closed-circuit television ("CCTV") and security recording)

Some of the personal data collected and processed may include what the Act defines as 'sensitive personal data' and these include, but are not limited to:

- Race
- Religion
- Health
- Records of misconduct and disciplinary action
- Records of criminal offence
- · Family court orders

This sensitive information shall be treated carefully by ACE EdVenture Group and shall only be used for specific purposes in accordance with the conditions stated in Section 40 of the Act. Agreement to the terms of this Personal Data Protection Policy shall be deemed to be 'explicit consent' for ACE EdVenture Group to use your 'sensitive personal data' for the purposes stated in Section 2 of this policy and to disclose your 'sensitive personal data' to the classes of third parties stated in Section 3.2 with the objective of fulfilling the purposes stated in Section 2.

Your 'sensitive personal data' shall not be used for any purpose not stated in this policy and shall not be released to a third party not stated in this policy without your further 'explicit consent' pursuant to the conditions of Section 40 of the Act.

# 1.2 Source of Personal Data

- (i) <u>Student or potential student</u>: ACE EdVenture Group collects your personal data directly from you or indirectly from your parents, guardians and/or recruitment agents when you, your parents, guardians and/or recruitment agents send us completed enquiry, application and/or registration forms via various means, including but not limited to online and physical hardcopies at public venues, seminars held at schools and/or when you, your parents/ guardians and/or your recruitment agents visit our campuses. Your personal data may also be collected from cookies through the use of our website.
- (ii) <u>Parent/guardian of our student or potential student</u>: ACE EdVenture Group collects your personal data directly from you or indirectly from your child/ward, recruitment agents when you send us completed enquiry, application and/or registration forms via various means, including but not limited to online and physical hardcopies at public venues, seminars held at schools and/or when you, your child/ward and/or your recruitment agents visit our campuses. Your personal data may also be collected from cookies through the use of our website.
- (iii) <u>Client/customer or potential client/customer for ACE EdVenture Group products, services, events, conferences, seminars and/or other marketing activities organised by ACE EdVenture Group:</u> ACE EdVenture Group collects your personal data directly from you when you express an interest to be contacted for such events and marketing activities (including business card collections via fish bowl method or during previous events organised by us). Your data may also be collected indirectly (for example, via trade/online directories) or from cookies through the use of our website.
- (iv)<u>Vendors, suppliers or service providers:</u> ACE EdVenture Group collects your personal data directly from you or indirectly from your employer or credit reference agencies when tendering for projects or as part of commercial transactions. Your personal data may also be collected from cookies through the use of our website.

# 1.3 **Provision of Information**

All information requested for in the relevant forms is obligatory to be provided by you unless stated otherwise.

Should you fail to provide the obligatory information, we may be unable to process your request and/or provide you with relevant services.

# 2. Purposes of Collecting and Further Processing (including disclosing) Your Personal Data

- (i) <u>Student or potential student</u>: Your data is collected and further processed by ACE EdVenture Group as required or permitted by law and for various academic, educational and administrative purposes, including but not limited to the following:
  - to process your application for admission;
  - to manage and respond to enquiries;
  - to maintain your personal details, academic and non-academic records;
  - to maintain a student/class register;
  - to provide relevant administrative support, counselling and guidance services;
  - to provide ancillary services such as visa application and insurance coverage throughout your tenure of studies with us;
  - to facilitate internships, placement or attachments with third parties as well as co-curricular related activities and school events;
  - to administer and communicate with you in relation to our tuition fees and other relevant payments;
  - to manage your use of our facilities such as libraries, laboratories, residences, computing facilities and so on;
  - to administer and manage school events such as graduation, alumni related events and other events;
  - to operate our campuses in a manner which is physically safe, secure and befitting of health and safety requirements;
  - to conduct internal marketing analysis and analysis of student pattern and choice;
  - to comply with ACE EdVenture Group's legal and regulatory obligations in the conduct of its business;
  - to collect information for the relevant local or international statutory authorities or exam boards;
  - to contact your next of kin in the case of emergency;
  - to contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials which we feel may interest you\*;
  - to ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device;
  - for ACE EdVenture Group's internal records management; and
  - any other purposes related to the smooth operation of ACE EdVenture Group.
- (ii) <u>Parent / guardian of our student or potential student:</u> Your personal data is collected and further processed by ACE EdVenture Group as required or permitted by law for various academic, educational and administrative purposes, including but not limited to the following:
  - to process the student's application for admission;
  - to contact you in the event of emergency or accident;
  - to inform you about the progress of the students, our tuitions fees and other relevant payments;
  - to provide ancillary services to the students such as visa application and insurance coverage;
  - to conduct internal marketing analysis and analysis of student pattern and choice;
  - to comply with ACE EdVenture Group's legal and regulatory obligations in the conduct of its business;
  - to contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials which we feel may interest you\*;
  - to ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device;
  - · for ACE EdVenture Group internal records management; and
  - any other purposes related to the smooth operation of ACE EdVenture Group.

- (iii)<u>Client/customer or potential client/customer for products, services, events, conferences, seminars</u> <u>and other marketing activities organised by us:</u> Your personal data is collected and further processed by ACE EdVenture Group as required or permitted by law for the following (but not limited to) commercial purposes:
  - to provide you with information, products or services that you request from us and any incidental purposes thereto;
  - to contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials which we feel may interest you\*;
  - to improve the products or services offered by ACE EdVenture Group;
  - to conduct internal marketing analysis and analysis of consumer pattern and choice;
  - · to notify you about changes to our products and services;
  - to ensure that the content from our website is presented in the most effective manner for you and for your computer and / or device;
  - to comply with ACE EdVenture Group's legal and regulatory obligations in the conduct of its business;
  - for ACE EdVenture Group internal records management; and
  - any other purposes related to the smooth operation of ACE EdVenture Group.
- (iv)<u>Vendors, suppliers or service providers:</u> Your personal data is collected and further processed by ACE EdVenture Group as required or permitted by law and to give effect to your requested commercial transaction, including but not limited to the following:
  - to administer and give effect to the commercial transaction;
  - to process any payments related to the commercial transaction;
  - · for internal investigations, audit or security purposes;
  - to comply with ACE EdVenture Group's legal and regulatory obligations in the conduct of its business;
  - to contact you regarding product, services, upcoming events, promotions, advertising, marketing and commercial materials which we feel may interest you\*;
  - to ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device;
  - for ACE EdVenture Group's internal records management; and
  - any other purposes related to the smooth operation of ACE EdVenture Group.

\* Where you have indicated your consent to receiving marketing or promotional updates from ACE EdVenture Group, you may opt-out from receiving such marketing or promotional material at any time. You may select the "unsubscribe" option provided in ACE EdVenture Group's email blasts / sms blasts or you may contact ACE EdVenture Group at the details provided in Section (6) below.

# 3. Disclosure and Transfers of Personal Information (within or outside of Malaysia)

# 3.1 Entities within the ACE EdVenture Group

Your personal data provided to us is processed by entities (within or outside of Malaysia) within the ACE EdVenture Group. By agreeing to this Personal Data Protection Policy you hereby give consent for your personal data and 'sensitive personal data' to be processed and used by entities within the ACE EdVenture Group within and/or outside of Malaysia.

ACE EdVenture Group shall ensure that:

- access to your personal information is restricted to staff who are contractually required to process your personal data in accordance with their respective job requirements;
- only necessary data is released to the relevant employees;
- our staff are aware of and understand our policies and procedures; and
- pursuant to Section 9 of the Act, ACE EdVenture Group has procedures in place to ensure appropriate use, disclosure and protection of your personal data, including your sensitive personal data. ACE EdVenture Group uses physical and electronic safeguards to ensure the security of data.

# 3.2 Classes of Third Parties

Your personal data may be disclosed or transferred to relevant third parties within or outside of Malaysia) as required under law, pursuant to a relevant contractual relationship (for example, where we appoint third party service providers) or for the purposes stated in Section (2) above (or directly related to those purposes).

With reference to the above, ACE EdVenture Group hereby discloses that personal data collected by us is stored under SchoolHub Management System which is hosted on Amazon Web Services (AWS) located in Singapore. By agreeing to the terms of this Policy, you hereby grant consent to ACE EdVenture Group to host your personal data in Singapore.

In the event of a potential, proposed or actual sale of business, disposal, acquisition, merger or re-organisation ("Transaction"), your personal data may be required to be disclosed or transferred to a third party as a result of the Transaction. By agreeing to the terms of this Policy, you hereby acknowledge that such disclosure and transfer may occur and permit the ACE EdVenture Group to release your personal information to the other party and its advisers/ representatives.

- (i) <u>Student or potential student:</u> Your personal data may be disclosed to the following classes of third parties:
  - The Ministry of Education, other relevant government departments/agencies, statutory authorities and industry regulators;
  - Any person to whom we are compelled or required to do so under law or in response to a competent or government agency;
  - Foreign government departments, government agencies or authorities if you are enrolled in a foreign accredited programme;
  - Malaysian Immigration Department (including its appointed agencies);
  - Foreign embassies and their appointed agencies;
  - · Your sponsors including your parents/guardians;
  - Our external counterparts providing external, twinning or other similar educational programmes;
  - Third parties providing you with attachments, placements or internships;
  - Relevant professional or statutory regulatory bodies or accreditation bodies;
  - Examination boards;
  - Law enforcement agencies;

- Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, printing companies, telecommunications companies, contractors, conference/training/event organisers, other advisers, travel agencies, recruitment agencies and insurance companies); and
- Other institutions or companies within the ACE EdVenture Group.
- (ii) <u>Parent/guardian of our student or potential student:</u> Your personal data may be disclosed to the following classes of third parties:
  - The Ministry of Education, other relevant government departments/agencies, statutory authorities and industry regulators;
  - Any person to whom we are compelled or required to do so under law or in response to a competent or government agency;
  - Foreign government departments, government agencies or authorities if you are enrolled in a foreign accredited programme;
  - Malaysian Immigration Department (including its appointed agencies);
  - Foreign embassies and their appointed agencies;
  - Our external counterparts providing external, twinning or other similar educational programmes;
  - Third parties providing your child/ward with attachments, placements or internships;
  - Relevant professional or statutory regulatory bodies or accreditation bodies;
  - Examination boards;
  - Law enforcement agencies;
  - Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, printing companies, telecommunications companies, contractors, conference/training/event organisers, other advisers, travel agencies, recruitment agencies and insurance companies); and
  - Other institutions or companies within the ACE EdVenture Group.
- (iii)<u>Client/customer or potential client/customer for products, services, events, conferences,</u> <u>seminars and other marketing activities organised by us:</u> Your personal data may be disclosed to the following classes of third parties:
  - Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, printing companies, contractors, conference/training/event organisers and other advisers);
  - · Law enforcement agencies;
  - Government departments/agencies, statutory authorities and industry regulators;
  - Any person to whom we are compelled or required to do so under law or in response to a competent or government agency; and
  - Other institutions or companies within the ACE EdVenture Group.

(iv)<u>Vendors, suppliers, tenants or service providers:</u> Your personal data may be disclosed to the following classes of third parties:

- Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, printing companies, contractors, conference/training/event organisers and other advisers);
- · Law enforcement agencies;
- · Government departments / agencies, statutory authorities and industry regulators;
- Any person to whom we are compelled or required to do so under law or in response to a competent or government agency; and
- Other institutions or companies within the ACE EdVenutre Group.

#### 4. Websites

#### 4.1 Links to Other Sites

Links to other sites are provided for your convenience and information. These sites may have their own privacy statements in place, which we recommend you review if you visit any linked websites. We are not responsible for the content on the linked sites or any use of the site

#### 4.2 Location Enabled Products or Applications

Location enabled products or applications transmit your location information to us. We do not use the information sent or provided other than to provide the service you request. Location enabled features are opt-in and you have control over your participation and can turn these services off at any time or uninstall them.

Some mobile applications will utilize Google Analytics (or similar tools) to help us better serve you through improved products, services, and revisions to the mobile applications. This collected information will not identify you to us. It may, however, let us know anonymously, which services and features you are using the most within the application, as well as device type and hardware features, country and language of download.

#### 4.3 Cookies

A cookie may be used in the processing of your information. A cookie is a text file placed into the memory of your computer and / or device by our computers. A copy of this text file is sent by your computer and / or device whenever it communicates with our server. We use cookies to identify you. We may also collect the following information during your visit to our website and/ or the fully qualified domain name from which you accessed our site, or alternatively, your IP address:

- the date and time you accessed each page on our web site;
- the URL of any webpage from which you accessed our site (the referrer); and
- the web browser that you were using and the pages you accessed.

# 5. Rights and Obligations of Data Subjects

# 5.1 Data Subject's Obligation Towards Third Parties

If you give us personal data or information about another person, you must first confirm in writing that he/she has appointed you to act for him/her, to consent to the processing of his/her personal data and to receive on his/her behalf any data protection notices.

# 5.2 Right to Access and Correction of Personal Information

You have the right to access and correct your personal information held by us (subject to the exceptions stated in Sections 32 and 36 of the Act). We shall make every endeavour to ensure your personal data is complete, accurate and up to date. If you have any reason to believe that your records with us are inaccurate, incomplete, or not updated, please notify us in a timely manner.

If you would like to request access to your personal data, or to correct the data held by us, please forward your request to Student Affairs Department of:

- (i) ACE EdVenture English Language Centre:
  - Telephone : (603) 5634 3211
  - Email : enquiry@aceedventure.com
- (ii) Pusat Tuisyen Sirius:
  - Telephone : (603) 8011 7902
  - Email : enquiry@aceedventure.com
- (iii)Sri Emas International School:
  - Telephone : (603) 7865 5787
  - Email : enquiry@sriemas.edu.my
- (iv)Dwi Emas International School:
  - Telephone : (603) 7865 5787
  - Email : enquiry@dwiemas.edu.my

# 5.3 Right to Limit the Processing of Personal Information, to Make Further Enquiries and Complaints

You have the right to prevent processing which is damaging or distressing to you or others, to prevent processing for direct marketing and to request us to stop processing and using your data. If you wish to withdraw your consent/limit the processing/use of your personal data, make a complaint in respect of your personal data and/or make further enquiries please contact Student Affairs Department of:

# (i) ACE EdVenture English Language Centre:

- Telephone : (603) 5634 3211
- Email : enquiry@aceedventure.com
- (ii) Pusat Tuisyen Sirius:
  - Telephone : (603) 8011 7902
- Email : enquiry@aceedventure.com
- (iii) Sri Emas International School:
  - Telephone : (603) 7865 5787
  - Email : enquiry@sriemas.edu.my
- (iv)Dwi Emas International School:
  - Telephone : (603) 7865 5787
  - Email : enquiry@dwiemas.edu.my

Kindly be informed that if you chose not to provide and/or fail to supply us with such personal data (and/or decide not to give us consent to process your personal data, including explicit consent for sensitive personal data), we may not be able to perform our obligations and/or provide you with the requested services.

# 6. Retention of personal data

Any personal data supplied by you shall be retained by ACE EdVenture Group as long as necessary for the continued fulfilment of the purposes set out in Section 2 of this Policy or as is required to satisfy any legal, regulatory and/or accounting requirements.

#### 7. Consent

Your submission of your personal data to us shall be deemed consent for ACE EdVenture Group to collect, process, use and store the data in accordance with the terms stipulated in this policy.

You may object or make further enquiries by contacting the relevant departments listed in Section 5.3 of this policy. Failure to raise any objection shall be taken as an act of consenting.

#### 8. Conflict

In the event of any conflict between this English language Personal Data Protection Policy and its corresponding Bahasa Malaysia Personal Data Protection Policy, the terms stated in this English language Personal Data Protection Policy shall prevail.