Data Protection
Policy

Revision History

Version	Date	Author/ Owner	Summary of Change
1.0	22-10-2015	DPO	Approved by the BoG
2.0	24-05-2021	DPO	Updated to reflect new Policy Template and other changes (see summary table) Reviewed by the Compliance Manager on 20-01-2021 Approved by the ITSC on 16-03-2021 Approved by the SDSC on 23-04-2021 Approved by the Board on 24-05-2021
3.0	06-02-2023	DPO (Mike Kewelar)	Complete overhaul of existing policy as per consultations recommendation No changes from the SMT Approved by the SDSC on 18-01-2023 Approved by the Board on 06-02-2023
4.0	28-05-2025	DPO (Mike Kewelar)	Review Cycle • (3.4) Addition Implications of Opting Out • (3.9) Addition Purpose of Student Media Collection and Use • (3.14) Addition Platforms and Media Distribution

			Approved by the SMT on 2025-03-11 Approved by the SDSC on 21-05-2025 Approved by the Board on 28-05-2025

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1. Introduction / Purpose

This Data Protection Policy sets out the basis for how German European School Singapore ("**GESS**") may collect, use, disclose or otherwise process personal data of parents, children, alumni, staff, former staff, and members of the public in accordance with the Singapore Personal Data Protection Act ("**PDPA**"). This Policy applies to personal data in the school's possession or under GESS' control, including personal data in possession of organizations which the school has engaged in collecting, using, disclosing, or processing personal data for school purposes.

Depending on the nature of the data subject's interaction with the school, some examples of personal data that GESS may collect include name, address, email, telephone number, nationality, gender, date of birth, photo/video, employment information, financial information, national ID card, CCTV data, photos and videos, student records, qualifications, references, health information, safeguarding and welfare data.

Other terms used in this Policy shall have meanings in the PDPA (where the context permits).

2. Scope / Applicability

This policy covers all personal data collected, processed, and disclosed by GESS, on any GESS-owned or personal device, by any person with access to personal data. This policy binds all employees, affiliated consultants, contractors, and evaluation teams.

3. Policy

3.1 COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

GESS generally do not collect personal data unless

(a) it is provided voluntarily by the parent or staff member directly or via a third party who has been duly authorized to disclose the personal data to GESS ("authorized representative") after

  (i) the parent or staff member (or authorized representative) have been notified of the purposes for which the data is collected, and
  (ii) parent or staff member (or authorized representative) have provided written consent to the collection and usage of 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. The school shall seek consent before collecting any additional personal data and before using personal data for a purpose that has not been notified to the parent or staff member (except where permitted or authorized by law).

GESS may collect and use personal data for any or all of the following purposes:

- performing obligations in the course of or in connection with the provision of educational services contracted between the parent and the school;
- verifying the identity;
- responding to, handling, and processing queries, requests, applications, complaints, and feedback from the parent;
- managing the parent or staff member relationship with the school;
- processing payment or credit transactions;
- complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental or regulatory authority;
- any other purposes for which the parent have provided the information;
- transmitting to any unaffiliated third parties, including third-party service providers and agents, and relevant governmental or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes;
- management and recruitment of staff and performing operational human resourcing
- manage information after the parent has subscribed to the GESS magazine.
- any other incidental business purposes related to or in connection with the above.

GESS may disclose personal data:

- Such disclosure is required for performing obligations in the course of or in connection with the provision of the goods and services requested by the parent.
- To third-party service providers, agents, and other organizations, GESS has engaged to perform any of the functions regarding the purposes mentioned above.
- To meet legal obligations or disclosure requirements from public authorities.
- To enable health care and medical services to be provisioned.
- To ensure child safety and child protection/safeguarding.

The purposes listed in the above clauses may continue to apply even in situations where the parents or staff relationship with GESS (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable the school to enforce the rights under a contract).

3.2 RELIANCE ON THE LEGITIMATE INTERESTS EXCEPTION

In compliance with the PDPA, GESS may collect, use or disclose personal data without the parent and staff consent for the legitimate interests of GESS or another person. In relying on the legitimate interests exception of the PDPA, GESS will assess the likely

adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.

In line with the legitimate interests' exception, GESS will collect, use or disclose personal data for the following purposes:

- Fraud detection and prevention.
- Detection and prevention of misuse of services.
- Network analysis to prevent fraud and financial crime and perform credit analysis.
- Collection and use of personal data on school-issued devices and technology equipment to prevent data loss.
- Security and security of the school's facilities and assets.

The purposes listed in the above clause may continue to apply even in situations where the parent or staff relationship with GESS (for example, pursuant to a contract) has been terminated or altered in any way for a reasonable period thereafter.

3.3 DEEMED CONSENT BY NOTIFICATION

GESS may collect or use personal data or disclose existing personal data for secondary purposes that differ from the primary purpose it initially collected pursuant to clauses 5 and 6. Suppose GESS intends to rely on deemed consent by notification for such secondary purposes. In that case, GESS will notify the parent or staff member of the proposed collection, use, or disclosure of his personal data through appropriate mode(s) of communication.

In particular, GESS may rely on deemed consent by notification to collect, use or disclose personal data for the following purposes:

- Employment applications submitted online (when applications are submitted);
- Student Admissions Applications (the admissions process before acceptance);
- Events on campus.

Before relying on deemed consent by notification, GESS will assess and determine that the collection, use, and disclosure of the personal data will not likely have an adverse effect on the parent or staff member.

The parent or staff member will be given a reasonable period to inform GESS if they wish to opt out of collecting, using, and disclosing personal data for such purposes.

After the lapse of the opt-out period, the parent or staff member may notify GESS that they no longer wish to consent to the purposes for which the consent was deemed by notification by withdrawing consent for the collection, use, or disclosure of personal data concerning those purposes.

3.4 WITHDRAWING THE CONSENT

GESS may use limited personal data (such as contact details) relating to students, parents, and others who have consented to receive communications for fundraising, marketing, or promotional purposes. Photographs and videos on social media and Internet-facing will be used only with consent.

- The consent provided for collecting, using, and disclosing personal data will remain valid until it is withdrawn in writing. The parent or staff member may withdraw consent and request GESS to stop collecting, using, or disclosing personal data for any or all of the purposes listed above by submitting a request in writing or via email to our Data Protection Officer at the contact details provided below.

- Upon receipt of the written request to withdraw the consent, the school may require reasonable time (depending on the complexity of the request and its impact on the relationship with GESS) for the request to be processed and for GESS to notify the parent or staff member of the consequences of GESS acceding to the same, including any legal matters which may affect the rights and liabilities to the school. Opt-out requests will be processed within 30 business days.

- While GESS respects such a decision to withdraw the consent, however depending on the nature and scope of the request, GESS may not be in a position to continue providing our goods or services, and the school shall, in such circumstances, notify the parent or staff member before completing the processing of the request. Any request shall be made in writing to dpo@gess.edu.sg.

- Withdrawing consent does not affect the right to collect, use, and disclose personal data. Under applicable laws, such collection, use, and disclosure without consent are permitted or required.

3.5 ACCURACY OF PERSONAL DATA

GESS generally relies on personal data provided by the parent or staff member (or authorized representative). To ensure that the personal data is current, complete, and accurate, the parent or staff member has to update GESS if there are changes to the personal data.

3.6 ACCESS TO AND CORRECTION OF PERSONAL DATA

If a parent or staff member wishes to make

a) an access request for access to a copy of the personal data that GESS hold about the parent or staff member or information about how GESS uses or disclose the personal data, or
b) a correction request to correct or update any of the personal data that the school holds about the parent or staff member must be submitted via request in writing or via email to our Data Protection Officer at the contact details provided below.

A reasonable fee may be charged for an access request. If so, GESS will inform the requester of the fee before processing the request.

GESS will respond to the request as soon as reasonably possible. In general, the response will be within thirty days. However, should GESS not be able to respond to the request within thirty days after receiving the request, the school will inform the requester in writing within thirty days of the time by which GESS will be able to respond to the request. For example, suppose the school cannot provide the requester with any personal data or make a correction requested by the requester. In that case, GESS shall generally inform the requester of the reasons why GESS is unable to do so (except where GESS is not required to do so under the PDPA).

3.7 PROTECTION OF PERSONAL DATA

To protect the personal data from unauthorized access, collection, use, disclosure, copying, modification, disposal, or similar risks, the school has introduced appropriate administrative, physical, and technical measures such as:

- industry-standard firewall and other network security features
- clear guidelines for staff on the computer and network security expectations placed
- robust data backup and recovery processes
- periodic external security audits of online systems
- minimized collection of personal data,
- authentication and access controls
- encryption of data
- data anonymization
- up-to-date antivirus protection
- regular patching of operating system and other software
- web security measures against risks, and
- security review and testing performed regularly

The parent or staff member should be aware that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, GESS strives to protect the security of the information and is constantly reviewing and enhancing the information security measures.

3.8 RETENTION OF PERSONAL DATA

GESS may retain personal data for as long as it is necessary to fulfill the purpose for which it was collected or as required or permitted by applicable laws.

GESS will cease to retain personal data or remove how the data can be associated with the parent or staff member 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.

3.9 TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

GESS may transfer personal data overseas while ensuring a comparable standard of protection to PDPA. This is achieved through:

- Binding contractual agreements with third parties.
- Ensuring the recipient country has comparable data protection laws.
- Conducting regular compliance audits.

3.10 DATA BREACH MANAGEMENT

In the event of a data breach, GESS will:

1. Contain and mitigate the breach by disabling affected systems.
2. Notify affected individuals and the PDPC within 72 hours if the breach is likely to cause harm.
3. Provide guidance to affected individuals on protective measures.
4. Conduct a root cause analysis to prevent recurrence.

Staff must report breaches immediately to the DPO.

3.11 STAFF TRAINING AND AWARENESS

- Mandatory annual training.
- Regular updates on changes to PDPA and internal policies.
- Assessments to ensure understanding of data protection responsibilities.

Training records will be maintained by the DPO.

3.12 DATA PROTECTION OFFICER

For any inquiries or feedback on GESS's personal data protection policy and procedures, or for any request, please contact GESS's Data Protection Officer (DPO) in the following manner:

Contact No. : +65 6469 1131
Email Address : dpo@gess.edu.sg
Address : 2 Dairy Farm Lane, Singapore 677621

4. Media & Consent Block

4.1 Purpose of Student Media Collection and Use

Student media may be collected and used for the following purposes:

Educational and Internal Use

- Documenting student progress, learning activities, and school events
- Creating classroom projects, yearbooks, and school archives
- Enhancing teaching, training, and professional development materials

School Communications and Publications

- Sharing updates via newsletters, bulletins, and official school communications
- Publishing on the school's website, learning platforms, and parent portals
- Displaying achievements in school exhibitions, award ceremonies, and internal reports

Marketing, Promotions, and External Representation

- Featuring in digital and print marketing materials, including brochures, banners, and advertisements
- Showcasing school life on official social media accounts, the website, and promotional videos
- Participating in external media coverage (e.g., school partnerships, press releases)

Event Documentation and Live Coverage

- Capturing student participation in school events, performances, and extracurricular activities
- Recording school-led activities that may be broadcast live (e.g., graduation ceremonies, sports events)

4.2 Platforms and Media Distribution

Student media may appear on the following official platforms and distribution channels:

- School Website & Parent Portal
- Official School Social Media Channels (Facebook, Instagram, LinkedIn, YouTube, etc.)
- Printed and Digital Marketing Materials (brochures, posters, banners, advertisements)
- School Newsletters, Magazines, and Yearbooks
- Event Live Streaming and Video Recordings

Where appropriate, students' full names will generally not be published alongside their images unless necessary for a specific feature (e.g., award recognitions or academic honors).

4.3 Third-Party Sharing & Media Handling

All third-party vendors handling student media are contractually required to comply with PDPA regulations and GESS's Data Protection Policy.

- Authorized third-party vendors (e.g., photographers, video editors, printing companies) may process student media strictly for school-approved purposes.
- Student media is securely stored, with restricted access for authorized personnel only, and retained for its intended purpose, which aligns with data minimization principles.
- Student media will never be sold, transferred, or used for commercial purposes outside the school's intended scope.

4.4 Implications of Opting Out

- Students with media restrictions may not be featured in school communications, marketing, or external publications.
- Opting out may affect participation in activities where photography or videography are integral (e.g., performances, competitions, team sports), as event documentation often includes group recordings where individual exclusion may not be possible.

5. Definitions

Personal Data refers to any data, whether true or not, about an individual who can be identified

(i) from that data; or
(ii) from that data and other information which GESS has or is likely to have access and all other data deemed protected under the PDPA.

"**parents**" include legal guardians or other legal representatives with parental authority.

"**staff**" includes contractors and other personnel employed by the school.

6. Policy authority

Policy Owner:	Data Protection Officer
Implementation Body:	Data Protection Officer
Governing school Sub-Committee:	School Development Subcommittee
Next required review date:	June 2027
Final Approver:	Board of Governors

7. Related policies/references/processes

Personal Data Protection Act - 2012 (PDPA)
Appendix A – Contracts with third parties

8. Policy Compliance

Compliance Measurement

Compliance / Audit will verify compliance to this policy through various methods, including but not limited to business tool reports, internal and external audits, and feedback to the policy owner.

Non-Compliance

Any employee in violation of this policy will be subject to appropriate disciplinary action, in accordance with GESS Disciplinary Policy, up to and including termination and notifying the appropriate law enforcement authorities.