

Privacy Policy

(updated on 18 Dec 2019)

This is the Privacy Policy of Zhicheng Private School Pte Ltd (ZPS). ZPS collects, uses and discloses your personal data in order to provide you with an efficient and quality education experience. The collection, use and disclosure of your personal data enables ZPS to provide services and courses that are most likely to meet your needs and requirements. This Privacy Policy outlines ZPS's policy and responsibility in relation to the collection, use and disclosure of your personal data.

By continuing to study in ZPS, you signify that you have read, understood and agree to be bound by this Privacy Policy as amended from time to time in respect of ZPS's collection, use and disclosure of your personal data.

1. Types of personal data

The types of personal data that ZPS collects depend on the circumstances of collection and on the nature of the service requested or transaction undertaken.

These include but are not limited to -

- (i) personal information that links back to an individual e.g., name, gender, date of birth, photo, passport or other personal identification numbers;
- (ii) contact information e.g., address, phone number, email address, QQ and wechat accounts;
- (iii) financial information e.g., bank information, cheque number, payment date and bankers guarantee information;
- (iv) education history information e.g., schools attended, period of attendance and academic records;
- (v) family information e.g., parents names, their date of birth, passport numbers and marital status; siblings names, their date of birth and passport numbers;
- (vi) family financial status information e.g., parents employment status, declared bank deposits and declared income;
- (vii) medical information e.g., medical checkup reports, medical certificates and medical history;
- (viii) videographic and photographic information e.g., CCTV recordings, photographs;

The provision of the above data is obligatory in order for ZPS to carry out its services to you.

The failure to supply such data may result in (i) ZPS being unable to provide you or your parent/guardian with the services and/or courses requested; (ii) ZPS being unable to update you or your parent/guardian on your progress and performance in the courses; and/or (iii) ZPS being unable to apply for a student pass on your behalf.

2. Purposes for Collection, Use and Disclosure

Generally, ZPS collects your personal data either directly from you or your parents or from your authorised representatives (i.e. persons whom you have authorised such as your guardian), from third parties (e.g., your recruitment agent or our partners), or from publicly available sources, through our website, mobile services, and other channels, in order to fulfil the following purposes, which include but are not limited to:

Providing services to you such as determining your eligibility and suitability to enrol in our course; providing precourse counselling to you and/or your parents or guardians; carrying out course selection and admission procedures; delivering a course to you; providing student support services which include but are not limited to, applying and collecting a student pass, providing fee protection, and providing medical insurance to you; conducting student satisfaction surveys; and ensuring safety, security and legal compliance.

ZPS may also use and disclose your personal data with and to third parties in order to fulfil the purposes listed above. This may include but are not limited to, our recruitment agents, our business partners such as Zhicheng Enrichment Centre, your guardian, and government agencies such as the Ministry of Education, Committee for Private Education, and Immigration and Checkpoints Authority.

ZPS shall use its best endeavours to ensure that its employees, officers, agents, consultants, contractors and such other third parties mentioned above who are involved in the collection, use and disclosure of your personal data will observe and adhere to the terms of this Privacy Policy.

ZPS may disclose your personal data to law enforcement agencies and government for security, compliance, tax and immigration purposes. Please be informed that the initial recipients of such information may share your personal data with other government agencies or enforcement authorities.

In addition, ZPS may disclose your personal data to our legal advisors for establishing, exercising or defending our legal rights, to our other professional advisors, or as otherwise authorised or required by law. ZPS also reserves the right to share your personal data as is necessary to prevent a threat to the life, health or security of an individual or corporate entities such as ZPS. Further, ZPS may disclose your personal data, as is necessary, to investigate suspected unlawful activities.

3. Transfer of information overseas

The head office of ZPS is based in Singapore. Your personal data in its electronic form may be transmitted to data storage facilities where ZPS keeps its records. Your personal data may be transferred to its appointed agents in Singapore or other countries in connection with ZPS's performance of the student contract with you.

4. Consent

Generally, in the course of ZPS' performance of the contract with you, your personal data will, by nature of the task, be provided by you or your parent, guardian or recruitment agent to ZPS. In such instances, consent will necessarily be implied from you or your parent that you are agreeable to providing personal data in order for ZPS to provide the requested or necessary service to you. However, where required by law, ZPS will adopt an 'opt-in' policy for obtaining customer consent, in which event, express written consent will be sought from you when collecting your Customer Data e.g., signing a form or checking a box.

Where your parent or guardian or recruitment agent makes an application for a course on your behalf, you undertake and will ensure that the individual whose personal data is supplied to ZPS has authorized the disclosure, is informed of and consents to the terms and conditions of this Privacy Policy.

You may submit a request to withdraw your consent at any time by contacting ZPS.

Statistical data e.g. aggregated and compiled survey responses, is not linked to a customer record and ZPS does not need to seek consent for the collection, use or disclosure of Statistical Data.

5. Access

ZPS will, upon your written request, allow you to view your stored personal data. Where permitted by law, ZPS reserves the right to charge a reasonable administrative fee for this service. In exceptional circumstances, ZPS reserves the right to deny you access to your personal data and may provide an explanation as required by applicable laws.

Exceptional circumstances include where:

An investigating authority or government institution objects to ZPS complying with a customer's request. The information may, in the exercise of ZPS' reasonable discretion and/or assessment, affect the life or security of an individual, and data is collected in connection with an investigation of a breach of contract, suspicion of fraudulent activities or contravention of law.

6. Retention

ZPS will retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, the legal or business purposes of ZPS, or as required by relevant laws. Removal of personal data is accomplished when the data cannot be associated with particular individuals. Data removal may be made through non-specialised technology commonly available, eg. paper shredder or Google Suite tools. Physical records may be removed by shredding, mixing up the shredded pieces, and disposing of them. Electronic data may be removed through the "Move to Trash" and "Empty Trash" functions of the software.

7. Accuracy

ZPS needs your assistance to ensure that your personal data is current, complete and accurate. As such, please inform ZPS of changes to your personal data by contacting ZPS and submitting your updated particulars to ZPS in writing. ZPS may also request personal data updates from you from time to time.

8. Security safeguards

ZPS takes the security and protection of your Customer Data very seriously. As such, ZPS makes reasonable security arrangements to protect your Customer Data against loss or theft as well as unauthorised access and undue disclosure.

As an example of a procedural safeguard, your data can only be accessed through an account protected by a password. Your physical records are also kept under lock and key in a place where access is controlled and restricted.

9. Updates to the privacy policy

ZPS will amend this Privacy Policy from time to time and the updated versions will be posted on ZPS' website and date stamped so that you are aware of when the Privacy Policy was last updated. Subject to applicable laws, the English version of this Privacy Policy will prevail over any version of this Privacy Policy in another language. In the event of any inconsistency in interpretation between the English version and any translation of the Privacy Policy, this Privacy Policy statement in English will prevail.

10. Contact us

If you have comments, questions or complaints about or requests relating to this Privacy Policy statement, please contact ZPS in writing at the address below referencing 'Privacy Policy':

The Director
Zhicheng Private School
865 Mountbatten Road
#07-03
Singapore 437844

Or email school@zhicheng.edu.sg referencing: Privacy Policy.