# **Privacy Policy**

This privacy notice explains what information HIS International School (HIS) (Wholly owned by Harvest Education Group) collects, how we use it and how we protect any information provided to us, by our website users and through any forms submitted to us. HIS is committed to preserving your privacy. Please read the following privacy notice to understand how we use and protect the information obtained from those visiting and using the HIS website **www.hisschools.edu.my**, its associated platforms and subsites, and through any forms submitted to us. This notice is your guide to how we will handle information we learn about you from your visit to our website and through any forms submitted to us and you can be assured that any information we have obtained from you will only be used in accordance with this privacy notice. By using the website and submitting of any forms, you consent to the collection/retention and use of your personal information in accordance with this notice.

### 1. Introduction

HIS is committed to the protection of your Personal Data and takes the matter of protecting your privacy as a high priority matter. These statements outlined hereunder explains the general terms on how we protect the privacy of your Personal Data under the Personal Data Protection Act 2010 ("PDPA") and all regulations and schedules made thereunder by the Commissioner for Data Protection.

## 2. What Personal Data We Collect

The types of Personal Data that we collect directly from you or from third parties may include (but not limited to) your name, address, educational details, credit/debit card number and expiry date, billing address, telephone numbers and health issues relevant to your child (children). We may collect such other relevant information that could be required by us or such other Third Parties in order to facilitate the nature of our business and to be sent to Examiners for purposes of conducting Examinations and Tests, for third party payments, enrolments, and such. The information that we collect from you is strictly on a voluntary basis.

## 3. How Personal Data Is Collected

This Privacy Notice covers any Personal Data provided to us:

- Under any other contractual agreement or arrangement; and/or
- Via a third party

- Provided by you
- When payments are made via Debit or Credit Card or Online Banking/Payment Services

## 4. Other Methods of Personal Data Collection (but is not limited to):

- Via telephone, letter, email
- When you visit our School
- When you visit our website
- When you contact us in person
- When we contact you in person; or
- When we collect information about you from third parties
- When payment is made via debit or credit card
- When payment is made by online banking/payment services

### 5. How Personal Data Is Collected From Our Website

### **IP Address**

We use your IP address to help diagnose problems with our server, and to administer our website. Your IP address is used to help identify you and your information and to gather broad demographic information. We may use cookies for purposes of tracking your preferences. Cookies are small amounts of information that we transfer to your computer's hard drive through your web browser. They tell us when you have visited our site and where you have been. They do not identify you personally, just the presence of your browser. Cookies make it easier for you to log on and use the site during future visits. They also enable us to provide you with a more personalised service. By clicking on our website, you have agreed to our terms and conditions as stated in our privacy notice.

### **User enquiry Form and other Forms**

Our enquiry form and other forms requires you to give us contact information (e.g. your name and email address) so that we can respond to your comments. We may use your contact information from the form to send you information about our company. Your contact

information is also used to contact you when necessary. Demographic and profile data are also collected at our site. We use your Personal Data to tailor your experience at our site by showing you content that we think you may be interested in according to your preferences.

### Information on Cookies

A cookie is an element of data that a website can send to your browser, which may then store it on your system. We use cookies in some of our pages to store your preferences and record session information. The information that we collect is then used to ensure a more personalised service level for our users. You can adjust settings on your browser so that you will be notified when you receive a cookie. Please refer to your browser documentation to check if cookies have been enabled on your computer or to request not to receive cookies. In the event we do not receive any such notification that that you do not wish to receive cookies from us, then it shall be deemed that you have consented and agreed to accept such informational cookies.

# 6. Usage of Personal Data

We may use your Personal Data for the following purposes ("Purpose"):

- To send you promotions and information on educational activities
- To facilitate your participation in any loyalty programs
- To protect the safety and well-being of yourself and/or other customers
- To investigate and respond to claims from you; or
- To comply with any legal or regulatory requirements
- To be sent to examiners or such Bodies for the purposes of conducting examinations
- For the purposes of conducting surveys or collecting opinions from you pertaining to our current service or for any future products or services that we may offer in due course
- For future marketing and promotional activities
- For processing of applications
- For collection of student and parent information to be use in accordance to the processes of the school

## Accessing / Limiting / Correcting / Updating Your Personal Data

You may request to obtain information of your Personal Data, limit the processing of your Personal Data and also update or make amendments to your Personal Data as below:

You may forward your request to admin@hisschools.edu.my. We will endeavour to respond to you as soon as possible. We also reserve the right to validate all requests in order to authenticate the said request prior to updating or making amendments as requested.

In regards to the submission of a request, you will be required to provide such proof that you are the data subject in question. As such we shall be at liberty to request any verifying and identifying information and/or records to prove your identity before any such access to amend or alter or change personal data is allowed.

We reserve the right to deny you access to such personal data in our records should there be any suspicion or inconsistency in regards to the information provided by you. Any such application shall be made directly by you on a personal basis. In these circumstances, no third parties are allowed to seek access to your personal data within our database. Therefore, your Privacy and Personal Data are kept secure. In the absence of any such verification provided by you, we shall disregard such requests made.

## Withdrawing Consent

Please note that it is obligatory for us to process your Personal Data, without which we will not be able to make educational arrangements for you and keep you updated about our future, new and/or enhanced services and products. Nonetheless, you may stop receiving promotional activities by:

- unsubscribing from the mailing list
- editing the relevant account settings to unsubscribe; or
- sending a request to admin@hisschools.edu.my
- sending a formal written notice to our headquarters at: Block E, No. 1, Jalan SS 15/8, 47700 Subang Jaya, Selangor, Malaysia

#### 7. Personal Data Disclosure

We will not trade or sell your Personal Data to third parties. Your Personal Data shall only be disclosed or transferred to the following third parties who may be located within or outside Malaysia for the following purposes:

- Other HIS affiliates and subsidiaries where necessary to facilitate your educational needs
- Credit card verification providers, data warehouse and other third parties in order to process your commercial transactions
- Legal bodies as permitted or required by law such as in compliance with a warrant or subpoena issued by a court of competent jurisdiction
- The Government of Malaysia
- The Ministry of Education and such affiliated Bodies
- The University of Cambridge
- Such other Higher Institute of Education whose role is necessary for the conduct of examinations

### 8. Personal Data Retention Period

The personal data collected will be retained as long as it is necessary to fulfil our role in providing all the assistance that may be required in providing optimum results or experience for the student. The relevant Personal Data may be retained subject to the conditions below:

- As and when required by law; or
- Where legal actions have arisen and are pending
- For the duration and subsistence of any contract with us so as to provide the service to you

HIS shall take all reasonable steps to ensure that all Personal Data is destroyed or permanently deleted when no longer required. You are at liberty to write in to us, upon expiry of your contractual obligations with us, to request that we remove your personal data from our database. Such request can be made via email to admin@hisschools.edu.my. Likewise you may also send us formal written notice to our headquarters at:-

Block E, No. 1, Jalan SS 15/8, 47700 Subang Jaya, Selangor, Malaysia

### 9. Notification of Changes of the Privacy Notice

Please note that this Privacy Notice may be amended from time to time in accordance to applicable laws and regulations and such variations may be applicable to you. The latest version of this Privacy Notice will be made available to all persons when visiting the website www.hisschools.edu.my.

It shall be your responsibility to check and read our Privacy Notice and any subsequent changes, additions or alterations that we may made to the said Notice from time to time. We shall not be responsible nor held accountable for any such omission on your part for not reading nor updating yourself in regards to the terms and conditions of our Privacy Notice.

#### 10. Contact Information

For any queries, concerns or complaints in relation to our handling of your Personal Data or HIS's Personal Data Protection policies, please contact us at **admin@hisschools.edu.my**. We shall do our best to respond to you within the shortest possible waiting period. However, we reserve the right to also seek legal advice before responding to any complaint. We also reserve the right and prerogative as to whether to take action upon our staff or make any such changes to our Privacy Notice should we feel that any complaint lodged is unfair, illogical or unreasonable.

### 11. Information Collected

Information we may collect includes personal details and information relevant to customer surveys and/or offers. This information is mainly used to serve you better by improving our products, services and website, and sending out promotional information regarding new products, offers and other information which may be of value to you. We may also use your information to contact you by email, phone, fax or mail, for market research purposes. The information is also used for internal record keeping.

Your personal information is kept private and stored securely until a time it is no longer required or has no use. It is not passed on to any third parties unless we have your permission or are required to do so by law. Every effort has been made to ensure a safe and secure form to the email submission process but we do advise users that when using such form to email processes that they do so at their own risk.

For the purposes of data collection, it refers to any such information collected from you in regards to your children, whether in regards to making an enquiry for our courses or for the purposes of registration for our courses or examination with us. By submitting your children's personal data and their information, it is deemed that you, as the legal guardian have duly submitted their personal data and hereby consent to the terms of conditions of our Privacy Notice.

Sensitive Personal Data may be collected from you upon registration. Sensitive Personal Data means any personal data consisting of the physical or mental health or condition, political opinions, religious beliefs or other beliefs of a similar nature, the commission or alleged commission of an offence or any such other Personal Data described under the law as sensitive personal data.

If in the event Sensitive Personal Data is submitted, it will be deemed submitted on your own volition and with your consent. As such we, as a responsible Data Collector shall treat such data as confidential and such sensitive personal data shall be subject the terms and conditions of the privacy policy including as to processing, usage and disclosure thereof.

## 12. Incorrect / Incomplete Information

If you believe that any information we are holding on you is incorrect or incomplete, please email us as soon as possible to **admin@hisschools.edu.my**. We shall be at liberty to seek verification from you before making any such changes or alterations to the personal data that you wish to change, amend, or alter.