

# Singapore Institute of Management

## Personal Data Protection Policy

### 1. The SIM Group (SIM)

- 1.1 Members of The SIM Group comprise Singapore Institute of Management (SIM Professional Development and SIM Membership), Singapore Institute of Management Pte. Ltd. (SIM Global Education or SIM GE) and SIM University (UniSIM) collectively and/or individually referred to as "SIM".

### 2. Notification

- 2.1 In the course of your dealings with SIM, SIM may be required to collect, use and/or disclose personal data about you. This may arise when you register, participate or attend as a member, student or participant of a course, seminar or workshop, or in the course of SIM's provision of services to you.

- 2.1 Personal data means data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which an organisation has or is likely to have access. Personal data may include personal information such as (but are not limited to) name, NRIC or passport number, age, credit card number, residential address, mobile or residential telephone number, personal email address, photograph(s) or video image(s) of an individual.

- 2.3 In view of the regime of the Personal Data Protection Act (PDPA) 2012 coming into effect on 2 July 2014, SIM is seeking your acknowledgement of and agreement to the terms and conditions in relation to collection, use and disclosure of personal data, as set out in this Policy. To find out more about PDPA, you may visit the [Singapore Personal Data Protection Commission's website](#) and the [Frequently Asked Questions \(FAQs\)](#).

### 3. Purpose Limitation

- 3.1 The amount and the type of personal data collected from you:-
- will be limited to that which is necessary to fulfil the purposes identified;
  - will be used, handled and processed by SIM reasonably, fairly and lawfully; and
  - will be retained for such period to fulfil the purposes identified or as is necessary for legal or business purposes.

### 4. Purpose

- 4.1 Your personal data may be collected, used or disclosed by or on behalf of SIM for the following purposes in connection with the processing of your queries in respect of events, programme briefings, programmes, membership and/or services provided by SIM:
- to process and/or attend to your query relating to educational services, professional development, corporate training services, programmes offered by SIM and/or other related or ancillary services provided by SIM; to respond to your query and provide you with the relevant information relating to educational services, professional

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development, corporate training services, programmes offered by SIM and/or other related or ancillary services provided by SIM;

- b. to provide you with relevant information relating to the subject matter and/or areas of interests indicated in your query;
  - c. to send you SIM's marketing surveys, feedback and evaluation forms in connection with your SIM experience.
- 4.2 During the course of your participation or attendance at events, functions or programme organised or held by SIM, photograph(s) or video image(s) of you may be taken or recorded for news and publicity purposes relating to the legitimate interests of SIM. By participating in or attending the same, you agree for SIM to collect, use, reproduce, publish, adapt, apply or otherwise deal with the same in any medium and format (whether in their present, adapted or modified form) for the said purposes.
- 4.3 SIM may receive and record information on our servers from your browser (including but not limited to your IP address, cookie information) when you browse or search on SIM websites. Although browser sessions may be tracked, individual users will remain anonymous.

### 5. Protection and Security

- 5.1 SIM respects and understands the importance of protection of your personal data. SIM deploys appropriate security arrangements and technological measures to safeguard and protect your personal data.

### 6. Access, Update and Correction of Personal Data

- 6.1 You have the right to request access to, update and/or correct any personal data provided by you and/or held by SIM.
- 6.2 If you wish to access, update and/or correct your personal data, you will have to follow the procedures listed.

6.2.1 Your request to access, update and/or correct your personal data must be sent to SIM via:

a. Email

- i. To facilitate processing, the subject header of the email should be entitled 'Request to Access / Update / Correct Personal Data – PDP'.
- ii. Your Name (as it appears on your NRIC / Passport) and your NRIC / FIN / Passport Number must be provided.
- iii. Send the email to [infomgmt@sim.edu.sg](mailto:infomgmt@sim.edu.sg)

b. Post

- i. To facilitate processing, the subject header of the email should be entitled 'Request to Access / Update / Correct Personal Data – PDP'.
- ii. In your letter, your Name (as it appears on your NRIC / Passport) and your NRIC / FIN / Passport Number must be accurately and legibly provided.
- iii. Post the completed letter to SIM at the following address:

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SIM Management House  
41 Namly Avenue  
Singapore 267616  
Attention: Mr Lee Wee Leong – PDPA  
Deputy Data Protection Officer

- 6.3 Upon the receipt of your request to access / update / correct your personal data, SIM will inform you of the receipt of request within 7 working days from the date of receipt of your request. At the same time, SIM will seek to verify your identity, the image on which you are identifiable and inform you of the administrative follow-up (if any). SIM will make the appropriate correction as soon as reasonably practicable, unless it is satisfied on reasonable grounds that the correction should not be made. For the request to access of image(s), SIM will contact you to facilitate the explicit indication of the specific image(s) within 7 working days from the date of receipt of your request.
- 6.4 Upon your written confirmation (may be via email) of the image(s) of which access is requested, SIM will process the request and provide you access to the image(s) within 21 working days from the date of receipt of your written confirmation. A reasonable fee may be imposed for the provision of a copy of the image(s).

### 7. Withdrawal of Consent to the Collection, Use and / or Disclosure of Personal Data

- 7.1 Individuals who wish to withdraw the consent given to SIM for the collection, use and / or disclosure of personal data will have to follow the procedures listed.

7.1.1 You have to notify SIM of your intention to withdraw your consent.

7.1.2 Your notification of withdrawal of consent must be sent to SIM via:

b. Email

- iv. To facilitate processing, the subject header of the email should be entitled 'Notice of Withdrawal of Consent – PDP'.
- v. Your Name (as it appears on your NRIC / Passport) and your NRIC / FIN / Passport Number must be provided.
- vi. Send the email to [infomgmt@sim.edu.sg](mailto:infomgmt@sim.edu.sg)

b. Post

- iv. To facilitate processing, the subject header of the email should be entitled 'Notice of Withdrawal of Consent – PDP'.
- v. In your letter, your Name (as it appears on your NRIC / Passport) and your NRIC / FIN / Passport Number must be accurately and legibly provided.
- vi. Post the completed letter to SIM at the following address:

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SIM Management House  
41 Namly Avenue  
Singapore 267616  
Attention: Mr Lee Wee Leong – PDPA

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Deputy Data Protection Officer

- 7.2 Upon the receipt of your notice of withdrawal of consent, SIM will inform you of the consequences of your withdrawal of consent within 7 working days from the date of receipt of your notice. At the same time, SIM will seek your confirmation of your withdrawal of consent and inform you of the administrative follow-up (if any). For the withdrawal of consent on image(s), SIM will contact you to facilitate the explicit indication of the specific image(s) within 7 working days from the date of receipt of your notice.
- 7.3 Upon your written confirmation (may be via email) of withdrawal of consent, SIM will cease (and inform its data intermediaries, if applicable, to cease) to collect, use or disclose your personal data within 21 working days from the date of receipt of your written confirmation. In the case of image(s), SIM will cease (and inform its data intermediaries, if applicable, to cease) to use or disclose the specific image(s) based on the following:
- c. Hardcopy Version – after the current hardcopy prints have been exhausted.
  - d. Electronic – 21 working days from the date of the individual's confirmation.

## Updates and Variation

SIM reserves the right to update and vary this Policy from time to time as may be necessary. The updated or varied version will be posted on this webpage. Please check this page regularly for any updates or variations.

Last updated 2 Jun 2015