 <b>AVENTIS SCHOOL OF MANAGEMENT</b>		<b>PROCESS MANUAL</b>
<b>Department/Unit:</b> Management Team	<b>Process Code</b> 2.6.2	<b>Process Title</b> Confidentiality and Security of Information
<b>POLICY:</b>	All student and staff information shall be kept private and confidential	
<b>OBJECTIVES:</b>	to set the Information Management process to ensure all sensitive and private information are protected	

## **Information Management**

### **POLICY FRAMEWORK**

#### **Top Management Commitment**

The involvement and commitment of top management of every organization is essential for information management.


Management can show commitment and leadership through active participation in activities, taking corrective action as a result of incidents and provide resources to improve the process.

#### **Information Management policy**

The information management policy is a high level document that addresses key principles. The policy should focus on the usage of the information.

#### **Student Data Handling**

All student information shall be kept private and confidential. There will be three student information centers, sales & marketing, student service and academic department. Sales & Marketing department keep all student data information required for student acceptance. The Student Service department will take over the database after the first payment with completed student contract. The Academic Department will keep separate and secured student information based on the hand over data of Student Service. This information shall be only accessible by the Academic Department and Board Members (with Approval by Academic Board.) All Student information is not to be revealed with authorized approval from the student. All Student Information shall be preserved in hard and soft copy.

 <b>AVENTIS SCHOOL OF MANAGEMENT</b>		<b>PROCESS MANUAL</b>
<b>Department/Unit:</b> Management Team	<b>Process Code</b> 2.6.2	<b>Process Title</b> Confidentiality and Security of Information
<b>POLICY:</b>	All student and staff information shall be kept private and confidential	
<b>OBJECTIVES:</b>	to set the Information Management process to ensure all sensitive and private information are protected	

### Data Security

All Student Data in hardcopy shall be kept in area which is not accessible by public and kept under lock and key. All Softcopy for Sales and Student Service shall be protected with a password to the CRM System. The hardcopy of the academic and exam result shall be kept separately and the softcopy record kept by Academic Department shall be kept at Aventis FTP Server and protected with password. Aventis FTP Server is only accessible by the Academic Department and Board Members (with Approval by Academic Board.). Should any information be accessible by public, the area shall be covered by surveillance camera to detect case of information theft.

### Data Protection

In accordance to PDPA regulatory requirement, the Data Protection Officer is appointed to oversee our organisation's compliance with the PDPA which includes developing policies for handling personal data in electronic or non-electronic forms, communicating internal personal data policies to customers, and handling any queries or complaints about personal data.

### **Aventis Data Protection Policy**

Aventis respects the privacy of individuals and recognizes the importance of the personal data entrusted to us and believe that it is our responsibility to properly manage, protect, process and disclose these personal data. We are also committed to adhering to the provisions and principles of the Personal Data Protection Act 2012. As such, this Personal Data Protection Statement is to assist you in understanding how we collect, use and/or disclose your personal data.


We will collect, use and disclose your personal data in accordance with the Personal Data Protection Act 2012 ("Act"). The Act establishes a data protection law that comprises various rules governing the collection, use, disclosure and care of personal data. It recognises both the rights of individuals to protect their personal data, including rights of access and correction, and the needs of organisations to collect, use or disclose personal data for legitimate and reasonable purposes.

### **Aventis adheres to the PDPA act by protecting our stakeholders' (students and graduates) data by abiding the following obligations of the PDPA:**

Aventis will in its best effort ensure that data collected is accurate and complete.

Aventis is committed to protect the personal data and prevent unauthorized access, collection, usage, disclosure or being exposed to other risks.

Aventis will not allow non-consented data to be shared, viewed or used for any purpose unless the individual/individuals consent to the usage, disclosure or collection

 <b>AVENTIS SCHOOL OF MANAGEMENT</b>		<b>PROCESS MANUAL</b>
<b>Department/Unit:</b> Management Team	<b>Process Code</b> 2.6.2	<b>Process Title</b> Confidentiality and Security of Information
<b>POLICY:</b>	All student and staff information shall be kept private and confidential	
<b>OBJECTIVES:</b>	to set the Information Management process to ensure all sensitive and private information are protected	

Aventis will, upon consent; make known to the individual methods of how their data has been used, collected or disclosed as well as to allow the individuals to correct any errors found or for which data has not been included.

### Use of Personal Data


When you apply for a course or programme with Aventis, we will be using your personal data for evaluating, processing and for creation of student ID and online e-learning portal. The information below serves only to supplement and clarify this matter, without limiting the scope of your earlier consent:

- (a) Evaluating suitability for admission into programmes and processing and administering applications
- (b) For identification and creation of course materials, assignment submission and examination details via various means, including postal mail, electronic mail, SMS
- (c) For outreach, alumni and student engagement activities or participating in alumni surveys and sending of communication collaterals;
- (d) Processing, administering and conferring awards of prizes, medals, scholarships, classes of honours and other marks of distinction, and student or graduation status, and publication or releasing of information on the same;
- (e) Taking of photographs and/or videos (whether by Aventis staff or third party photographers and/or videographers) during events, graduation or seminars organized by Aventis for publicity purposes;
- (f) For any other purpose arising in respect of the environment within which an institution of higher learning such as Aventis operates which is reasonable given your relationship with us
- (g) Administering and managing relationships with both Aventis and our university partners
- (h) For carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations including the obtaining of references and/or other information from prior educational institutions and employers;
- (i) Processing application(s) for scholarships, educational loans and/or financial aid,
- (j) Investigative purposes, including possible academic misconduct or inappropriate activities;
- (k) Responding to requests for information from government or public agencies, ministries, statutory boards or other similar authorities or non-government agencies authorised to carry out specific Government services or duties
- (l) Usage, collection or disclosure of personal data upon consent should serve its purpose and not be extended beyond the intentional purpose.

Usage, collection or disclosure of personal data shall be ceased by Aventis for any business or legal purposes once the data is deemed no longer required. Aventis always notifies individuals stating the intent for which data is used, disclosed or collected.

### Disclosure of Personal Data to Third Parties

We will not disclose your personal data to any third parties without first obtaining your consent permitting us to do so or unless any such disclosure is permitted under any of the statutory exemptions under the

 <b>AVENTIS SCHOOL OF MANAGEMENT</b>		<b>PROCESS MANUAL</b>
<b>Department/Unit:</b> Management Team	<b>Process Code</b> 2.6.2	<b>Process Title</b> Confidentiality and Security of Information
<b>POLICY:</b>	All student and staff information shall be kept private and confidential	
<b>OBJECTIVES:</b>	to set the Information Management process to ensure all sensitive and private information are protected	

Act. In this respect, please note that we may disclose your personal data to third parties in certain circumstances without first seeking your consent, if such disclosure is either required or permitted under the Act, including without limitation, if the disclosure is required by law and/or regulations or if there is an emergency.

### Purpose Limitation

Aventis shall collect, use or disclose the personal data only for the purposes disclosed unless the disclosure of the personal data is made in the following circumstances

- Where the disclosure is permitted by you;
- Where the disclosure is permitted and/or pursuant to this Personal Data Protection Policy and/or under the particular terms of the contract governing the transaction that has been entered with Aventis and is reasonably appropriate in the circumstances;
- Where the disclosure is necessary under the law or to prevent fraud or to protect any personal safety, right or property, we may at our discretion, disclose your personal data to any appropriate investigative third party; and/or


### Data Security

Aventis has put in place security procedures, technical and organisational measures to protect the personal data against accidental or unlawful destruction, loss or alteration and against unauthorized disclosure or access.

### Administration and Management of Personal Data

We will take appropriate measures to keep your personal data accurate, complete and updated. We will also take reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data.

We will also take reasonable efforts to ensure that the personal data in our possession or under our control is destroyed as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes. Our websites may contain links to other websites not maintained by Aventis. Such third party websites are subject to their own data protection and privacy practices and you are encouraged to examine the data protection policies of those websites.

 <b>AVENTIS SCHOOL OF MANAGEMENT</b>		<b>PROCESS MANUAL</b>
<b>Department/Unit:</b> Management Team	<b>Process Code</b> 2.6.2	<b>Process Title</b> Confidentiality and Security of Information
<b>POLICY:</b>	All student and staff information shall be kept private and confidential	
<b>OBJECTIVES:</b>	to set the Information Management process to ensure all sensitive and private information are protected	

### Data Protection and Feedback

Aventis has appointed Data protection officer to ensure that it complies with the Personal Data Protection Act of Singapore. If you have any queries relating to Aventis' policies relating to the Personal Data Protection Act of Singapore,

Please contact Aventis Data Protection Officer by email or phone.

Email: [dpo@aventisglobal.edu.sg](mailto:dpo@aventisglobal.edu.sg)

Contact: 6720 3333

For general inquiries and feedback relating to Aventis policies, you should expect a reply within two (2) working day of Aventis receiving the feedback. For other feedback requiring further investigations and/or evaluations, Aventis will acknowledge the reply within 2 working days but may take up to 4 weeks to provide an official reply on the outcome of the feedback.