

GRACE ORCHARD SCHOOL

PRIVACY POLICY / PERSONAL DATA PROTECTION NOTICE

1. Introduction

Grace Orchard School (“GOS”, “the School”, “we”, “us” or “our”) respects the privacy of individuals and is committed to protecting personal data in our possession or under our control.

This Privacy Policy explains how the School may collect, use, disclose, store, protect and otherwise process personal data in accordance with the Personal Data Protection Act 2012 (“PDPA”) and other applicable laws, regulations, policies and guidelines.

This Policy applies to personal data relating to individuals who interact with the School, including prospective and current students, former students, parents, guardians and authorised representatives, employees, job applicants, interns, volunteers, visitors, donors, vendors, contractors, service providers and other stakeholders.

Where the School collects, uses, discloses or processes personal data on behalf of government ministries, statutory boards or other public agencies, such data may also be handled in accordance with applicable government policies, requirements and guidelines.

2. Personal Data

For the purposes of this Policy, “personal data” refers to data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data together with other information to which the School has or is likely to have access.

- name, identification and contact information;
- date of birth, gender and nationality;
- parent, guardian, caregiver and emergency contact information;
- student admission and enrolment information;
- educational records, assessments, attendance and progress information;
- information necessary to support a student's educational, developmental, care, health, safety and well-being needs;
- medical, dietary, allergy and medication information where required;
- transportation and school activity information;
- photographs, video recordings, audio recordings and other audio-visual information;
- CCTV recordings;
- employment, internship and volunteer information;
- financial and payment information where applicable;
- information relating to the use of the School's ICT systems, networks, devices, websites and online services; and

- any other information provided to the School for purposes connected with its functions and activities.

The School will endeavour to collect only personal data that is reasonably necessary for the relevant purposes.

3. Collection of Personal Data

The School may collect personal data directly from an individual or from his or her parent, guardian, caregiver, authorised representative or other authorised third party.

- application and enrolment forms;
- consent and declaration forms;
- school administrative forms;
- meetings, interviews and assessments;
- correspondence, telephone calls and electronic communications;
- school websites and online forms;
- school ICT systems and learning platforms;
- photographs, video and audio recordings;
- CCTV systems;
- school events, programmes and activities;
- government agencies and other authorised organisations; and
- service providers engaged by the School.

Where required under the PDPA or other applicable requirements, the School will notify individuals of the purposes for collecting, using or disclosing their personal data and obtain the appropriate consent.

The School may also collect, use or disclose personal data without consent where this is permitted or required under applicable laws.

4. Purposes for Collection, Use and Disclosure

The School may collect, use and disclose personal data for purposes reasonably necessary for its educational, administrative, operational and student-support functions, including:

- processing applications for admission and enrolment;
- providing educational programmes, training and learning support;
- supporting students' developmental, educational, care, health, safety and well-being needs;
- maintaining student records and monitoring educational progress;
- communicating with parents, guardians, caregivers and authorised representatives;
- managing attendance, school activities, programmes, events and excursions;
- providing student welfare, safety and emergency support;
- managing school transportation arrangements where applicable;
- administering financial assistance, subsidies and other support schemes;
- managing ICT accounts, devices, applications and learning platforms;

- maintaining the safety and security of students, staff, visitors and School premises;
- processing employment, internship and volunteer applications;
- managing employees, interns, volunteers, contractors and service providers;
- responding to enquiries, requests, feedback and complaints;
- conducting audits, evaluations, quality assurance and service improvement activities;
- fulfilling reporting and administrative requirements;
- complying with applicable laws, regulations, codes, policies, guidelines and requirements;
- responding to requests from government ministries, statutory boards, regulatory authorities or law-enforcement agencies where applicable; and
- any other purposes reasonably related to the above.

5. Consent

Where consent is required, the School may obtain consent directly from the individual or, where appropriate, from the individual's parent, guardian or authorised representative. Consent may be provided in writing, electronically or through other appropriate means.

There may also be circumstances where the collection, use or disclosure of personal data without consent is permitted or required under the PDPA or other applicable laws.

For example, information may need to be used or disclosed where necessary to respond to an emergency involving the life, health or safety of a student or another individual, or where disclosure is required by law or an authorised public agency.

6. Withdrawal of Consent

An individual, parent, guardian or authorised representative may withdraw consent for the collection, use or disclosure of personal data by submitting a request to the School's Data Protection Officer ("DPO").

Upon receiving a withdrawal request, the School will inform the individual, where appropriate, of the likely consequences of withdrawing consent. Depending on the nature and scope of the withdrawal, the School may not be able to continue providing certain programmes, services or support.

Withdrawal of consent will not affect the School's right or obligation to continue collecting, using or disclosing personal data where such collection, use or disclosure is permitted or required by applicable laws.

7. Disclosure of Personal Data

The School does not sell or rent personal data. Where necessary for the purposes described in this Policy, personal data may be disclosed to appropriate parties, including:

- government ministries, statutory boards and public agencies;
- healthcare, allied health and other professional service providers, where applicable;
- transportation and logistics service providers;
- ICT, cloud, software and online learning service providers;

- consultants, auditors and professional advisers;
- contractors, vendors and other service providers engaged by the School;
- emergency services and law-enforcement or regulatory authorities; and
- other parties authorised by the individual, parent, guardian or authorised representative.

Where the School engages third parties to process personal data on its behalf, the School will take reasonable steps to ensure that appropriate data protection arrangements are in place.

8. Photographs, Video and Audio Recordings

The School may take photographs, video recordings or audio recordings during school programmes, activities and events for purposes such as education, documentation, communication, school publications and other authorised School purposes.

Where consent is required for a particular use, the School will obtain the appropriate consent from the individual or, where applicable, the student's parent, guardian or authorised representative. The School will endeavour to use such materials responsibly and in accordance with applicable data protection requirements.

9. CCTV and Security

Closed-circuit television ("CCTV") may be used at appropriate locations within School premises for safety, security, incident investigation and protection of students, employees, visitors and School property.

Access to CCTV recordings will be restricted to authorised personnel and may be disclosed to relevant authorities or other parties where necessary or permitted by law.

CCTV recordings will be retained only for an appropriate period based on the purpose for which they were collected, unless a longer retention period is required for an investigation, legal matter or other authorised purpose.

10. ICT Systems, Online Learning Platforms and Digital Services

The School may use ICT systems, cloud services, communication platforms, educational applications and online learning services to support teaching, learning and School administration. Use of these services may involve the processing of personal data by third-party service providers.

The School will take reasonable steps to assess and manage data protection considerations when engaging such service providers. Users of School ICT systems and services are also expected to follow applicable School policies and practices relating to account security, passwords, acceptable use and information security.

11. Website, Cookies and External Links

The School's website may use cookies or similar technologies to support website functionality, improve user experience, understand website usage and maintain security. Certain technical information, such as IP address, browser type, device information and website usage information, may be collected automatically when users access the School's website.

The School's website may contain links to external websites or services. Such external websites are governed by their respective privacy policies and practices, and the School is generally not responsible for the privacy practices of external websites.

12. Access and Correction of Personal Data

Individuals may request (a) access to personal data held by the School about them and information about how such data has been used or disclosed, where applicable; or (b) correction of personal data held by the School where the information is inaccurate or incomplete.

Requests should be submitted to the School's Data Protection Officer. The School will process requests in accordance with the PDPA and other applicable requirements. Where permitted, a reasonable fee may be charged for an access request, and the requester will be informed of the applicable fee before the request is processed.

There may be circumstances under applicable laws where the School is unable or not required to provide access to certain personal data.

13. Accuracy of Personal Data

The School generally relies on personal data provided by individuals, parents, guardians or authorised representatives. Individuals and parents/guardians are encouraged to inform the School promptly of any changes to their personal data so that School records can be kept accurate, complete and up to date.

14. Protection of Personal Data

The School will make reasonable security arrangements to protect personal data in its possession or under its control against risks such as unauthorised access, collection, use, disclosure, copying, modification, loss or disposal.

- access controls and appropriate user permissions;
- password and authentication controls;
- multi-factor authentication where appropriate;
- encryption and other technical safeguards;
- endpoint protection and security updates;
- network and system security controls;
- physical security measures;

- appropriate backup arrangements;
- secure disposal of documents and storage media;
- staff awareness and data protection practices; and
- periodic review of security arrangements.

While the School takes reasonable measures to protect personal data, no electronic transmission, information system or storage method can be guaranteed to be completely secure.

15. Retention of Personal Data

The School will retain personal data only for as long as reasonably necessary to fulfil the purposes for which it was collected or as required or permitted by applicable laws, regulations, policies or operational requirements.

When personal data is no longer required, the School will take reasonable steps to securely dispose of it or remove the means by which it can be associated with an identifiable individual, where appropriate.

16. Transfer of Personal Data Outside Singapore

Where personal data is transferred, stored or processed outside Singapore, including through cloud or technology service providers, the School will take reasonable steps to ensure that the transfer is carried out in accordance with applicable requirements under the PDPA.

17. Personal Data Breaches

The School will take reasonable steps to assess and manage suspected or confirmed personal data breaches.

Where a data breach is determined to be notifiable under the PDPA, the School will notify the relevant authorities and affected individuals as required by applicable laws and regulations. The School may also take appropriate measures to contain the incident, reduce potential harm and prevent recurrence.

18. Data Protection Officer

The School has designated a Data Protection Officer (“DPO”) to oversee matters relating to personal data protection.

- questions or feedback regarding this Privacy Policy or the School's personal data protection practices;
- withdrawal of consent;
- requests for access to or correction of personal data; and
- concerns relating to the handling of personal data.

Data Protection Officer
Grace Orchard School
Email: dpo@go.edu.sg

Telephone: 65619128

Address: 170 West Coast Road, Singapore 127443

Alternatively, you may [download](#) and complete the request form manually, and submit the completed form via email to dpo@go.edu.sg.

19. Changes to this Privacy Policy

The School may review and update this Privacy Policy from time to time to reflect changes in legal or regulatory requirements, School practices, technology or operational requirements. The latest version of this Privacy Policy will be made available through the School's website or other appropriate channels.

This Privacy Policy should be read together with any other applicable consent forms, notices, policies or terms issued by the School.

Last Updated: 19 Aug 2026