

Personal Data Protection Notice for ELS Language Centres

ELS Language Centres (ELS) respects and is committed to the protection of your personal information and your privacy. This Personal Data Protection Notice explains how we collect and handle your personal information in accordance with the Malaysian Personal Data Protection Act 2010. Please note that ELS may amend this Personal Data Protection Notice at any time without prior notice and will notify you of any such amendment via our website or by email.

(1) Personal information

1.1 Type of personal information

Personal information means any information which relates to you and which was collected or provided to ELS for the purposes stated in Section 2 below.

Your personal information may include your name, contact details, religious belief, medical details, previous examination results, academic records, information in audio and/or video format (including voice, video recording, closed-circuit television (“CCTV”) and security recording), images (including photographs) and location tracking / GPS information.

1.2 Source of personal information

- (i) Student or potential student: ELS collects your personal information directly from you or indirectly from your parents, guardians and / or recruitment agents when you, your parents, guardians and / or recruitment agents send us completed enquiry, application and / or registration forms via various means, including online and physical hardcopies at public venues, seminars held at schools and / or when you, your parents / guardians and / or your recruitment agents visit our centres. Your personal information may also be collected from cookies through the use of our website.
- (ii) Parent / guardian of our student or potential student: ELS collects your personal information directly from you or indirectly from your child / ward, recruitment agents when you send us completed enquiry, application and / or registration forms via various means, including online and physical hardcopies at public venues, seminars held at schools and / or when you, your child / ward and / or your recruitment agents visit our centres. Your personal information may also be collected from cookies through the use of our website.
- (iii) Client / customer or potential client / customer for our products, services, events, conferences, seminars and / or other marketing activities organised by us: ELS collects your personal information directly from you when you express an interest to be contacted for such events and marketing activities (including business card collections via fish bowl method or during previous events organised by us). Your information may also be collected indirectly (for

example, via trade / online directories) or from cookies through the use of our website.

- (iv) Vendor, supplier or service provider: ELS collects your personal information directly from you or indirectly from your employer or credit reference agencies when tendering for projects or as part of the commercial transactions. Your personal information may also be collected from cookies through the use of our website.

1.3 Obligatory personal information

All information requested for in the relevant forms is obligatory to be provided by you unless stated otherwise.

Should you fail to provide the obligatory information, we may be unable to process your request and / or provide you with relevant services.

(2) Purposes of collecting and further processing (including disclosing) your personal information

- (i) Student or potential student: Your personal information is collected and further processed by ELS as required or permitted by law and for various academic, educational and administrative purposes, including the following:
- to process your application for admission and thereafter to ensure continuous provision of academic and educational services to you (including recording the details of studies) and determining your academic achievements;
 - to provide ancillary services such as visa application and insurance coverage throughout your tenure of studies with us;
 - to assist you in placements, internships or attachments with third parties (where such internships, placements or attachments are required in order to complete your course);
 - to administer and communicate with you in relation to our tuition fees and other relevant payments;
 - to manage your use of our facilities and management of our events such as libraries, residences, computing facilities, graduations, alumni;
 - to operate our centres in a manner which is physically safe, secure and befitting of health and safety requirements;
 - to conduct internal marketing analysis and analysis of student pattern and choice;
 - to comply with ELS' legal and regulatory obligations in the conduct of its business;
 - to contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials which we feel may interest you*;
 - to ensure that the content from our website is presented in the most

- effective manner for you and for your computer and/or device; and
- for ELS internal records management.

In particular, religious belief is processed for reporting purposes to the Ministry of Education and any other relevant authorities. Medical details are processed to assist you in your studies at ELS.

(ii) Parent / guardian of our student or potential student: Your personal information is collected and further processed by ELS as required or permitted by law and for various academic, educational and administrative purposes, including the following:

- to process the student's application for admission;
- to contact you in the event of emergency or accident;
- to inform you about the progress of the students, our tuitions fees and other relevant payments;
- to provide ancillary services to the students such as visa application and insurance coverage;
- to conduct internal marketing analysis and analysis of student pattern and choice;
- to comply with ELS' legal and regulatory obligations in the conduct of its business;
- to contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials which we feel may interest you*;
- to ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device; and
- for ELS' internal records management.

(iii) Client / customer or potential client / customer for products, services, events, conferences, seminars and other marketing activities organised by us: Your personal information is collected and further processed by ELS as required or permitted by law and for the following commercial purposes:

- to provide you with information, products or services that you request from us and any incidental purposes thereto;
- to contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials which we feel may interest you*;
- to improve the products or services offered by ELS;
- to conduct internal marketing analysis and analysis of consumer pattern and choice;
- to notify you about changes to our products and services;
- to ensure that the content from our website is presented in the most effective manner for you and for your computer and / or device;
- to comply with ELS' legal and regulatory obligations in the conduct of its business; and

- for ELS internal records management.

(iv) Vendor, supplier or service provider: Your personal information is collected and further processed by ELS as required or permitted by law and to give effect to your requested commercial transaction, including the following:

- to administer and give effect to the commercial transaction;
- to process any payments related to the commercial transaction;
- for internal investigations, audit or security purposes;
- to comply with ELS' legal and regulatory obligations in the conduct of its business;
- to contact you regarding product, services, upcoming events, promotions, advertising, marketing and commercial materials which we feel may interest you*;
- to ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device; and
- for ELS' internal records management.

** Where you have indicated your consent to receiving marketing or promotional updates from ELS, you may opt-out from receiving such marketing or promotional material at any time. You may select the "unsubscribe" option provided in ELS' email blasts / sms blasts or you may contact ELS at the details provided in Section (6) below.*

(3) Disclosures and transfers of personal information (within or outside of Malaysia)

3.1 Entities within ELS and its Associate Companies

Your personal information provided to us is processed by entities (within or outside of Malaysia) within ELS and its Associate Companies (including related companies, subsidiaries, holding companies, associated companies and outsourcing partners).

ELS will ensure that:

- (i) access to your personal information is restricted to staff who are contractually required to process your personal information in accordance with their respective job requirements; and
- (ii) only necessary information is released to the relevant employees.

3.2 Classes of third parties

Your personal information may be disclosed or transferred to relevant third parties (within or outside of Malaysia) as required under law, pursuant to relevant contractual relationship (for example, where we appoint third party service providers) or for the purposes stated in Section (2) above (or directly related to those purposes).

In the event of a potential, proposed or actual sale of business, disposal,

acquisition, merger or re-organisation (“Transaction”), your personal information may be required to be disclosed or transferred to a third party as a result of the Transaction. You hereby acknowledge that such disclosure and transfer may occur and permit ELS to release your personal information to the other party and its advisers / representatives.

(i) Student or potential student: Your personal information may be disclosed to the following classes of third parties:

- The Ministry of Education, other relevant government departments / agencies, statutory authorities and industry regulators;
- Any person to whom we are compelled or required to do so under law or in response to a competent or government agency;
- Foreign government departments, government agencies or authorities if you are enrolled in a foreign accredited programme;
- Malaysian immigration department (including agencies appointed by Malaysian immigration department to carry out its services) if you are required to obtain or renew your student visa for your tenure of studies with ELS;
- Foreign embassies (including agencies appointed by foreign embassies to carry out their services) if ELS assists you in your visa application as part of your transfer procedure to foreign universities;
- Your sponsors including your parents / guardians;
- Our external counterparts providing external, twinning or other similar educational programmes ;
- Third parties providing you with attachment placements or internships as part of your course requirements;
- Relevant professional or statutory regulatory bodies or accreditation bodies depending on your programme or course requirements;
- Law enforcement agencies; and
- Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, printing companies, telecommunications companies, contractors, conference / training / event organiser, other advisers, travel agencies, recruitment agencies and insurance companies).

Upon your graduation, we will retain a summary of your personal information indefinitely for our records. Your contact details will be added to our alumni database. ELS and its Associate Companies may contact you in future to keep you up-to-date with news which may be of interest to you including opportunities to connect with your old classmates and to build up your network for personal and career development. If you wish to opt-out from receiving these up-dates, select the “unsubscribe” option provided in the email updates sent by ELS. Please note that ELS will not disclose your personal information to third parties.

(ii) Parent/guardian of our student or potential student: Your personal information

may be disclosed to the following classes of third parties:

- The Ministry of Education, other relevant government departments / agencies, statutory authorities and industry regulators;
- Any person to whom we are compelled or required to do so under law or in response to a competent or government agency;
- Foreign government departments, government agencies or authorities if you are enrolled in a foreign accredited programme;
- Malaysian immigration department (including agencies appointed by Malaysian immigration department to carry out its services) if the student is required to obtain or renew his / her student visa for his / her tenure of studies with ELS;
- Foreign embassies (including agencies appointed by foreign embassies to carry out their services) if ELS assists the student in his / her visa application as part of his/her transfer procedure to foreign universities;
- Our external counterparts providing external, twinning or other similar educational programmes;
- Law enforcement agencies; and
- Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, printing companies, telecommunications companies, contractors, conference / training / event organiser, other advisers travel agencies, recruitment agencies and insurance companies).

(iii) Client / customer or potential client / customer for products, services, events, conferences, seminars and other marketing activities organised by us: Your personal information may be disclosed to the following classes of third parties:

- Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, printing companies, contractors, conference / training / event organiser and other advisers);
- Law enforcement agencies;
- Government departments / agencies, statutory authorities and industry regulators; and
- Any person to whom we are compelled or required to do so under law or in response to a competent or government agency.

(iv) Vendor, supplier, tenant or service provider: Your personal information may be disclosed to the following classes of third parties:

- Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, printing companies, contractors, conference / training / event organiser, other advisers);
- Law enforcement agencies;
- Government departments / agencies, statutory authorities and industry regulators; and
- Any person to whom we are compelled or required to do so under law or

in response to a competent or government agency.

(4) Websites

4.1 Links to other sites

Links to other sites are provided for your convenience and information. These sites may have their own privacy statements in place, which we recommend you review if you visit any linked websites. We are not responsible for the content on the linked sites or any use of the site.

4.2 Location enabled products or applications

Location enabled products or applications transmit your location information to us. We do not use the information sent or provided other than to provide the service you request. Location enabled features are opt-in and you have control over your participation and can turn these services off at any time or uninstall them.

Some mobile applications will utilize Google Analytics (or similar tool) to help us better serve you through improved products, services, and revisions to the mobile applications. This collected information will not identify you to us. It may, however, let us know anonymously, which services and features you are using the most within the application, as well as device type and hardware features, country and language of download.

4.3 Cookies

A cookie may be used in the processing of your information. A cookie is a text file placed into the memory of your computer and / or device by our computers. A copy of this text file is sent by your computer and / or device whenever it communicates with our server. We use cookies to identify you. We may also collect the following information during your visit to our website and/or the fully qualified domain name from which you accessed our site, or alternatively, your IP address:

- (i) the date and time you accessed each page on our web site;
- (ii) the URL of any webpage from which you accessed our site (the referrer); and
- (iii) the web browser that you are using and the pages you accessed.

Some web pages may require you to provide a limited amount of personal information in order to enjoy certain services on our websites (system login credentials, email address and contact, etc). These personal information will only be used for its intended purposes only, i.e. to respond to your message or deliver the requested services.

(5) Right to access and correct personal information

You have the right to access, correct or change your personal data held by us by writing to us at the following address: info@els.edu.my

Upon the verification of your identity, you may:

- a. request for information pertaining to your personal data;
- b. request to make corrections or edit your personal data; or
- c. request to limit or to stop the processing of your personal data, subject to the requirements and restrictions under the relevant applicable laws, contractual conditions and a reasonable time period. By providing your personal data to us, you are consenting to the processing of your personal data by us in the manner as described above.

(6) Limiting the processing of personal information, further enquiries and complaints
If:

- (i) you would like to obtain further information on how to limit the processing of your personal information;
- (ii) you have any further query; or
- (iii) you would like to make a complaint in respect of your personal information, you may contact: info@els.edu.my or your respective ELS centre.

(7) Conflict

In the event of any conflict between this English language Personal Data Protection Notice and its corresponding Bahasa Malaysia Personal Data Protection Notice, the terms in this English language Notice shall prevail.

Click [here](#) for Bahasa Malaysia version

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