



Stamford American
SCHOOL HONG KONG

PERSONAL INFORMATION COLLECTION STATEMENT

1. Stamford American School Hong Kong and Flora Education Limited, its operating entity (collectively, the "School") comply with the Hong Kong Personal Data (Privacy) Ordinance Cap 486 ("PDPO") relating to the collection, use, disclosure and security of you/your child's personal data.

2. Purpose: Personal data that is collected about you and your family (including you and your child's identity documents, contact details, date of birth, marital status, medical information and bank information) may be collected, used, disclosed or processed for the purposes of:

- I. processing your application and determining your child's eligibility for enrolment at the school;
- II. providing online services to students and parents/guardians;
- III. responding to your questions and feedback;
- IV. applying to the relevant Hong Kong authorities for relevant approvals or student passes for enrolment at the School;
- V. providing academic references and/or educational history to any third party where reasonably required;
- VI. administration, billing and finance;
- VII. conducting surveys of parents and students to assess the performance of the School as a whole and for statistical and research purposes;
- VIII. ensuring all relevant legal obligations of the School, parents, students and staff are complied with. This includes but is not limited to, for example, public filing requirements with the Companies Registry of Hong Kong in relation to the issuance of debentures, if applicable;
- IX. maintaining relationships with prospective students and prospective parents of the School for fundraising, marketing or promotional purposes by the School and its affiliate organizations that may fall under the definition of direct marketing under the Hong Kong Personal Data (Privacy) Ordinance (with your consent where required by applicable law); and
- X. all other matters relating to your child's application to the School that the School deems necessary or reasonable, including any matters in relation to the debenture issued to you by the School.

The provision of you/your child's personal data is voluntary, but failure to provide the requested data may result in us being unable to process your application and may influence the outcome of the application.

3. Direct marketing: The School intends to use you/your child's data in direct marketing through post, email or SMS and the School requires your consent (which includes an indication of no objection) for that purpose. In this connection, please note that:

- a. you/your child's name and contact details from time to time may be used by the School in direct marketing;
- b. the following classes of services, products and subjects may be marketed:
 - i. educational services;
 - ii. extra-curricular activities, shows, concerts or fairs; and

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- iii. fundraising, sponsorship and charitable activities;
- c. the above services, products and subjects may be provided by the School and its affiliate organizations; and
- d. in addition to marketing the above services, products and subjects itself, the School also intends to provide the data described in section 3a) above to all or any of the persons described in section 3c) above in order to enable them to direct market to you the same types of services, products and subjects, and we require your written consent (which includes an indication of no objection) for that purpose.

You may withdraw your consent to the collection, use and disclosure of your personal data for direct marketing purposes at any time.

4. Transferees: Personal data that is collected may be transferred to the following third parties in connection with the purposes listed in Clause 2 of this PICS: (i) affiliates of the School; (ii) service providers and contractors (whether within or outside Hong Kong) appointed by us to undertake some of our academic, pastoral and administrative functions; (iii) public and governmental agencies, organizations and registries, including the Hong Kong government; and (iv) other organizations where permitted or required by law.

5. Access and Correction: You have the right to request access to and/or correct the personal data held about you and your child(ren) by the School and the School shall respond to such requests as soon as reasonably possible. You may contact the School's Data Protection Officer at icthelp@sais.edu.hk in writing (together with proof of your identity) to confirm what personal data the School holds concerning you and your child(ren), request a copy of that data and request that any errors or omissions in your or your child(ren)'s personal data be rectified. The School must be able to verify your identity before it can accept any access or correction requests from you and a fee may be charged for such access. The School reserves the right to decline access if the burden or expense of providing access would be unreasonable in the circumstances, if the School is satisfied on reasonable grounds that a correction should not be made or if any of the exemptions under the PDPO are applicable. Written requests for access and correction can be made to the School.

6. Security and Retention: The School will take practicable steps to ensure the accuracy of the personal data we hold and will ensure that your personal data is always secure by implementing appropriate security measures to prevent unauthorized or accidental access, collection, processing, erasure, loss, use, disclosure, copying or modification of your personal data, in particular when the processing of data involves third parties. The School will only retain your and your child(ren)'s personal data for so long as it is necessary to fulfill the purposes listed above.