

## ICR Pte Ltd

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[sg.icanread.asia](http://sg.icanread.asia)



Below is the privacy policy applicable to our operations in Singapore. Each country's office is responsible for researching local privacy laws and regulations. Please review your country's legal requirements and adapt the content below as necessary to ensure compliance with your local regulations.

### PRIVACY POLICY

ICR places a high value on doing our part to keep your personal information and privacy safe. The following is our Privacy Policy which is based on the Singapore Personal Data Protection Act 2012. It is a policy on what we do with the information we may obtain from you and the measures we use to ensure that your personal information is not misused.

#### 1. Introduction

ICR holds and processes a wide range of information about its students, prospective students and other persons who may be interested in its services.

This privacy notice applies to all ICR operations in the global locations where we organise courses or promote services. The notice explains the type of information that we process, why we are processing it and how that processing may affect you.

The privacy notice is split into the sections listed below. The Glossary section explains what we mean by "personal data", "processing", and other terms used in this notice.

We may update this privacy notice from time to time, and will post any revised notice on this webpage. Where appropriate we may notify you by email or by a notice on our website that our privacy notice has changed but we recommend that you check this page regularly. Any changes will be immediately effective on posting.

#### 2. Who We Are?

ICR Pte Ltd and its affiliates will have control of personal information and data in relation to your registration and enrolment of the Online Courses.

#### 3. Your Personal Data and the Collection of Personal Data

##### Collection directly from you in response to our request

Most of the personal data we process about you comes directly from you (whether face to face, over the telephone, on a paper form, by email or online) for example:

- when you apply for or enrol on one of our courses;
- when you call us, email us or meet with one of our staff;
- when you sign up on [website], or while attending an event or student recruitment fair, to receive news about upcoming courses and events relating to particular areas of interest.

##### Automatic collection when you call us, visit our premises or our website, or take one of our online courses

- Your image may be collected by ICR if you attend our premises. We use CCTV at our premises for the protection of our staff, our students, and our visitors.
- We also sometimes video or record our lectures or other events, and may make these videos and recordings available through social media, but we will inform you on arrival at the



lecture or event if we intend to do this. If you have enrolled on one of our online courses, we also collect certain data about your progress through the course, such as which modules you have completed, the results of any test.

- We collect data about your computer when you visit our website which includes your internet address, your operating system and browser type. We use this information for our internal system administration, to help diagnose problems with our servers, to administer our website and monitor and improve the user experience.
- We also collect data about you through cookies. A cookie is a simple text file that is stored on your computer or mobile device by our website's server which allows our website to remember your preferences or transactions that are in progress. You can see more detail on cookies by clicking on Cookie Settings.

Collection of data from other sources

We may also obtain information about you from other sources, for example when we verify your data from banks or any references that you may provide us.

4. What Personal Data Do We Process and Why?

We have set out below the types of personal data that we process, the purposes for which we use it and the legal grounds on which we process it. The Glossary contains more information about the legal grounds for processing.

Purpose	Examples of personal data (please note that the list is not exhaustive)	Legal grounds for processing
To provide you with requested services (for example, assessing eligibility for a course, enrolling you on a course, assessing fitness to study, delivering teaching to you)	<ul style="list-style-type: none"> <li>• name, title, and contact details (including email address, postal address, telephone numbers)</li> <li>• your bank account details, payment card details, bank transfer receipt</li> <li>• your prior academic achievements and qualifications</li> <li>• nature of the services including contractual terms</li> <li>• progress in your studies with us (attendance, coursework, interim grades and awards, online module completion status) and final outcome</li> <li>• records of your communications with us</li> <li>• any information relating to complaints or academic and other misconduct</li> </ul>	Performance of a contract
Where required, to evidence our compliance with legal requirements, (for example, verifying your identity)	<ul style="list-style-type: none"> <li>• your date of birth, identification documents (including photo) and the results of identification verification checks</li> <li>• information about you that must be monitored and/or reported to a regulator</li> <li>• any requirements relating to ICR's obligation to make reasonable adjustments to accommodate a disability or otherwise meet your specific needs</li> </ul>	Compliance with a legal obligation

	<ul style="list-style-type: none"> <li>any information relating to a dispute or legal proceeding</li> </ul>	
To keep you, our staff, and property on our premises secure	<ul style="list-style-type: none"> <li>CCTV images</li> </ul>	Legitimate Interests
To provide you with details about upcoming courses and events	<ul style="list-style-type: none"> <li>your name, email address and/or postal address</li> <li>your marketing and communication preferences and/or or any hard copy or digital sign up</li> </ul>	Legitimate Interests (for past students)  Consent (for individuals who have signed up online, at an event, by talking to a member of staff)
To monitor the performance of our website and online course platform and make your user experience better	<ul style="list-style-type: none"> <li>your internet addresses</li> <li>your browser type and operating system</li> <li>the resources you access on our website</li> <li>the data obtained from cookies, web logs and other similar technologies that monitor the use of our online course platform or website and/or deliver more appropriate advertisements on or beyond our website</li> </ul>	Legitimate Interests
To monitor your use of our services, train our staff and improve your student or website experience	<ul style="list-style-type: none"> <li>your complaints, opinions, responses to our surveys or market research</li> <li></li> </ul>	Legitimate Interests

## 5. Who Gets to See your Personal Data?

### ICR and the wider ICR's group

Your personal data will be processed by the ICR entity that initially receives it, and may also be transferred to and processed by other ICR locations. ICR uses EU Commission approved standard contractual clauses to regulate the transfer and processing of data between group companies.

### Outside the ICR's Group

We do not transfer your personal data to organisations who wish to use it for their own marketing promotions or other purposes. We only transfer your personal data to other organisations where it is necessary to enable us to provide you with the services you have requested (for example: we may transfer your data to our bank, payment card acquirers, library service providers, travel agents, transport and accommodation companies in relation to trips forming part of your course, course venues, caterers, institutions who evaluate the equivalence of your existing overseas qualifications, and direct marketing fulfilment and distribution). We also transfer your data to any organisations that validate our course provision and award your qualification, for courses run by ICR. Where we do so it will be on the basis that these organisations are required to keep the information confidential and secure, and they will only use the information to carry out the instructed services. Some of these organisations may be located outside the European Economic Area ("EEA") and you should refer to the section Is your personal data transferred out of the EEA for more information.

### References

For students of ICR physical centres and students of our online courses, we release information about you and your studies with ICR (such as dates of attendance and qualifications or awards achieved) only when you request that we provide such information to future employers, educational bodies or other persons.

### Mandatory disclosure to local authorities

ICR may disclose your information if required by law or regulations that either ICR or you are subjected to.

#### 6. Is your Personal Data transferred out of the EEA and Singapore?

ICR may in the normal course of its business transfer your personal data outside of Singapore or the EEA to individuals and organisations who need to process your data in connection with the services that ICR provides to you.

Non- EEA countries offer varying standards for the protection of personal data and your privacy rights and in some cases, these standards are lower than equivalent EEA standards. When we send your personal data outside the EEA, we have in place the EU Commission approved standard contractual clauses in the form of an appropriate data transfer agreement. More details about typical standard clauses can be found here: [http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm).

If you have any questions or would like further information about how we make personal data available to non-EEA countries please contact us (see Contact Information below).

#### 7. How Long will We Keep your Personal Data?

We will retain your personal data for as long as is necessary to provide the relevant services, maintain business records or educational records to satisfy tax, legal and other regulatory requirements, and protect and defend against potential legal claims.

#### 8. What Steps do We Take to Keep your Personal Data Secure?

We will take all reasonable and appropriate steps to protect the security and integrity of all personal information provided via our website, or by any other means electronic or otherwise.

We use a variety of security technologies and procedures to help protect your personal details from unauthorised physical and electronic access.

As effective as modern security practices are, we cannot guarantee the complete security of personal data held in our systems, nor that that information you supply through the internet or any computer network is entirely safe from unauthorised intrusion, access or manipulation during transmission. Any transmission is at your own risk. We will not be liable for any resulting misuse of your personal data.

#### 9. Third Party Websites

ICR's websites may contain links to other websites not operated by ICR. The information you provide to us will not be transmitted to other websites, unless we clearly say so, but these other websites may collect personal information about you in accordance with their own privacy notice. ICR cannot accept any responsibility for the privacy practices or content of those websites.

#### 10. Access to your Data and Other Rights

We try to be as open as we can about the data that we process and recommend you ask us if you have questions about the data we hold on you.

### *EU residents*

If you are a resident of the EU, you have the legal right to make a “subject access request”. If you exercise this right and we process personal data about you by automated means or as part of a Filing System, we are required to provide you with a description and copy of that personal data, and tell you why we are processing it.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing, or have its processing restricted.

If you have provided us with data about yourself and the grounds for processing is Contract or Consent (see What personal data do we process and why?), you have the right to be given the data in machine readable format for transmitting to another data controller.

If we are relying on Consent as the grounds for processing your data (see What personal data do we process and why?), you may withdraw consent at any time. This will not affect the lawfulness of ICR’s processing of your data prior to your withdrawal.

Please contact us at [dataprivacy@icanread.asia](mailto:dataprivacy@icanread.asia) if you would like to exercise any of your rights explained above in relation to your personal data.

### *Rights for California residents*

If you are a resident of California you may have a right pursuant to Section 1798.83 of the California Civil Code to obtain certain information about the types of personal data that we have shared with third parties for direct marketing purposes during the preceding calendar year, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties.

If you wish to exercise this right, please contact us at [dataprivacy@icanread.asia](mailto:dataprivacy@icanread.asia).

## 11. Contact Information

If you (a) have any questions about this Policy; (b) would like to withdraw your consent to any use of your Personal Data; or (c) would like to obtain access to or make corrections to your Personal Data records, you may contact us at:

ICR Pte Ltd  
601 MacPherson Road, #06-15  
Grantral Complex  
Singapore 368242

Email: [dataprivacy@icanread.asia](mailto:dataprivacy@icanread.asia)