

DATA PROTECTION NOTICE FOR CUSTOMERS

This Data Protection Notice (“**Notice**”) sets out the basis which *Invictus International School* (“**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act (“**PDPA**”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

PERSONAL DATA

- As used in this Notice:

“**customer**” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

“**personal data**” means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

- Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include:

Types of Personal Data	Examples (Non-exhaustive)
Personal identification information	Name, residential address, email address, contact number, nationality, gender, date of birth, marital status and photograph.
Family information	Name of Spouse, ID number of spouse, Number of children, name(s) of child/children, and ID number(s) of child/children.
Health and medical information	Medical history and records including but not limited to test/scan results, consultation reports and reviews.
Employment information	Name and address of employer and type of work pass held.
Information that you decide to voluntarily share with us	Number of children to be enrolled, campus you are interested in, anticipated enrolment year, number of attendees for school tour and how you have heard about us.

3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
5. We may collect and use your personal data for any or all of the following purposes:
 - a. performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - b. verifying your identity;
 - c. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - d. managing your relationship with us;
 - e. processing payment or credit transactions;
 - f. complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - g. any other purposes for which you have provided the information;
 - h. transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Cambodia or abroad, for the aforementioned purposes; and
 - i. any other incidental business purposes related to or in connection with the above.
6. We may disclose your personal data:
 - a. where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you; or
 - b. to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above mentioned purposes.
7. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

DEEMED CONSENT BY NOTIFICATION

8. We may collect or use your personal data, or disclose existing personal data for secondary purposes that differ from the primary purpose which it had originally

collected for pursuant to clauses 5 and 6. If *Invictus International School* intends to rely on deemed consent by notification for such secondary purposes, *Invictus International School* will notify you of the proposed collection, use or disclosure of this personal data through appropriate mode(s) of communication.

9. In particular, we may rely on deemed consent by notification to collect, use or disclose your personal data for the following purposes:
 - a. advertising and marketing, including to send you promotional information about our products and services, and information about third parties that we consider may be of interest to you; and
 - b. conducting surveys.
10. Before relying on deemed consent by notification, *Invictus International School* will assess and determine that the collection, use and disclosure of the personal data will not likely have an adverse effect on you.
11. You have five (5) business days (after your submission of personal data to us) to inform us if you wish to opt-out of the collection, use and disclosure of your personal data for such purposes.
12. After the lapse of the opt-out period, you may notify us that you no longer wish to consent to the purposes for which your consent was deemed by notification by withdrawing your consent for the collection, use or disclosure of your personal data in relation to those purposes.

RELIANCE ON THE LEGITIMATE INTERESTS EXCEPTION

13. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for the legitimate interests of *Invictus International School* or another person. In relying on the legitimate interests exception of the PDPA, *Invictus International School* will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.
14. In line with the legitimate interests' exception, we will collect, use or disclose your personal data for the following purposes:
 - a. Fraud detection and prevention;
 - b. Detection and prevention of misuse of services;
 - c. Network analysis to prevent fraud and financial crime, and perform credit analysis; and
 - d. Collection and use of personal data on company-issued devices to prevent data loss.

The purposes listed in the above clause may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter.

WITHDRAWING YOUR CONSENT

15. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your

personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

16. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.
17. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 8 above.
18. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

19. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
20. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
21. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

PROTECTION OF PERSONAL DATA

22. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as:
 - a. minimised collection of personal data;
 - b. authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.);
 - c. encryption of data;
 - d. up-to-date antivirus protection;
 - e. regular patching of operating system and other software;
 - f. web security measures against risks;
 - g. regular vulnerability assessments; and
 - h. use of Captcha for selected online forms.

23. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

24. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

RETENTION OF PERSONAL DATA

25. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
26. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF CAMBODIA

27. We generally do not transfer your personal data to countries outside of Cambodia. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

USE OF COOKIES

28. By using our website, you consent to the use of cookies as described in this notice. If you do not agree to the use of cookies, you should adjust your browser settings or refrain from using our website.

What are cookies?

29. Cookies are small text files that are placed on your device (e.g., computer, tablet, or smartphone) when you visit a website. They serve various purposes, including improving website functionality and user experience, analysing website performance, and providing personalized content.

Types of cookies we use

30. **Session Cookies:** These cookies are essential for the operation of our website. They are temporary and are deleted from your device when you close your browser.
31. **Necessary Cookies:** Necessary cookies are required for the basic functionality of our website, such as maintaining your session and enabling you to access secure areas. They do not contain personal data.
32. **Functional Cookies:** These cookies enhance your user experience by remembering your preferences and settings, such as language preferences and font size.

33. Analytics Cookies: We use analytics cookies to collect information about how visitors interact with our website. This data helps us improve our website and provide a better user experience. Analytics cookies do not collect personal data.
34. Advertisement Cookies: We may use advertising cookies to display relevant advertisements to you on our website and third-party websites. These cookies may collect non-personal data to improve the targeting of ads.
35. Social Media Cookies: Our website may integrate social media features that use cookies to track your interactions with these features. These cookies are managed by the respective social media platforms and may collect personal data if you are logged into your social media accounts.

Your cookie choices

36. You can manage your cookie preferences by adjusting your browser settings to accept or reject cookies. Please note that blocking certain types of cookies may affect your experience on our website.
37. For more information on managing cookies, please refer to your browser's help documentation.

DATA PROTECTION OFFICER

38. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Contact No. : +855 23 723 212
Email Address: dpo@invictus.edu.kh

EFFECT OF NOTICE AND CHANGES TO NOTICE

39. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
40. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date : 1 Nov 2023
Last updated : 1 Nov 2023