

GSTM DATA SUBJECT ACCESS REQUEST (DSARs) POLICY

(Last updated: 31 October 2023)

1. Introduction

At GSTM, we are committed to upholding the rights of individuals in relation to their personal data as mandated by the Singapore Personal Data Protection Act (PDPA) and promoting transparency, privacy, and accountability in handling DSARs. This Data Subject Access Requests (DSARs) Policy outlines our procedures for handling and responding to DSARs in a timely and compliant manner.

2. Objective

The objective of this policy is to:

- Ensure that individuals have the right to access their personal data held by GSTM School.
- Define the procedures for processing DSARs in accordance with the PDPA.
- Maintain transparency and accountability in our data processing practices.

3. Policy Guidelines

3.1. DSAR Submission:

Individuals who wish to submit a DSAR must do so in writing or through our designated DSAR portal, if available. All DSARs will be directed to our Data Protection Officer (DPO).

3.2. Verification of Identity:

To ensure the security and privacy of personal data, we will verify the identity of the individual making the DSAR using reasonable and appropriate means.

3.3. Response to DSAR:

Upon receiving a valid DSAR, we will respond within 30 days, as required by the PDPA. This response will include information about the personal data held, how it is used, and to whom it may have been disclosed.

3.4. Fees:

We reserve the right to charge a reasonable fee for processing a DSAR, if warranted by the complexity or volume of the request. We will inform the individual of any applicable fees in advance.

3.5. Refusal or Partial Disclosure:

We may refuse a DSAR under specific circumstances allowed by the PDPA. In such cases, we will inform the individual of the refusal and provide reasons as required by law.

4. Data Protection Officer (DPO)

Our designated Data Protection Officer is responsible for receiving, coordinating, and overseeing the response to DSARs. The DPO will also ensure compliance with the PDPA in handling DSARs.

5. Training and Awareness

All staff members will receive training and guidance on handling DSARs in compliance with the PDPA. Regular reminders and awareness campaigns will be conducted to reinforce the importance of this policy.

6. Review

This DSARs Policy will be periodically reviewed and updated to align with changing operational needs and evolving data protection requirements.