Personal Data Protection Policy

XCL Education Malaysia

Approved by:	Anthony Partington	Date: 01/01/2026
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1. Our Commitment

1.1 XCL Education Malaysia is committed to protecting the personal data of all individuals with whom we interact, including students, parents, employees, contractors, alumni, and partners. We recognise that personal data is entrusted to us and must be handled lawfully, responsibly, and transparently.

1.2 This policy sets out how XCL Education Malaysia collects, uses, stores, discloses, and protects personal data in compliance with the **Personal Data Protection Act 2010 (PDPA) of Malaysia** and its related regulations.

1.3 Respect for privacy is integral to our values and underpins the trust placed in us as an education provider. Data protection is not a one-time obligation but an ongoing organisational responsibility.

1.4 This policy applies to all XCL Education Malaysia employees, governors, contractors, volunteers, consultants, and third parties who process personal data on our behalf.

2. Legal Framework

2.1 This policy is guided by the Personal Data Protection Act 2010 (PDPA), including the seven Personal Data Protection Principles:

- General Principle
- Notice and Choice Principle
- Disclosure Principle
- Security Principle
- Retention Principle
- Data Integrity Principle
- Access Principle

2.2 Where relevant, this policy also aligns with:

- Child Act 2001
- Employment Act 1955
- Education-related regulatory requirements
- International best practice in privacy and data governance

3. Scope and Definitions

3.1 **Personal Data** refers to any information relating directly or indirectly to an identifiable individual, whether in electronic or physical form.

3.2 **Sensitive Personal Data** includes information relating to health, religious beliefs, criminal records, or other data classified as sensitive under PDPA.

3.3 **Data Subject** means an individual whose personal data is processed by XCL Education Malaysia.

3.4 **Processing** includes collecting, recording, storing, using, disclosing, or otherwise handling personal data.

4. Collection of Personal Data

4.1 XCL Education Malaysia collects personal data only where it is necessary for legitimate educational, operational, legal, or contractual purposes.

4.2 Personal data may be collected from:

- Students and parents/guardians
- Employees and job applicants
- Contractors, vendors, and service providers
- Alumni and community members

4.3 Data collection methods may include:

- Admission and enrolment forms
- Employment applications and HR records
- Digital platforms, websites, and learning systems
- Recording via CCTV cameras installed
- Communications via email, forms, or surveys
- Payment information such as debit or credit card information

5. Purposes of Processing

5.1 Personal data is processed for purposes including but not limited to:

- Student admission, education, wellbeing, and safeguarding
- Academic administration and assessment
- Employment, payroll, and human resources management
- Communication with parents and stakeholders
- Compliance with legal and regulatory obligations
- Safety, security, and risk management
- Marketing and communications (where consent has been provided)

5.2 Personal data shall not be processed for purposes incompatible with those originally disclosed, unless required by law or with consent.

6. Notice and Consent

6.1 XCL Education Malaysia provides clear Privacy Notices informing data subjects of:

- The type of data collected
- The purpose of collection
- How the data is used and disclosed
- Data subject rights

6.2 Consent is obtained where required under PDPA, particularly for sensitive personal data or marketing communications.

6.3 Consent may be withdrawn in writing, subject to legal or contractual limitations.

7. Disclosure of Personal Data

7.1 Personal data is not disclosed to third parties except where:

- Necessary for operational or educational purposes
- Required by law or regulatory authorities
- Consent has been obtained
- Data is shared with service providers under contractual safeguards

7.2 All third parties processing personal data on behalf of XCL Education Malaysia must comply with PDPA-equivalent standards.

8. Security of Personal Data

8.1 XCL Education Malaysia implements appropriate technical and organisational measures to protect personal data against:

- Unauthorised access
- Accidental loss or destruction
- Misuse or alteration

8.2 Security measures include:

- Access controls and role-based permissions
- Secure storage of physical and digital records
- Encryption and password protection
- Staff training and awareness

9. Retention of Personal Data

9.1 Personal data is retained only for as long as necessary to fulfil its purpose or to meet legal and regulatory requirements.

9.2 Data that is no longer required is securely destroyed or anonymised in accordance with retention schedules.

10. Data Accuracy

10.1 XCL Education Malaysia takes reasonable steps to ensure personal data is accurate, complete, and up to date.

10.2 Data subjects are encouraged to notify the organisation of any changes to their personal information.

11. Rights of Data Subjects

11.1 Under PDPA, data subjects have the right to:

- Access their personal data
- Request correction of inaccurate data
- Withdraw consent (where applicable)
- Limit processing in certain circumstances

11.2 Requests must be made in writing and will be handled within the timeframes prescribed by law.

12. Data Breaches

12.1 Any suspected or actual personal data breach must be reported immediately to the Data Protection Officer or senior leadership.

12.2 XCL Education Malaysia will investigate breaches promptly and take appropriate remedial action, including notification where required.

13. Responsibilities and Governance

13.1 All staff are responsible for protecting personal data and complying with this policy.

13.2 Managers are responsible for ensuring appropriate data protection practices within their areas.

13.3 Breaches of this policy may result in disciplinary action.

14. Training and Awareness

14.1 All employees receive data protection awareness training as part of induction and ongoing professional development.

14.2 Additional training is provided for staff handling sensitive or high-risk data.

15. Monitoring and Review

15.1 This policy is reviewed annually or earlier if required due to legal or organisational changes.

15.2 Updates will be communicated to all relevant stakeholders.

16. Enquiries and Complaints

16.1 Data protection enquiries, requests, or complaints should be directed to:

Data Protection Officer / Responsible Officer XCL Education Malaysia Email: s.sriganesh@xcledu.my

16.2 Data subjects may also lodge a complaint with the Personal Data Protection Commissioner of Malaysia if unresolved.

17. Supporting documents

- PERSONAL DATA PROTECTION ACT 2010 (PDPA) NOTICE_V2
- Internal Data Management & Governance Policy
- PDPA (Vendor Registration)
- Data Breach Management Policy
- Acceptable Use Policy
- Information Classification & Handling Procedure
- Password Policy
- Access Control Policy