



## XCL Education Malaysia – Privacy Notice

This Privacy Notice explains how XCL Education Malaysia collects, uses, discloses, and protects personal data in accordance with the Personal Data Protection Act 2010 (PDPA).

It applies to all individuals whose personal data we process, including students, parents and guardians, employees, contractors, alumni, and visitors.

### 1. Data Controller

XCL Education Malaysia is the data user (data controller) for the purposes of the PDPA.

**Organisation:** XCL Education Malaysia

**Address:** 17-01 & 17-02 Vertical Corporate Tower B, Ave 10, The Vertical, Bangsar South City, No 8 Jalan Kerinchi, 59200, Kuala Lumpur

**Email:** contactus@xcledu.my

### 2. Categories of Personal Data Collected

We may collect and process the following categories of personal data:

#### 2.1 Students

- Name, identification details, date of birth
- Academic records, assessments, attendance
- Health, medical, learning support, and safeguarding information
- Photographs, images, and video recordings

#### 2.2 Parents / Guardians

- Names and contact details
- Identification and emergency contact information
- Financial and billing information

#### 2.3 Staff and Job Applicants

- Identification and contact details
- Employment records, qualifications, and payroll data
- Background and suitability checks where permitted by law

#### 2.4 General

- CCTV footage on school premises
- Communications with the school
- Website and system usage data

Sensitive personal data is processed only where lawful, necessary, and subject to enhanced safeguards.

### 3. Purposes of Processing

Personal data is processed for purposes including:

- Student admission, education, assessment, and progression
- Safeguarding, wellbeing, and pastoral care
- Communication with parents and the school community
- Employment, human resources, and payroll management
- Compliance with legal, regulatory, and inspection requirements
- School security, safety, and risk management
- Marketing and communications, where consent has been provided



#### 4. Source of Personal Data

Personal data is collected directly from data subjects or parents/guardians, and through authorized school systems and service providers.

#### 5. Disclosure of Personal Data

Personal data may be disclosed to:

- Government authorities and regulators where required by law
- Examination, accreditation, and assessment bodies
- Health, safeguarding, or welfare agencies
- Service providers and vendors supporting school operations

All third parties are required to protect personal data and use it only for authorised purposes.

#### 6. Data Security

XCL Education Malaysia implements reasonable technical and organisational measures to protect personal data against loss, misuse, unauthorised access, or disclosure.

#### 7. Data Retention

Personal data is retained only for as long as necessary to fulfil its purpose or to comply with legal and regulatory requirements. When no longer required, data is securely destroyed or anonymised.

#### 8. Data Subject Rights

Under the PDPA, data subjects have the right to:

- Request access to their personal data
- Request correction of inaccurate or incomplete data
- Withdraw consent for processing, subject to legal or contractual obligations

Requests should be made in writing using the contact details below.

#### 9. Consequences of Not Providing Personal Data

Failure to provide required personal data may affect our ability to:

- Process student admissions or enrolment
- Provide education or support services
- Meet legal or regulatory obligations

#### 10. Consent

By providing personal data to XCL Education Malaysia, you consent to the processing of that data in accordance with this Privacy Notice, unless consent is specifically required or withdrawn under the PDPA.

#### 11. Changes to This Privacy Notice

We may update this Privacy Notice from time to time. The most current version will be made available through our official communication channels.

#### 12. Contact and Complaints

For enquiries, requests, or complaints relating to personal data:

##### **Data Protection Officer / Responsible Officer**

XCL Education Malaysia

Email: [s.sriganesh@xcledu.my](mailto:s.sriganesh@xcledu.my)

If concerns are not resolved, data subjects may lodge a complaint with the Personal Data Protection Commissioner of Malaysia.

