

 <p>S P Jain School of Global Management</p> <p>DUBAI • MUMBAI • SINGAPORE • SYDNEY</p>	Privacy Policy
Document Type	Policy
Administering Entity	President, Vice President – Academic, Vice President – Administration, Registrar, Director – Examinations, Chief Marketing Officer, Chief Financial Officer, Director-People and Culture, Heads of Campuses (HOCs), Director – Information Technology
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1. Purpose

- a. S P Jain School of Global Management (S P Jain / the School) recognises its responsibility to collect, manage and disclose personal information relating to its students, staff, alumni, external partners and other stakeholders in accordance with relevant legislation and guidelines and prevailing community expectations.
- b. The School acknowledges its obligation with regards to the collection, storage and use and disclosure of this information under the Privacy Act 1988 (Cth), and the Australian Privacy Principles (APPs). In addition, S P Jain is subject to the General Data Protection Regulation (GDPR) of the European Union.
- c. Likewise, S P Jain respects and complies with other countries' privacy laws where its offshore campuses are located as detailed below:
 - i. Singapore: Personal Data Protection Act 2012 ("PDPA").
 - ii. United Arab Emirates (Dubai): Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data ("PDPL").
 - iii. India: Digital Personal Data Protection Act, 2023 ("DPDPA").
- d. This *Privacy Policy* establishes a framework and processes for the responsible collection, use, disclosure and handling of personal information collected and managed by S P Jain and its operations. This policy should be read in conjunction with the *Records Management Policy*.

- e. Heads of Campuses (HoCs) of S P Jain's onshore and offshore campuses may supplement this *Privacy Policy* with additional campus specific privacy procedures and processes to meet any additional local regulatory requirements. All such procedures and processes must be consistent with this *Privacy Policy* and approved by Vice- President Administration in consultation with the Director – People and Culture and the Registrar.

2. Scope

- a. This policy applies to the management of all personal information collected and held by the School. The policy applies to, but is not limited to all staff, prospective and enrolled students, alumni, contractors, partners and other stakeholders handling personal information.
- b. This policy applies to any personal information input into an artificial intelligence (AI) system, including, but not limited to generative (Gen) AI systems and also to output generated by such systems.

3. Definition of personal information

- a. Personal information is defined as any information or an opinion about an individual or an individual who is reasonably identifiable, including information relating to the person's study or work at S P Jain.
- b. Personal information includes name, phone number, email address, nationality, date of birth, educational history, enrolment history, and staff or student identification numbers and may also include other sensitive information such as, passport details, bank account number and details, tax file number, driver's licence number, records and banking details, health records details, photos, race, religion and ethnic background.

4. Collection of personal information

- a. The School only collects and holds personal information that is reasonably necessary to fulfil the School's functions and activities, including for the purposes set out in subparagraphs (g) and (h) below.
- b. Sensitive personal information will only be collected if :
 - i. it is for a lawful purpose connected with the School's functions or activities
 - ii. the collection is considered necessary for that purpose
- c. The School collects personal information only by lawful and fair means. All reasonable steps will be taken to inform the individuals concerned of:
 - i. the purpose for which the information is collected
 - ii. any law or legal authority that requires or authorises particular information to be collected or disclosed to a third party, and
 - iii. any third party to whom S P Jain usually discloses the information that is being collected

- iv. For sensitive personal information, the School will obtain explicit written consent before collection, specifying the purpose of usage
- d. Personal information is collected directly from the concerned individuals where possible unless they provide consent for collection from a third party, or the collection is required or permitted by law.
- e. Some information is also generated by the School in the course of its activities (e.g. assessment results and grades, performance management, professional development).
- f. Individuals are advised of the purpose/s of collection and their rights to access that information.
- g. The purposes for which the School collects and holds student personal information, include but are not limited to:
 - i. the administration of admission, enrolment, and class registration;
 - ii. student retention and academic progress matters;
 - iii. the administration of course completions and award conferrals;
 - iv. administration of prizes and scholarships;
 - v. communication with students;
 - vi. the School's internal planning purposes;
 - vii. the provision of student services including health and well-being programs;
 - viii. diversity and equity purposes including disability support and reasonable adjustments;
 - ix. provision of associated services such as safety and security including the monitoring of IT activity and security cameras;
 - x. arrangement of work-integrated learning placements;
 - xi. conduct of student elections;
 - xii. administration matters, including transactions relating to payments and fees;
 - xiii. complaints and appeals processes;
 - xiv. investigation of general misconduct or alleged breaches of the Student Code of Conduct and/or academic integrity;
 - xv. provision of information to current and former students and applicants about S P Jain's courses, activities and programs;
 - xvi. fostering alumni relations;
 - xvii. marketing purposes
 - xviii. public health emergencies;
 - xix. verification of student records for employers or external bodies with legitimate reasons for checking the academic credentials of students, and
 - xx. any legislative or regulatory obligations.
- h. The purposes for which the School collects and holds staff, visitor and stakeholder information, include but are not limited to:
 - i. management of employment, onboarding and performance;
 - ii. visa and immigration purposes;
 - iii. administration of wages, superannuation and other employment benefits;
 - iv. taxation purposes;

- v. safety and security including monitoring IT activity and security cameras to provide access to facilities and services;
- vi. health and wellbeing;
- vii. diversity and equity purposes including disability support and reasonable adjustments;
- viii. marketing purposes
- ix. disability, rehabilitation and compensation matters;
- x. investigation of allegations of misconduct and breaches of the Code of Conduct;
- xi. complaints and appeals processes;
- xii. public health emergencies, and
- xiii. any legislative or regulatory obligations

i. The School collects personal information through various methods including but not limited to emails, online forms, student/learning management systems, staff management systems, security cameras, audio and video recordings of classes and events.

j. A privacy notice is provided to individuals before information is collected. A privacy notice may be provided in a variety of ways including but not limited to:

- i. online forms
- ii. via a consent or other form
- iii. in terms and conditions for an app, information system or service;
- iv. in a local privacy policy.

k. Individuals who have given the School their consent to use personal data for marketing purposes or similar, have the right to change their mind at any time and withdraw that consent to use their personal data for marketing activity through all channels, or selected channels.

l. S P Jain websites may use cookies and similar technologies to enhance user experience, analyse website traffic, and personalize content. The School may also collect personal information and other data from an individual through the use of cookies or other automated means, and this information may include a person's server address, domain name, IP address, the date and time of the visit, the pages accessed and documents downloaded; the previous site visited and the type of browser used. Individuals can manage the cookies through browser settings, noting that that disabling cookies may affect the functionality of the School's websites.

m. Usage and availability of AI and Gen AI tools (e.g., chatbots, AI tutor) are clearly identified as such to both internal and external users.

n. Where personal information is the product of an AI tool, an authorised user will verify the accuracy of the information.

o. External sites that are linked to or from S P Jain's websites or student and staff systems are generally not under the School's control or responsibility. Individuals who access linked third-

party websites, are encouraged to review this third-party privacy policy, terms of use and content.

5. Storage and management of personal information and School's records

- a.** S P Jain will take all reasonable steps to:
 - i. ensure that information collected, stored or processed by the School is accurate, relevant, current, complete and not misleading;
 - ii. protect such information against misuse, loss, unauthorised access, modification, or disclosure through appropriate safeguards, and
 - iii. maintain an information security program aligned with recognised international standards, such as ISO 27001, incorporating managerial, technical, operational and physical controls consistent with the *Information and Cyber Security Policy*.
- b.** All personal information for student, staff, casual and sessional staff, partners, alumni and other stakeholders is stored as hard copy or electronic records in an approved physical or online storage system in accordance with the *Records Management Policy*.
- c.** The School uses physical security, password protection and other measures to ensure that all personal information is protected from misuse, interference and loss, and from unauthorised access, modification and disclosure.
- d.** Where information or personal information is stored on a portable storage device (PSD), the device owner must take all reasonable steps to ensure the security of the PSD and the information stored on it is protected.
- e.** Personal or sensitive information must not be stored on any application, software or device including AI and Gen AI tools and platforms that has not been provided or approved by S P Jain.
- f.** Personal information will only be stored or handled in accordance with the various policies approved by the Board of Directors or the supporting processes and guidance materials developed and approved by the following in their respective areas:
 - Registrar
 - Vice President- Administration
 - Director – People and Culture
 - Vice President – Academic
 - Head of Campuses
 - Chief Financial Officer
 - Chief Marketing Officer
 - Director – Information Technology
 - Chief Information Security Officer
 - Privacy Officer

- g. All information management system users are required to undergo appropriate training as directed and organised by the Vice President - Administration or Registrar and must follow the requirements set out in the appropriate manuals and guides.
- h. As an Institute of Higher Education with campuses located in multiple countries, S P Jain operates across different jurisdictions. The School ensures that personal information transmitted between campuses is managed in accordance with all the jurisdictions' privacy laws for the protection and integrity of information.
- i. Any cross-border (other than the 4 campus jurisdictions) transmission of information to a location where different privacy laws apply will be authorised by the Registrar and VP- Administration after ensuring that the transmission is reasonably necessary for the School's functions or business activities, and :
 - S P Jain can reasonably ensure the recipient does not breach the law, and
 - the transmission is permitted by law, or
 - specific written consent of the individuals whose information is being transmitted has been obtained.
- j. The School will not be held responsible for loss, damage, or misuse of personal data if caused by events beyond reasonable control (Force Majeure), including but not limited to natural disasters, war, terrorism, computer hacking, or major systemic failures.

6. Access to personal information and records

- a. **Access to student personal information and records**
 - i. S P Jain will take all reasonable steps to allow individual students to view the information it holds about them.
 - ii. A student may directly view a limited amount of information about themselves which is held on S P Jain's Student Information System and Learning Management System. Requests to view additional information or documents held by S P Jain must be directed to the Registrar's Office.
 - iii. For students under 18, information regarding attendance, progress and general well-being may be provided to keep parents and/or guardians adequately informed.
 - iv. Staff access to student information will be restricted to those staff members who require the information to carry out their duties and responsibilities.
 - v. Staff who are granted access to student information will only use that information for legitimate purposes and activities, in accordance with the scope of their duties and responsibilities.
 - vi. Where input of student personal information into AI systems is approved, staff with access to student personal information should ensure that this information is only entered into the School's secure AI systems and tools including Gen AI tools. Student information should not be entered into publicly available Gen AI tools.

b. Access to staff personal information and records

- i. S P Jain will take all reasonable steps to allow individual staff to view the information it holds about them.
- ii. A staff may directly view a limited amount of information about themselves which is held on S P Jain's Staff Management System. Requests to view additional information or documents held by S P Jain must be directed to the Regional People and Culture Managers.
- iii. Access to staff information will be restricted to those staff members who require the information to carry out their duties and responsibilities.
- iv. Staff who are granted access to staff information will only use that information for legitimate purposes and activities, in accordance with the scope of their duties and responsibilities.
- v. Where input of staff personal information into AI systems is approved, staff with access to staff personal information should ensure that only the School's secure AI systems and tools including Gen AI tools are used. Staff information should not be entered into publicly available Gen AI tools.

c. S P Jain reserves the right to refuse access to personal information in circumstances where, for example, giving access has an unreasonable impact on another person's privacy, it may prejudice an investigation of misconduct, or the request is unlawful. In such cases, the School will provide reasons for any refusal to give access to personal information and how the person can appeal the decision.

7. Amendments to personal information

- a. S P Jain takes all reasonable steps to ensure that the personal information it holds is accurate, up-to-date, complete and relevant.
- b. S P Jain may update or correct personal information it holds about an individual at their written request (where required with supporting evidence) to ensure the information is accurate, up-to-date, relevant and not misleading.
- c. Students, staff and alumni who wish to update or correct personal information held by the School may also be able to update or correct certain details such as their address and emergency contact details directly via the School's online information management systems. They may be required to provide/upload supporting evidence with such updates.
- d. S P Jain reserves its right to amend or correct information in certain circumstances for example, if the change would result in the information being out of date, inaccurate or misleading; insufficient evidence has been provided to support the change or the change conflicts with legislation. In such cases, the School provides reasons for any refusal to amend or correct personal information.

8. Disclosure to third parties

S P Jain will not disclose information about students, staff, alumni, partners and other stakeholders to persons, bodies or agencies outside the School including parents, spouses or other relatives or friends of the student, or to staff who have no need of the information, unless one of the following provisions apply:

- a. The School will not share personal data with third parties for direct marketing purposes unless the individual has provided specific consent.

- b. Disclosure to third parties with the consent of the concerned individual**

Information may be disclosed to third parties with the consent of the concerned individual. Such consent should be given in writing. The consent should specify the extent and nature of the information the individual agrees to disclose.

- c. Disclosure to guardians of underage students**

For students under 18, information regarding attendance, progress and general well-being may be provided in order to keep parents and/or guardians adequately informed.

- d. Disclosure under statutory or other legal authority in Australia**

S P Jain is required under State and Commonwealth legislation to provide personal information of students, staff and other stakeholders to the following Australian government departments and agencies. It will take reasonable steps to inform these individuals of the types of information that are usually disclosed or reported to government departments and external agencies:

- i. The Tertiary Education Quality and Standards Agency (TEQSA) established under the TEQSA Act (2011)
 - ii. The Australian Government department responsible for tertiary student support funding and programs, for reporting purposes and to enable the administration of Commonwealth student contribution, tuition fee and loans programmes
 - iii. Centrelink, as required to enable verification of entitlement to Centrelink payments
 - iv. The Australian Taxation Office (ATO) on the liabilities of students who have elected to defer and repay costs incurred during their study under the range of Commonwealth loans and contribution programs
 - v. The relevant Australian Government department (currently the Department of Home Affairs) responsible for student visa requirements in respect to relevant administrative information on student visas
 - vi. Where disclosure to a government agency is mandated, the School will act only on a written request that specifies the purpose of the request, and the agency must confirm that the information will not be published or shared further.

- e. Disclosure under statutory or other legal authority outside Australia**

Under the legislation relevant to the countries within which its campuses are located, S P Jain is required to provide personal information of students, staff and other stakeholder information to government departments and agencies. It will take reasonable steps to inform

these individuals of the types of information that are usually disclosed or reported to government departments and external agencies.

f. *Disclosure of information under court order*

S P Jain must also provide personal information of students, staff and other stakeholders if required to do so under a Court order.

g. *Release of information to state or Federal Police*

S P Jain may be required to release information to state or Federal police where a student, staff or other stakeholder is reasonably suspected of having committed a criminal offence or can assist in the prevention or solving a crime, or in the case of an emergency. Such requests must be directed to the Head of Campus who must confirm the identity and credentials of the person requesting the information and recommend release of information to the Registrar's Office or Vice President-Administration, except in case of an emergency where there is no time available for approval where the Head of Campus may make the decision.

h. *Staff of associated or affiliated institutions and accreditation and ranking organisations*

- i. S P Jain may grant access to student, staff and other stakeholder information to staff of an associated or affiliated institution, who have a demonstrated need to access it to carry out duties relevant to the administration of admission or enrolment activities, course or topic administration or other relevant activities in connection with S P Jain students or staff. Requests for access to student information should be directed to the Registrar who will review the request and approve further action as appropriate.
- ii. S P Jain may grant access to student, staff and other stakeholder personal information to established and recognised professional registration, accreditation and ranking bodies with respect to necessary reporting requirements (for example EQUIS, AMBA, Financial Times and Bloomberg).

i. *Release of personal information to contracted third parties*

Where any staff of department needs to release student information to contracted service providers that the School uses to perform services on its behalf, release of student information must be approved by the Registrar and the contract must include provisions to protect the security and confidentiality of the student information.

j. Where service providers — including those located overseas — access, store or process personal data, they must comply with all applicable data protection and privacy laws. These providers shall be bound by written agreements that ensure confidentiality, lawful processing, and secure transmission and storage of personal data, in accordance with the *Information and Cyber Security Policy*.

k. *Verification of an academic record or testamur*

- i. Enquiries concerning a student's academic records from a person or body with a valid reason for seeking the information (e.g. another registered provider or a prospective employer who has been presented with a testamur or transcript of academic record from the student) should be referred to the Office of the Registrar.

- ii. Such requests must be in writing and include a copy of the testamur or transcript of academic record. On receipt of a request, the Registrar's Office will check the identity and credentials of the person or body making the request, and if appropriate, will verify the student's academic record or testamur.
- iii. Where there is evidence that a student may have submitted to another educational institution, employer, or other person or body a falsified testamur or transcript of academic record, a formal report will be made to the Registrar. The report will include a copy of the falsified document, details of when and where this document was submitted, and a copy of the student's actual academic record. On receipt of the report the Registrar will investigate and write to the student or former student inviting them to respond to an allegation that they have falsified an official S P Jain document and undertake any additional investigation as appropriate.
- iv. Where an allegation that a student or former student has falsified an official S P Jain document has been proven, the Registrar in consultation with the VP – Administration may take one of the following actions, taking into account, any statement or information presented by the student or former student, including any extenuating circumstances:
 - issue the student or former student with a formal warning about his or her conduct
 - approve the application of a sanction precluding the student or former student from further enrolment at S P Jain
 - refer the matter to an external authority
- v. The Registrar will notify the student or former student of the outcome of the investigation.

I. *Serious and imminent threat to the life or health*

S P Jain may disclose information about students, staff and other stakeholders to the police, emergency services, an external health service provider, or nominated emergency contact person where there is a reasonable belief that disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the student or another person. Disclosure of information in these circumstances will only be made by the respective HoC.

9. Retention and Disposal of personal information

- a. Retention and disposal of the personal information and records will follow the processes established by the *Record Management Policy*.
- b. Personal data shall be retained only for as long as necessary to fulfil the purpose for which it was collected and to satisfy applicable legal, regulatory and contractual requirements. Thereafter, the data shall be securely deleted or permanently de-identified, in line with the *Information and Cyber Security Policy*.

10. Breaches in Privacy

- a. A privacy breach occurs when there is unauthorised access to, or use, disclosure or disposal of personal information held by S P Jain. Any staff member who becomes aware of an actual or potential privacy breach must immediately inform the Vice President – Administration.
- b. The Vice President – Administration will arrange for the requisite investigation to confirm the breach and its extent and to notify affected individuals, the Australian Information Commissioner and/or the relevant regulatory authority at the School's offshore campuses in the event of a data breach that is likely to result in serious harm to any person to whom the information relates.

11. Complaint and Grievances

- a. A student dissatisfied with the management of their personal information may lodge a complaint in accordance with the *Student Grievance and Mediation Policy and Procedures*.
- b. A staff member dissatisfied with the management of their personal information may lodge a complaint in accordance with the *Staff Grievance and Mediation Policy and Procedures*.
- c. Other individuals may lodge their complaint with the Registrar or the respective Head of Campus.
- d. The School will designate a Privacy Grievance Officer as the primary contact for concerns and feedback regarding personal information management.

12. Policy Compliance

- a. All employees, contractors, suppliers, vendors, service providers, partners, affiliates, and third parties must comply with this policy as applicable. Compliance will be enforced through:
 - i. Monitoring
 - ii. Self-assessments by department heads
 - iii. Security audits

13. Exceptions

- a. Any exception to this Policy shall not be universal and must be formally approved by the Chief Information Security Officer (CISO).
- b. Approved exceptions shall be documented, assigned a defined period of validity not exceeding one year, and reviewed at least annually to evaluate changes in associated risks and the feasibility of alternative controls.

14. External Regulation/Legislation

- a.** This Policy aligns with all applicable global, regional and national legislation and regulatory requirements governing Information Security, Cybersecurity and Data Protection in the jurisdictions where S P Jain operates.
- b.** This policy also ensures compliance with contractual obligations, accreditation requirements and standards prescribed by regulatory or funding authorities relevant to S P Jain's operations.

Related Documents

- a. Records Management Policy
- b. Staff Grievance and Mediation Policy and Procedures
- c. Student Grievance and Mediation Policy and Procedures
- d. Information and Cyber Security Policy

Policy History and Updates Approved by the BOD

Version	Date Executed	Revisions	Approval
1	13 January 2025	New Policy	Board of Directors
2	10 December 2025	<p>Added broader definitions of personal information, sensitive information, and AI-generated data to reflect emerging data types and digital processing practices.</p> <p>Added explicit requirements for obtaining and documenting consent, particularly when collecting or processing sensitive information or student personal data through digital systems</p> <p>Added clearer provisions governing the transfer of personal information to third parties or systems located in Dubai, Singapore, Sydney, India and other international jurisdictions</p> <p>Added new requirements for staff handling of personal information when using AI or GenAI tools, including prohibitions on</p>	Board of Directors

Version	Date Executed	Revisions	Approval
		<p>entering identifiable data into non-approved systems</p> <p>Enhanced references to cybersecurity controls, monitoring practices, system logging and compliance with the Information & Cyber Security Policy</p> <p>Added requirements for contractual compliance with privacy principles by all third-party processors or cloud service providers</p>	