



Personal Data Protection Notice for Sunway Education Group

Sunway Education Group and Sunway Group of Companies, including Sunway Berhad, Sunway Integrated Properties Sdn. Bhd., and the subsidiary companies of Sunway Berhad ("**Sunway**"), respect and are committed to the protection of your personal data and your privacy. In this Personal Data Protection Notice, "**we**", "**us**", and "**our**" refer to Sunway, and "**you**" and "**your**" include third parties whose personal data you have provided to Sunway.

This Personal Data Protection Notice explains how we collect and handle your personal data, including your sensitive personal data, in accordance with the Malaysian Personal Data Protection Act 2010. Please note that Sunway may amend this Personal Data Protection Notice at any time without prior notice and will publish the amended or revised Personal Data Protection Notice on our website or by email.

We may collect and process personal data of children under the age of 18 years old. If you are under 18 years old, please obtain your parent's or guardian's consent before you provide your personal data to Sunway. If we learn that we have collected such data from a child under 18 without verification of parental consent, we will delete the data. If you believe we might have any data from or about a child under 18 without parental consent, please contact us using the information provided below.

Note that your sensitive personal data (e.g. your physical or mental health or condition, or biometric data) and your medical information (e.g. patient medical history, diagnostics, allergies) **will not** be shared or disclosed to any entity unless where you have provided your express, written consent.

1 Personal data

1.1 Type of personal data

"**Personal data**" means any data which relates to you or any other third party related to you which was collected or provided to Sunway for the purposes stated in Section 2 below.

We process your personally identifiable data, which may include your name, NRIC number, contact details, religious beliefs, medical history or information, previous examination results, academic records, financial and banking account details, information regarding your family, relatives or third party that you provide to us, your preferences in relation to products and services you purchase from us, information in audio and/or video format (including voice recordings, video recordings, closed-circuit television ("**CCTV**") and security recordings), images (including photographs), location tracking/GPS information, other types of data as stated in this [link](#), and all other data which is provided by you to Sunway via these channels:

- (i) Sunway's website and 3rd party websites affiliated with Sunway;
- (ii) mobile application from Sunway;
- (iii) electronic forms from Sunway;
- (iv) physical forms from Sunway;
- (v) email; and/or
- (vi) social media and other communication messaging platforms.

1.2 Source of personal data

- (i) Student or potential student: Sunway collects your personal data directly from you or indirectly from your parents, guardians and/or recruitment agents when you, your parents, guardians and/or recruitment agents send us completed enquiry, application and/or registration forms via various means, including online and physical hardcopies at public venues, seminars held at schools and/or when you, your parents/guardians and/or your recruitment agents visit our campuses. Your personal data may also be collected from cookies through the use of our website.
- (ii) Parent/guardian of our student or potential student: Sunway collects your personal data directly from you or indirectly from your child/ward, or recruitment agents when you send us completed enquiry, application and/or registration forms via various means, including online and physical hardcopies at public venues, seminars held at schools and/or when you, your child/ward and/or your recruitment agents visit our campuses. Your personal data may also be collected from cookies through the use of our website.
- (iii) Client/customer or potential client/customer for our products, services, events, conferences, seminars and/or other marketing activities organised by us: Sunway collects your personal data directly from you when you express an interest to be contacted for such events and marketing activities (including business card collections via the fish bowl method or during previous events organised by us). Your data may also be collected indirectly (for example, via trade/online directories) or from cookies through the use of our website.
- (iv) Donor of Jeffrey Cheah Foundation: Sunway collects your personal data directly from you when you fill up the donation/pledge form via online and/or physical hardcopies. Your data may also be collected from cookies through the use of our website.
- (v) Vendor, supplier or service provider: Sunway collects your personal data directly from you or indirectly from your employer or credit reference agencies when tendering for projects or as part of commercial transactions. Your personal data may also be collected from cookies through the use of our website.

1.3 Obligatory personal data

All data requested for in the relevant forms is obligatory to be provided by you, unless stated otherwise.

Should you fail to provide the obligatory data, we may be unable to process your request and / or provide you with relevant services.

2 Purposes of collecting and further processing (including disclosing) your personal data

- (i) Student or potential student: Your personal data is collected and further processed by Sunway as required or permitted by law and for various academic, educational, and administrative purposes, including the following:
 - a) to process your application for admission and thereafter to ensure continuous provision of academic and educational services to you (including recording the details of studies) and determining your academic achievements;
 - b) to provide ancillary services such as visa application and insurance coverage throughout your tenure of studies with us;
 - c) to assist you in placements, internships, or attachments with third parties (where such internships, placements, or attachments are required in order to complete your course);

- d) to administer and communicate with you in relation to our tuition fees and other relevant payments;
- e) to manage your use of our facilities and management of our events, such as libraries, residences, computing facilities, graduations, and alumni;
- f) to operate our campuses in a manner which is physically safe, secure, and befitting of health and safety requirements;
- g) to process your request for any products and services;
- h) to conduct and support internal marketing analysis and analysis of student patterns, choices, and engagement with Sunway's related companies, subsidiaries, holding companies, and affiliate companies;
- i) to be collected and stored into a central repository that is accessible by Sunway's related companies, subsidiaries, holding companies, and affiliate companies;
- j) to create and deliver personalised products and services that are unique to you to enhance your customer experience;
- k) to provide you with a more seamless customer experience;
- l) to support research and innovation of our products and services;
- m) to store and carry out data analytics processes;
- n) to improve our products and services;
- o) for the matching of loyalty points provided by a third party/business partner to advertise and market products and services to you;
- p) for purposes of collaboration with a business partner to advertise and market products and services to you;
- q) to comply with Sunway's legal and regulatory obligations in the conduct of its business;
- r) to contact you regarding products, services, upcoming events, promotions, advertising, marketing, and commercial materials which we feel may interest you*;
- s) to send you season's greetings, special occasion messages, or other similar communications;
- t) to allow third parties to contact you for advertising, promotional, or marketing campaigns conducted by any third-party entities;
- u) to ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device; and
- v) for Sunway's internal records management.

In particular, religious belief is processed for reporting purposes to the Ministry of Education and any other relevant authorities. Medical details are processed to assist you in your studies at Sunway Education Group.

- (ii) Parent/guardian of our student or potential student: Your personal data is collected and further processed by Sunway as required or permitted by law and for various academic, educational, and administrative purposes, including the following:
 - a) to process the student's application for admission;
 - b) to contact you in the event of an emergency or accident;
 - c) to inform you about the progress of the students, our tuitions fees, and other relevant payments;
 - d) to provide ancillary services to the students, such as visa application and insurance coverage;
 - e) to process your request for any products and services;
 - f) to conduct and support internal marketing analysis and analysis of parent/guardian's patterns, choices, and engagement with Sunway's related companies, subsidiaries, holding companies, and affiliate companies;

- g) to be collected and stored into a central repository that is accessible by Sunway's related companies, subsidiaries, holding companies, and affiliate companies;
- h) to create and deliver personalised products and services that are unique to you to enhance your customer experience;
- i) to provide you with a more seamless customer experience;
- j) to support research and innovation of our products and services;
- k) to store and carry out data analytics processes;
- l) to improve our products and services;
- m) for the matching of loyalty points provided by a third party/business partner to advertise and market products and services to you;
- n) for purposes of collaboration with a business partner to advertise and market products and services to you;
- o) to comply with Sunway's legal and regulatory obligations in the conduct of its business;
- p) to contact you regarding products, services, upcoming events, promotions, advertising, marketing, and commercial materials which we feel may interest you*;
- q) to send you season's greetings, special occasion messages, or other similar communications;
- r) to allow third parties to contact you for advertising, promotional, or marketing campaigns conducted by any third-party entities;
- s) to ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device; and
- t) for Sunway's internal records management.

(iii) Client/customer or potential client/customer for products, services, events, conferences, seminars and other marketing activities organised by us: Your personal data is collected and further processed by Sunway as required or permitted by law and for the following commercial purposes:

- a) to provide you with information, products or services that you request from us and any incidental purposes thereto;
- b) to contact you regarding products, services, and upcoming events;
- c) to conduct and support internal marketing analysis and analysis of customer/client's patterns, choices, and engagement with Sunway's related companies, subsidiaries, holding companies, and affiliate companies;
- d) to be collected and stored into a central repository that is accessible by Sunway's related companies, subsidiaries, holding companies, and affiliate companies;
- e) to create and deliver personalised products and services that are unique to you to enhance your customer experience;
- f) to provide you with a more seamless customer experience;
- g) to support research and innovation of our products and services;
- h) to store and carry out data analytics processes;
- i) to improve our products and services;
- j) for the matching of loyalty points provided by a third party/business partner to advertise and market products and services to you;
- k) for purposes of collaboration with a business partner to advertise and market products and services to you;
- l) to contact you regarding products, services, upcoming events, promotions, advertising, marketing, and commercial materials which we feel may interest you*;
- m) to send you season's greetings, special occasion messages, or other similar communications;
- n) to allow third parties to contact you for advertising, promotional, or marketing campaigns conducted by any third-party entities;

- o) to notify you about changes to our products and services;
 - p) to ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device;
 - q) to comply with Sunway's legal and regulatory obligations in the conduct of its business; and
 - r) for Sunway's internal records management.
- (iv) Donor of Jeffrey Cheah Foundation: Your personal data is collected and further processed by Sunway as required or permitted by law and for Sunway's internal records management.
- (v) Vendor, supplier or service provider: Your personal data is collected and further processed by Sunway as required or permitted by law and to give effect to your requested commercial transaction, including the following:
- a) to administer and give effect to the commercial transaction;
 - b) to process any payments related to the commercial transaction;
 - c) for internal investigations, audit, or security purposes;
 - d) to comply with Sunway's legal and regulatory obligations in the conduct of its business;
 - e) to contact you regarding products, services, upcoming events, promotions, advertising, marketing, and commercial materials which we feel may interest you*;
 - f) to ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device; and
 - g) for Sunway's internal records management.

** Where you have indicated your consent to receiving marketing or promotional updates from Sunway, you may opt out from receiving such marketing or promotional material at any time. You may select the "unsubscribe" option provided in Sunway's email blasts/SMS blasts, or you may contact Sunway at the details provided in Section (6) below.*

Data Analytics Processing

Sunway wants to share and consolidate your data into a single platform to be shared across the Sunway Group of Companies, including Sunway Berhad and Sunway Education Group Sdn Bhd. We will use and share your data for analytics and measurement purposes to understand how our products and services are used, to help improve the products and services we offer, to provide you with more personalised products and services, and to provide a more seamless customer experience.

For example, we analyse data about your choice and preferences in relation to the products and services you purchase from us to send you targeted advertisements and promotional materials. We also process data about the ads you interact with to help us and advertisers understand the performance of various ad campaigns.

3 Disclosures and transfers of personal data (within or outside of Malaysia)

3.1 Entities within Sunway

Your personal data provided to us is processed by and disclosed to entities (within or outside of Malaysia) within Sunway (including related companies, subsidiaries, holding companies, associated companies and outsourcing partners) including the list of entities in this [Sunway Berhad \[https://ir2.chartnexus.com/sunway/doc/corporate-directory-listing\]](https://ir2.chartnexus.com/sunway/doc/corporate-directory-listing) and [Sunway Education Group Sdn Bhd, \[https://sunway.edu.my/corporate-directory-listing\]](https://sunway.edu.my/corporate-directory-listing) for the purposes stated in Section 2 (Purposes of collecting and further processing (including disclosing) your personal data) above.

Sunway will ensure that:

- (i) access to your personal data is restricted to staff who are contractually required to process your personal data in accordance with their respective job requirements.

3.2 Classes of third parties

Your personal data may be disclosed or transferred to relevant third parties (within or outside of Malaysia) as required under law, pursuant to relevant contractual or business relationships, to our service providers, or for the purposes stated in Section 2 (Purposes of collecting and further processing (including disclosing) your personal data) above (or directly related to those purposes).

Your personal data (including your sensitive personal data) may also be disclosed or provided to advertisers, business partners, or other third-party entities and their advisers/representatives (in or outside of Malaysia) for purposes of any advertising, promotional, or marketing campaigns conducted by any third-party entities.

In the event of a potential, proposed, or actual sale of business, disposal, acquisition, merger, or re-organisation (“**Transaction**”), your personal data may be required to be disclosed or transferred to a third party as a result of the Transaction. You hereby acknowledge that such disclosure and transfer may occur and permit Sunway to release your personal data to the other party and its advisers/representatives.

- (i) Student or potential student: Your personal data may be disclosed to the following classes of third parties:
 - a) the Ministry of Education, other relevant government departments/agencies, statutory authorities, and industry regulators;
 - b) any person to whom we are compelled or required to disclose under law or in response to a competent or government agency;
 - c) foreign government departments, government agencies or authorities if you are enrolled in a foreign accredited programme;
 - d) Malaysian Immigration Department (including agencies appointed by Malaysian Immigration Department to carry out its services) if you are required to obtain or renew your student visa for your tenure of studies with Sunway Education Group;
 - e) foreign embassies (including agencies appointed by foreign embassies to carry out their services) if Sunway assists you in your visa application as part of your transfer procedure to foreign universities;
 - f) your sponsors including your parents/guardians;
 - g) our external counterparts providing external, twinning, or other similar educational programmes;
 - h) third parties providing you with attachment placements or internships as part of your course requirements;
 - i) relevant professional or statutory regulatory bodies or accreditation bodies depending on your programme or course requirements;
 - j) law enforcement agencies; and
 - k) third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretaries, printing companies, telecommunications companies, contractors, conference/training/event organisers, other advisers, travel agencies, recruitment agencies, and insurance companies).

Upon your graduation, we will retain a summary of your personal data indefinitely for our records. Your contact details will be added to our alumni database. The Alumni Relations team or your faculty/department may contact you in future to keep you up-to-date with news which may be of interest to you, including opportunities to connect with your old classmates and to build up your network for personal and career development. If you wish to opt out from receiving these updates,

select the “unsubscribe” option provided in the email updates sent by the Alumni Relations team. Please note that the Alumni Relations team will not disclose your personal data to third parties.

- (ii) Parent/guardian of our student or potential student: Your personal data may be disclosed to the following classes of third parties:
- a) the Ministry of Education, other relevant government departments/agencies, statutory authorities, and industry regulators;
 - b) any person to whom we are compelled or required to disclose under law or in response to a competent or government agency;
 - c) foreign government departments, government agencies or authorities if you are enrolled in a foreign accredited programme;
 - d) Malaysian Immigration Department (including agencies appointed by Malaysian Immigration Department to carry out its services) if the student is required to obtain or renew his/her student visa for his/her tenure of studies with Sunway Education Group;
 - e) foreign embassies (including agencies appointed by foreign embassies to carry out their services) if Sunway assists the student in his/her visa application as part of his/her transfer procedure to foreign universities;
 - f) our external counterparts providing external, twinning, or other similar educational programmes;
 - g) law enforcement agencies; and
 - h) third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretaries, printing companies, telecommunications companies, contractors, conference/training/event organisers, other advisers, travel agencies, recruitment agencies, and insurance companies).
- (iii) (a) Client/customer or potential client/customer for products, services, events, conferences, seminars, and other marketing activities organised by us;
- (b) Donor of Jeffrey Cheah Foundation; and
- (c) Vendor, supplier, tenant, or service provider

In relation to the three categories stated above, your personal data may be disclosed to the following classes of third parties:

- a) third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretaries, printing companies, contractors, conference/training/event organisers, and other advisers);
- b) law enforcement agencies;
- c) government departments/agencies, statutory authorities, and industry regulators including Bank Negara Malaysia, Bursa Malaysia, Ministry of Health, Ministry of Education, Ministry of Works, LHDN/IRB, KWSP/EPF, Personal Data Protection Commissioner, MHTC (Malaysian Healthcare Tourism Council), SOCSO, Securities Commission Malaysia, Malaysian Medical Council, and Department of Statistics Malaysia; and
- d) any person to whom we are compelled or required to disclose under law or in response to a competent or government agency.

3.3 Transfer of your personal data outside Malaysia

It may be necessary for us to transfer your personal data outside of Malaysia if any of the third parties mentioned in Section 3.2 (Classes of third parties) above, including our service providers or business

partners who are involved in providing any services to us, are located or have processing facilities in countries outside of Malaysia.

You consent to us transferring your personal data outside Malaysia to such third parties and for the purposes set out in Section 2 (Purposes of collecting and further processing (including disclosing) your personal data).

We shall take necessary steps to ensure that any such third parties, whether within Malaysia or based outside of Malaysia, are contractually bound to protect your personal data to a relevant standard that is comparable to applicable laws and that they can only process your personal data under our instructions.

4 Websites

4.1 Links to other sites

Links to other sites are provided for your convenience and information. These sites may have their own privacy statements in place, which we recommend you review if you visit any linked websites. We are not responsible for the content on the linked sites or any use of the site.

4.2 Location-enabled products or applications

Location-enabled products or applications transmit your location data to us. We do not use the data sent or provided other than to provide the service you request. Location-enabled features are opt-in, and you have control over your participation and can turn these services off at any time or uninstall them.

Some mobile applications will utilise Google Analytics (or a similar tool) to help us better serve you through improved products, services, and revisions to the mobile applications. This collected data will not identify you to us. It may, however, let us know anonymously which services and features you are using the most within the application, as well as device type and hardware features, country, and language of download.

4.3 Cookies

A cookie may be used in the processing of your data. A cookie is a text file placed into the memory of your computer and / or device by our computers. A copy of this text file is sent by your computer and / or device whenever it communicates with our server. We use cookies to identify you. We may also collect the following data during your visit to our website and/or the fully qualified domain name from which you accessed our site, or alternatively, your IP address:

- (i) the date and time you accessed each page on our website;
- (ii) the URL of any webpage from which you accessed our site (the referrer); and
- (iii) the web browser that you are using and the pages you accessed.

Some web pages may require you to provide a limited amount of personal data in order to enjoy certain services on our websites (system login credentials, email address, and contact details, etc). This personal data will only be used for its intended purposes, i.e. to respond to your message or deliver the requested services.

5 Right to access and correct personal data

You have the right to access and correct your personal data held by us (subject always to certain exceptions). We will make every endeavour to ensure your personal data is accurate and up to date. Therefore, we ask that if there are changes to your data, you should notify us directly.

If you would like to access your personal data, please refer to our standard data access form available [here](#) and send us the completed form or query to the contact details in Section 6 below. If you would like to correct your personal data, please contact us at the details provided in Section 6 below.

6 Limiting the processing of personal data, withdrawing consent, further enquiries, transmission of personal data and complaints

If:

- (i) you would like to obtain further information on how to limit the processing of your personal data or withdraw your consent on personal data processing;
- (ii) you would like to request to limit your personal data or withdraw your consent on personal data processing (note that we may retain your data where there is a legal basis to do so);
- (iii) you request the transmission of your consented personal data to another organisation, in a compatible suitable machine-readable form;
- (iv) you have any further queries; or
- (v) you would like to make a complaint in respect of your personal data, you may contact:

Mr Ng Kok Cheng
Data Protection Officer
Financial Services
SUNWAY EDUCATION GROUP SDN BHD
No. 5, Jalan Universiti, Bandar Sunway
47500 Subang Jaya, Selangor Darul Ehsan, Malaysia
Email: seg_dpo@sunway.edu.my

Dr Jason Lee Kian Tek
Data Protection Officer
The Registry
SUNWAY EDUCATION GROUP SDN BHD
No. 5, Jalan Universiti, Bandar Sunway
47500 Subang Jaya, Selangor Darul Ehsan, Malaysia
Email: seg_dpo@sunway.edu.my

Ms Sarah Chan Sook Yian
Data Protection Officer
Sunway International School
SUNWAY EDUCATION GROUP SDN BHD
No. 5, Jalan Universiti, Bandar Sunway
47500 Subang Jaya, Selangor Darul Ehsan, Malaysia
Email: seg_dpo@sunway.edu.my

For student matters:

Tel : [\(603\) 7491 8622](tel:(603)74918622)
Email : registry@sunway.edu.my

For programme information:

Tel : [\(603\) 7491 8622](tel:(603)74918622)
Email : info@sunway.edu.my

For Sunway International School matters:

Tel : [\(603\) 5639 8800](tel:(603)56398800)
Email : infosis@sunway.edu.my

For alumni matters:

Tel : [\(603\) 7491 8622](tel:60374918622)

Email : alumni@sunway.edu.my

For public relations matters:

Tel : [\(603\) 7491 8622](tel:60374918622)

Email : pr@sunway.edu.my

Customer Service Assistant Manager

SUNWAY PALS membership service

Telephone No : [03-56333988](tel:0356333988) (Operation Hours: Mon-Sun, 10am-10pm)

Email Address : sunwaypals@sunway.com.my

For information on all other businesses, please submit your enquiry via Group Brand Marketing & Communications at <https://www.sunway.com.my/contact-us/>

7 Data security

We have implemented reasonable physical, technical, and procedural measures to secure your personal data from accidental loss and from unauthorised or accidental access, use, alteration, and disclosure. All data you provide to us is stored on our secure servers. The measures we implement include the following:

- (a) registering our employees handling personal data into a system/registration book before being allowed access to personal data;
- (b) terminating our employee's access rights to personal data after his/her resignation, termination of contract or agreement, or adjustment in accordance with changes in Sunway;
- (c) controlling and limiting our employee's access to personal data system for the purpose of collecting, processing, and storing personal data;
- (d) providing user ID and password for authorised employees to access personal data;
- (e) terminating user ID and password immediately when our employee who is authorised to access personal data is no longer handling the data;
- (f) establishing physical security procedures as follows:
 - (i) controlling the movement in and out of the data storage site;
 - (ii) storing personal data in an appropriate location which is unexposed and safe from physical or natural threats;
 - (iii) providing a closed-circuit camera at the data storage site (if necessary); and
 - (iv) providing twenty-four (24) hours of security monitoring (if necessary);
- (g) updating the back-up/recovery system and anti-virus software to prevent personal data intrusion;
- (h) safeguarding the computer systems from malware threats to prevent attacks on personal data;
- (i) prohibiting the transfer of personal data through removable media devices and cloud computing services unless consent has been obtained from the top management of Sunway and appropriate safeguards have been implemented;
- (j) recording any transfer of data through removable media devices and cloud computing services unless consent has been obtained from the top management of Sunway and appropriate safeguards have been implemented;
- (k) ensuring that personal data transfers through cloud computing services comply with the personal data protection principles in Malaysia, as well as with personal data protection laws of other countries;
- (l) maintaining a proper record of access to personal data periodically and making such record available for submission when directed by the Personal Data Protection Commissioner;
- (m) ensuring that all our employees involved in processing personal data always protect the confidentiality of the data subject's personal data; and

- (n) binding any third party appointed by us with a contract for operating and carrying out personal data processing activities.

We also ensure that any third-party service providers storing or processing your personal data have implemented similar, acceptable standards of security.

Unfortunately, the transmission of data via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted on our website.

8 Retention of personal data

We will process your personal data for as long as we have a legal basis to do so. Your personal data will be stored only for the period as necessary to fulfil the purposes stated above after which we will ensure that your personal data is deleted if it is no longer necessary to store it.

We also implement the following measures for the management and deletion of personal data stored by us:

- (a) maintaining a system for proper records of personal data disposal periodically and making such records available for submission when directed by the Personal Data Protection Commissioner;
- (b) conducting reviews and disposing of all unwanted personal data in the database from time to time;
- (c) preparing and maintaining a personal data disposal schedule for inactive data with a twenty-four (24)-month period;
- (d) disposing of personal data collection forms used in commercial transactions within a period of fourteen (14) days, except if/unless the forms carry legal values in relation to the commercial transaction; and
- (e) prohibiting the storage of personal data through removable media devices and cloud computing services unless written consent is obtained from an officer authorised by the top management of Sunway.

9 Conflict

In the event of any conflict between this English language Personal Data Protection Notice and its corresponding Bahasa Malaysia Personal Data Protection Notice, the terms in this English language Notice shall prevail.

This Personal Data Protection Notice was last updated on **12 June 2025**.