



## **St Joseph's College**

*Established 1875*

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### **Personal Data (Privacy) Policy Statement**

#### **A. Objectives**

This Statement describes the personal data (privacy) protection policy of St. Joseph's College ("the School") and sets out how the School will deal with the personal data of the stakeholders, donors, job applicants, agents and service providers.

#### **B. Statement of Policy**

The School respects the personal data privacy of all individuals and pledges to be in compliance with the requirements of the Personal Data (Privacy) Ordinance of Hong Kong ("PDPO") so that personal data is protected in accordance with the law. In doing so, we require all our staff to comply with the PDPO and adhere to principles of security and confidentiality.

#### **C. Statement of Practice**

##### **1. Kinds of Personal Data Held**

The following explains the types of records / personal data held by the School.

- (a) **Personnel records**, including but not limited to identity and biographical details, contact details, job applications, teaching and non-teaching staff files (containing personal details, job particulars, details of salary, payments, benefits, etc.), leave and training records, insurance records, provident fund (and equivalent retirement) schemes, participation records, performance appraisals, disciplinary records, information about dependents and affiliates necessary for administrative and operational activities;
- (b) **Records of students, alumni and their family members**, including but not limited to identity and biographical details, contact details, various School-related applications and operations (such as for enrollment in courses, programs or activities run by the School, scholarships or other assistance by the School, etc.) which contain student personal details, academic records (such as examination /

test results or transcript, and so on), student reports, assignment / essay papers, test and examination papers, administrative records (such as attendances, payments, charges and fines, disciplinary information, etc.), non-academic and extra-curricular records (such as student support, internship, community activities, student union and other societal participation, and so on);

- (c) **Records collected from the School's website / intranet**, including but not limited to records containing email addresses and personal details, preferences of web-users, location information (including IP addresses); and
- (d) **Other records**, including but not limited to administration and operational files, records holding personal data provided to the School from associates of the School, individuals participating in activities organized or run by the School (including promotional, educational, or training activities), log records on the use of data facilities, services, or participation in activities, images or videos recorded by cameras, CCTV system or drones, records of requests to access / correct personal data and enquiries from the public and related publications.

## 2. Main Purposes of Collecting and Keeping Personal Data

Unless otherwise required or permitted by the applicable laws or the necessary consent has been obtained, personal data will only be used for the purposes stated at the time the data is collected, which broadly speaking, cover admission, academic, educational / teaching, administrative, communication, recruitment, employment, security and safety, and related activities that are consistent with the School's mission and vision and purposes related to the above. However, specific purposes will vary depending on the nature of the personal data held.

Non-exclusive examples of specific purposes are explained further below.

Personal data held in:

- (a) **Personnel records** are collected and kept for corresponding with staff, recruitment and human resource management purposes including but not limited to obtaining reference checks, determining remuneration and benefits package, maintaining employee records and assessing work performance, determining eligibility for staff benefits, training and development, safeguarding health and safety, emergency purposes, organizing social, promotional, fundraising and other activities and events and complying with the obligations of the School;
- (b) **Records of students, alumni and their family members** are collected and kept

for purposes including but not limited to verifying the identity of students, alumni and their family members, selecting students for admission, providing education and assistance to students, assessing eligibility for awards, bursaries and scholarships, facilitating communications between the School and its students, alumni and their family members, facilitating the provision of information upon request by students, alumni or their family members in relation to their affairs at the School (such as requests for academic certificates and transcripts), compiling statistics on enrollment at the School to facilitate academic / career planning and management, safeguarding health and safety, emergency purposes, organizing social, promotional, fundraising and other activities and events and complying with the obligations of the School;

- (c) **Records collected from the School's website / intranet** are collected and kept for purposes including but not limited to handling various applications submitted through the School's website / intranet, sending communicating information to subscribers registered through the School's website, responding to requests submitted through the School's website / intranet, facilitating website access and compiling statistics on website usage; and
- (d) **Other records** are collected and kept for purposes which vary according to the nature of the record, including but not limited to purposes such as facilitating administration or office functions, ensuring safety and security on campus, organizing and delivering activities, compiling, summarizing, aggregating and / or de-personalizing personal data in connection with research / statistical / analytical activities carried on by the School in furtherance of the School's mission and vision, conducting direct marketing activities (such as communicating information to individuals about the School's activities) in connection with furthering the School's mission and vision, and facilitating publications relating to the School.

### 3. Collection of Personal Data

- (a) **General** : When the School collects personal data from individuals, the School will provide them with a Personal Information Collection Statement on or before the collection in an appropriate format and manner in compliance with the PDPO.
- (b) **Personal data of minors** : The PDPO does not impose any additional obligation on data users to seek the express consent of the minor (or his parent / guardian) on top of having to provide the requisite information just because the data subject is a minor. Notwithstanding this, data users are generally advised not to collect personal data from minors (particularly those who are incapable of making an

informed decision) without prior consent from a person assuming parental responsibility of the minor.

There are situations where the School may need to collect personal data of minors but it may not be practicable to obtain the consent of the parent / guardian because, for example:

- the occasion is not one where parents / guardians may accompany the minor;
- filling in an online application through the internet which the minor may be able to complete on his own, etc.

Under these circumstances, the School will ask for an indication that the minor has consulted his parent / guardian before providing the personal data.

- (c) **Personal data from the School's website / intranet** : In order to provide web-users with a smooth browsing experience, we may need to use technical means (such as cookies) to collect information from web-users when they visit the School's website / intranet. If you are given the option of whether or not to accept cookies and you do not accept, you may not be able to access the full content of our website / intranet.
- (d) **Direct marketing** : Where it is intended that the personal data collected will be used for direct marketing purposes, the School will provide the individual with all the necessary information required to be given by law such as information about the direct marketing means and the classes of marketing subjects and obtain the necessary consent before using or providing such personal data for direct marketing purposes. The School will not use or provide an individual's personal data for direct marketing purposes unless it has obtained the express consent of the individual concerned (which needs to be in writing in case of provision of personal data to third parties) and the individual has not required the School to cease to use or provide (as the case may be) his personal data for direct marketing purposes.

#### 4. Accuracy and Duration of Retention of Personal Data

All practicable steps will be taken to ensure that the personal data held by the School is accurate. The School will only hold personal data for as long as it is necessary to fulfill the purpose(s) or directly related purpose(s) for which they are collected. Different retention periods apply to the various kinds of personal data collected. For instance, the recorded images captured by the CCTV installed for security purpose should be securely deleted regularly if no incident of security concern is discovered or reported. Such images can only be accessed upon the production of an approved "Subject Access Request Form - CCTV". The School will also ask the transferees of any personal data to do the same.

## **5. Disclosure of Personal Data**

The School will take all practicable steps to keep the personal data you have provided confidential. However, the School may need to disclose, transfer or assign personal data collected by it to such external third parties to facilitate the purpose for which the personal data was collected or any directly related purpose. In general, the parties to which we may disclose, transfer or assign personal data include any agent, contractor or third-party service provider engaged by the School to provide services to or on behalf of the School (e.g. bankers, insurance providers and payroll service providers), any person to whom the School is under an obligation to make disclosure under any requirements of any law or for the purposes of any guidelines or codes of practice with which the School is expected to comply (e.g. the Education Bureau, the Courts, regulatory bodies and law enforcement agencies) as well as the School's professional advisers. We may also disclose, transfer or assign personal data internally within the School and to our affiliated schools on a need-to-know basis to facilitate the purpose(s) for which the personal data was collected or any directly related purpose. The personal data may be disclosed, transferred or assigned within or outside Hong Kong. In case it is disclosed, transferred or assigned to a place outside Hong Kong, subject to the implementation and application of section 33 of the PDPO, while the School will take appropriate steps to protect the privacy of the personal data, it should be noted that such place may not have in place data protection laws which are substantially similar to, or serve the same purposes as, the PDPO so personal data located outside Hong Kong may not be protected to the same or similar extent as they are in Hong Kong.

## **6. Security of Personal Data**

The School will take all practicable steps to protect the personal data held by it against unauthorized or accidental access use, loss, processing, erasure, transmission, modification or disclosure. When the School needs to disclose, transfer or assign personal data to external third parties, the School will take appropriate steps to protect the security of the personal data to be disclosed, transferred or assigned (for example, requiring our service providers to keep confidential any personal data with which it comes into contact).

Misuse or abuse of the personal data should be reported to a senior member of the staff ranked as PGM or above and appropriate follow up actions, including disciplinary action, can be taken.

## **7. Personal Data Access and Correction**

Individuals have the right to request access to and to correct their personal data held by the

School.

Personal data may be made available to concerned individuals by the completion of prescribed form provided by the concerned office and sending the completed form to the School General Office in person.

Similarly, requests to correct personal data held by the School may be made by submitting such requests in person, using prescribed form provided by the concerned office.

When handling a data access or correction request, the School will check the identity of the requester to ensure that he / she is the person legally entitled to make the data access or correction request.

In accordance with the PDPO, data access and correction requests will normally be handled within a 40-day period. A fee reflecting the cost of processing any data access request may be imposed.

## **8. Enquiries**

Any enquiries regarding personal data privacy policy and practice may be addressed to the School's Data Privacy Officer at the school address or by email to [info@sjc.edu.hk](mailto:info@sjc.edu.hk).

We keep our privacy policy statement under regular review. This statement was last updated on 26 September 2024.