

Kolej Yayasan UEM (KYUEM) – Privacy Policy

1. Introduction

Kolej Yayasan UEM ("KYUEM", "we", "us", or "our") is committed to protecting the privacy and personal data of all individuals whose data we process. This Privacy Policy sets out how KYUEM collects, uses, discloses, stores, and protects personal data in accordance with the Personal Data Protection Act 2010 (Act 709) of Malaysia, including amendments effective from 2024, and the guidelines issued by the Personal Data Protection Commissioner in 2025.

This Policy applies to applicants, students, parents or legal guardians, sponsors, alumni, staff, contractors, service providers, visitors, and users of KYUEM's websites, systems, and services.

2. Scope of Application

This Policy applies to all forms of personal data processed by KYUEM, whether in electronic or physical form, including but not limited to data processed through:

- Admissions, academic, and student information systems
- Learning Management Systems (LMS)
- Library and academic systems, including the Library Management System (KOHA)
- Email, collaboration, and productivity platforms (including Microsoft 365)
- Campus networks and Wi-Fi services
- Physical security systems, including Closed-Circuit Television (CCTV)
- Official websites, portals, and online services

3. Categories of Personal Data Collected

KYUEM may collect and process the following categories of personal data, among others:

3.1 Identity and Contact Information

- Name
- National Registration Identity Card (NRIC) or passport number
- Student or staff identification number
- Residential and mailing addresses
- Telephone number and email address
- Parent or legal guardian details

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3.2 Admissions and Academic Information

- Application and enrolment records
- Academic qualifications, transcripts, assessments, and examination results
- Attendance records and academic progress
- Awards, certifications, and disciplinary outcomes

3.3 Financial and Administrative Data

- Fee invoices, payments, and outstanding balances
- Scholarship, sponsorship, or financial assistance records
- Banking and payment details, where applicable

3.4 IT and Digital Usage Data

- System account identifiers and authentication records (stored securely)
- Learning platform activity logs
- Email and collaboration usage metadata
- Library borrowing and usage records
- Network and Wi-Fi usage metadata and device identifiers
- Website cookies, log files, and analytics data

3.5 Visual, Audio, and Security Data

- CCTV footage collected on KYUEM premises
- Access control and security system records

3.6 Sensitive Personal Data

Sensitive personal data refers to personal data of a more confidential nature, where relevant, information relating to an individual's health, religious or other similar beliefs, biometric identifiers, and records pertaining to disciplinary actions or misconduct.

4. Sources of Personal Data

KYUEM may collect personal data from various sources, including directly from individuals via application forms, correspondence, and interviews; automatically through its systems and networks; and from third parties (such as referees, partner institutions, and scholarship bodies), subject to and in accordance with applicable laws and regulations.

5. Purposes of Processing

KYUEM processes personal data for legitimate and lawful purposes, including:

- Managing admissions, enrolment, and student administration

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- Delivering teaching, learning, assessment, and academic support services
- Providing campus facilities, IT services, library management services (including user registration, access control, borrowing and return of materials, circulation records, overdue management, and related system usage monitoring), and student welfare support
- Managing fees, financial assistance, audits, and financial reporting
- Administering staff employment and human resource functions
- Managing alumni relations and institutional communications, subject to opt-out mechanisms
- Ensuring campus safety and security, including through CCTV monitoring
- Investigating misconduct and enforcing college rules and regulations
- Complying with legal, regulatory, accreditation, and reporting obligations

6. Legal Basis for Processing

KYUEM processes personal data on one or more of the following legal bases:

- The consent of the data subject
- Performance of a contract or steps taken at the request of the data subject
- Compliance with legal or regulatory obligations
- Legitimate interests pursued by KYUEM, balanced against the rights and interests of the data subject

7. Cookies and Online Tracking

KYUEM websites use cookies and similar technologies to enable essential website functions, maintain secure sessions, analyze usage, and improve user experience. Users may manage or disable cookies through their web browser settings; however, disabling essential cookies may affect website functionality.

8. Disclosure and Sharing of Personal Data

KYUEM may disclose personal data on a strict need-to-know basis to:

- Service providers and vendors engaged by KYUEM under contracts containing PDPA-compliant data protection obligations
- Government authorities, regulators, or law enforcement agencies where disclosure is required or permitted by law
- Partner institutions, examination boards, and accreditation bodies for academic progression, certification, or quality assurance purposes

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- Professional advisers such as auditors, accountants, and legal counsel
- KYUEM does not sell, rent, or trade personal data.

9. Cross-Border Transfers of Personal Data

Where personal data is transferred outside Malaysia, KYUEM ensures such transfers comply with Section 129 of the PDPA and the Cross-Border Personal Data Transfer Guideline (2025). Appropriate safeguards, such as contractual protections, technical controls, and transfer risk assessments, are implemented.

10. Data Retention and Disposal

Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected and to meet legal, regulatory, accreditation, or operational requirements. Upon expiry of the applicable retention period, personal data is securely deleted, destroyed, or anonymised in accordance with KYUEM's data retention and disposal procedures.

11. Security Measures

KYUEM implements reasonable administrative, technical, and physical safeguards to protect personal data against loss, misuse, unauthorised access, disclosure, or alteration. These measures include:

- Role-based access controls
- Encryption and secure system configurations
- System monitoring and logging
- Staff awareness and data protection training
- Incident response procedures and vendor due diligence

All data processors acting on KYUEM's behalf are required to implement equivalent security standards.

12. Personal Data Breach Management

KYUEM maintains a Personal Data Breach Response Plan. Where a notifiable personal data breach occurs, KYUEM will notify the Personal Data Protection Officer within seventy-two (72) hours of becoming aware of the breach and will notify affected individuals without undue delay where required by law.

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13. Rights of Data Subjects

Subject to applicable law, data subjects have the right to:

- Request access to their personal data
- Request correction of inaccurate or incomplete personal data
- Withdraw consent or restrict processing, subject to legal or contractual limitations
- Object to the processing of personal data for direct marketing purposes
- Request data portability, where applicable

Requests may be subject to identity verification and statutory fees as permitted by law.

14. Children and Minors

Where personal data relates to individuals under the age of eighteen (18), KYUEM processes such data with the consent or involvement of a parent or legal guardian, in accordance with the PDPA and recognized best practices for educational institutions.

15. Contact Information

Data Protection Officer (DPO)

Kolej Yayasan UEM
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16. Policy Review and Updates

This Privacy Policy may be reviewed and updated from time to time to reflect changes in legal requirements, regulatory guidance, or KYUEM's operational practices. The most current version will be published on the KYUEM website.

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