

# CORNEL LEADERSHIP ACADEMY, MALAYSIA

## Personal Data Protection Policy

### 1. Policy Statement

Cornell Leadership Academy (“Cornell”) is committed to safeguarding the privacy and personal data of all individuals whose data is collected, processed, or stored by Cornell. This policy outlines how Cornell collects, uses, stores, discloses, and protects personal data in accordance with the Malaysian Personal Data Protection Act 2010 (PDPA 2010).

In this policy:

- “we”, “us”, and “our” refer to Cornell.
- “you” and “your” include third parties whose personal data you have provided to Cornell.

Cornell reserves the right to amend this policy at any time without prior notice. Updated versions will be published on Cornell’s website or communicated via email.

### 2. Applicability

This policy applies to:

- Students and potential students;
- Parents and guardians of students;
- Clients, customers, and potential customers;
- Alumni;
- Employees and potential employees; and
- Vendors, suppliers, tenants, and service providers.

It also applies to the collection and processing of personal data from individuals under the age of 18. If you are under 18, you must obtain consent from a parent or guardian before submitting personal data to Cornell. Where such consent is not obtained, data will be deleted.

### 3. Definition of Personal Data

“**Personal data**” means any information that relates directly or indirectly to an identifiable individual. This includes, but is not limited to:

- Identification details (e.g., name, NRIC/passport number);
- Contact information (e.g., phone, email, address);
- Academic and examination records;
- Financial and banking details; Religious beliefs;
- Medical history, biometric data, and health conditions;
- Employment records;
- Photographs, video recordings, voice recordings, and CCTV footage;
- Location data (GPS);
- preferences and purchase history; and/or
- Other types of data as stated in this [link](#).

Data may be collected through:

- i. Cornell's website or affiliated websites;
- ii. Cornell's mobile applications;
- iii. Electronic and physical forms; and/or
- iv. Email, social media, and messaging platforms.

#### **4. Sources of Data**

Cornell may collect data directly from you, indirectly through authorized representatives, recruitment agents, third-party sources, or cookies when you interact with our online platforms.

Specific categories include:

- i. Students/Potential Students – data from application forms, recruitment activities, campus visits, and website cookies.
- ii. Parents/Guardians – data from enrolment processes, events, and direct communications.
- iii. Clients/Customers – data from event registrations, marketing activities, and online platforms.
- iv. Alumni – data from alumni events, websites, and networking activities.
- v. Employees/Potential Employees – data from applications, references, and employment records.
- vi. Vendors/Suppliers – data from tender processes, contracts, and credit reference agencies.

#### **5. Obligatory Data**

Certain data fields in Cornell forms are mandatory. Failure to provide obligatory data may result in Cornell being unable to process your request or provide services.

Individuals who do not wish for their personal data to be collected, processed, or disclosed (other than for statutory requirements) may submit the relevant opt-out form to [info@cornellacademy.org](mailto:info@cornellacademy.org).

#### **6. Purposes of Data Collection**

Personal data is collected and processed for purposes consistent with PDPA 2010. These purposes differ by category of data subject:

- i. Students and Potential Students – admissions, academic administration, ancillary services, internships, payments, safety, marketing, research, legal compliance.
- ii. Parents/Guardians – application processing, emergency contact, student updates, payments, marketing, service improvement.
- iii. Clients/Customers – service provision, marketing, research.
- iv. Alumni – engagement activities, networking, research.
- v. Employees/Potential Employees – recruitment, training, compliance.
- vi. Vendors/Suppliers – transactions, payments, audits.

## **7. Data Analytics and Profiling**

Cornell may consolidate personal data into a central repository for analytics, measurement, and service improvement, including:

- Understanding preferences and usage patterns;
- Delivering personalized services;
- Evaluating marketing campaign effectiveness.

## **8. Disclosure and Transfer of Data**

- a. Internal Disclosure – within Cornell, restricted to authorized staff;
- b. External Disclosure – government agencies, accreditation bodies, law enforcement, service providers, partners; and
- c. Cross-Border Transfer – only to jurisdictions with comparable data protection standards and under contractual safeguards.

## **9. Website and Digital Services**

- a. External Links – Cornell is not responsible for privacy practices of linked sites;
- b. Location Services – optional and user-controlled; and
- c. Cookies – used to identify users, track preferences, and improve services.

## **10. Your Rights**

You have the right to:

- i. Access your personal data;
- ii. Correct inaccuracies;
- iii. Withdraw consent;
- iv. Limit processing; and/or
- v. Request data portability.

Requests must be made in writing using Cornell's forms [here](#).

## **11. Data Security**

Cornell implements physical, technical, and procedural safeguards, including restricted access, secure storage, confidentiality obligations, and security software updates.

## **12. Data Retention**

Personal data is retained only as long as necessary for its purposes or legal requirements. Inactive data is deleted according to an established disposal schedule.

## **13. Contact for Enquiries or Complaints**

### **Data Protection Officer:**

Muhammad Syahir Bin Salihuddin

Email: [muhdsyahir@cornellacademy.org](mailto:muhdsyahir@cornellacademy.org)

Other enquiries: <https://www.cornellacademy.org/contact-us/>

## **14. Conflict of Versions**

In case of inconsistency between this English policy and the Bahasa Malaysia version, the English version prevails.

This Personal Data Protection Notice was last updated on **15 Aug 2025**.