

 <p>S P Jain School of Global Management</p> <p>DUBAI • MUMBAI • SINGAPORE • SYDNEY</p>	<p>Information Management Policy</p>
<p>Document Type</p>	<p>Policy</p>
<p>Administering Entity</p>	<p>President, Vice President – Academic, Vice President – Administration, Registrar, Director – Examinations, Chief Marketing Officer, Chief Financial Officer, Director-Human Resources and Heads of Campuses (HOCs), Director – Information Technology</p>
<p>Latest Approval/ Amendment Date</p>	<p>June 21, 2023</p>
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<p>Approval Authority</p>	<p>Board of Directors</p>
<p>Indicative Time of Review</p>	<p>June 20, 2025</p>

1. Overview

- a. S P Jain School of Global Management (S P Jain / the School) is committed to information management practices which comply with relevant legislation and that align with good professional practice. The School's Information Management Policy is intended to protect the rights of students, staff and the School.

2. Purpose

- a. The purpose of this Policy is to guide staff and where applicable, students and other stakeholders of the School in the responsible collection, use, disclosure and handling of information collected and managed by the S P Jain and all its operations in accordance with the relevant legislation.

3. Scope

- a. This Policy applies to:
 - i. staff, students and clients of S P Jain;
 - ii. external contractors who may collect, access, use, disclose or manage personal, sensitive, health and confidential information relating to staff, students or any other individual whose information may be collected; and
 - iii. all information whether recorded mechanically, magnetically or electronically.

4. Guiding Principles

a. *Collection of personal and sensitive information*

- i. Only information that is necessary to fulfil the School's functions and activities will be collected.
- ii. Sensitive information will only be collected and used in accordance with relevant School

processes, or where required or permitted by law.

- iii. The School will take all reasonable steps to ensure responsible handling and management of information in accordance with the Records Management Policy.
- iv. Individuals are advised of the purpose/s of collection and their rights to access that information, and
- v. Information stored and maintained by the School is accurate, complete and up-to-date.

b. Use and storage of personal and sensitive information

- i. Personal or sensitive information will only be used for the purpose for which it was collected, or for related secondary purposes with consent or as required or permitted by law.
- ii. S P Jain is open and transparent about the type of personal or sensitive information it collects from individuals and how the information is used.
- iii. S P Jain ensures personal credit card details that could inappropriately disclose personal information are never retained or stored by the School.
- iv. S P Jain will assign and use student and staff numbers only to facilitate efficient management of its business and, where possible, not use other organisations' identifiers.
- v. Personal information will only be collected, stored or handled in accordance with the various policies approved by the Boards or the processes and guidance materials developed and approved by following in their respective areas:
 - Registrar
 - Vice President- Administration
 - Director -Human Resources
 - Vice President – Academic
 - Head of Campuses
 - Chief Financial Officer
 - Chief Marketing Officer
 - Director – Information Technology
- vi. 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 and that all information stored on a PSD is protected.
- vii. Personal or sensitive information must not be stored on any application, software or device that has not been provided by S P Jain.

c. Management of School's records and information

- i. The School's records must be stored in an approved physical or online storage system in accordance with the Records Management Policy.
- ii. All information management systems whether physical or online are assessed as meeting security requirements before use or adoption and as being fit-for-purpose for S P Jain as a registered higher education provider.
- iii. Access to S P Jain's information systems is provided in accordance with the processes approved by Registrar, Vice President- Administration, Vice President – Academic, Chief Financial Officer, Chief Marketing Officer and/or Heads of Campuses in their

- respective areas.
- iv. All information management system users are required to undergo appropriate training as directed and organised by Vice President -Administration or Registrar and must follow the requirements set out in the appropriate manuals and guides.
 - v. As a higher education provider with campuses located in multiple countries, the School operates across different jurisdictions. S P Jain ensures that personal information transmitted between campuses is managed in accordance with the all the jurisdictions' privacy laws for the protection and integrity of information.
 - vi. Any cross-border (other than the 4 campus jurisdictions) transmission of information will be authorised by the Regsitar and VP–Administration after ensuring that:
 - The transmission is reasonably necessary for the School's functions or business activities to a location where different privacy laws apply, 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.

d. Access to and management of Academic Student Records¹

- i. The following S P Jain staff are responsible for the management of and access to Academic Student Records and the development of the associated processes:
 - Registrar
 - Vice President – Academic
 - Vice President - Adminstration
 - Director - Examinations
 - Staff authorised by Vice President – Academic, Vice President- Adminstration or Registrar.
- ii. In accordance with the Student Information Provision Policy:
 - Staff access to student information will be restricted to those staff members who require the information in order to carry out their duties and responsibilities.
 - 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.
 - Staff requesting access to student information, held electronically, must acknowledge their responsibility to maintain confidentiality of information.

e. Access to and management of Employee Records

- i. The following S P Jain staff are responsible for the management of and access to employee records and the development of the associated processes:
 - Vice President- Administration
 - Director- Human Resources
 - Head of Campuses

¹ Refer Student Information Provision Policy

- Chief Financial Officer

f. *Retention, Transfer and Disposal*

- i. Retention and disposal of the School's business information and records will follow the processes established by the Record Management Policy.
- ii. Information that is reasonably likely to be required in future legal proceedings must not be destroyed.
- iii. The transfer of records must follow approved processes as developed and disseminated by the Registrar, Vice President- Administration, Vice President – Academic, Heads of Campus, Chief Financial Officer and/or Chief Marketing Officer in their respective areas.

Related Documents

- a. Records Management Policy
- b. Student Information Provision Policy