

PERSONAL DATA PROTECTION POLICY

1. INTRODUCTION

- 1.1. Informatics Education Ltd and its associated/related companies (“Informatics Group”), take our responsibilities under Singapore’s Personal Data Protection Act 2012 (“PDPA”) seriously. We recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.
- 1.2. This Personal Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us.
- 1.3. If you have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (“DPO”) at dpo@informaticseducation.com or via letter marked for the attention of the ‘Data Protection Officer’ addressed to:

Informatics Education Ltd.
133 Middle Road
#05-01 BOC Plaza
Singapore 188974

2. INTRODUCTION TO THE PDPA

- 2.1. “Personal Data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Common examples of personal data could include names, dates of birth, identification numbers and contact information.
- 2.2. We will collect your personal data in accordance with the PDPA. When we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to collect and process your personal data without your consent.

3. PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

- 3.1. Depending on your relationship with us (whether as student, employee, alumnus, or service provider, etc), the personal data which we collect from you may be collected, used, disclosed and/or processed for the following purposes including but not limited to:

For Students

- 3.1.1. Evaluating your application to be a student or to undertake a course with us;
- 3.1.2. Administering and managing your relationship as our student including:
 - 3.1.2.1. Processing any payments, fee adjustments, refunds and waivers related to courses, products, services and/or trainings as instructed by you or to universities, financial institutions, insurers and other business partners;
 - 3.1.2.2. Monitoring and managing your attendance and academic performance;
 - 3.1.2.3. Providing educational or career counseling and guidance, informing you of available educational or training pathways and assisting you to undertake or progress to higher levels or other courses, trainings or products;
 - 3.1.2.4. Applying for, renewing, processing or administering student passes and/or work permits;
 - 3.1.2.5. Administering and processing any insurance claims and payments arising from such claims;
 - 3.1.2.6. Providing you with information and/or updates on our courses, products, services, trainings, benefits and promotions offered by us and/or events organised by us and/or selected third parties which may be of interest to you and/or for other direct marketing purposes from time to time;
 - 3.1.2.7. Sending you invitations to join and to facilitate your participation in, and our administration of, any events including contests, promotions or campaigns;
 - 3.1.2.8. Sending you seasonal greetings messages from time to time; and
 - 3.1.2.9. Arranging for learning tours or visits, job interviews, internships, work placements, pick-up, transportation, accommodation for you;
- 3.1.3. Performing planning, research and analysis in relation to developing courses, products and/or services or launching marketing campaigns with our university and other business partners;

For Alumni

- 3.1.4. Maintaining your relationship as our alumni, including informing you of promotions, benefits and services available to alumni; and organising, facilitating and notifying you of events and programmes, courses or other activities and providing you with Informatics publications of Informatics Group;

For Employees/Contractors

- 3.1.5. Evaluating your application to be an employee, contractor or agent with us;
- 3.1.6. Administering and managing your relationship as our employee, contractor or agent, including secondments with or transfer to associated companies or third party organisations and/or;

- 3.1.7. Dealing with and/or administering remuneration, employment benefits and other welfare programmes;

General

- 3.1.8. Carrying out your instructions or responding to any enquiry given by you or on your behalf;
 - 3.1.9. Contacting or communicating with you by SMS, phone call, email, fax, mail, social media and/or any other appropriate communication channels for the purposes of administering and managing your relationship with us;
 - 3.1.10. Publicising, monitoring, reviewing, developing and improving our events and promotions, courses, products and/or services;
 - 3.1.11. Maintaining internal records and other internal operational and administrative purposes;
 - 3.1.12. Monitoring or recording for quality assurance, training, performance evaluation, audit, risk management or security purposes;
 - 3.1.13. Detecting, investigating and preventing fraudulent, prohibited or illegal activities and analysing and managing commercial risks;
 - 3.1.14. Enabling us to perform our obligations and enforce our rights under any agreements or documents that we are a party to;
 - 3.1.15. Disclosing to any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition, asset sale or financing) involving any of the Informatics Group;
 - 3.1.16. Transferring or assigning our rights, interests and obligations under any agreements entered into with us;
 - 3.1.17. Meeting or complying with any applicable legal or regulatory requirements and making disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular or code applicable to us;
 - 3.1.18. Enforcing or defending our rights and your rights under, and to comply with, our obligations under the applicable laws, legislation and regulations;
 - 3.1.19. Any other purposes which we notify you of at the time of obtaining your consent; and/or
 - 3.1.20. Any purposes which are reasonably related to the aforesaid (collectively, "Purposes").
- 3.2. As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

4. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES AND DISCLOSURE PERMITTED BY STATUTORY EXEMPTION UNDER THE ACT

- 4.1. In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our service providers, agents, affiliates, business partners, related corporations, and/or other third parties whether sited in Singapore or outside of Singapore. This is because such third parties would be processing your personal data on Informatics Group's behalf for one or more of the purposes mentioned above.
- 4.2. We respect the confidentiality of the personal data you have provided to us. In that regard, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including without limitation, the following:
- 4.2.1. cases in which the disclosure is required or authorised based on the applicable laws and/or regulations;
 - 4.2.2. cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
 - 4.2.3. cases in which the disclosure is necessary for any investigation or proceedings;
 - 4.2.4. cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
 - 4.2.5. cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
 - 4.2.6. where such disclosure without your consent is permitted by the PDPA or by law.
- 4.3. The instances listed above are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the PDPA which is publicly available at <http://statutes.agc.gov.sg>.
- 4.4. Where we disclose your personal data to third parties with your consent, we will employ our best efforts to require such third parties to protect your personal data.

5. REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

5.1. You may request to access and/or correct the personal data currently in our possession or control by submitting a written request to us. We will verify your identity as well as the nature of your request, so as to be able to deal with your request effectively. Please submit your request via:

- (i) email to dpo@informaticseducation.com; or
- (ii) letter marked for the attention of the 'Data Protection Officer' addressed to:

Informatics Education Ltd
133 Middle Road

#05-01 BOC Plaza
Singapore 188974

- 5.2. For a request to access personal data, once we have obtained sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within a reasonable timeframe.
- 5.3. For a request to correct personal data, once we have sufficient information from you to deal with the request:
- 5.3.1. We will correct your personal data as soon as practicable after verifying your identify. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request.
 - 5.3.2. We will send the corrected personal data to every other organisation to which the personal data was disclosed by us within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose. We may however, upon obtaining your consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.
 - 5.3.3. We may charge you a reasonable fee for the handling and processing of your requests to access your personal data and we will provide you with a written estimate of the fee we will be charging. Please note that in the event that fees are charged, we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

6. REQUEST TO WITHDRAW CONSENT

6.1. You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control. Please submit your request via:

- (i) email to dpo@informaticseducation.com; or
- (ii) letter marked for the attention of the 'Data Protection Officer' addressed to:

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- 6.2. We will process your request within a reasonable timeframe after a request to withdraw consent has been made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.
- 6.3. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your

withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us/the contract you have with us will have to be terminated. We will notify you in advance of any such impact and obtain your consent to proceed further before processing your withdraw consent.

7. ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 7.1. We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had initially provided us with.
- 7.2. We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties which are wholly attributable to factors beyond our control.
- 7.3. We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.
- 7.4. Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the PDPA.

8. COMPLAINT PROCESS

- 8.1. If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.
- 8.2. Please contact us through one of the following methods with your complaint or grievance:
 - (i) email to dpo@informaticseducation.com; or
 - (ii) letter marked for the attention of the 'Data Protection Officer' addressed to:

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8.3. Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

9. UPDATES ON PERSONAL DATA PROTECTION POLICY

9.1. As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.

9.2. We reserve the right to amend the terms of this Personal Data Protection Policy at our absolute discretion. Any amended Personal Data Protection Policy will be posted on our website at www.informatics.edu.sg/privacy-statement/.

9.3. You are encouraged to visit our website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.