

# Personal Data Protection Policy

## Our Commitment to Your Privacy

This Personal Data Protection Policy documents our adherence to industry standards for the protection of your Personal Data. Please take a moment to read this Personal Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

This policy supplements but does not supersede nor replace any consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which any of us may have at law to collect, use and/or disclose your Personal Data.

References to “we,” “our,” or “us” herein refer to Busy Bees Singapore Pte Ltd, its subsidiaries and affiliates, business partners, associates, agents and/or employees.

## Scope of the Personal Data Protection Policy

This policy covers our treatment of Personal Data that is collected in the course of your interaction with us and while you are on our site. For the purposes of this policy, “Personal Data” refers to any data, whether true or not, about an individual who can be identified (i) from that data, or (ii) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

Examples of Personal Data (depending on the nature of your interaction with us) include unique identifiers (eg. NRIC or FIN number, passport number) as well as any set of data (eg. telephone number(s), mailing address, photo or video images) which when taken together would be able to identify the individual. Such information may be provided to us by you in any forms submitted to us or via other forms of interaction with us.

This policy does not apply to the practices of companies not owned or controlled by us or to people whom we do not employ or manage, nor does it address non-personally identifiable information. This policy does not apply to information collected at a web site of an affiliated company or business line that may be linked to this web site; in those cases, the privacy policy provided at that web site will apply.

This policy specifically addresses the following matters:

- (i) How we collect Personal Data and what Personal Data we collect;
- (ii) How we may use this Personal Data;
- (iii) With whom we may share this Personal Data;
- (iv) What choices are available to you with respect to collection, use and disclosure of your Personal Data;
- (v) What types of measures are in place for the management and care of Personal Data in our possession and/or under our control; and
- (vi) How you can access and correct any inaccuracies in your Personal Data.

## Collection of Personal Data

Generally, we may collect Personal Data from you or your child/ward in the following ways:

- (i) When you arrange for a visit to our school/centre;
- (ii) When you submit an application for your child/ward to be enrolled with the school/centre or submit forms for school/centre activities;
- (iii) When you interact with our staff (whether via telephone calls, letters, emails or during face-to-face meetings);
- (iv) When you are contacted by, and respond to, our staff;
- (v) In the course of providing educational services to your child/ward;
- (vi) when your or your child's/ward's images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you or your child/ward attend events hosted by us or any third party organiser we appoint;
- (vii) when you request that we contact you, be included in an email or other mailing list; or when you respond to our request for additional Personal Data, our promotions and other initiatives;
- (viii) When you submit your Personal Data to us for any other reasons.

You should ensure that all Personal Data submitted to us is complete, accurate, true and up-to-date.

First, we collect anonymous, aggregate information from all visitors to our site. This information is never linked to any personally identifiable information and is used in the aggregate to generate statistical reports about the use of our site. In addition, we use a third-party service provider to serve ads on our behalf across the Internet and on our site. That provider may collect anonymous information about your visits to our site and your interaction with our products and services. That provider may also use information about your visits to our and other sites to target advertisements for goods and services. This anonymous information is collected through the use of a pixel tag, which is industry standard technology used by most major websites. If you would like more information about this practice and your choices about not having this anonymous information used by our third-party service provider, please link to [www.networkadvertising.org/consumer/opt\\_out.asp](http://www.networkadvertising.org/consumer/opt_out.asp).

## Use, Disclosure and Process of Personal Data

We may use, disclose or process Personal Data about you collected before 2 July 2014 for the purposes for which the Personal Data was collected unless consent for such use is withdrawn in accordance with applicable law or if you have otherwise indicated to us, whether before, on or after 2 July 2014, that you do not consent to the use of such Personal Data.

## Purposes of Collection, Use and Disclosure

Depending on your relationship with us, the Personal Data which we collect from you or your child/ward may be collected, use and/or disclosed for the following purposes:

- (i) for maintaining student records;
- (ii) for school/centre communications;
- (iii) for audit, administration and emergency purposes;
- (iv) for emergency contact;
- (v) for school/centre or extra-curricular activity registration;
- (vi) responding to requests from child care regulators, medical providers, payment processors and financial institutions;
- (vii) evaluating suitability for admission or employment;

- (viii) carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or put in place by us, including the obtaining of references and/or other information from prior educational institutions and employers;
- (ix) investigating possible fraud, misconduct, unlawful action or omission, and utilising electronic access and video systems to maintain security of persons or property, control access and investigate suspicious or inappropriate activities including but not limited to possible violation of any terms and conditions or policies posted on our website;
- (x) responding to requests for information from government or public agencies, ministries, statutory boards or other similar authorities or non-government agencies authorised to carry out specific Government services or duties;
- (xi) supporting our functions including, but not restricted to, the teaching and personal and professional development of students and administration of our schools/centres;
- (xii) processing, administering and conferring awards of prizes and student or graduation status, and publication or releasing of information on the same;
- (xiii) processing applications and enrolment activities related to health, life and travel insurance and service provision as well as school-related cards, and administering matters related to use of those services;
- (xiv) taking photographs and/or videos (whether by our staff or third party photographers and/or videographers) during events organised by us;
- (xv) for use on the centre's "Little Lives" portal / website ;
- (xvi) for us to provide you with information about our services and our affiliate schools/centres;
- (xvii) any other purposes which we may inform you of in writing from time to time, but for which we will seek your separate consent.

If you have provided us your Singapore telephone number(s) and/or email address and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s) and/or email address, then from time to time, we may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) and/or email address with information about our services and schools/centres.

## Disclosure and Transfer to Third Parties

We will take reasonable steps to protect your or your child's/ward's Personal Data against unauthorised disclosure. We may disclose your or your child's/ward's Personal Data to third parties without first obtaining your consent in certain situations, for example:

- (i) where disclosure is required or permitted by applicable law and/or regulations;
- (ii) where necessary, to our third party service providers, payment processors, agents, regulatory bodies and auditors in the ordinary course of our business and subject to any restrictions imposed by the applicable law and/or regulations;
- (iii) where you have authorised us to disclose your Personal Data another party.

The instances listed above are not exhaustive. In all other instances of disclosure of your Personal Data to third parties with your express consent, we will provide for adequate forms of protection over such Personal Data, and confidentiality and security in the handling and administration of your Personal Data by such third parties in compliance with applicable law.

## Personal Data of Children

We have designed our site for parents and adults, not for children. For that reason, we do not knowingly collect Personal Data from children who may visit our site, and we do not want to include any such information in our customer databases. We recommend that parents monitor their children's use of the Internet.

## Management and Care of Personal Data

Wherever your Personal Data is in our possession or under our control, we will take reasonable and appropriate steps to protect your Personal Data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. We shall also take reasonable and appropriate measures to keep your Personal Data accurate, complete and updated.

We use encryption to protect sensitive information online. The servers that store your Personal Data are housed in a secure environment. We also make an effort to protect your information off-line. However, given the nature of the Internet and the fact that network security measures are not infallible, we cannot assume responsibility for any unauthorised use of your Personal Data by third parties which are wholly attributable to factors beyond our control.

If we ever require you to register with us before being able to access a specific section of our site, we may ask you to select a username and password. We recommend that you do not divulge or share that information with anyone. We will never ask you for that information in an unsolicited phone call or in an unsolicited email. Also, remember to sign out of the registered site and close your browser window when you have finished your work. This is to ensure that others cannot access your Personal Data and correspondence when accessing your computer.

## Retention of Personal Data

We shall take reasonable effort to destroy or anonymise documents containing Personal Data, or remove the means by which the Personal Data can be associated with particular individuals, as soon as it is reasonable to assume that:

- (i) the purpose for which the Personal Data was collected is no longer being served by retention of the Personal Data; and
- (ii) retention is no longer necessary for legal or business purposes.

## Withdrawal of Consent

You may at any time withdraw any consent already given, or deemed to have been given under applicable law, in respect of the collection, use or disclosure by us of Personal Data about you for any purpose on giving reasonable notice to us. We do not prohibit an individual from withdrawing consent to the collection, use or disclosure of Personal Data about the individual, but this shall not affect any legal consequences arising from such withdrawal.

If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, we may not be in a position to continue to provide our services to you, administer any contractual relationship in place, which in turn may also result in the termination of your agreements with us. Our legal rights and remedies in such event are expressly reserved.

## Request for Access or Correction of Your Personal Data

If your Personal Data changes, you may contact us to correct, update, delete or deactivate our record of your Personal Data. 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, or if you so consent, only to specific organisations to which the Personal Data was disclosed by us within a year before the date the correction was made.

## Our Website

(a) Profile

We store information that we collect through cookies and log files to create a profile of our customers. A profile is stored information detailing how individual customers use our site. Collected information in a profile is tied to the customer's personal information.

(b) Cookies

A cookie is a small text file stored on your hard drive for an extended period of time which allows us to remember you or other data about you. Allowing a related cookie to remain on your computer makes it easier for you to log in to and use our site. However, should you wish to disable cookies, you may do so by changing the setting in your browser. Please note that you may not be able to enter certain part(s) of our website by doing so.

(c) Log Files

Log files record internet protocol (IP) addresses, browser types, internet service provider referring/exit pages, platform type, date/time stamp, and number of clicks to analyse trends, administer our site, track a customer's movement in the aggregate and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

(d) Posting Content

You may voluntarily post or link to content on this site that is publicly viewable. By doing so, you consent to us sharing your posted content, including the name and email address associated with that content.

(e) Links

Our site may contain links to and portions of other third party sites. We are not responsible for the privacy practices or content of these other sites. When you leave our site or view a portion of a third party's site through our site, we encourage you to read the privacy policies, as well as the other terms and conditions, of each such other sites. This policy applies solely to information we collect on our site.

We also collect anonymous, aggregate information from all visitors to our site. This information is never linked to any personally identifiable information and is used in the aggregate to generate statistical reports about the use of our site. In addition, we use a third-party service provider to serve ads on our behalf across the Internet and on our site. That provider may collect anonymous information about your visits to our site and your interaction with our products and services. That provider may also use information about your visits to our and other sites to target advertisements for goods and services. This anonymous information is collected through the use of a pixel tag, which is industry standard technology used by most major websites. If you would like more information about this practice and your choices about not having this anonymous information used by our third-party service provider, please link to [www.networkadvertising.org/consumer/opt\\_out.asp](http://www.networkadvertising.org/consumer/opt_out.asp).

## Business Transitions

In the event that we go through a business transition, such as a merger, acquisition by another company, or sale of a portion of our assets, any personal information you provide us may be part of the assets transferred. You will be notified via prominent notice on our site prior to a change of ownership or control of their personal information. If, as a result of the business transaction, your personally identifiable information will be used in a manner materially different from that stated at the time of collection, you will be given a choice consistent with the "Notification of Changes" paragraph below.

## Notification of Changes

We may amend this Policy from time to time to ensure that it is consistent with any changes in legal or regulatory requirements. If we make any substantial changes, we will prominently post a notice on the main page and other pages to alert you of the change.

## Contact Information

If you:

- (i) have any questions about this Policy;
- (ii) would like to withdraw your consent to any use of your Personal Data as set out in this Policy; or
- (iii) would like to obtain access to or make corrections to your Personal Data records,

please contact our Data Protection Officer at:

**Busy Bees Asia**

100G Pasir Panjang Road

#05-18 Interlocal Centre

Singapore 118523

(Attention: Data Protection Officer)

DPO@busybeesasia.com