

# PRIVACY POLICY

This Privacy Policy (“Policy”) applies to personal data collected, stored, disclosed and/or processed by MindChamps Holdings Pte Limited and its subsidiaries, related companies, affiliates and franchisees (individually and collectively, “MindChamps”).

This Policy describes the types of personal data we may collect from you, how we may use that information, and with whom we may share it. Our Policy also describes the measures we take to protect the security of the information you provide to us, including without limitation through this website. We also tell you how you can reach us to update your personal data, ask questions you may have about our personal data protection practices and provide feedback on our personal data protection practices.

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## 1. COLLECTION OF PERSONAL DATA

“Personal Data” or “personal data” in this Policy refers to 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 name, identification number and contact information.

The types of personal data collected includes, among other things (depending on the nature of your interaction with us):

- i. name;
- ii. street or mailing address;
- iii. telephone number(s);
- iv. email addresses;
- v. date of birth;
- vi. gender;
- vii. nationality;
- viii. NRIC number, FIN number, passport number;
- ix. voice;
- x. photographs;
- xi. video images; and
- xii. credit card information.

We may collect additional personal data about you that you knowingly and voluntarily provide in connection with certain activities at or transactions with MindChamps, such as participation in certain events, participation in social media offerings (such as signing up through our Facebook pages), use of MindChamps’ mobile applications, applications for employment, and liability claims. The additional information that we collect depends on the nature of the activity or transaction.

Where you provide us personal data about other individuals (e.g. information of spouse, children, parents, friends, relatives, employees and/or authorised representatives), you represent to us that you have obtained the consent of the individuals to you providing us with their personal data for the respective purposes.

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## 2. PURPOSES FOR COLLECTION AND USE OF PERSONAL DATA

MindChamps may collect and use your information for any purpose not prohibited by applicable law. This includes the following purposes:

- i. To verify your identity;
- ii. To process and respond to inquiries;

- iii. To process purchase transactions and provide products and services;
  - iv. To facilitate and enhance your experience with us;
  - v. To notify and provide special events, promotions and offers to you;
  - vi. To provide you with personalized content on our websites and mobile applications;
  - vii. To improve the content and the navigability of our websites and mobile applications;
  - viii. To administer and award reward in a loyalty or rewards program;
  - ix. To compile data and conduct statistical or demographic analysis;
  - x. To protect and defend the rights or property of MindChamps;
  - xi. To prevent, detect and investigate crime and managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
  - xii. To conduct audits, review and analysis of our internal processes, action planning and managing commercial risks;
  - xiii. To respond and process for other purposes for which you provided the information (e.g., to apply for an employment); and
  - xiv. To comply with a court order or other legal process or other legal requirements of any governmental authorities.
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### **3. DISCLOSE, SHARING AND TRANSFER OF PERSONAL DATA**

MindChamps does not sell personal data that we collect from individuals, including our website visitors. We disclose and transfer personal data to the following parties within or outside of Singapore for the purposes of managing, operating, administering and running our business and for our business and legal purposes, and in the course of or in connection with providing our products and services to you:

- i. To members and representatives of MindChamps for the purposes of keeping you updated on the products and services, including promotions, loyalty and reward programs of MindChamps;
- ii. To government and non-government authorities, agencies and/or regulators as required under applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies;
- iii. To our business partners for the purposes of providing products and services to you;
- iv. Vendors or third party service providers in connection with marketing promotions and services offered by MindChamps and to facilitate the planning of events / functions that MindChamps organises or is involved in;
- v. To our service providers (who may be located outside Singapore) that have been retained to perform services on our behalf, including:
  - a. Agents, contractors or third party service providers who provide operational services to MindChamps, e.g. courier services, telecommunications, information technology, etc.;
  - b. Professional, financial and legal advisors, tax advisors, auditors, insurers and insurance brokers; and
  - c. Vendors, service providers and consultants that have been engaged to help manage, operate, administer and run MindChamps's operations and business process or provide services to facilitate our provision of our products and services.
- vi. To exhibit students' work for centre display, exhibition, competition and other related purposes; and
- vii. For job applicants, your personal data may be shared within MindChamps if we takes the view that you may be suitable or eligible for another job position with one of our subsidiaries, related companies and affiliates, unless you inform us otherwise.

MindChamps requires that the parties to whom we transfer personal data and our service providers implement adequate levels of protection in order to protect personal data. We also require that these parties only process personal data strictly for purposes for which we engage them for and consistent with the purposes that we have described in the section "Purposes for Collection and Use of Personal Data" or with other purposes for which consent has been sought and obtained.

MindChamps's website may contain links to third parties which are not controlled by us and which are not covered by this personal data Policy. You are responsible for reviewing the privacy policies for all such third parties before disclosing your personal data to any third party, directly or indirectly.

In addition, we would disclose personal data in the following circumstances:

- i. When we are required to do so by law;
- ii. In response to a request from law enforcement authorities or other governmental officials;
- iii. To comply with a court order or direction from a government agency or regulatory authority ordering the disclosure of the personal data; and
- iv. In the sole discretion of MindChamps, in exceptional circumstances, such as a national emergency, security concern, or other situation in which MindChamps deems such disclosure is prudent.

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#### **4. COOKIES AND OTHER TECHNOLOGIES**

When you visit our website, we may assign your computer one or more "cookies". By accessing our website, you agree that we can place cookies on your device.

A cookie is a small text file that contains information that can later be read by us to facilitate your access to our website, gather statistical data, and personalize your online experience. We currently use cookies on our website for purposes including, but not limited to, detecting your web browser's multimedia capabilities, tracking promotional advertisements that we have displayed to you, maintaining current login and purchase information on secure portions of the website and providing a unique identifier to your computer so that we can generate statistics regarding website usage.

Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies. Generally, you can remove these cookies by following directions provided in your Internet browser's "help" file. If you choose not to allow us to place a cookie on your computer, you may be restricted from some services and some of the interactive features offered on our websites may be similarly restricted or rendered inoperable.

In addition to cookies, we may also use other Internet technologies, such as web beacons or pixel tags, and other similar technologies, to deliver or communicate with cookies and track your use of our website. We also may include web beacons in e-mail messages or newsletters to determine whether messages have been opened and acted upon, and how. The information we obtain in this manner enables us to customize the services we offer and measure the overall effectiveness of our online content, advertising campaigns, and the products and services we offer through our website. By accessing our website and agreeing to receive our e-mail messages or newsletters, you agree to that we can use other Internet technologies such as those mentioned above on your device.

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#### **5. CONSENT**

When you provide us with your personal data, you are deemed to have given the necessary consent to MindChamps collecting, using, disclosing and sharing within MindChamps your personal data for the purposes described above, and disclosing such personal data to MindChamps's authorised service providers and relevant third parties in the manner set forth in this Policy. If you want to withdraw your consent, please send your request to the Data Protection Officer (refer to the contact details provided below).

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#### **6. PROTECTION AND SECURITY OF PERSONAL DATA**

MindChamps uses reasonable precautions to protect your personal data and store it securely. The security of your personal data is important to us. MindChamps complies with technical and

organisational security measures to safeguard your personal data. When using external service providers, we require that they adhere to the same security standards as MindChamps. Personal data may be transferred to, or stored at, a location outside of Singapore. Regardless of where personal data is transferred, we take all steps reasonably necessary to ensure that personal data is kept securely.

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## **7. ACCESS TO AND CORRECTION OF PERSONAL DATA**

You may request to access or correct (including update) your information by submitting a prescribed form which can be obtained upon request. MindChamps may charge you a fee for each request.

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## **8. CONTACT DETAILS**

For questions regarding this Policy, please contact us

By Post:

The Data Protection Officer  
MindChamps Holdings Pte Limited  
480 Lorong 6 Toa Payoh  
#17-01 HDB Hub East Wing  
Singapore 310480

By Email:

[DataProtection@mindchamps.org](mailto:DataProtection@mindchamps.org)

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## **9. CHANGES TO POLICY**

MindChamps reserves the right to amend this Policy at any time and without prior notice to you. Please review this Policy from time to time so you are aware of any changes or updates to the notice.

Updated on: 30 August 2016