



Carpe Diem Holdings Pte Ltd

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Policy Document

12 Oct 2018

Privacy Policy

1 Introduction

We at Carpe Diem Holdings Pte Ltd respect the privacy and confidentiality of our clients' personal data. We are committed to implementing policies, practices and processes to safeguard the collection, use and disclosure of the personal data you provide us, in compliance with the Singapore Personal Data Protection Act (PDPA) 2012.

We have developed this Privacy / Data Protection Policy to assist you in understanding how we collect, use, disclose, process and retain your personal data.

2 How We Collect Your Personal Data

The PDPA defines personal data as “data, whether true or not, about an **individual** who can be **identified** a) from that data; or b) from that data and other information to which the organisation has or is likely to have access.”

We collect the personal data of our prospects and clients through the following methods / channels:

- When you submit all forms for enrolment processing
- When you make enquiries

3 Types of Personal Data We Collect About You

The types of personal data we collect about you may include:

- Education & Professional Qualifications
- Medical Details/Health Information
- Personal Contact Information
- Personal Details
- Photos & Video Footage

4 How We Use Your Personal Data

We use the personal data we have collected about you for one or more of the following purposes:

- Comply with legal obligations and regulatory requirements
- Fulfil legal requirements
- Academic purposes
- Printing of Marketing brochures or other promotional materials
- Sharing of photos/videos amongst parents of our centre

5 Who We Disclose Your Personal Data To

We disclose some of the personal data we have collected about you to the following parties or organisations outside Carpe Diem Holdings Pte Ltd:

- Banks
- External vendors
- ECDA and other government agencies

6 How We Manage the Collection, Use and Disclosure of Your Personal Data

We take our responsibilities under the PDPA seriously. We are committed to implementing policies, practices and processes for data protection that comply closely with the PDPA obligations. These are elaborated in the rest of this Policy document.

6.1 Obtaining Consent

Before we collect, use or disclose your personal data, we will notify you of the purpose why we are doing so. We next obtain written confirmation from you on your expressed consent. As far as possible, we will not collect more personal data than necessary for the stated purpose.

Under certain circumstances, we may assume deemed consent from you when you voluntarily provide your personal data for the stated purpose, e.g. when you enter into a sales agreement.

6.2 Third-Party Consent

If you have a one-on-one meeting with us or do a transaction with us on behalf of another individual, you must first obtain consent from that individual in order for us to collect, use or disclose his/her personal data.

6.3 Withdrawal of Consent

If you wish to withdraw consent, you should give us reasonable advance notice. You have to be aware, though, of the likely consequences of your withdrawal of consent, e.g. without your personal contact information we may not be able to inform you of future updates or that the quality of our service may be impacted.

Your request for withdrawal of consent can take the form of an email or letter to us, or through the “UNSUB” feature in an online service.

7 Accessing and Making Correction to Your Personal Data

You may write in to us, based on reasonable grounds, to find out how we have been using or disclosing your personal data. We are obligated under the PDPA to allow you access to your personal data of the past one year, and to make any correction if there is any error or omission. Before we accede to your request, we may need to verify your identity by checking your NRIC or other legal identification document. We will try to respond to your request within 30 days. By which time we will give you an estimate of how long it is going to take to retrieve all the relevant data, and how much we will charge you for processing the request.

8 Accuracy of Your Personal Data

We will take reasonable precautions and verification checks to ensure that the personal data we have collected from you is reasonably accurate, complete and up-to-date. From time to time, we will do a verification exercise for you to update us on any changes to your personal data. If you are a client or customer, it is important that you update us if there are any changes in your personal information such as your home address.

9 Protection of Personal Data

We have implemented an Information Security Policy that governs how personal data and confidential information are protected within our organisation. We will take the necessary security arrangements to protect your personal data that is under our charge or control to prevent unauthorised access, collection, use, disclosure, or similar risks. All our employees will take reasonable and appropriate measures to maintain the confidentiality and integrity of your personal data, and will only share your data with authorised persons on a 'need to know' basis.

External data intermediaries who process and maintain your personal data on our behalf will be bound by contractual data security arrangements we have with them.

10 Retention of Personal Data

We will not retain any of your personal data under our charge or control when it is no longer necessary for any business or legal purposes. We have a Document Retention Policy that spells out how long we ought to retain each type of confidential document or personal data. Certain retention periods are based on statutory or regulatory requirements.

We will ensure that your personal data that no longer has any business or legal use will be destroyed or disposed of in a secure manner. This applies to both paper documents and electronic data stored in databases.

11 Transfer of Personal Data

If there is a need for us to transfer your personal data to another country, we will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA. If this is not so, we will enter into a contractual agreement with the receiving party to accord similar levels of data protection as that in Singapore.

12 Do-Not-Call (DNC) Provisions

Before we make any 'cold calls' in telemarketing activities, we will check the DNC Registry and our internal blacklist before we make the phone call, send SMSes or send faxes to the individual, unless that individual has given his/her clear and unambiguous consent. The blacklist refers to phone numbers belonging to those individuals who have withdrawn their consent.

13 Contacting Us

If you have any questions about our collection, use, and/or disclosure of your personal data; feedback regarding this Policy, or any complaint you have relating to how we manage your personal data, you may contact our Data Protection Officer(s) at:

Name:

Designation: Data Protection Officer

Contact Number:

Email Address: dpo@carpediem.com.sg

Any query or complaint should include, at least, the following details:

- Full name and contact information of the data subject
- Brief description of the query or complaint

We treat such queries and complaints seriously and will deal with them confidentially and within reasonable time.