

PERSONAL DATA PROTECTION POLICY

The Tots' Classroom ("TTC") is committed to safeguarding your privacy. This Personal Data Protection Policy explains how TTC collects, uses and discloses the personal information we collect during your interaction with TTC.

COLLECTION OF PERSONAL INFORMATION

Purpose

TTC collects and holds personal information (basically information relating to an individual or which can be used to identify an individual) about you or/and your child, that is reasonably necessary for or related to our activities and the services we provide.

The Personal Data which we collect from you and/or your child may be used or/and disclosed for the following purposes:

- i. For identity verification;
- ii. For Centre's communication;
- iii. For maintenance of Centre's records;
- iv. For audit, administration and emergency purposes;
- v. For notification of Centre's special events, promotions and offers;
- vi. For responding to requests from child care regulators, medical providers, payment processors and financial institutions;
- vii. For protection and defence of the rights or property of TTC;
- viii. For market research or surveys conducted on TTC's programmes, products and/or services;
- ix. For investigating, detecting and preventing of any fraudulent, prohibited or illegal activities and analysing and managing of commercial (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- x. For photographs or/and videos (whether they are taken by our staff or 3rd party photography vendors) taken during events organised by us;
- xi. For use on the Centre's website;
- xii. Any other purposes which we may inform you of in writing from time to time, but for which we will seek your separate consent.

Type of Information Collected

Kinds of personal information which TTC collects and holds may include your: name, gender, address, phone numbers, email address, date of birth, bank account details, credit card number, custody arrangements and/or other information relevant to providing you with services.

Additional specific information which TTC collects and holds about children may include their: name, preferred name, gender, address, date and place of birth, birth certificate, custody arrangements or parenting orders, dietary requirements, languages spoken, medical conditions, additional needs, photographs and videos of children, samples of children's work and general information about your child and

your family that assists us in providing individualised early learning and care to children.

Method of Collection

Personal information will generally be collected from you directly through the use of our standard forms, over the internet via our website, via email or written communication with you, or through a telephone conversation with you. Photos and videos of children and children's work samples are collected at TTC's Centre. Name, address and phone numbers of children's additional emergency contact people may be collected from children's parents or guardians.

There may on occasion be instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect the personal information from you directly. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

Failure to Provide Information

If you do not wish for your personal information to be collected you should discuss this with a TTC employee. TTC employees will act strictly in accordance with this policy and will be happy to discuss the reason(s) for seeking to collect your personal information. They will also discuss with you any consequences of not providing your personal information, or providing incomplete or inaccurate personal information, which may include an effect on what services TTC can provide to you.

Disclosure and Transfer to Third Parties

TTC respects the confidentiality of the personal data that we have collected. TTC will only disclose the personal information for the purpose it was collected or a reasonably expected or related secondary purpose.

We may disclose personal information about you or/and your child to:

- i. 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;
- ii. third party service providers, who assist us in operating our business (including credit reporting bodies, collection agencies, legal advisors and technology service providers). We will take reasonable steps to ensure these service providers do not breach the Privacy Policy;
- iii. another party whom you have authorised us to disclose your Personal Data to.

The instances listed above are not intended to be exhaustive. In the event where by TTC discloses your personal data to third parties with your consent, we will provide for adequate forms of protection over such Personal Data.

Access and Correction

You may request access to your personal information by submitting a written request to the DPO through email or letter. Only the DPO will be able to provide you with access.

If at any time you believe that TTC's record of your personal information is incorrect, please let TTC know. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

Internet

If you access our website, we may collect additional personal information about you in the form of your IP address or domain name. Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and any linked websites are not subject to our privacy policies and procedures.

Information Storage and Security

Personal information collected by TTC will be stored securely in paper form or electronically at TTC's Centre. TTC may store, process or back-up your personal information on computer servers that are located overseas, including through third party service providers who assist us in operating our business. Only authorised employees from TTC and third party service providers will have access to your information and this access will be structured in such a way as to ensure the use and disclosure as stated above. We will take reasonable steps to protect any personal information that we hold from unauthorised access, modification, misuse, loss and disclosure.

Retention of Personal Data

TTC shall take reasonable effort to destroy or anonymize 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 TTC. TTC 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.

TTC will discuss with you any consequences of not providing your personal information, or providing incomplete or inaccurate personal information, which may include an effect on what services TTC can provide to you.

Contact Information

Should you:

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

Please contact our Data Protection Officer at:

The Tots' Classroom LLP
531 Bedok North Street 3
#01-704
Singapore 460531
Attn: Data Protection Officer

Email: DPO@thetotsclassroom.edu.sg

Updates on Data Protection Policy

TTC will review the policies, procedures and processes from time to time. TTC reserves the right to amend the terms set forth under this Data Protection Policy at TTC's absolute discretion. All amended Data Protection Policy will be posted on TTC's website.