

Data Protection Policy and Privacy Document

Your privacy is important to us. The purpose of this Privacy Policy is to inform you of how Cyberland Consultancy Pte Ltd manages personal data as collected by the Institution's headquarters or administrator (individually and/or collectively referred as the "Institution", where appropriate) in accordance with the Personal Data Protection Act 2012 ("the Act"). Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we store, use and disclose your Personal Data.

This Privacy Policy governs the use of the services ("Services") provided by Cyberland Consultancy Pte. Ltd. ("we" or "our" or "us"), either itself or through its subsidiaries or licensees, via various electronic platforms such as web and mobile applications or website, namely cyberland.sg, or any other platforms designated by us (the "System").

General

Cyberland stores and processes personal information provided by you or any third parties and/or further information and data that may be required.

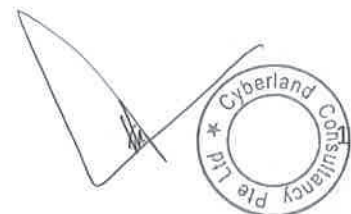
By using our Services, you agree that you have read this Privacy Policy and accept the terms stated herein. We reserve the right to modify this Privacy Policy, without notice, at any time. You understand that your continued use of our Services after this Privacy Policy has been revised constitutes your acceptance of the Privacy Policy as amended, provided that if such revision materially impacts your use of our Services, we may notify you through avenues in which we deem as appropriate, such as e-mail. What constitutes a material change, will be determined by us at our sole and absolute discretion.

Information Collected by Institution

In this Privacy Policy, "Personal Data" refers to any data, whether true or not, about you, the child/resident, parents/guardians/caretakers or visitors (individually and/or collectively referred as an "Individual", where appropriate) who can be identified:

- from that data; or
- from other information to which we have or are likely to have access to (including data in our records as may be updated from time to time).

We may process personal information such as:



- an Individual's name and contact details;
- particulars of an Individual's social media accounts (such as gender, birthdate and location) if any such account is connected to our system;
- an Individual's personal information such as name, NRIC or birth certificate number, emergency contact information and content as provided by the Individual, Institution or any third parties;
- any information an Individual may send to us or our affiliates who use our Services ("Affiliate");
- transactional history in order to document a transaction an Individual may have had with us or other users; and
- information collected through the use of Cookies (as defined below).

An Individual's name, contact details and personal information are obligatory and if we are not allowed to process such information, we may not be able to provide the Individual with the Services.

Some of the information stored by us may not be explicitly submitted by an Individual as we do from time to time also automatically receive and record information on our server logs from the Individual's browser, including the Individual's IP address, cookie information, requested web pages, browser type and language, access times, and the referring website address.

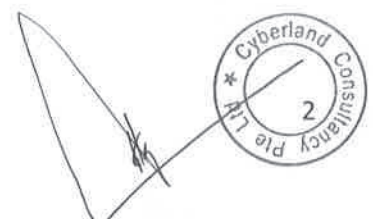
The System uses "cookies" to help an Individual personalize their online experience. A cookie is a text file that is placed on the Individual's hard drive by a web page server. Cookies cannot be used to run programs or deliver viruses to the computer. Cookies are uniquely assigned to the Individual, and can only be read by a web server in the domain that issued the cookie to the Individual.

Cookies on the System may be used to ensure a smooth user experience, perform analytics, and for showing relevant advertisements.

Most Web browsers automatically accept cookies, but an Individual can usually modify their browser setting to decline cookies if preferred. If an Individual choose to decline cookies, they may not be able to access all or parts of our System.

If an Individual gives us information about another person, the Individual confirms that:

- consent is given on behalf of the other person for the storage and/or processing of the person's personal information;



- they receive on the other person's behalf any data protection notices; and
- they warrant that they have obtained the other person's consent for us or have the right to allow us to store and/or use the other person's personal information

We store personal information when an Individual or an Individual's Institution:

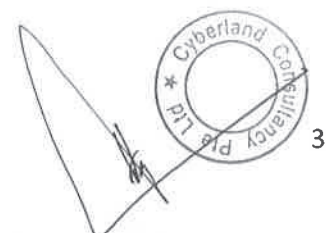
- sets up and/or registers an account with us;
- use the Services;
- provide comments or submit a problem to us;
- request information from us and provide the Individual's name or return contact information;
- join any contests or surveys organised by us; or
- register for our training classes

We may also process the personal information of an Individual if they are provided by the Institution or by the Individual. The Individual agrees and consents to us processing their personal information in accordance with the terms and conditions of this Privacy Policy.

Usage of Information Collected by Institution

In general, other than providing an Individual with the Services and other services incidental or related to the Services, we may use the information provided to us for the following purposes:

- provide, maintain, protect and improve the System;
- develop new services;
- protect ourselves and our users;
- verify the Individual's eligibility and deliver prizes in connection with any contests and giveaways that we may have;
- research and reporting purposes including historical and statistical purposes;
- general operation and maintenance of the System including audit and its related portal(s);
- provide the Individual with regular communications (other than direct marketing materials) from us relating to the Services and System;
- investigate complaints, suspected suspicious transactions and research for service improvement;
- respond to any enquiries from our users;
- conduct market surveys and analytics; and
- inform our users of any updates regarding our Services



3

Sharing of Information Collected by Institution

We may share an Individual's personal information with any person, who is under a duty of confidentiality to which has undertaken to keep such data confidential, which we have engaged to fulfil our obligations to the Individual.

We do not share an Individual's personal information with third parties for marketing purposes. However, we may need to share an Individual's personal information with the Institution in order to ensure that we are able to provide the Services to the Individual and also to fulfil our obligations to the Institution.

We may disclose personal information if required to do so by law or if we have good faith belief that such disclosure is necessary to protect and/or defend our rights and interests. We may, as permitted by applicable law, disclose personal information to third parties in connection with an investigation of fraud, infringement, piracy, tax avoidance and evasion or other unlawful activity and the Individual expressly authorize us to make such disclosures.

If we are merged or acquired by another entity, we will duly inform the Institution accordingly and any personal information may be transferred to such entity as a part of the merger or acquisition.

Rights to Information Collected by Institution

The right of access

At any point, an Individual can make a request relating to their data and we will endeavour to provide a response. We can refuse a request if we have a lawful obligation to retain data i.e. from the relevant authorities, but we will inform the Individual of the reasons for the rejection.

The right to erasure

An Individual has the right to request the deletion of their data where there is no compelling reason for its continued use.

The right to restrict processing and to object

An Individual can object to us processing their data. This means that records can be stored but must not be used in any way, for example, reports or for communications.

An Individual can also object to their data being used for certain activities like marketing

or research.

However, the request to restrict or object to us processing and/or using their data must be requested through the Institution who collected the data.

Request

If an Individual wishes to make a request to access or request of correction regarding the personal information or have any inquiries or complaints in respect of the personal information, please contact us at dpo@cyberland.edu.sg.



A handwritten signature in black ink is positioned above a circular stamp. The stamp contains the text "Cyberland Consultancy Pte Ltd" around the perimeter and a small asterisk in the center.