This Data Privacy Policy has been prepared to assist you in understanding how Info-Tech Systems Integrators Pte Ltd (Info-Tech) collects, uses and/or discloses or otherwise process personal data that is provided to us.

Privacy of your personal data is important to us and Info-Tech is committed to show care when managing this information through our Privacy Policy statement, and consistent with the Personal Data Protection Act 2012.

The policy applies to Info-Tech Systems Integrators Pte Ltd, subsidiaries and its associated/affiliated businesses and outlines our obligations and practices in the handling of the Personal Data we collect and hold. If you have any questions on this policy or in relation to how Info-Tech manages, protects and/or processes your personal data, please contact our <u>Data Protection Officer (DPO)</u> via email: <u>dpo@infotech.edu.sg</u>.

# PERSONAL DATA [DEFINITION]

Personal data ("Personal Data") refers to all and any information relating to you obtained by us in the course of and as a result of the provision of any products and services by us to you. Personal Data includes but not limited to your name, mailing address, telephone number(s) and personal email address and NRIC number, nationality, gender, date of birth, marital status, photographs, employment information and financial information.

## WHY DO WE COLLECT DATA [PURPOSE LIMITATION]

Generally, we collect Personal Data from customers and prospective customers, for purposes relating the products and services we offer. These purposes include, but are not limited to:

- Responding to your enquiries regarding training courses, and any other services we offer
- Processing and managing feedback
- Processing requests, orders and administering accounts
- Providing customer support including account servicing (class confirmation, reminders, postponements, cancellations etc)
- Communication with you in relation to products and services we provide which are relevant to your existing relationship with us
- Offering you updated marketing and promotional packages which you may benefit from, including products and services offered by our selected partners
- Administering and managing your relationship with us as our trainees, (training grant application, assessment, post-course evaluation, and license collection)
- Meeting regulatory and legal obligations

- Responding to your enquiries regarding training courses, and any other services we offer
- Research and survey
- Safety and Security of Premises

We may for these purposes, contact you via mail (including electronic mail), telephone, SMS or other communication (text or image) applications for mobile devices.

### **HOW DO WE COLLECT [CONSENT]**

- Where possible, we will collect your Personal Data directly from you and secure
  the relevant consent from you. This may take place in several ways, such as when
  you physically visit us at our Training Centres/ Exhibition Booths to provide us a
  written order or virtually ask us to provide a product or service over the telephone
  or internet.
- Our websites and mobile applications may also offer interactive facilities, such as
  enquiry, comment forms and contest entry forms, where Personal Data may be
  collected. In addition, we may also obtain Personal Data from third parties such
  as our partners, contractors and regulatory authorities.
- Enter our property and/or premises and/or when your images are captured by us via CCTV cameras while you are within our property and/or premises, or via photographs or videos taken by us or our representatives when you attend our events / courses.
- Regardless of who provides Personal Data to us, it will always be handled by us in accordance with this Personal Data Protection and Privacy Policy and the Personal Data Protection Act 2012.

#### WHERE AND WHEN DO WE USE YOUR DATA [NOTIFICATION AND TRANSFERS]

In providing you with a product or service, we may sometimes need to disclose your Personal Data to others. It is generally not our policy to disclose your Personal Data to external organisations unless we have your consent and/or are required to disclose your Personal Data as required in the normal course and scope of our business in the provision of our services to you, and/or for contractual, legal and regulatory requirements.

Some examples of the types of external organisations we may need to disclose information to in the course of providing a product or service are:

- Regulatory bodies and agencies
- Ministry of Manpower (MOM) etc.
- Funding agencies, e.g. SkillsFuture Singapore (SSG)

- Insurers and financiers
- Info-Tech data intermediaries, programme partners, other companies or individuals, including legal counsel and information technology service providers, who assist us in providing services

Some of our information technology service providers may be located overseas (if any) and, as a result, Personal Data collected and held by us may be transferred overseas.

Unless otherwise required or permitted by law, we will only disclose your Personal Data with your consent (implied or expressed), and we will also take reasonable steps to ensure the external organisation to whom we have disclosed your information are also legally bound to protect the privacy of your Personal Data.

However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:

- the disclosure is required by law; or is necessary for any investigation or proceedings
- 2. the purpose of such disclosure is clearly in your interests and consent cannot be obtained in a timely way
- 3. the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual.

For the full list of exemptions, please refer to the Act which is publicly available at https://sso.agc.gov.sg/Act/PDPA2012.

### ADMINISTRATION AND MANAGEMENT OF DATA [ACCURACY AND PROTECTION]

We will do our best to ensure that the Personal Data we hold is accurate, complete and up to date whenever we collect or use it. This means that from time to time, we may approach you via our marketing channel to get updates for your Personal Data. If you find that the Personal Data, we hold about you is incorrect, please contact us immediately and we will correct it.

Security of Personal Data is important to us, and we take all reasonable precautions to protect Personal Data from misuse, loss, unauthorized access, modification or disclosure.

Some of the ways we protect Personal Data include:

- External and internal premises security;
- Restricting access to Personal Data only to staff who need it to perform their dayto-day functions;

- Maintaining technology products to prevent unauthorized computer access or damage to electronically stored information, such as requiring identifiers and passwords, firewalls and anti-virus software; and
- Maintaining physical security over paper records.

#### HOW TO FIND OUT HOW IS YOUR DATA USED [ACCESS]

You can access most of the Personal Data we hold about you by contacting us formally through email at <a href="mailto:dpo@infotech.edu.sg">dpo@infotech.edu.sg</a>. We will require a formal written request from you to our Data Protection Officer. An administrative fee may be charged to you to cover the reasonable cost of retrieving the information and supplying it to you.

Access to Personal Data may be refused in several circumstances, such as where the Personal Data relates to anticipated legal proceedings or the request for access is frivolous or vexatious. If we deny or restrict your access, we will explain why as required by applicable laws.

#### **HOW CAN YOU WITHDRAW CONSENT? [WITHDRAWAL OF CONSENT]**

Should you wish to withdraw your consent for us to send you sales and marketing information via a specific mode or all modes of communications (e.g., mail, email, telephone calls, SMS-Text), please notify us in writing to <a href="mailto:dpo@infotech.edu.sg">dpo@infotech.edu.sg</a>. It may take up to 4 weeks, upon receipt of your request, for the change to take effect.

#### HOW LONG WOULD YOUR DATA BE KEPT [RETENTION]

Your Personal Data will only be retained for a reasonable period based on your transaction purposes, usually no more than 5 years or as required by law.

#### **USE OF COOKIES: PRIVACY AND OUR WEBSITES**

Should you believe that the privacy of your Personal Data has been compromised, please contact us at <a href="mailto:dpo@infotech.edu.sg">dpo@infotech.edu.sg</a>. We will take the relevant steps to address your concerns.

## **RECORDING AND PHOTOGRAPHY POLICY**

To protect the privacy of our customers, employees, and safeguard our intellectual property, we strictly prohibit any form of audio or video recording, photography, or similar activities within our premises without prior written consent from the management.

#### RIGHT TO AMEND DATA PRIVACY POLICY

We reserve the right to amend this Data Privacy Policy at any time. This is part of our continuous efforts to ensure that we properly manage, protect and process your personal data.

We may amend the terms of this Data Privacy Policy at our absolute discretion. Please check our Data Privacy Policy on a regular basis.

For any questions relating to your Personal Data or about our Privacy Policy, you may contact our us at:

## Info-Tech Systems Integrators Pte Ltd

80 Bendemeer Road #01-08

Singapore 339949

Email: <a href="mailto:dpo@infotech.edu.sg">dpo@infotech.edu.sg</a>

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