

DATA PROTECTION POLICY

This Data Protection Policy applies to Singapore Ballet Academy's collection, use and disclosure of the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data. This policy statement provides information on the obligations and policies of Singapore Ballet Academy in respect of an individual's personal data. Singapore Ballet Academy undertakes to use reasonable efforts in applying, whether practicable, those principals and the processes set out herein to its operations.

This Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your personal data, and your consents herein are additional to any rights which we may have at law to collect, use or disclose your personal data.

By interacting with us, submitting information to us, or signing up for any products or services offered by us, you agree and consent to Singapore Ballet Academy as well as to its respective representatives and/or agents ("Representatives") (collectively referred to herein as "SBA", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your personal data, and disclosing such personal data to SBA's authorised service providers and relevant third parties in the manner set forth in this Policy.

A) GENERAL DATA PROTECTION POLICY

1. INTRODUCTION TO THE PERSONAL DATA PROTECTION ACT (PDPA)

1.1 "Personal Data" is defined under PDPA to mean 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.

1.2 As part of its day-to-day activity, SBA may collect from you, through various means, including via our websites, smart phone applications, events, and any forms used by SBA from time to time, some or all of the following personal data:

- (a) Name of student
- (b) NRIC / birth certificate / FIN details
- (c) Date of birth and age
- (d) Gender
- (e) Nationality
- (f) Race
- (g) Name of parent/guardian and occupation
- (h) Name of emergency contact and relationship
- (i) Training background with respect to dance
- (j) Contact details including telephone numbers and email addresses
- (k) Residential and mailing addresses
- (l) Identifiable images
- (m) Audio recordings

1.3 We will collect your personal data in accordance with the PDPA directly from you. We will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to collect and process your personal data without your consent.

2. PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

2.1 The personal data which SBA collects from you may be used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data which includes but are not limited to:

- (a) Communicating with you on enquiries, and/or sending you marketing, advertising and promotional information and materials relating to events, productions, shows, concerts and/or services that we, our partners and/or third party individuals/organisations with whom we are collaborating, may be promoting.

- (b) Communicating with you on important or urgent updates/reminders such as cancellation of classes via SMS, telephone or email.
- (c) Administrative matters on your sign-ups/registrations for enrolment information such as assessments, auditions, master classes, workshops, parents' week, mailing lists, etc.
- (d) Photos, videos and/or sound recordings taken during classes, master classes, workshops, parents' week, performances and photo shoots for teachers' training, curriculum and promotional purposes.
- (e) For security and record keeping purposes, our premise is monitored by CCTV placed at the entrances, waiting area, office and dance studios. Your presence may be recorded by our CCTV.
- (f) Any other purposes that we notify you of at the time of obtaining your consent.

(collectively, the "Purposes")

As the purposes for which we may/will collect, use, disclose or process your personal data depends on the circumstances at hand, such purposes may not appear above. However, we will notify you of such other purposes at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by PDPA or by law.

3. SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- 3.1 We respect the confidentiality of the personal data you have provided us.
- 3.2 On occasion, we need to hire other companies to provide some services, such as theatre venues. We will limit the personal data to them, and they will only have access to your personal data for the purpose of backstage security. They will be strictly monitored in order to make certain your privacy is always protected.
- 3.3 We will not disclose your personal data to third parties without first obtaining your consent permitting us to do so. 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:
 - (a) cases in which the disclosure is required or authorised based on the applicable laws and/or regulations;
 - (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
 - (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
 - (d) cases in which the disclosure is necessary for any investigation or proceedings;
 - (e) cases in which the personal data is disclosed to an officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
 - (f) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
 - (g) where such disclosure without your consent is permitted by the PDPA or by law.

4. REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

- 4.1 You may request to access and/or correct the personal data currently in our possession or control by submitting a written request to our Data Protection Officer ("DPO"). We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request. Hence, please submit your written request to spballet@singnet.com.sg or enquiries@sba.com.sg.
- 4.2 For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested. Note that the PDPA exempts certain types of personal data from being subject to your request.
- 4.3 For a request to correct personal data, once we have sufficient information from you to deal with the request, we will:
 - (a) correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time which we are able to make the correction. Note that the PDPA

exempts certain types of personal data from being subject to your personal request as well as provides for situation(s) when correction need not be made by us despite your request; and
(b) subject to paragraph [4.4], we will send the corrected personal data to every other organisation to which the personal data was disclosed by SBA within a year before the date the correction was made unless that other organisation does not need the corrected personal data for any legal or business purpose.

4.4 Notwithstanding paragraph [4.3(b)], we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.

4.5 We will also be charging you an administrative fee for the handling and processing of your requests to access your personal data. We will provide you with a written estimate of the fee we will be charging. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

4.6 Please note that if your personal data has been provided to us by a third party (e.g. another student via a referral process), you should contact that individual to make such queries, complaints and access and correction requests to SBA on your behalf.

5. REQUEST TO WITHDRAW CONSENT

5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by submitting your request to spballet@singnet.com.sg or enquiries@sba.com.sg, and/or completing the prescribed form available from the Office.

5.2 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.

5.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue to provide our services to you.

6. ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

6.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by SBA to make a decision that affects you, or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had originally provided us with.

6.2 We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties which are wholly attributable to factors beyond our control.

6.3 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable to assume that:

- (a) the purpose for which that personal data was collected is no longer being served by the retention of such personal data, and
- (b) retention is no longer necessary for any other legal or business purposes.

6.4 Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, you consent to your personal data being transferred outside of Singapore. We will be taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide the transferred personal data a standard of protection that is at least comparable to the protection under the act. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

7. COMPLAINT PROCESS

- 7.1 If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with PDPA, we welcome you to contact our DPO with your complaint or grievance.
- 7.2 Please contact us with your complaint or grievance through one of the following methods:
- (a) Email: spballet@singnet.com.sg or enquiries@sba.com.sg
 - (b) Mail: 51 Waterloo Street #04-01/02/03, Singapore 187969

8. UPDATES ON DATA PROTECTION POLICY

- 8.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will review our policies, procedures and processes from time to time.
- 8.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amendments to the Policy will be posted on our website.
- 8.3 We strongly encourage you to review our Data Protection Policy periodically so that you are updated with any changes/amendments.

B) COOKIE POLICY

9. COOKIES

- 9.1 Please note that we use cookies on our website. Cookies are text files that we put on your computer and they store/record information about your visit to and use of the website. Cookies can compile information about your browsing habits and can also enhance your browsing experience.
- 9.2 We use cookies for the following purposes:
- (a) to improve your user experience on our website;
 - (b) to remember your preferences;
 - (c) to help us understand how our website is performing;
 - (d) to monitor traffic to our website;
 - (e) to enable our website to function properly.
- (collectively the "Purposes")
- 9.3 You can control cookies through your web browser settings. This allows you to determine which cookies to allow and which to refuse. If you disallow the use of cookies on our website, please note that you may not be able to access the full range of functions that our website offers.
- 9.4 Personal data (if any) that we collect from you through cookies may be passed to our third party service providers, whether located in Singapore or elsewhere, for one of more of the Purposes, for managing and/or administering our website, or for the purpose of data hosting/storage/backup.
- 9.5 Your use of our website constitutes consent by you to our use of cookies and to the matters set out herein.

This policy is governed by and shall be construed in accordance with the laws of Singapore. You hereby submit to the non-exclusive jurisdiction by the Singapore courts.