



## **PERSONAL DATA PROTECTION POLICY**

The **Mind Stretcher Group of Companies**, which consists of any entity operating under the “Mind Stretcher”, “Mind Stretcher Learning Centre”, “MS Junior Campus”, “Mind Stretcher Junior Campus”, “Xuehuile”, “学汇乐” names or any of their variations thereof in Singapore (hereinafter referred to as “**the MS Group**”, “**MS**”, “**Mind Stretcher**”, “**our**”, “**us**” or “**we**”) is committed to ensuring that your personal data is protected.

The purpose of this document is to explain how the MS Group manages personal data which is subject to the Singapore Personal Data Protection Act 2012.

All references in this Policy to “client”, “you” and “your” refer to the individual(s) who accepted or proposes to accept products or services by MS.

### **1. Types of personal data collected**

We collect personal data so that we can provide an experience that is customised / responsive to your needs and enables us to carry out our business activities. Examples of such personal data collected include:

- a. Information about you and your family members, which may include names, identification particulars, contact details, preferences, educational information, demographic data, payment details, transaction history and general photos/videos of classroom activities / MS events (in which a student may be enrolled in);
- b. Information and data generated in the course of any continual relationship with Mind Stretcher, for example, instructions given by you to arrange class enrolments, transfers, make-up (if any), withdrawals, and other information and records you choose to provide by various modes of communication such as email, telephone, SMS, telephone, social media and the internet; and
- c. Information from cookies, technologies deployed by Mind Stretcher for the analysis of website usage or other information technology applications (learning platforms or otherwise) used by Mind Stretcher in delivering or communicating its services.

### **2. Purpose of Collection, Use and Disclosure of Personal Data**

We collect personal data from you, your family members, your authorised representatives, our website and social media, internet, mobile services, emails, SMS, phone conversations, face-to-face interactions with any Mind Stretcher employee/officer/director and publicly available sources. The purposes (“Permitted Purposes”) for which Mind Stretcher collects, uses and discloses the personal data include:

- a. verifying your identity (including the making of copies of I/C for our records);
- b. discharging our contractual obligations;
- c. providing you better service;
- d. informing you of our value-added workshops, seminars, study trips, events or holiday workshops;
- e. responding to, processing and handling your queries, requests, inter-centre transfers within the MS Group, feedback and suggestions;
- f. managing the administrative and operational aspects of the MS Group and complying with internal policies and procedures;
- g. facilitating operational processes, which includes, but not limited to student profile assessments, class and student management, payment administration and statistical analysis;
- h. requesting feedback or participation in surveys (on teachers, staff etc), market research and / or analysis for statistical profiling or other purposes for us to design our products, understand customer behaviour, preference and market trends, and to review, develop and improve the quality of our products and services;
- i. for our marketing, branding, communications and corporate affairs purposes which include publication in our printed materials, social media, website and / or electronic media; and
- j. managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting investigations);
- k. providing you product-related services and support, including the provision of administrative support, technical assistance and customer alerts;
- l. monitoring and recording calls and electronic communications with clients for record-keeping, quality control, training and case investigations; and
- m. enforcing or defending the rights of MS, its employees, officers and directors;

### 3. **To whom your personal data may be disclosed**

The personal data that we collect may be disclosed to the following parties for the following purposes:

- a. to our full-time teachers and independent contract teachers for them to effectively discharge their teaching and tutoring obligations;
- b. to third party service providers whom we engage or collaborate with to organise/conduct our enrichment programmes, events / workshops / talks / seminars;
- c. any person or entity which is part of Mind Stretcher, to the extent necessary to fulfil the Permitted Purposes;
- d. to professional advisors, third party service providers, agents or contractors whom we engage to manage / support our business operations; and
- e. any person, entity or authority to whom disclosure is required under applicable laws or regulations;

### 4. **Security of Personal Data**

We will take reasonable steps to protect personal data in our possession or under our control by making reasonable security arrangements to prevent unauthorised access, collection, use and disclosure of these personal data.

### 5. **Accuracy of Personal Data**

It is your obligation to ensure that all personal data submitted to us and retained by us is accurate, not misleading, updated and complete in all respects. Failure on your part to do so may result in our inability to provide you with the products and services you have requested. For the avoidance of doubt, we, including our employees or authorised officers or agents, shall not be responsible for any personal data submitted by you to us that may be inaccurate, misleading, incomplete or not updated.

6. If you provide us with any personal data relating to a third party (e.g. information of your spouse, children, parents, and / or guardians), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their personal data for the respective purposes. You should ensure that all personal data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the products and services you have requested.

### 7. **Retention of Personal Data**

We will retain your personal information either for the period of our business relationship, or as long as you have any form of ongoing relationship with us, or for the requisite retention periods as stipulated in any contractual arrangements or in accordance with any legal, regulatory, business and operational obligations, whichever is the later.

### 8. **Access and Correction of Personal Data**

You may access and request for correction or updating of your personal data at any time after the submission of your personal data to us.

If you wish to know about your personal data in our possession or under our control, or how your personal data has been used or to whom it has been disclosed, you may write in to us by filling in our Access Request Form (available at your request). If you wish to correct any personal data in our possession or under our control, you may write in to us by filling in a Correction Request Form (available at your request).

Kindly note that we reserve the right to charge an administrative fee for providing the aforementioned services.

### 9. **Personal Data Protection Policy Updates**

We reserve the right to amend and vary the terms of this Policy from time to time. If so, we will make available the updated Policy on our website ([www.mindstretcher.com](http://www.mindstretcher.com)). The use or continued use of any of our services shall be deemed as your agreement and consent to be bound by our Personal Data Protection Policy.

### 10. **Questions and Feedback**

For any queries on this Policy, you may email us at [enquiries@mindstretcher.com](mailto:enquiries@mindstretcher.com) (Attention: Data Protection Officer).

By providing to us your personal data, you declare that you have read, understood and accepted the provisions herein and do hereby consent to the processing of your personal data in accordance with all the foregoing. You acknowledge that the use or continued use of our services shall be deemed as your agreement and consent to be bound by our Personal Data Protection Policy.