
JOSIAH MONTESSORI PRIVACY POLICY

LAST UPDATE: JUNE 2020

CONTENTS

- 1. DEFINITIONS**
- 2. DEFINING PERSONAL DATA**
- 3. PRIVACY PRACTICES**
- 4. USE, DISCLOSURE AND PROCESS OF PERSONAL DATA**
- 5. DISCLOSURE**
- 6. USE OF COOKIES**
- 7. DATA SECURITY**
- 8. THIRD-PARTY SITES**
- 9. CONTACTING US - FEEDBACK, WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION OF YOUR PERSONAL DATA**

JOSIAH MONTESSORI (“JM”) PRIVACY POLICY

This Privacy Policy governs the manner in which we manage Personal Data (as defined below) which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) (the “Act”). Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose Personal Data. This Privacy Policy applies to the website and all products and services offered by us. It supplements but does not supersede nor replace any consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which any of us may have at law to collect, use and/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 us collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to our authorized service providers and relevant third parties in the manner set forth in this Privacy Policy.

We may add, modify, or remove portions of this Privacy Policy from time to time at our absolute discretion without notice. You may ask for the most recent version of this Privacy Policy from the Centre’s Privacy Officer.

1. DEFINITIONS

1.1 In this Privacy Policy, the following terms have the meanings set out below:

Personal Data: any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

Examples of such Personal Data (depending on the nature of your interaction with us) include unique identifiers (e.g. NRIC or FIN number, passport number) as well as any set of data (e.g. telephone number(s), mailing address, photo or video images which when taken together would be able to identify the individual.

Client: The parent, ward/guardian or other legal representative of a student who has enrolled a child with us.

Student: A prospective, current or past student of JM;

Staff: Employees who are employed under Josiah Associates Pte Ltd and its related corporations, subsidiaries

Record: Includes books, documents, maps, letters, papers, images, videos, audio recordings and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means.

We / Our / Us: Refers to Josiah Associates Pte Ltd and its related corporations, subsidiaries and affiliates, business partners, associates, representatives, agents and/or employees.

You/Your/Yours: Refers to our clients, students and all individuals who disclose Personal Data to us.

2. DEFINING PERSONAL DATA

2.1 Most of the Personal Data that we collect comes to us directly from parents or students, or is information regarding a student's school activities, performance or behaviour, such as attendance records or grades. This also includes information on academic, health, images, videos and personal matters needed by us to provide our students with care, education and co-curricular programs. We will collect Personal Data from you only if you voluntarily submit such information to us. You can always refuse to supply personally identification information, except that it may prevent your child from being enrolled successfully into the mandatory Early Childhood Development Agency (ECDA), Ministry of Education (MOE), childcare link (CCLS) enrolment system etc.

Exceptions: business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information.

2.2 Where an individual uses his or her home contact information as business contact information as well, we consider that the contact information is business contact information, and is not therefore subject to protection as Personal Data.

3. PRIVACY PRACTICES

Personal Data gathered by us is kept in confidence. Our personnel are authorised to access Personal Data based only on their need to deal with the information for the reason(s) for which it is obtained.

This Private Policy will address specifically the following matters:

- How we collect Personal Data and what Personal Data we collect;
- How we may use this Personal Data;
- With whom we may share this Personal Data;
- What choices are available to you with respect to collection, use and disclosure of your Personal Data;
- What types of measures are in place for the management and care of Personal Data in our possession and/or under our control; and
- How you can access and correct any inaccuracies in your Personal Data.

HOW WE COLLECT PERSONAL DATA

Generally, we may collect Personal Data from you or your child/ward in the following ways:

- When you visit our centre;
- When you submit an application for your child/ward to be enrolled with our centre
- When you submit forms for centre activities;
- When you communicate with our staff (whether via telephone calls, letters, emails or during face-to-face meetings);
- When you are contacted by, and respond to, our staff;
- In the course of providing educational services to your child/ward;
- When your or your child's/ward's images are captured by us while you are within our premises, or via photographs or videos taken by us or our representatives when you or your child/ward attend events hosted by us or any third party organiser we appoint;
- When you request that we contact you, be included in an email or other mailing list; or when you respond to our request for additional Personal Data, our promotions, marketing efforts and other initiatives;
- When you use our electronic services, or interact with us via our websites or other social media platforms (such as, but not limited to Instagram, Facebook and other third party marketing and promotional platforms (collectively, such social media platforms shall be referred to as the "Social Media Platforms") or use services on our websites and/or the Social Media Platforms; and/or
- When you submit your Personal Data to us for any other reasons.

You should ensure that all Personal Data submitted to us is complete, accurate, true and up-to-date.

4. USE, DISCLOSURE AND PROCESS OF PERSONAL DATA

PURPOSES FOR WHICH PERSONAL DATA IS COLLECTED

- We collect and use Personal Data to provide you with the best possible experience with us. We require the collection, use, and disclosure of Personal Data for, but not limited to, the following purposes:
- For maintaining student/waitlist records;
- To communicate with students and parents, process applications, assess and determine the suitability of a prospective or current student for admission and for a particular level, or classroom;
- To administer and provide care and educational services;
- To communicate with current and former students and their parents regarding school activities, extra-curricular activity registration, special events, future plans, opportunities to volunteer and marketing efforts;
- To enable us to operate our administrative and accounting functions, including payment and collection of school fees; administration; billing and accounting; and maintenance of non-educational school programs, including parent and volunteer participation;
- To maintain the smooth operation of building security and fire safety policies, including check in/ check out registers and phone calls;
- To communicate with members of our staff about physical or emotional health issues that are deemed important for the well-being and safety of the student and for the maintenance of a safe and harassment-free environment;
- To comply with applicable government or public agencies, ministries, statutory boards or other similar authorities or non-government agencies authorised to carry out specific Government services, duties or obligations;
- To use anonymous information, such as information collected through surveys or statistical information regarding students, to constantly improve our products and services;
- For taking photographs and/or videos (whether by our staff or third-party photographers and/or videographers) during events organised by us;
- For the use on the centre's "Little Lives" portal / website;
- For us to provide you with information about our services and our affiliate schools/centres;
- To monitor use of our facilities, including email and internet use;
- For investigating possible fraud, misconduct, unlawful action or omission, and utilising electronic access and video systems to maintain security of persons or property, control access and investigate suspicious or inappropriate activities including but not limited to possible violation of any terms and conditions or policies posted on our website;

-
- For supporting our functions including, but not restricted to, the teaching and personal and professional development of students and administration of our schools/centres; and
 - For processing, administering and conferring awards of prizes and student or graduation status, and publication or releasing of information on the same;
 - For carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or put in place by us, including the obtaining of references and/or other information from prior educational institutions and employers.

In addition to the above, during the course of our student's academic life/tenure, their images may be recorded. This may be to document their participation or achievements, as part of their academic work or simply as a social act.

By enrolling them in the school, you are deemed to have given permission (i) for such recordings to occur as a part of our regular activities and (ii) for us to use your child/children images on the posters on our premises, reports, publications/newsletters and marketing purposes.

If you do not wish for your child/children's images to be recorded for any reason, you should notify us in writing via the address stated in the section entitled "Contacting Us- Feedback, Withdrawal of Consent, Access and Correction of your Personal Data" below.

FOR STAFF IN GENERAL

For the avoidance of doubt, in order to comply with its contractual, statutory, and management obligations and responsibilities, JM is required to process personal data relating to its staff.

All such data will be processed in accordance with the provisions of the Act and our rules and policies, including those on data protection, as may be amended from time to time as stipulated in all the above.

Our staff employment will be governed primarily by the relevant Employment Act and employment contract where applicable, and our staff agree to be bound by the terms and conditions set out in the employment contract. A Staff Handbook, if any, will very often inform, remind you expressly or impliedly the purposes for, and the manner in, which our employee personal data will be used. A staff shall also be bound by all policies, terms and conditions set out in our Staff Handbook.

Staff should also be aware that their personal data may be collected for the purposes listed below. For the avoidance of doubt, the purposes listed below serve to supplement and clarify the employer-employee relationship, without limiting, superseding or supplanting any express or implied terms in the above mentioned purposes and usages stipulated in this document:

- for managing Staff's employment relationship with us.
- for providing remuneration, reviewing salaries and bonuses, conducting salary benchmark reviews, staff appraisals and evaluation, as well as recognizing individuals for their services and conferring awards.
- for using Staff's bank account details to deposit salaries and other payments;
- for monitoring the use of our computer network resources;
- for posting photographs/ videos images, audio recordings involving a staff (whether alone or in a group), on the following, but not limited to: website, Social Media Platforms, staff pass, newsletters and etc;
- for administrative and support processes relating to staff's employment, including our management and termination, as well as staff benefit, including travel, manpower, business continuity and logistics management or support, processing expense claims, medical insurance applications, leave administration, training, learning and talent development, and planning and organizing corporate events;
- for providing staff with tools and/or facilities to enable or facilitate the performance of staff's duties;
- for compiling and publishing internal directories and emergency contact lists for business continuity;
- for managing corporate social responsibility projects;
- for conducting analytics and research for human resource planning and management, and for us to review, develop, optimize and improve work-related practices, environment and productivity;
- for ensuring that the administrative and business operations of our function in a secure, efficient and effective manner (including but not limited to examining or monitoring any computer software and/or hardware installed within us, Staff work emails and personal digital and storage devices);
- for disclosing Staff's personal data where necessary to external parties for purposes of school administration, and to Government agencies for official purposes and disclosed to external third parties for, or in connection with, the above purposes, or where required by applicable rules, laws and regulations, codes of practice or guidelines;
- any other purpose arising in respect of the environment within which how our school(s) or centre(s) operate which is reasonable given your relationship with us; and
- any other purposes not related to those listed above or in your employment contract, which we may inform our employee of in writing from time to time, but for which we will seek our employee separate consent.

5. DISCLOSURE

We will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be provided, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:

- our related corporations;
- agents, contractors or third party service providers who provide services to us, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to us;
- vendors or other third party service providers in connection with products and services offered by us;
- any business partners, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or any debt or asset sale) involving us;
- our joint venture or business partners;
- our professional advisers such as our auditors and lawyers;
- relevant government regulators, government ministries, statutory boards or authorities, courts and/or law enforcement agencies, whether local or overseas, including the Ministry of Education, and the Accounting and Corporate Regulatory Authority, to comply with any directions, laws, orders, rules, guidelines, regulations, warrants, subpoenas, warrants or schemes issued or administered by any of them (including subsidy audit requirements or for any ECDA related matters);
- person responsible for the prevention or detection of crimes or statutory offences;
- persons who must act urgently to protect the life, health, or safety of the person concerned or of other individuals;
- law enforcement authorities or investigation agencies when we have reasonable reasons to believe that a fraud or statutory offence may be or has been committed.

6. USE OF COOKIES

When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. We may employ cookies in order for our server to recognise a return visitor as a unique user including, without limitation, monitoring information relating to how a visitor arrives at the website, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).

Cookies are small text files stored in your computing or other electronic devices which allow us to remember you or other data about you. The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on an electronic device. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visitor.

Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

7. DATA SECURITY

We will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that for example no harmful code will enter our website (for example viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with using websites.

While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet and we urge you to take every precaution to protect your Personal Data when you use such platforms. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.

If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person, and to inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorised transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorised and/or fraudulent use of your username and password.

8. THIRD-PARTY SITES

Our website may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third-party websites. Some of these third -party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable privacy policy of the third -party website to determine how they will handle any information they collect from you.

9. CONTACTING US - FEEDBACK, WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION OF YOUR PERSONAL DATA

If you:

- have any questions or feedback relating to your Personal Data or our Data Protection Policy;
- would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
- would like to obtain access and make corrections to your Personal Data records, you can approach us via the following channels:
 - Email us at info@josiah.com.sg
 - Call our hotline at 6336 6906
 - Talk to our staff at any of our branches
- You may also write to our Data Protection Officer as follows:

Data Protection Officer

Address: 1 Changi Business Park Crescent, Plaza 8@CBP, #01-05, S (486025)

Tel: 6634 1780

Please note that if your Personal Data has been provided to us by a third party, you should contact such party directly to make any queries, feedback, and access and correction requests to us on your behalf.

- If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, we may not be in a position to continue to provide our products or services to you, administer any contractual relationship already in place. This may also result in the termination of any agreements you have with us, and your being in breach of your contractual obligations or undertakings. Our legal rights and remedies in such event are expressly reserved.

Governing Law

This Privacy Policy and your use of this website shall be governed in all respects by the laws of Singapore.