

JOSIAH PRIVACY POLICY

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Introduction

At JOSIAH, we respect the privacy and confidentiality of personal data and we are committed to protecting your privacy and safeguarding your personal data.

Our Privacy Statement covers

- How We Collect Your Personal Data
- Types of Personal Data We Collect About You
- How We Use Your Personal Data
- Who We Disclose Your Personal Data To
- How We Manage the Collection, Use and Disclosure of Your Personal Data
- How You Can Access and Make Correction to Your Personal Data
- How We Ensure the Accuracy of Your Personal Data
- How We Protect Your Personal Data
- How We Retain Your Personal Data
- How We Transfer Your Personal Data
- How We Handle Queries and Complaints

In so doing, our Privacy Statement has set out the choices that you can make about JOSIAH's use of your personal information and how you can make informed decisions about what personal data you would like to share with us.

JOSIAH may, in our sole discretion, permit users of our website and web applications ("the Platforms") to post, upload, publish, submit or transmit content, which may include but is not limited to photos, write-ups, videos or links ("User Content"), on our Platforms.

How We Collect Your Personal Data

We collect your personal data in the following ways:

- When you visit our centre
- Provide feedback to us on our quality of service or your user experience
- Provide your personal information relating to registration/enrolment of your child for services or activities at our centres
- Provide your personal information when enquiring on infant and child care services for your child
- Visit our websites and leave behind your contact information
- Communicate with us via emails or written correspondences
- When you 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;
- Respond to our events or campaigns
- Submit your CV and job application form to us in response to our recruitment advertisements in newspapers and websites, or at roadshows or job fairs
- Submit your CV to recruitment firms or job portals, which are in turn forwarded to or retrieved by us
- Tax filing preparations;
- processing refunds;

- Collection of fees, charges, and expenses for services provided;
- Billing, accounting, auditing and the maintenance of proper book-keeping of JOSIAH's operations
- Fulfilling any other reasonable purpose which may, in the ultimate discretion of JOSIAH, be necessary.

Types of Personal Data We Collect About You

The types of personal data we collect about you may include:

- Yours and your child's personal information such as name, **last 3 digits and letter** of NRIC, residential address, work address, e-mail address, telephone number, mobile phone number, date of birth, gender, names and ages of children and the copies of birth certificates, passport numbers, student visas, employment details, nationality, race, marital status, images and videos, including other information necessary to fulfil special requests such as emergencies, etc.
- Your personal government-issued identification document numbers such as NRIC/FIN/Work Permit/birth certificate and passport numbers; only when **required** under the law or **necessary** to accurately establish or **verify** your identity to a high degree of fidelity
- Other personal details (where relevant) when applying for an employee position: name, nationality, marital status, languages spoken or written; professional and work experience (job title, occupation, employment history, work experience, Curriculum Vitae; education and professional qualifications, schools attended, academic transcripts, membership of professional bodies)
- JOSIAH may also collect non-personally identifiable information about you, such as use of our website, internet protocol addresses, browser and computer system information, cookies, invisible pixels, web beacons, and aggregated data related to your use of our Platforms.

Should you require more details on types of personal data we collect about you, you may visit our website: <http://josiah.com.sg/> or contact our DPO at simon.chan@josiah.com.sg

How We Use Your Personal Data

We use the personal data we have collected about you for one or more of the following purposes:

- Provision of Infant/Childcare services and account management
- To register your Child information into ECDA's Centre Management System (CMS) System, Child's Development Account (CDA) and other government boards as stipulated by ECDA.
- Communicate with enquirers and analyse website visitors
- Notify you about our services, special events and programs
- Respond to enquiries, update requests and feedback on user experience
- Monitor the movement of visitors to our physical premises for safety and/or security purposes
- Process job applications, recruitment and selection
- Carry out our obligations arising from any contracts entered into between you and us
- Presentations and Training purposes
- Comply with legal obligations and regulatory requirements

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.

Who We Disclose Your Personal Data To

We disclose some of the personal data we have collected about you to the following parties or organisations outside JOSIAH:

- External advisors e.g., auditors, lawyers, consultants
- Insurance Companies
- IT/Technical Support, IT Service Providers (e.g., Little Lives and Carbonate)
- Webhosting Companies, Cloud Service Providers
- Banks, Payment card processing companies
- Recruitment Agencies / Head hunters
- Commercial Service and Training Providers
- Early Childhood Development Agency (ECDA) and other government agencies (e.g., Ministry of Manpower, Ministry of Health, etc) 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) for any ECDA related matters

We will use our best endeavours to ensure that your personal data is protected by such third parties.

How We Manage the Collection, Use and Disclosure of Your Personal Data

□ Obtaining Consent

To the fullest extent required by the PDPA, before we collect, use or disclose your personal data, we will notify you of the purpose why we are doing so. We next obtain written confirmation from you on your expressed consent.

We will not collect more personal data than necessary for the stated purpose.

Under certain circumstances, we will rely on **deemed consent** when you voluntarily provide your personal data for the stated purpose and it is reasonably appropriate to do so, e.g., when you submit a registration form to us.

Please note that JOSIAH will be exempted from obtaining consent for collection, use or disclosure based on the conditions and circumstances specified under the 2nd, 3rd, and 4th Schedules of the PDPA.

□ Third-Party Consent

If you have a one-on-one meeting with us or do a transaction with us on behalf of another individual, you must first obtain consent from that individual in order for us to collect, use or disclose his/her personal data.

□ Withdrawal of Consent

If you wish to withdraw consent, you should give us reasonable advance notice. You have to be aware, though, of the likely consequences of your withdrawal of consent, e.g. without your personal contact information we may not be able to inform you of future services offered by us.

Your request for withdrawal of consent can take the form of an email or letter to us, or through the "UNSUBSCRIBE" feature in an online service.

How You Can Access and Make Correction to Your Personal Data

You may write in to us, based on reasonable grounds, to find out how we have been using or disclosing your personal data. We are obligated under the PDPA to allow you access to your personal data of the past one year, and to make any correction if there is any error or omission. Before we accede to your request, we may need to verify your identity by checking your NRIC or other legal identification document.

We will endeavor to fulfill your request within **30 days**, with an estimate of the fee for processing the request (if applicable). If we are not able to do so within 30 days, we will notify you of the additional time required.

How We Ensure the Accuracy of Your Personal Data

We will take reasonable **precautions** and **verification** checks to ensure that the personal data we have collected from you is reasonably accurate, complete and up-to-date. From time to time, we may do a verification exercise with you to update us on any changes to your personal data.

How We Protect Your Personal Data

We will take the **reasonable security arrangements** to protect your personal data that is in our possession to prevent unauthorised access, use, disclosure, or similar risks. We will take reasonable and appropriate measures to maintain the confidentiality and integrity of your personal data, and will only share your data with authorised persons on a 'need to know' basis.

External Data Intermediaries who process and maintain your personal data on our behalf will be bound by contractual information security arrangements we have with them.

How We Retain Your Personal Data

We will not retain any of your personal data under our charge **when the original purpose has been fulfilled or it is no longer necessary for any business or legal obligations**. Based on our Document Retention Policy, we will ensure that your personal data that are no longer needed by us will be destroyed or disposed of in a secure manner.

How We Transfer Your Personal Data

If there is a need for us to transfer your personal data to another country, we will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA. If this is not so, we will enter into a contractual agreement with the receiving party to accord similar levels of data protection as that in Singapore.

Tracking of User Activity

Where we track user activity, we will document this in our data inventory, and disclose such activity in our External Privacy Notice.

We use Tracking Tools such as Google Analytics

□ **Use of Cookies**

We use "cookies" to collect information about your activity on our web site. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. You can instruct your browser to refuse all cookies or to indicate them when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our web site.

□ **Behavioural Re-marketing**

Where we use remarketing services to advertise on third party web sites to you after you have visited our website, we, and our third party vendors, use cookies to inform, optimize and serve ads based on your past visits to our website.

The following is used for remarketing services for purposes of advertising:

- Remarketing and behavioural targeting - Google Analytics for display advertising

You can opt out of these re-marketing services by visiting the web site of the relevant third party vendor(s).

Compliance with Laws

Where required to do so by law, we will disclose personal data about you to the relevant authorities or to law enforcement agencies.

Links to Other Sites

Our website may contain links to other websites that are not operated by us. If you click on a third party link, you will be directed to that third party's website. It is important that you review the Privacy Policy of every site you visit. We have no control over, and are unable to assume any responsibility for, the content, privacy policies or practices of any third party sites or services.

Changes to this Data Protection Policy

We may update our Data Protection Policy from time to time. We will notify you of any changes by posting the policy on this page. Please revisit this page periodically for any changes. Changes to this Policy are effective when they are posted on this page.

Contacting Us

If you have any questions about our collection, use, and/or disclosure of personal data about you; feedback regarding this Policy, or any complaint you have relating to how we collect, use, disclose and store personal data about you, you may contact our Data Protection Officer(s) at dpo@josiah.com.sg.

Any query or complaint should include, at least, the following details:

- Your full name and contact information
- A brief description of your query or complaint

We treat such queries and complaints seriously and will deal with them confidentially and within reasonable time.