Masterminds Data Protection Policy

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Version 2.0 – *23 May 2022*

Key details

- Policy prepared by: Ismail Kay Jianming
- Reviewed by board / management on: Eugene Peh / Yang Yen Thaw
- Policy became operational on: 27 September 2021
- Next review date: 01 January 2023
- Review approved by: Carol Cheng

Change History Log

S/N	Version	Release Date	Updated By	Summary of Changes	Reviewed By	Approved By
1	1.0	22/12/2020	Affinite Solutions Pte Ltd (Ismail)	Initial release	Affinite Solutions Pte Ltd (Eugene)	Masterminds Education Pte Ltd (Carol Cheng)
2	1.1	14/10/21	Affinite Solutions Pte Ltd (Eugene)	Amended CCTV Policy clause	Chief PDPA Consultant – Yang Yen Thaw	Masterminds Education Pte Ltd (Carol Cheng)
3	1.2	17/02/22	Affinite Solutions Pte Ltd (Ismail)	Policy Update	Affinite Solutions Pte Ltd (Eugene)	Masterminds Education Pte Ltd (Carol Cheng)
4	2	23/05/22	Affinite Solutions Pte Ltd (Eugene)	Policy Update	Masterminds Education Pte Ltd (Carol Cheng)	Masterminds Education Pte Ltd (Carol Cheng)

Contents

1. Objective

The Company is engaged in the business of Education.

In the course of conducting its business and providing the Programs listed below, the Company needs to gather and process personal data.

Programs:

- Chinese immersion program
- Montessori classes
- Critical Thinking
- Concept of Neuroplasticity

Learning Domain:

- Life Skills
- Physical Development
- Personal Responsibility and Independence
- Linguistic Competency
- Mathematical Foundation
- General Knowledge

These can include personal data (any information that can or will lead to identifying you) from customers, suppliers, business contacts, employees, representatives, partners, agencies, authorities, contracting parties, III parties, and other individuals the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, used, disclosed, stored, protected to meet the Company's data protection standards and to comply with the Personal Data Protection Act 2012 of Singapore (PDPA).

The contents of this policy may be updated from time to time and individuals providing personal data should revisit this policy at least once every quarter.

This Policy is available on request. A version of this statement is also available on the Company's website.

2. Scope

This data protection policy ensures the Company:

- Complies with PDPA and follow good practices
- Protects the rights of staff, customers, and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

3. Personal Data of Children

As our site is designed for parents and adults, we do not knowingly collect personal data from children who may visit our site, and we do not knowingly include any such information in our customer databases.

4. Personal Data Protection Act

PDPA describes how organisations must collect, use, disclose, and store personal data. Data protection includes collection, use, disclosure, and storage of personal data of individuals dealing with the Company.

The policy applies regardless of whether data is stored electronically, on paper, or on any other medium.

PDPA is underpinned by 11 key obligations (Whether in force or to be notified). According to these obligations, personal data must:

1. Be obtained with consent
2. Be obtained only for specific, lawful purposes
3. Be obtained with notification of purpose
4. Be provided for access and/or correction on request by applicant
5. Be accurate, up to date, adequate, relevant, and not excessive
6. Be notified to relevant authorities and persons in the event of qualifying as a notifiable data breach
7. Be ported to another organization or platform on request
8. Be protected in appropriate ways
9. Not be retained or held for any longer than necessary
10. Not be transferred outside Singapore, unless that recipient country or territory or recipient organization also ensures an adequate level of protection
11. Be processed in accordance with requisite policies and practices, complaint handling process, and PDPA regulations
12. Be in compliance with Do Not Call (DNC) provisions

5. Corporate Structure

Director – Carol Cheng
Director – Tan Ek Kian

Everyone who works for or with the Company has relevant responsibility for ensuring data is collected, used, disclosed, stored, and handled / processed appropriately.

These following people have key areas of responsibility:

- The **board of directors** is ultimately responsible for ensuring that the Company meets its legal obligations
- The **[data protection officer]** (DPO) contact particulars are:

Name:	Carol Cheng
Email:	info@masterminds.sg
Call:	+65 6235 0983
Write in:	Data Protection Officer 68 Namly Place Singapore 267214

- The DPO is responsible for the following:
    i. Keeping the board updated about data protection responsibilities, risks, and issues
    ii. Reviewing all data protection procedures and related policies, in line with an agreed schedule
    iii. Arranging data protection training and advice for the people covered by this policy
    iv. Handling data protection questions from staff and anyone else covered by this policy
    v. Dealing with requests from individuals to see the data the Company holds about them
    vi. Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data

6. General staff guidelines

i. The only people able to access data covered by this policy would be those who **need it for their work**

ii. Data **is not shared informally**. When access to confidential information is required within the Company, employees will request it from their line managers

iii. **The Company has and shall continue to provide training** to all employees to help them understand their responsibilities when handling data

iv. Employees will **keep all data secure**, by taking sensible precautions and following the guidelines below:

- In particular, **using strong passwords** and never be shared
- Personal data **will not be disclosed** to unauthorised persons, either within the company or externally.
- Data will be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it will be deleted and disposed of.
- Employees **shall request help** from their line manager or the data protection officer if they are unsure about any aspect of data protection.

7. Collection of Personal Data

By interacting with, submitting information to, or signing up with us for [any products or services] offered by us, you agree and consent to the Company (including their related corporations and overseas branches and offices) (collectively, the "Company"), as well as their respective representatives and/or agents ("Representatives") (the Company and Representatives are collectively referred to herein as "us", "we", or "our") collecting, using, disclosing and sharing amongst themselves your Personal data, and disclosing such Personal data to the Company's authorised service providers and relevant third parties in the manner set forth in this Data Protection Policy.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of PDPA.

We only collect data necessary for fulfilling our product / service requirements. Only personal data (including, where relevant, personal data of a sensitive nature) necessary to meet the specified purpose, is collected. By submitting your data, you are deemed to have given your consent to our collection, use, disclosure, and storage of your personal data. Please let us know if you wish to withdraw or vary your consent. In the event any other use of your personal data is contemplated, we will notify you of the same.

Types of personal data collected by Masterminds includes, among other things (depending on the nature of your interaction with us)

<u>Student Information</u>

- Full name
- NRIC
- Sex
- Country of Birth
- Date of Birth
- Home Address
- Telephone number

- Parents details (Name, mobile, Email, NRIC)
- Medical History (Medical Conditions/ Allergies)
- Doctor Name & Telephone (BCI)

Parents Information

- Full Name
- Mobile
- Email
- NRIC
- Occupation
- Citizenship

Job applicants

- Full name
- Home address
- Date & place of birth
- Mobile number/Home number
- Citizenship
- Email address
- Work Experience
- Education

Employees

- As above (Job Applicants)
- NRIC
- Medical information
- Employee's Bank account information
- Marital status

Caregiver

- Name of Caregiver
- Photo of Caregiver (if any)
- IC of Caregiver
- Relationship with Child

Visitors to Masterminds Office

- Full name
- Contact number

Website Users

- Full name
- Child's name
- Child's date of birth
- Email address
- Mobile number

a. Personal data may be collected in the following ways **(*General Users/Customers/Visitors/Caregivers*)**:

i. Form submission, including but not limited to application forms or other forms relating to any of our products or services which may be enquired about or purchased through the Company

ii. Any agreement or providing of other documentation or information in respect of your interactions with us, or when you use our services

iii. Interaction with our staff, including relationship managers and their assistants, example via telephone calls (which may be recorded), letters, fax, face-to-face meetings, and emails

iv. Images captured via closed-circuit television cameras ("CCTVs") while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events hosted by us

v. Use of services provided through our online and other technology platforms, such as websites and apps, including when you establish any online accounts with us

vi. Request that we contact you, or include you in an email or other mailing list; or when you respond to our request for additional personal data, our promotions, and other initiatives

vii. Contact by, and / or response to, our marketing representatives, agents, and other service providers

viii. Information sought about you and receipt of your personal data from third parties in connection with your relationship with us, for example, from referrers, business partners, external or independent asset managers, public agencies, or the relevant authorities

ix. Personal data through physical access, internet, and information technology monitoring processes

x. Personal data in connection with any investigation, litigation, registration or professional disciplinary matter, criminal prosecution, inquest, or inquiry which may relate to you

xi. Direct submission by you of your personal data to us

xii. Visitors to the premises of the Company via visitor logs

xiii. Consent for any notification of new purposes

b. Personal data may be collected in the following ways (***Job Applicants**):*

We obtain this information directly from you, our personnel, through our systems and equipment, as well as from third parties such as recruitment agencies, background checking companies or former employers. We may also obtain it from your public profiles available online.

c. The Company need not collect your consent under the following circumstances. Where collection of personal data:

   i. For legal purpose such as compliance with regulations under ECDA, IRAS, MOH, and all other relevant laws of Singapore

   ii. Cannot be obtained in timely way

   iii. Not reasonably be expected to withhold consent

   iv. Is an emergency that threatens the life, health, or safety of the individual or another individual

   v. The Company has reasonable grounds to believe that the health or safety of the individual or another individual will be seriously affected

   vi. For the purpose of contacting the next-of-kin or a friend of any injured, ill or deceased individual

   vii. Is publicly available

   viii. Is in national interest

   ix. For artistic or literary purposes

   x. For archival or historical purposes (not for sensitive data)

   xi. There is legitimate interest

   xii. For business asset transactions

   xiii. For business improvement purposes

d. When you browse our website and platforms, you generally do so anonymously but please see the section below on cookies. We do not, at our website and platforms, automatically collect personal data, including your email address unless you provide such information or login with your account credentials.

e. If you provide us with any personal data relating to a third party (for example, information of your spouse, children, parents, or a representatives), by submitting such information to us, you represent to us that you have obtained the consent of the third party to you providing us with his/her personal data for the respective purposes.

f. In relation to products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your personal data. If so, then we will collect, use and disclose your personal data for these additional purposes as well, unless we have specifically notified you otherwise.

g. Withdrawal of Consent: Should you wish to withdraw your consent for collection, use, or disclosure of your personal data, please contact the Company for such withdrawal of your personal data via the Personal Data Application Form (write in to our DPO to receive a copy of this form).

Upon reasonable notice being given by an individual, including client, representative, employee, job applicant and general inquirer, of his/her withdrawal of any consent given or deemed to have been given in respect of our collection, use or disclosure of his personal data, there is no consequences of withdrawing consent, either before or upon receiving the notice of withdrawal before giving effect to the withdrawal of consent. We will cease collecting, using or disclosing the personal data unless it is required or authorised under applicable laws within 30 days.

You may also request us to erase or to stop processing of all or some of your personal data. We will process such instruction whenever possible except if we are not able to do so and we shall provide explanation to you.

h. In the event of missing field(s) or missing signature(s) from various forms, it will be deemed as incomplete registration. You may choose to complete the registration. If you choose to not proceed, no information will be registered in our system.

i. Accuracy: You should ensure and check 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 products and services you have requested. You agree to inform us immediately of any change of facts or circumstances which may render any information or personal data previously provided inaccurate, untrue, or incorrect and provide any information or documentation as we may reasonably require for the purposes of verifying the accuracy of the updated information or personal data.

8. Use of Personal Data

Personal data is of no value to the Company unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption, or theft. The general staff guidelines are:

- When working with personal data, employees to ensure **the screens of their computers are always locked** when left unattended.
- Personal data is **not shared informally**. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be **encrypted before being transferred electronically**. The IT manager can explain how to send data to authorised external contacts.
- Personal data should **never be transferred outside of Singapore** unless recipient country and / or recipient organization observes personal data protection through law and policies. (Transfer Limitation)
- Employees **should not save copies of personal data to their own devices.** Always access and update the central copy of any data.

The Company hereby notifies you of use your personal data for the following purposes (***General Users/Customers/Visitors/Caregivers*****):**

a. verifying your identity
b. managing the administrative and business operations of the Company and complying with internal policies and procedures and sharing between departments within the Company (including but not limited to facilitating business continuity planning)

c. audit purposes

d. verifying or confirming trade orders and transactions or instructions from you or for your orders

e. facilitating business asset transactions (which may extend to any mergers, acquisitions, or asset sales) involving the Company

f. matching any personal data held which relates to you for any of the purposes listed herein

g. responding to and resolving complaints and handling requests and enquiries, requests, feedback, and suggestions

h. preventing, detecting, and investigating crime, analysing, and managing commercial risks

i. project management

j. providing media announcements and responses

k. requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling, or other purposes for us to design our [products / services], understand customer behaviour, preferences, and market trends, and to review, develop and improve the quality of our products and services

l. managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances)

m. managing and preparing reports on incidents and accidents

n. organising events, seminars, or trainings

o. complying with any applicable rules, laws and regulations, codes of practice or guidelines, obligations, requirements, or arrangements for collecting, using, and disclosing personal data that apply to the Company

p. to assist in law enforcement and investigations by relevant authorities

q. archival management (including but not limited to warehouse storage and retrievals)

The Company hereby notifies you of use your personal data for the following purposes (***Job Applicants***):

a. to enable us to comply with our legal and regulatory obligations;
b. to make recruitment decisions;
c. to prevent and detect fraud and other wrongdoing;
d. to establish, exercise or defend our legal rights; and
e. to manage risk

9. Disclosure of Personal Data

The Company may disclose your personal data, locally or overseas, to:

a. Departments within the Company for the above use and purposes

b. Networks

c. Contracting parties

d. Referrers who have referred you to the Company

e. Agents, contractors, vendors, installers, or third-party service providers who provide administrative or operational services to the Company, such as data intermediaries, courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to the Company

f. Agents, contractors, vendors, or other third-party service providers in connection with marketing, products and services offered by the Company

g. Analytics, search engine providers or third-party service providers that assist us in delivering our products, services, websites, and platforms as well as improving and optimising the same

h. Any business partner, 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 any of the Company

i. Professional advisers such as auditors and lawyers

j. Relevant government regulators, government ministries, exchange, statutory boards or authorities or law enforcement agencies who have jurisdiction over the Company or any Company or over any transaction entered into by you

k. Any liquidator, receiver, administrator, judicial manager, trustees-in-bankruptcy, custodian, or other similar official who has been so appointed, pursuant to bankruptcy, winding-up or insolvency proceedings instituted in Singapore or elsewhere, in respect of you or your assets

l. Third parties who organise promotional or marketing events, seminars, or trainings

m. Any other party to whom you authorise us to disclose your personal data to.

The Company will take reasonable steps to protect your personal data against unauthorised disclosure by overseas entities or organizations, check for transfer limitation obligation – by ensuring the recipient country or at least the recipient organization has data protection laws and policies.

10. On-going Notifications

a. If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, the Company may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services (including discounts and special offers).

b. In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other, different or new purposes for which we collect, use, or disclose your personal data. If so, we will collect, use and disclose your personal

data for these additional purposes as well, unless we have specifically notified you otherwise.

c. If you do not wish to receive any calls from us, please let us know and we shall act accordingly.

11. Use of Cookies and Related Technologies

a. The Company's websites and platforms use cookies and other technologies. Cookies are small text files stored in your computing or other electronic devices when you visit our website and platforms for record keeping purposes. Cookies are stored in your browser's file directory, and the next time you visit the website or platform, your browser will read the cookie and relay the information back to the website, platform or element that originally set the cookie. Depending on the type of cookie it is, cookies may store user preferences and other information.

b. Web beacons (also known as pixel tags and clear GIFs) involve graphics that are not apparent to the user. Tracking links and/or similar technologies consist of a few lines of programming code and can be embedded in our websites or platforms. Web beacons are usually used in conjunction with cookies and primarily used for statistical analysis purposes. This technology can also be used for tracking traffic patterns on websites and platforms, as well as finding out if an e-mail has been received and opened and to see if there has been any response.

c. The Company may employ cookies and other technologies as follows:

   i. tracking information such as the number of visitors and their frequency of use, profiles of visitors and their preferred sites

   ii. making our websites and platforms easier to use. For example, cookies may be used to help speed up your future interactions with our websites and platforms

   iii. to better tailor our products and services to your interests and needs

   iv. collating information on a user's search and browsing history

   v. when you interact with us on our websites and platforms, we may automatically receive and record information on our server logs from your browser. We may collect for the purposes of analysis, statistical and site-related information including, without limitation, information relating to how a visitor arrived at the website or platform, the browser used by a visitor, the operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp (which may include for example, information about which pages they have viewed, the time the pages were accessed, and the time spent per web page)

   vi. using such information to understand how people use our websites and platforms, and to help us improve their structure and contents

   vii. using cookies that are necessary in order to enable our websites and platforms to operate, for example, cookies that enable you to log onto secure parts of our websites and platforms

viii. personalising the website and platform for you, including delivering advertisements which may be of particular interest to you and using cookie related information to allow us to understand the effectiveness of our advertisements.

d. Some cookies we use are from third party companies to provide us with web analytics and intelligence about our websites and platforms. These companies collect information about your interaction with our websites and platforms. We use such information to compile statistics about visitors who interact with the websites, platforms, and other companies' online content, to gauge the effectiveness of our communications, and to provide more pertinent information to our visitors.

e. If you do not agree to our use of cookies and other technologies as set out in this Data Protection Policy, you should delete or disable the cookies associated with our websites and platforms by changing the settings on your browser accordingly. However, you may not be able to enter certain part(s) of our websites or platforms. This may also impact your user experience while on our websites or platforms.

f. Third-Party Sites: Our website may contain links to other websites operated by third parties. We are not responsible for the data protection policies or privacy practices of websites operated by third parties that are linked to our website. We recommend you learn about the policies and practices related to data of such third-party websites.

12. Data Protection Measures

This policy helps to protect the Company from data security risks.

a. The Company keeps all physical data (non-electronic and electronic forms in data storage devices) confidential and under lock and key. Only authorised personnel are allowed access to that data required for providing the product or service. All personnel data are marked confidential.

b. The Company will take reasonable efforts to protect personal data in our possession or our control by making reasonable security and IT arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal, or similar risks. Access of data is restricted to authorised personnel and to seniority of personnel. However, we cannot completely guarantee the security of any personal data we may have collected from or about you or prevent harmful code that enter our website. You should be aware of the risks associated with using websites and take necessary precautions.

c. While all steps will be taken to protect your personal data, security of the information you transmit to us via the Internet or electronic communication or when you use our electronic services cannot be ensured. You should 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.

d. 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 have 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.

13. Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is **stored on paper,** it will be marked "CONFIDENTIAL" and kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- Employees should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically including CCTV footage**, it must be protected from unauthorised access, accidental deletion, and malicious hacking attempts. In addition, to the following, the Company has internal policies to protect your personal data:

- Data to be **protected by strong passwords** that are changed regularly and never shared between employees.
- If data is **stored on removable media** (like a USB device, external storage medium, CD or DVD), to be kept locked away securely when not being used.
- Data to only be stored on **designated drives and servers** and to be uploaded only to an **approved cloud computing service** that are PDPA compliant.
- Servers containing personal data to be **sited in a secure location**.
- Data **backed up frequently**. Those backups tested regularly, in line with the Company's standard backup procedures that are encrypted, and password protected.
- Data **not saved directly** to laptops or other mobile devices like tablets or smart phones.
- All non-networked servers and computers containing data protected by **approved security software and firewall**.
- CCTV footage will be housed in external HDDs that are encrypted and accessible only by password using Password Management Policy.

14. Data accuracy

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in **as few places as necessary**. Staff will not create any unnecessary additional data sets.
- Staff will **take every opportunity to ensure data is updated** by follow up calls or emails and recording them**.**
- The Company will make it **easy for data subjects to update the information** the Company holds about them such as on company websites.
- Data to be **updated as inaccuracies are discovered**.

a. Masterminds keeps personal data as accurate, complete and up to date as possible, by taking into account its use and the interests of our stakeholders. The data provided will be validated by making references to generally accepted practices and guidelines. This includes the requests to see original documentation before using your personal data.

b. You should ensure that all personal data submitted to us is as complete, accurate and up to date as possible. Failure to do so on your part may result in our inability to provide you with products and services that you have requested.

15. Access & Correction Requests

All individuals who are the subject of personal data held by the Company are entitled to:

- Ask **what information** the company holds about them and why.
- Ask **how to gain access** to it but must specify the type of data and time range.
- Be informed **how to keep it up to date.**
- Be informed how the company is **meeting its data protection obligations**.
- Correct any **mistakes or update** their personal data in possession of the Company

Access

An individual can contact the Company and request for her/his personal data (Access Request) via the Personal Data Application Form (write in to our DPO to receive a copy of this form) Individuals have the right to request that we amend or update your personal data where it is inaccurate or incomplete. Kindly note that while we shall make a reasonable effort to ensure that the Personal Data we collect is accurate and complete, Individuals are responsible for ensuring the accuracy of the Personal Data that you provide to us directly.

Access Requests from individuals should be made by email, addressed to the DPO. The DPO may supply a standard request form, although individuals do not have to use this.

Individuals may be charged a reasonable fee per Access Request to defray minimum costs. This may also increase depending upon the extent and effort of procuring the personal data. The DPO will aim to provide the relevant data within 30 calendar days.

The DPO will always verify the identity of anyone making an Access Request before handing

over any information.

Correction

Correction requests will be carried out within 30 calendar days. No charge will be levied for any correction requests.

You have the right to request that we amend or update your personal data where it is inaccurate or incomplete. Kindly note that while we shall make a reasonable effort to ensure that the Personal Data we collect is accurate and complete, you are responsible for ensuring the accuracy of the Personal Data that you provide to us directly.

We will respond to your correction request as soon as reasonably possible. Should we not be able to perform the correction request within 30 days after receiving your request, we will inform you in writing via email on the time by which we will be able to perform your correction request. If we are unable to perform a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA or under any other applicable laws). If dissatisfied with the refusal to correct the personal data, individuals could email to DPO with other supporting documents to request for correction. DPO may assess the situation on case by case scenario.

Unsolicited Personal Data: In the event information is provided in hard copy or website without our specific collection of data, you agree that you hereby give your consent for our collection, use, and disclosure of this data to fulfil the purpose specified by you / respond to your query. Please let us know if you would like to withdraw your consent using our Personal Data Application Form.

16. Retention of Personal Data

So long as you have a direct or indirect relationship with the Company, your personal data will be held and processed in accordance with this Policy. Once the relationship ends or you withdraw all your personal data, the Company will not retain your personal data unless there are legal and / or business reasons for so doing.

Where you are a **customer**, we will keep your personal data for the length of any contractual relationship you have with us and after that for a period of up to 3 years.

Where you are a **prospective customer** and you have expressly consented to us contacting you, we will only retain your personal data for this purpose (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content; or (c) for 1 year from when you last interacted with us or our content.

Where you are a **Job Applicant**, we will keep your personal data (including interview records) till the period your application is successful (not more than 6 months). In the event your application is unsuccessful, we will not retain your personal data.

Personal data will be retained by the Company till purpose is fulfilled. This is subject to sectoral and other written laws which includes law relating to the sector the Company does business in, employment laws, CPF, income tax laws, Limitation Act, and other regulations thereunder.

17. Transfers of Personal Data Outside of Singapore

We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

18. Data Protection Officer

You may contact our Data Protection Officer if you have any enquiries, feedback, questions, or comments on our personal data protection policies and procedures, or if you wish to make any complaints or request, in the following manner:

Name of DPO : Carol Cheng
Contact No. : +65 6235 0983
Email Address : info@masterminds.sg
Address : 68 Namly Place, Singapore 267214

19. Effect of Notice and Changes To Notice

This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

20. Governing Law

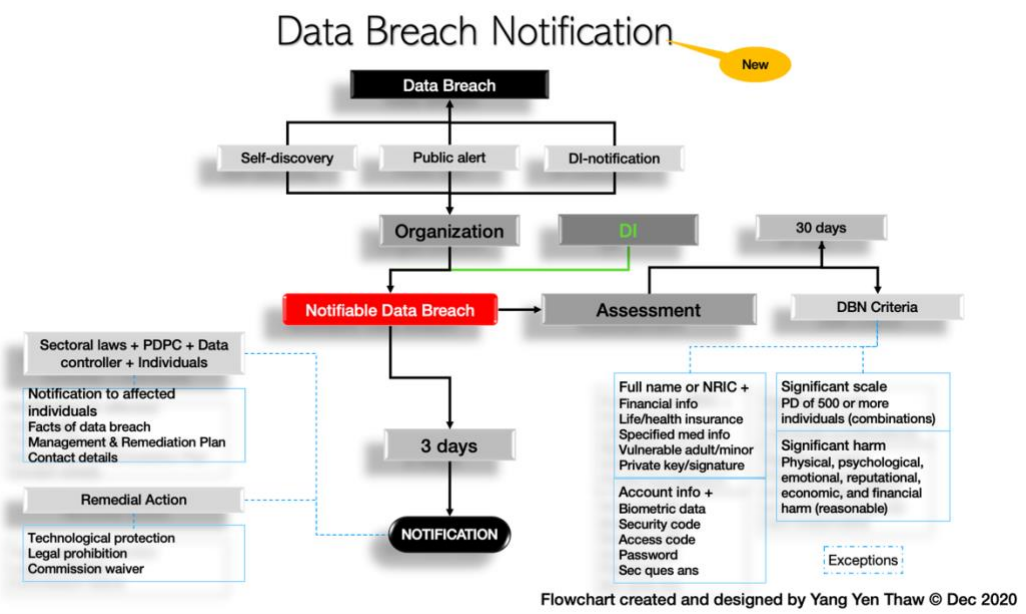
This Data Protection Policy shall be governed in all respects by the laws of Singapore.

21. Data Breach Management Plan

S/N	Version	Release Date	Updated By	Summary of Changes	Reviewed By	Approved By
1	1.0	16 September 2021	Affinite Solutions (Eugene)	Initial Release	DPO	Carol Cheng

Should there be a breach of data, the Data Protection Officer (DPO) will activate the Data Breach Management Plan as detailed below:

Step	Action	Responsibility
A	Report data breach incident to the DPO via email with the following details: • Date and time of event • Name of the person who reported the case • A brief description of the nature of the data breach	**Anyone**
B	**Data Breach Incident Form**: Initiate meeting (through phone, email or face to face) with the person who reported the case to collect tangible evidence of the case: • Source of the data leakage – How did the person find out the case. • Nature of data leaked • Person(s) affected by the leak DPO to record details of meeting in the Data Breach Incident Form and get the person who reported the case to sign on the form.	**DPO & Person Concerned**
C	**Assessment Review:** Gather facts and assess the level of risk of the data breach and propose corrective action (CA) and/or preventive action (PA) measures and present to the Senior Management Committee for approval of action. Senior Management Committee will escalate to Board of Directors/Shareholders if deemed necessary. DPO to record the assessment in the Data Breach Incident Form. Update to DBMP activity log.	**DPO**
D	**Notification:** Upon approval by the Senior Management Committee, DPO to carry out the Corrective / Preventive Action and close the case. Notify relevant parties involved, Sectoral Laws, PDPC, Data Controller + Data Intermediaries + Individuals.	**DPO**
E	**Post Evaluation Review:** Explore root cause analysis and Post Breach action taken, the team will conduct review and Improve policy and procedures.	**DPO**



Timeframes for Managing Data Breach Process (within 30 days)

1) Data Incident suspected - Within 24 hours
2) Data Breach Confirmed - Without delay
3) Data Breach Notification- Within 30 days (PDPC, DI, Affected Individuals)
4) Responding to Data Breach – 3 days
5) Corrective/Preventive Actions - With immediate effect