

# PRIVACY POLICY – BRIDGING TALENTS PTE LTD

This is the Privacy Policy (“this Policy”) of BRIDGING TALENTS PTE LTD, a company incorporated in Singapore (“BT”). The terms ‘we’, “our” and “us” in this Policy refer to Bridging Talents Pte Ltd. The term “you” refer to you as an individual accessing our services or your organisation’s authorized representative applying for you to access/use our services. BT values your privacy and this Policy outlines how we collect, use, disclose, store and protect your information in accordance with the Singapore Personal Data and Protection Act 2012.

## 1. APPLICATION

BT has different channels of collecting personal data but is committed to complying with this Policy to ensure the high level of trust with all our clients and maintain uniformity in the way we protect your personal data. For the purposes of this Policy, personal data shall carry the definition assigned to it under the Personal Data Protection Act 2012 and shall include any data about you, the student, your employee who can be identified from that data and/or other information to which BT has or is likely to have access to.

## 2. CONSENT

This Policy applies to all personal data you provide to us or that we may collect about you. By providing us your personal data or accessing, using or viewing the applicable website or any of its services, functions or contents (including transmitting, caching, or storing of any such personal data), you shall be deemed to have agreed to each and all the terms, conditions and notices in this Policy. This consent will remain valid until it is being withdrawn by you. Please do not provide any personal data to us if you do not accept this Policy. If you do not accept this Policy, we may not be able to establish a relationship with you or be able to service your requests. If you have any questions in relation to your personal data or about this Policy, please visit our website “CONTACT US”.

## 3. CHANGES TO THIS POLICY

BT reserves the right to amend and vary the terms of this Policy at any time, without notice to you, to comply with applicable laws or as we update our data usage and handling processes. The updated policy will supersede earlier versions and will apply to personal data provided to us previously. The amended policy will take effect when made available on our website. The use or continued use of our services shall be deemed as your agreement and consent to be bound by this Policy.

## **4. WHAT DATA IS COLLECTED**

The data collected may include your personal details (name, address, email address, telephone number, NRIC/FIN, date of birth), educational or professional background, payment and billing information, photograph, video image, audio-visual materials (eg. class recordings, event photos), usage data from websites or applications (eg. cookies, IP address) and any other information that may identify you or is personal to you.

## **5. HOW IS DATA COLLECTED**

We collect personal data relevant to our relationship with you. We may collect your personal data directly or indirectly through various channels, including when:

- You use our services or enter into transactions with us (or expressed interest in doing so)
- You subscribe to our mailing list
- You visit our websites, download or use our mobile applications
- You register an account with us through our websites directly or indirectly
- You transact with us, contact us or request that we contact you through various communication channels eg. through social media platforms, face-to-face meetings, telephone calls, emails and other modes of communication
- Your images are captured via photographs, videos taken by us or our representatives when you are attending events organized by us
- You participate in events and programs, contests or competitions organized by us
- You submit your personal data to us for any other reason

Depending on your relationship with us, we may also collect your personal data from third parties including :

- From your employer, organization or authorized organization's representative on your behalf
- From professional associations
- From public agencies or other public sources
- From your friends and family members who provide us your personal data on your behalf

Your provision of personal data to us is voluntary and you have the right to withdraw your consent for us to use your personal data at any time by contacting and submitting a written request to us. Your withdrawal will take effect after your request is processed. However, if you choose not to provide us with personal data we require, it may not be possible for us to fulfil the purposes for which we require the personal data, including providing products and services which you need from us.

In certain circumstances, you may also provide the personal data of persons other than yourself (employees, members etc.) If you do so, you are responsible for informing him/her of this Policy, its purposes for which we require his/her personal data and warrant that you are validly acting on behalf of him/her to consent to our collection, use and disclosure of his/her personal data.

You must ensure that all personal data that you provide is true, accurate and complete and promptly inform us of any changes to the personal data.

## **6. PURPOSES OF COLLECTION AND USE**

We collect, use and disclose your personal data where:

- you have given us consent;
- necessary to comply with our legal or regulatory obligations (including but not limited to):
- necessary for our legitimate business interests, provided that this does not override your interests or rights; and/or
- necessary to perform a contract or transaction you have entered into with us, or provide a service that you have requested or require from us.

Generally, we collect, use and disclose your personal data for purposes connected or relevant to our business, including:

- processing your seminar registration, funding and administration
- managing internal operations, analysis and service improvements
- facilitating your use of our platforms and services for learning;
- assisting you with your requests, enquiries and feedback;
- compliance with laws and regulations, internal policies and procedures, e.g. audit, accounting, risk management and record keeping;
- marketing and promotional purposes;
- engaging you as a trainer or matters relating to training;
- such purposes that may be informed to you when your personal data is collected;
- carrying out our legitimate business interests; and/or
- any other reasonable purposes related to the aforesaid

For marketing and promotional purposes, where you have given us consent in the terms and conditions at time of registration, we will collect, use and disclose your personal data for purposes of :

- Managing and/or administering your request to receive news, promotions and marketing information from us;
- Analyzing and/or profiling your purchases, transactions and/or likes or dislikes so as to be better able to send you relevant or targeted news, promotion and marketing information from us;

- Sending you news and promotions as well as marketing information from us;

## 7. DISCLOSURE

We may disclose or share your personal data in connection with the purposes described in point 6 above including to the following parties :

- Third parties who are appointed to provide services to us or in collaboration for projects eg. trainers, IT vendors, collaborators, etc;
- Affiliates or partners assisting with course delivery or logistics;
- Regulatory authorities and public agencies

## 8. TRANSFER OF DATA

Your data may be stored or processed outside Singapore by third parties appointed. Regardless of location where the personal data is transferred or stored, we will make reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks to your personal data. Please note, however that we cannot be held responsible for unauthorized or unintended use, access or disclosure that is beyond our control. We also do not guarantee that our websites and applications are invulnerable to security breaches or that your use of our websites and applications is safe and protected from viruses, worms, Trojan horses and other vulnerabilities.

## 9. RETENTION OF DATA

We retain personal data only as long as necessary for business or legal purposes. Certain data (eg. course certifications) may be retained for longer based on regulatory requirements and access to them may entail an administrative fee as per terms and conditions.

## 10. RIGHTS OF ACCESS

You have the rights to :

- Access and correct your personal data
- Withdraw consent but may affect continued service provision
- Request for data deletion, where applicable and must be made in writing

Please note that we may be prevented by law or any relevant authorities from complying with your request that you may make. We may also decline any request that you may make if the law permits us to do so. For this request, you may email to us under "CONTACT US" at our website.

## **11. USE OF COOKIES**

We use cookies and similar technologies on our website for analytics, functionality and personalization. You can manage cookie settings through your browser. Our website may, from time to time contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites may or may not have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **12. DISCLAIMER**

To the maximum extent permitted by law, we shall not be liable in any event for any special, exemplary, punitive, indirect, incidental or consequential damages of any kind or for any loss of reputation or goodwill, whether based on contract, tort, (including negligence), equity, strict liability, stature or otherwise, suffered as a result of unauthorized or unintended use, access or disclosure of your personal data.