

# PRIVACY POLICY

SeraphCorp Institute Pte Ltd (“**SeraphCorp**” or as appropriate in the context, “**we**”; “**us**”; or “**our**”) is an Approved Training Organisation with SkillsFuture Singapore (SSG) and a Private Education Institution with the Committee for Private Education, and conducts classes, seminars and events for the development of individuals (referred to as “**Services**”). SeraphCorp also has a presence on the World Wide Web, at [www.seraphcorp.net](http://www.seraphcorp.net) (referred to as “**Website**”).

SeraphCorp respects the protection of the Personal Data of individuals and values the relationship we have with you. This Personal Data Policy (“**Privacy Policy**”) is applicable to any data processing implemented by SeraphCorp and any SeraphCorp websites.

This Privacy Policy describes the types of Personal Data we may collect from you, how we may use that information, and with whom we may share it. Our Privacy Policy also describes the measures we take to protect the security of the information you provide to us, including without limitation through this Website. We also tell you how you can reach us to update your Personal Data, ask questions you may have about our personal data protection practices and provide feedback on our personal data protection practices.

BY SUBMITTING YOUR INFORMATION, ENROLLING IN OUR COURSES/CLASSES/ SEMINARS/EVENTS/PROGRAMMES, ATTENDING OUR MARKETING EVENTS, AND/OR OTHER CONFIRMATION, YOU ARE CONFIRMING THAT YOU ARE BOUND BY THIS PRIVACY POLICY. BY USING THE SERVICES OR BY OTHERWISE GIVING US YOUR INFORMATION, YOU WILL BE DEEMED TO HAVE READ, UNDERSTOOD AND AGREED TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND YOU HEREBY CONSENT TO OUR COLLECTION, USE AND DISCLOSURE OF YOUR INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. WE RESERVE THE RIGHT TO CHANGE, MODIFY, ADD OR DELETE PORTIONS OF THE TERMS OF THIS PRIVACY POLICY, AT OUR SOLE DISCRETION, AT ANY TIME. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY AT ANY TIME, DO NOT USE ANY OF THE SERVICES OR GIVE US ANY OF YOUR INFORMATION. IF YOU USE THE SERVICES ON BEHALF OF SOMEONE ELSE (SUCH AS YOUR CHILD) OR AN ENTITY (SUCH AS YOUR EMPLOYER), YOU REPRESENT THAT YOU ARE AUTHORISED BY SUCH INDIVIDUAL OR ENTITY TO (I) ACCEPT THIS PRIVACY POLICY ON SUCH INDIVIDUAL’S OR ENTITY’S BEHALF, AND (II) CONSENT ON BEHALF OF SUCH INDIVIDUAL OR ENTITY TO OUR COLLECTION, USE AND DISCLOSURE OF SUCH INDIVIDUAL’S OR ENTITY’S INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.

## SECTION 1: WHY THIS PRIVACY POLICY

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This Privacy Policy is published in compliance with the Personal Data Protection Act (2012) of Singapore (the “PDPA”).

The objectives of this Policy are to:

- Provide a set of privacy and personal data protection standards that govern our procedures and protect the privacy of your personal data.
- Demonstrate our on-going commitment to protecting your privacy and addressing any privacy concerns that you might have.
- Describe the ways in which we collect, use, disclose and retain your personal data.
- Ensure that we comply with the PDPA.
- Facilitate our compliance with any further developments in the protection of personal data.

## SECTION 2: TYPE OF PERSONAL DATA

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Generally, some of the Services require us to know who you are so that we can best meet your needs. When you enroll in our class, course, seminar, event or programme; register for one of our marketing events including IgniteSME events, complete a payment, access the Services, are employed by us, or through any interaction with us via employment contracts, application or registration forms, emails, telephone calls, short messaging services (“SMS”), texts or other correspondence, we may ask you to voluntarily provide us with certain information that personally identifies you or could be used to personally identify you.

Without prejudice to the generality of the above, information collected by us from you may include (but is not limited to) the following:

- (a) name, NRIC or FIN number, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to the Data Subject which the Data Subject has provided us in any forms he/she may have submitted to us, in other forms of interaction with the Data Subject, or through registration/enrolment on the Website and through e2i’s website;
- (b) business contact information from name cards, either through SeraphCorp’s courses, classes, events and seminars or given by e2i;
- (c) comments or feedback on your experience in SeraphCorp’s programmes, classes and events;

- (d) employment history, education background, and income levels;
- (e) occupation and company's name and address;
- (f) other information that you voluntarily choose to provide to us (such as information shared by you with us through emails);
- (g) financial information such as bank accounts, credit and debit card details or other payment instrument details;
- (h) information received by body corporate under lawful contract or otherwise;
- (i) employment record; employment history; education background or income levels;
- (j) email and telephone call data records;
- (k) photographs, video and CCTV footage;
- (l) your use of Websites and Services, including cookies, IP address, policy and usage history information; and
- (m) your usage of and interaction with our website and/or services including computer and connection information, device capability, bandwidth, statistics on page views, and traffic to and from our website.

The information collected from you by SeraphCorp may constitute Personal Data under the PDPA.

**“Personal Data”** is defined under the PDPA to mean any data, whether true or not, about an individual who can be identified from that data or from that data and other information to which an organisation has or is likely to have access. This would include, without limitation, information such as name, address, telephone number, e-mail address, credit card details and any other personal information.

SeraphCorp will be free to use, collect and disclose information that is freely available in the public domain without your consent.

Information that is business contact information such as your name, position name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about you, which are not provided by you for personal purposes, will not be regarded as Personal Data under the PDPA. Your consent to us collecting, using and disclosing any business contact information will not be required.

## SECTION 3: COLLECTION OF PERSONAL DATA

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### Personal Data collected from you

Personal Data may be collected by us through processes including, but not limited to the following:

- (a) When individual submits his/her application or enrolment form for SeraphCorp's courses and classes via physical copy or online;
- (b) When an individual subscribes on the Website to receive SeraphCorp's newsletter;
- (c) When individual registers for SeraphCorp's marketing events via email or marketing registration;
- (d) When individual registers for IgniteSME events via email or e2i's website links;
- (e) When Data Subject interacts with any of SeraphCorp's employees (including customer service officers);
- (f) When Data Subject or client responds to SeraphCorp's request for additional Personal Data;
- (g) When individual asks to be included in an email or other mailing list;
- (h) When individual requests that SeraphCorp contact him/her;
- (i) When individual responds to SeraphCorp's marketing events, initiatives, seminars, surveys or promotions;
- (j) When individual applies for employment in SeraphCorp;
- (k) When individual gives comments or feedback on classes, programmes and events via evaluation forms given out to individuals at the end of such course, class, programme and event;
- (l) When individual submits his/her Personal Data to SeraphCorp for any other reason.

### Data collected by automated means

Various technologies may be used on our Website or our emailing system in order to make it more user-friendly, effective and secure. Such technologies may lead to data being collected automatically by us or by third parties on behalf of us. This data does not generally, but may, contain a user's personal data. These technologies include but are not limited to cookies, web beacons, tracing links, click stream data and web analytics. You may set up your web browser to block cookies. You may also remove cookies stored from your computer or mobile device. However if you do block cookies, you may not be able to use certain features and functions of our web sites. Please see Section 7: Additional Privacy Statements for Website Users.

In addition, our email database is collected and stored by MailChimp for the sending out of SeraphCorp's newsletters and/or marketing emails. For more details on the platform providers' Privacy Policy, please refer to MailChimp's Privacy Policy (<http://mailchimp.com/legal/privacy/>). We also collect personal data through a survey/information aggregator, Survey Monkey. For more details on the Survey Monkey's Privacy Policy, please refer to Survey Monkey's Privacy Policy (<https://www.surveymonkey.com/mp/policy/privacy-policy/>).

## **SECTION 4: CONSENT TO COLLECTION OF PERSONAL DATA**

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SeraphCorp shall not collect, use or disclose your personal data unless:

- (a) you give, or are deemed to give, consent to the collection, use or disclosure of your personal data; or
- (b) the collection, use or disclosure of your personal data without your consent is required or authorised under the PDPA or other written law.

SeraphCorp shall not, as a condition of providing a product or service to you, require you to consent to the collection, use or disclosure of your personal data beyond what is reasonable to provide the product or Service to you.

SeraphCorp shall not obtain or attempt to obtain your consent for collecting, using or disclosing personal data by providing false or misleading information with respect to the collection, use or disclosure of your personal data, or use deceptive or misleading practices.

As part of our continuous effort to keep you informed on our new courses, classes, programmes, seminars, events and services, we may mail, email, telephone and contact you by any other means. Information sent to you may also include upcoming special events, seminars or other relevant information that may be of interest to you.

You may also receive mailings or other communications materials from our strategic marketing partners and/or carefully selected third parties. You will always have the option to decline any or all of these communications by following the directions included in our emails or other communications, or by contacting the Data Protection Officer of SeraphCorp directly (see Section 18 below).

SeraphCorp may collect and use personally identifiable information that you volunteer, or other behavioural data and big data generated. In addition to that, permission will be deemed given for communication from us that are necessary to fulfil transactions and services requested by you.

Photographs, videos and CCTV footage may constitute personal data if an identifiable individual is captured. SeraphCorp will either seek your written consent for the collection, use and disclosure of photographs, videos and/or CCTV footage of you, or state in the invitation to you of an event/seminar, that photographs/videos/CCTV footage will be taken at the event/seminar for publicity on SeraphCorp's print and electronic media. Appropriate and obvious notices shall also be put up at the reception or entrance of

our event/seminar to inform attendees on the event/seminar day.

## **SECTION 5: PURPOSES FOR WHICH WE COLLECT AND USE PERSONAL DATA**

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SeraphCorp may use and/or disclose your Personal Data depending on your relationship with SeraphCorp (e.g. as an applicant, student, employee, service provider, event attendee, or other person relating to SeraphCorp).

### **In General**

SeraphCorp may collect, use and/or disclose your Personal Data for the following purposes:

- (a) maintaining records of SeraphCorp's interactions with you, through telephone recordings, documentation (hard copy and electronic), internal reporting and analysis related to SeraphCorp's business operations;
- (b) sending you SeraphCorp's newsletters;
- (c) responding to your queries and requests and handling complaints;
- (d) updating you on developments and new offerings in SeraphCorp's classes, courses, services and special happenings;
- (e) managing commercial and financial risks, including preventing, detecting and investigating crime, including fraud and any form of financial crime;
- (f) assessing and processing any applications, requests and instructions for courses, classes and services offered by SerpahCorp;
- (g) evaluating your qualifications, standing, resources and capabilities to enter or maintain a relationship with you as a client, employee, business partner, student, course participant or other;
- (h) establishment and maintenance of relationship with SeraphCorp;
- (i) marketing and promotional activities or SeraphCorp, including client pitches, proposals and collaterals;
- (j) taking of photographs and/or videos (whether by SeraphCorp staff or third party photographers and/or videographers) during classes, courses, seminars, events or programmes organized by

SeraphCorp for its affiliates for publicity purposes;

- (k) if consented to in the application/enrolment/registration form and/or other methods of consent notification, providing marketing, advertising and promotional information via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;
- (l) any other purposes which SeraphCorp may inform you of in writing from time to time, but for which SeraphCorp will seek your separate consent; and
- (m) any other purposes related to the above purposes.

**If you are an employee**

If you are an employee, SeraphCorp may collect, use and/or disclose your Personal Data for the following purposes:

- (a) recruitment;
- (b) administration of benefits entitlement (such as medical, leave entitlement, pension and other benefits);
- (c) salary administration and payment of expenses;
- (d) employee surveys;
- (e) pre-employment screening;
- (f) training course management;
- (g) contacting employee's nominee in connection with emergencies;
- (h) photographs and other indications of employee's likeness for identification cards, management reports, internal documents and company collaterals;
- (i) monitoring registrations with any regulatory bodies to ensure any compliance, training, examination and other requirements are met;
- (j) absence, leave and sickness monitoring;
- (k) assessing medical suitability for particular jobs or task;
- (l) handling and administration of employee claims;
- (m) payroll processing;
- (n) administration of international assignments;

- (o) career planning, performance appraisals, job moves, promotions, skills monitoring, and staff restructuring;
- (p) disciplinary, capability, grievance and code of conduct processes and other investigations;
- (q) equal opportunities monitoring;
- (r) providing references if requested by the employee;
- (s) administering bonus payments and other forms of remuneration;
- (t) maintenance the security; and/or
- (u) general Business operations, including (a) record keeping; (b) compliance with applicable rules, laws, regulations, code of practice or guidelines which are binding on SeraphCorp; and/or (c) any other purposes that is necessary or incidental to the above and business of SeraphCorp.

**If you are a class, course or seminar attendee**

If you are a class, course or seminar attendee, SeraphCorp may collect, use and/or disclose his/her Personal Data for the following purposes:

- (a) evaluating your performance as a student and/or class course or seminar attendee;
- (b) providing educational courses and training, including sending of materials on course/study/assignment/lecture materials, information on time tables and examination details via email, text messages, and/or voice calls;
- (c) applying for funding from and to submit any course; study; assignment and training assessment results or feedback to relevant Singapore governmental and public agencies or authorities for the courses, training programmes and seminars SeraphCorp conducts;
- (d) all Personal Data except photos are to be used for uploading assessment results to the Work Development Authority, for subsidy claims like Skills Development Fund (SDF), Absentee Payroll (AP), Skills Future Credit;
- (e) videos and images are used for Facebook publicity (some classes have an entry in the SeraphCorp Facebook page);
- (f) all Personal Data except photos of students are collated into an annual report to the Council of Private Education for their data analysis; and
- (g) contacting you for surveys or interviews relating to the above subject matter.



### **If you are a marketing event attendee and/or participant**

If you are an IgniteSME or marketing event attendee and/or participant, SeraphCorp may collect, use and/or disclose his/her Personal Data for the following purposes:

- (a) for marketing and promotional purposes; and
- (b) videos and images may be used for publicity on SeraphCorp's Facebook page and Youtube account.

In order for SeraphCorp to conduct its operations more smoothly, SeraphCorp may also be disclosing the Personal Data that Data Subjects have provided to us to our third party service providers, agents and/or our affiliates or related corporations, which may be sited locally or outside.

### **Marketing Purposes**

Where you have specifically provided SeraphCorp with additional consents, SeraphCorp may also collect, use and/or disclose your Personal Data for the following purposes:

- (a) providing you benefit, including without limitation promotions, loyalty and reward programmes and sending you details of courses; classes; seminars; modules; events; informational and motivational material related to SeraphCorp's business, either to our clients generally, or which may be of interest to you;
- (b) matching your Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by SeraphCorp, or other third parties;
- (c) SeraphCorp's client proposals or pitches and marketing collaterals;
- (d) for use in SeraphCorp's social media accounts, including Facebook and YouTube;
- (e) for disclosure to our third-party marketing vendor and agency;
- (f) administering networking events, new offerings of courses; classes; modules and seminars;
- (g) developing marketing and advertising programmes.

If you have provided your Singapore telephone number(s) and have indicated that your consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, SeraphCorp may contact you using such Singapore telephone number(s) (including via voice calls, SMS, fax or other means) with information about SeraphCorp's courses classes; seminars; events; programmes; and services.

## SECTION 6: DISCLOSURE OF PERSONAL DATA

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SeraphCorp will disclose a Data Subject's personal data:

- (a) for the primary purpose for which it was collected as outlined in Section 5 above;
- (b) for purposes that a reasonable person will consider appropriate in the circumstances;
- (c) where you have consented; or
- (d) where permitted under the PDPA or other applicable law or if required by law.

However, subject to applicable laws, SeraphCorp may disclose the Data Subject's personal data for the purposes set out above to parties such as those described below:

- (a) public agencies and governmental bodies including Work Development Authority and Council for Private Education;
- (b) potential clients as part of a marketing pitch or client proposal, such personal data is disclosed on an anonymised basis;
- (c) agents, contractors or third party service providers who provide services to us such as marketing and advertising, information technology, payment, data processing, storage and archival;
- (d) SeraphCorp's professional advisers such as our auditors and lawyers; and
- (e) regulators and authorities.

When SeraphCorp discloses a Data Subject's personal data to third parties, SeraphCorp will ensure that they are contractually bound to protect Data Subject's personal data in accordance with applicable laws and regulations (as set out in herein), save in cases where his/her personal data is shared with governmental agencies and regulators, or where her/her personal data is publicly available, or where use/disclosure of his/her personal data is otherwise legally mandated and exempted.

If Data Subject's personal data has to be transferred overseas, SeraphCorp will, where legally required, inform the Data Subject of the extent to which his/her personal data will be protected, in the foreign jurisdiction(s) to which it will be transferred.

In addition, SeraphCorp would disclose Personal Data in the following circumstances:

- (a) in response to a request from law enforcement authorities or other government officials;
- (b) to comply with a court order or direction from a government agency or regulatory authority ordering the disclosure of the Personal Data; and

- (c) where the disclosure is necessary for investigations or legal proceedings.

## SECTION 7: ADDITIONAL PRIVACY STATEMENTS FOR WEBSITE USERS

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### **7.1 Persons who have visited and subscribed to receive Seraphcorp’s newsletter on the Website (“Subscriber”) Note:**

This section applies to all Subscribers.

- i. As part of the signing-up process on the Website for the receipt of newsletters, certain information, including Personal Data or sensitive personal information is collected from the Subscribers.
- ii. All the statements in this Privacy Policy apply to all Subscribers, and all Subscribers are therefore required to read and understand the privacy statements set out herein prior to submitting any Personal Data or sensitive personal information to SeraphCorp, failing which they are required to leave the Website immediately.
- iii. If you have inadvertently submitted any such information to SeraphCorp prior to reading the privacy statements set out herein, and you do not agree with the manner in which such information is collected, processed, stored, used or disclosed, then you may access, modify and delete such information by using options provided on the Website. In addition, you can, by sending an email to karen@seraphcorp.net, inquire whether SeraphCorp is in possession of your Personal Data, and you may also require SeraphCorp to delete and destroy all such information.
- iv. Subscribers’ personally identifiable information, which they choose to provide on the Website when they sign up, is used to help the Subscribers describe/identify themselves; request for more information from SeraphCorp; and if Subscriber consents, for SeraphCorp to inform Subscriber about any of SeraphCorp’s new courses, programmes, services, events and other updates. Other information that does not personally identify the Subscribers as an individual, is collected by SeraphCorp from Subscribers (such as, your computer’s internet protocol (IP) address which provides us with information that helps us learn about your browser and operating system) and is exclusively owned by SeraphCorp. SeraphCorp may also use such information in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes. In particular, SeraphCorp reserves with it the right to use anonymized Subscriber demographics information for the following purposes:
  - (a) Analyzing software usage patterns for improving product design and utility; and
  - (b) Using analysis of such information in other commercial product offerings of SeraphCorp.
- v. The Website uses temporary cookies to store certain data (that is not sensitive personal data or information) that is used by SeraphCorp and its service providers for the technical administration of

the Website, research and development, and for Subscriber administration. In the course of serving advertisements or optimizing services to Subscribers, SeraphCorp may allow authorized third parties to place or recognize a unique cookie on the Subscriber's browser. The cookies however, do not store any Personal Data of the Subscriber. You may adjust your internet browser to disable cookies. If cookies are disabled you may still use the Website, but may be limited in the use of some of the features.

- vi. SeraphCorp will communicate with the Subscribers through email, telephone, SMSs, text and other forms of messaging. The Subscribers can change their e-mail and contact preferences at any time by sending an email to karen@seraphcorp.net.
- vii. SeraphCorp may keep records of electronic communications and telephone calls received and made for making appointments or other purposes for the purpose of administration of Services, Subscriber support, research and development.
- viii. All SeraphCorp employees and data processors, who have access to, and are associated with the processing of sensitive personal data or information, are obliged to respect the confidentiality of every Subscribers' Personal Data or sensitive personal information.
- ix. To the extent necessary to provide Subscribers with the Services, SeraphCorp may provide their Personal Data to third party contractors who work on behalf of or with SeraphCorp to provide Subscribers with such Services, to help SeraphCorp communicate with Subscribers or to maintain the Website. Generally, these contractors do not have any independent right to share this information, however certain contractors who provide services on the Website, including the providers of online communications services, may use and disclose the personal information collected in connection with the provision of these Services in accordance with their own privacy policies. In such circumstances, you consent to us disclosing your personal information to contractors, solely for the intended purposes only.
- x. Subscribers may choose to unsubscribe from marketing communications that they receive from SeraphCorp by clicking the 'unsubscribe' link provided at the end of every such promotional communication.

## **7.2 Casual Visitors Note:**

No sensitive personal data or information is automatically collected by SeraphCorp from any casual visitors of this website, who are merely perusing the Website.

Nevertheless, certain provisions of this Privacy Policy are applicable to even such casual visitors, and such casual visitors are also required to read and understand the privacy statements set out herein, failing which they are required to leave this Website immediately.

If you, as a casual visitor, have inadvertently browsed any other page of this Website prior to reading the privacy statements set out herein, and you do not agree with the manner in which such information is

collected, processed, stored, used, disclosed or retained, merely quitting this browser application should ordinarily clear all temporary cookies installed by SeraphCorp. All visitors, however, are encouraged to use the “clear cookies” functionality of their browsers to ensure such clearing / deletion, as SeraphCorp cannot guarantee, predict or provide for the behaviour of the equipment of all the visitors of the Website.

You are not a casual visitor if you have willingly submitted any Personal Data or personal information to SeraphCorp through any means, including email, post or through the registration process on the Website. All such visitors will be deemed to be, and will be treated as, Users for the purposes of this Privacy Policy, and in which case, all the statements in this Privacy Policy apply to such persons.

## **SECTION 8: SHARING AND TRANSFER OF PERSONAL DATA**

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In general, the third-party providers used by us, such as data intermediaries and aggregators, will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.

In the course of or in connection SeraphCorp’s business operations, which includes, providing products and services to customers, SeraphCorp may transfer Personal Data to the following parties for the following purposes:

- (a) to our vendor data aggregators for the collection and storing of Personal Data from Data Subjects;
- (b) to our data intermediaries for the processing of Personal Data;
- (c) To government and non-government authorities, agencies and/or regulators as required under law or under directions or orders from the government and non-government authorities, agencies and/or regulators for security, regulatory approvals or permits;
- (d) To event organisers and service providers to facilitate the planning of seminars/ publicity events / functions that SeraphCorp organises or is involved in;
- (e) financial institutions or payment gateways for purposes of payment processing and transactions related to SeraphCorp’s provision of products and services;
- (f) other service providers who provide IT and outsourcing services such as electronic mail services, deployment of management operations for information technology and HR outsourcing services];  
and
- (g) professional, financial and legal advisors, tax advisors, auditors, insurers and insurance brokers.

However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

In particular, remember that certain providers may be located in or have facilities that are located a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.

Once you leave our Website(s) or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's Terms of Service.

SeraphCorp requires that the parties to whom we transfer Personal Data and our service providers implement adequate levels of protection in order to protect Personal Data. We also require that these parties only process Personal Data strictly for purposes for which we engage them for and consistent with the purposes that we have described in the **Section 5 "Purposes for which we collect and use Personal Data"** or with other purposes for which consent has been sought and obtained.

## **SECTION 9: CONFIDENTIALITY AND SECURITY**

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Your Personal Data is maintained by SeraphCorp in electronic form on its equipment, and on the equipment of its employees. Such information may also be converted to physical form from time to time. SeraphCorp takes all necessary precautions to protect your personal information both online and off-line, and implements reasonable security practices, precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed, including certain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of SeraphCorp's business.

No administrator at SeraphCorp will have knowledge of your password. It is important for you to protect against unauthorized access to your password, your computer and your mobile phone. Be sure to log off from the Website when finished. SeraphCorp does not undertake any liability for any unauthorised use of your account and password. If you suspect any unauthorized use of your account, you must immediately notify SeraphCorp by sending an email to [karen@seraphcorp.net](mailto:karen@seraphcorp.net). You shall be liable to indemnify SeraphCorp due to any loss suffered by it due to such unauthorized use of your account and password.

SeraphCorp makes all Personal Data accessible to its employees, agents or partners and third parties only on a need-to-know basis, and binds only its employees to strict confidentiality obligations.

Notwithstanding the above, SeraphCorp is not responsible for the confidentiality, security or distribution of your personal information by our partners and third parties outside the scope of our agreement with such partners and third parties. Further, SeraphCorp shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond the reasonable control of SeraphCorp including but not limited to, acts of government, computer hacking, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of Internet service or telephone service of the Website user or Subscriber etc.

## **SECTION 10: AGE OF CONSENT**

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By using the Websites, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence and you have given us your consent to allow any of your minor dependents to use this site.

SeraphCorp strongly encourages parents and guardians to supervise the online activities of their minor children and consider using parental control tools available from online services and software manufacturers to help provide a child-friendly online environment. These tools also can prevent minors from disclosing their name, address, and other personally identifiable information online without parental permission. Although the SeraphCorp Websites and Services are not intended for use by minors, SeraphCorp respects the privacy of minors who may inadvertently use the internet or the mobile application.

## **SECTION 11: ACCURACY**

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SeraphCorp will take reasonable efforts to ensure that any Personal Data collected is accurate and up to date by updating its records whenever changes to information come to its attention. SeraphCorp will disregard information which seems, on a reasonable basis, to be inaccurate or out of date by reason of the time which has elapsed since it was collected or by reason of any other information in its possession.

## **SECTION 12: RETENTION OF PERSONAL DATA**

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SeraphCorp only retains Personal Data for as long as the retention is required for the purposes for which

we collected the Personal Data, the purposes described in this Policy and for our business and legal purposes. Generally, we do not retain Personal Data for a period of longer than 7 (seven) years after the original purposes for which the Personal Data was collected have ceased to be applicable, unless otherwise required by law or other mandatory directions by court or government authorities or for purposes of legal proceedings or other similar proceedings or investigations.

For job applicants who were interviewed by the Company but were unsuccessful, SeraphCorp will retain your Personal Data for no longer than 1 (one) year for the purposes of evaluating your suitability for future job openings within SeraphCorp, unless you inform us otherwise.

All enrolment data collected by SeraphCorp will be kept for up to 7 (seven) years (in accordance with Council for Private Education regulations).

Financial and business data shall be kept for 7 (seven) years. Finance data involves personal data in the instances of self-sponsored participants.

## **SECTION 13: ACCESS, CORRECTION OR UPDATE OF PERSONAL DATA**

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If you have any questions about the use of your Personal Data (including how your Personal Data has been used and to whom it has been disclosed), or if you wish to correct, delete or update any of your Personal Data held by SeraphCorp, you may submit a written request via email to and request for our [Request for Access of Personal Data](#) form or [Request for Update/Correction of Personal Data](#) form.

We will endeavour to acknowledge the receipt of your request within 3 working days after the date of receipt of your request if it is sent by e-mail, or within 7 days after the date of receipt of your request if it is sent by post. As it is important to us that the Personal Data that we have about you is accurate and complete, it may be necessary for us to request for supporting documentation from you. We will contact you if we require supporting documentation from you.

There may be circumstances where SeraphCorp will not correct, delete or update your Personal Data, including: (a) where the Personal Data is opinion data that is kept solely for evaluative purpose; and (b) the Personal Data is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.

SeraphCorp shall have the right to request for information for the purposes of verification of your identity and for more information about your request. As allowed under the PDPA, SeraphCorp reserves a right to charge an administrative fee to respond to the request set out above.



## SECTION 14: TRANSFER OF PERSONAL DATA OUTSIDE OF SINGAPORE

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Certain SeraphCorp’s agents, vendors, or service providers may be operating outside Singapore. By providing information to us through our application forms, employment, use of our Websites or otherwise, you are consenting to the transfer of that information to be processed and used in accordance with the terms of this Privacy Policy. In such a situation, SeraphCorp will ensure that the Personal Data so transferred will be accorded a standard of protection comparable to the protection provided under the PDPA.

## SECTION 15: YOUR REQUESTS AND FEEDBACK ON YOUR PERSONAL DATA WITH US

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You may request for information from SeraphCorp on what Personal Data of yours we have and how we have used and shared your Personal Data during the last one year before the date of your request.

To learn more about how you can request for information from SeraphCorp, please see our [Request for Access of Personal Data](#) form.

You may also choose to withdraw your consent to SeraphCorp’s use, collection, sharing or processing of your Personal Data at any time. To learn more about how you can withdraw your consent, please see our [Request for Withdrawal of Personal Data](#) form. Please understand that your withdrawal of your consent to our use of your Personal Data may affect our provision of products and services to you or our business dealings with you, depending on the nature of your relationship with us and what you are withdrawing consent for. Some personal data is necessary for participation in SeraphCorp’s services, for example, an individual’s personal data including educational history for participation in one of SeraphCorp’s courses. Our [Request for Withdrawal of Personal Data](#) form allows you to withdraw consent for optional purposes (example, receipt of SeraphCorp’s newsletter) without concurrently withdrawing consent for the necessary purpose.

If you have any concerns, feedback or complaints about the use and/or sharing of your Personal Data, you may contact us at [karen@seraphcorp.net](mailto:karen@seraphcorp.net).

## SECTION 16: DO NOT CALL PROVISIONS

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SeraphCorp shall not, and shall ensure that its agents shall not, send a specified message to a Singapore telephone number without first checking with the Do Not Call Registry established by the Personal Data Protection Commission (“PDPC”) and receiving confirmation from the PDPC that such Singapore telephone

number is not listed on the Do Not Call Register.

SeraphCorp shall not, and shall ensure that its agents shall not, send a specified message to a Singapore telephone number, unless the specified message includes clear and accurate information identifying the person sending the specified message.

The prescribed duration within which SeraphCorp must check with the Do Not Call Registry before sending a specified message to a Singapore telephone number will be 30 days. You may continue to receive marketing messages and other product information from SeraphCorp within the prescribed validity period.

SeraphCorp shall not make, cause or authorise a voice call addressed to a Singapore telephone number that conceals or withholds, or that has the effect of concealing or withholding, the calling line identity from the recipient.

SeraphCorp will not require a subscriber or users of a Singapore telephone number to consent to the sending of a specified message beyond what is reasonable for SeraphCorp to provide its products, courses and services. SeraphCorp will not obtain or attempt to obtain such consent by:

- (a) providing false or misleading information; or
- (b) using deceptive or misleading practices.

If a subscriber or user of a Singapore telephone number gives notice withdrawing consent for the sending of a specified message to that number, then SeraphCorp shall cease (and cause its agents to cease) sending specified messages to that number.

## **SECTION 17: CHANGES TO THIS PRIVACY POLICY**

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SeraphCorp may update this Privacy Policy at any time, with or without advance notice. In the event there are significant changes in the way SeraphCorp treats your personally identifiable information, or in the Privacy Policy itself, SeraphCorp will display a notice on the Website or send you an email, as provided for above, so that you may review the changed terms prior to continuing to use the Services. As always, if you object to any of the changes to our terms, and you no longer wish to use the Services, you may contact Unless stated otherwise, SeraphCorp's current Privacy Policy applies to all information that SeraphCorp has about you and/or your account.

If a Website user or Subscriber uses the Services; or accesses the Website after a notice of changes has been sent to such user or Subscriber, or published on the Website, such user or Subscriber hereby provides his/her/its consent to the changed terms.

## SECTION 18: HOW TO CONTACT US

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Should you have questions about this Privacy Policy or SeraphCorp's information collection, use and disclosure practices, or if you would like to access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information contact us at. We will use reasonable efforts to respond promptly to any requests, questions or concerns, which you may have regarding our use of your personal information. If you have any grievance with respect to our use of your information, you may communicate such grievance to:

Name: Ms Karen Lam

SeraphCorp Institute Pte Ltd

The Devan Nair Institute, Unit 06-01, 80 Jurong East St 21, S609607

Phone: 6468 6008 (Ask to be connected to Ms Karen Lam)

Email: karen@seraphcorp.net

Effective date: 1 June 2016

Revised: 2 January 2020