

DATA PROTECTION AND PRIVACY POLICY

SimsView Technologies Pte Ltd (“SimsView”, “we”, “us”, or “our”) is committed to complying with privacy and data protection. We aim to respect your personal information and keep it safe.

We have policies, procedures and training in place so that our employees understand the data protection responsibilities and adhere to the data protection principles.

This Data Protection Notice (“Notice”) sets out the basis which we collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act (“PDPA”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

The provision of your personal data to us is voluntary. However, without providing us with your personal data, your use of our services or your interaction with us may be impaired. For example, you will be unable to take an examination or receive a qualification.

The content of this data protection notice outlines how we manage and protect your data with compliance to PDPA ([weblink](#)) and GDPR ([weblink](#)).

PERSONAL DATA

As used in this Notice:

“user” means an individual who

(a) has contacted us through any means to find out more about any goods or services we provide,

or

(b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

“personal data” means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

Depending on the nature of your interaction with us, the types of personal data we may collect from you include the following:

- Your contact details such name, residential address, email address, telephone number
- Your date of birth and gender
- NRIC, birth cert, passport number
- Any Special Educational Needs requirements for exams including relevant medical records
- Your instrument and grade
- Name of your parent / guardian (if you are under 18)/ Next of Kin
- Nationality
- Details of your qualifications / experience
- Your financial information such as bank details and/ or credit/debit card details and any purchases you have made
- Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

We at SimsView, generally do not collect your personal data unless:

(a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”) after:

- (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and
- (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or

(b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

We may collect, use or share/disclose your personal data for any or all of the following purposes: performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;

- verifying your identity;
- responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- managing your relationship with us;
- processing payment or credit transactions; and
- transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes.
- Communications for marketing/promotional purposes where you have given us prior consent for us to send you information about our work, events, services or activities via email, SMS or telephone.

Payment

When you use our online payment function you will be directed to a specialist payment services provider who will receive your financial information to process the transaction. We will provide your personal information to the payment services provider only to the extent necessary for the purpose of processing your payment.

We do **NOT** share, sell or rent your personal data to third parties for marketing purposes. However, in general, we may disclose your personal data:

where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you; or to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above-mentioned purposes.

WITHDRAWING YOUR CONSENT

The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to us at the contact details on our Apps or Website.

Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same,

including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within thirty (30) business days of receiving it.

Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described prior.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to us at the contact details provided in our Apps or Website.

Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request.

If we are unable to provide you with any personal data or to make 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).

PROTECTION OF PERSONAL DATA

To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption, use of privacy filters, and disclosing personal data both internally and to our authorised third-party service providers and agents only on a need-to-know basis.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing us in writing or via email at the contact details provided in our Apps or Website.

RETENTION OF PERSONAL DATA

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

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.

DATA PROTECTION POLICY

You may contact us if you have any enquiries or feedback on our personal data protection policies and procedures.

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.