

## DATA PROTECTION NOTICE

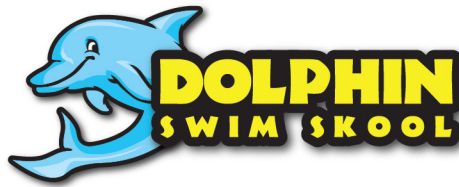
This Data Protection Notice sets out the basis which Dolphin Swim Skool may collect, use, disclose or otherwise process personal data of our customers in accordance with Singapore Personal Data Protection Act ("PDPA"). This Notice applies to personal data in our possession or under our control. We respects your privacy and are committed to safeguarding the personal data entrusted to us.

### 1. PERSONAL DATA

- We shall only collect personal data relevant to the purpose of the collection or if it is mandatory in order to accomplish the purpose.
- Personal data refers to any data, whether true or not, about an individual who can be identified from that data or/and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.
- Examples of personal data may include (depending on the nature) name, date of birth, telephone number, address and email address among others.

### 2. COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

- Consent may be collected through written documentations or electronically.
- We 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 after you (or your authorised representative) have been notified of the purposes for which the data is collected
  - 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 and use your personal data for any or all of the following purposes:
  - a. Performing obligations in the course of or in connection with our provision of the services requested by you;
  - b. Verifying your identity;
  - c. Responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
  - d. Managing your relationship with us;
  - e. Processing payment or credit transactions;
  - f. Sending information about our goods or services including notifying you of our events and promotions
  - g. Complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;



### **3. WITHDRAWING YOUR CONSENT**

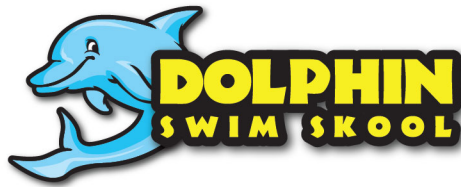
- The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
- 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 ten (10) business days of receiving it.

### **4. 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 our Data Protection Officer at the contact details provided below.
- 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. 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).

### **5. 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 and the use of privacy filters to secure all storage and transmission of personal data by us, 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.



## **6. ACCURACY OF PERSONAL DATA**

- We will make reasonable efforts to ensure that personal data collected is accurate and complete. 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 our Data Protection Officer in writing or via email at the contact details provided below.

## **7. 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.

## **8. TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

- We will not transfer your personal data to countries outside of Singapore.

## **9. DATA PROTECTION OFFICER**

- You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, via email to [admin@dolphinswimskool.com](mailto:admin@dolphinswimskool.com).
- The DPO shall verify the identity of the individual before responding to the request for access or correction via telephone call, written note or electronic mail. In any case, the DPO shall keep records of such requests and responds for future reference and verification.

## **10. 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.