

ASTOR PRIVACY AND DATA PROTECTION POLICY
Version 1 – 18 August 2021

Introduction

This Privacy and Data Protection Policy (“**Policy**”) sets out the basis on which **Astor International School Pte Ltd** of 1 Kay Siang Road, #05-01/02 Singapore, 248922 (UEN 201833962E) (together with our subsidiaries and/or related companies, collectively called “the **Company**,” or “**Astor**,” or “**we**,” or “**our**” or “**us**”) collects, uses and processes Personal Data (as defined below) from you in compliance with Singapore’s Personal Data Protection Act 2012.

1. This Policy applies to the Personal Data collected in the Company’s properties at [this](#) website, Astor’s social media and customer communication channels, and through any services accessed by you through other properties owned by Astor (collectively our “**Properties**”).
2. By accessing any of our Properties, you accept and consent to the practices set out in this Policy and authorize the Company to act in accordance with this Policy. If you do not agree with the terms of this Policy, please cease to interact with the Properties, clear all Cookies and refrain from future interaction. If you have any queries pertaining to this Privacy Policy, you may contact the Astor Data Protection Officer at dpo@astor.edu.sg.

Collection of Personal Data

3. In this Policy, “**Personal Data**” means data, whether true or not, about a person who can be identified from that data or from that data and other information to which we have or are likely to have access. Personal Data may include (without limitation):
 - a. Information that you provide us (which may include your name, address, email address, telephone number, nationality, gender, identification numbers, date of birth and other requested particulars, as well as your child’ particulars including their medical notes and any other information requested by Astor for delivering our services) by filling in forms on our Properties, or by corresponding with us (by phone, email or otherwise), for example:
 - i. when you book a school tour;
 - ii. when you fill in the application form;
 - iii. when you sign up for a Astor camp;
 - iv. when you sign up for any school activities such as field-trips and extra-curriculum activities (ECAs);
 - v. when you sign up for a school bus service; and
 - vi. when you complete any survey or questionnaire we send you.

- b. Information automatically collected when you visit our Properties, such as technical information including the Internet protocol (IP) address used to connect your computer to the Internet and your log-in information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - c. Information that can enhance your overall user experience and improve fraud management of our services, including information about your interaction with our Properties, such as the full Uniform Resource Locators (URLs), clickstream to, through and from our Properties (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, your device's operating system and platform, browser type and version, plug-ins, device type, unique device identifier, GPS data, location data, web or mobile analytics such as clickstream and page interaction data and any phone number used to contact our contact number.
4. We retain Personal Data only for as long as the applicable Purpose still exists, and will use our best endeavours to expunge it within a reasonable time of that Purpose elapsing.

Uses made of Personal Data

5. We may use Personal Data for the following **Purposes**:
- a. Processing your booking and application forms, including but not limited to verifying your identity and any information you provide to us;
 - b. Communicating with you and responding to your questions and enquiries;
 - c. Processing your requests and any necessary related investigations;
 - d. Requesting feedback or participation in surveys, conducting market research and/or analysis for statistical, profiling or other purposes for us to improve our services, understand customer preferences and market trends, and to review, develop and improve the quality of our services;
 - e. Dealing with any matters relating to the services which you are applying for or have already applied for, including e-mailing to you invoices, school reports or notices, processes which involve disclosing certain Personal Data about you in order to carry out the aforementioned delivery of services;
 - f. Investigating fraud, misconduct, unlawful action or omission, and any suspicion of the aforementioned; and/or
 - g. Complying with applicable law in administering and managing your relationship with us;
 - h. Presenting content and information in our Properties in the most effective manner for you and for the device you use;

- i. Providing you with alerts, updates, materials or information about our services or other types of information that you requested or signed up to;
 - j. Personalising your user experience, or to provide targeted advertising on our Properties or through other channels;
 - k. Maintaining the quality of our services including parent communication (all communications between you and the Company, whether made via telephone calls, e-mails and/or text-based modality may be monitored and recorded);
 - l. Meeting the requirements imposed by any law, rules, regulations, agreements or schemes imposed by any government regulators, law enforcement agencies, government authorities, dispute resolution or industry bodies or in connection with any investigations;
 - m. Responding to or taking part in legal proceedings, fulfilling legal purposes such as enforcing obligations owed to us or seeking professional advice (including legal advice); and/or
 - n. Any other purposes directly related or incidental to the above.
6. If you share your personally identifying and contact information via our website, we may use this information to send further information about Company, its services, news and updates, or to contact you when necessary. We may contact you by e-mail and/or SMS/WhatsApp. If you change your mind about being contacted in the future by any of these means then you may always opt-out of receiving future mailings using the procedure described in clause 26 of this Policy.
7. If you share your personally identifying and contact information via an e-mail sent to us containing an enquiry, question or comment, we will use your information from e-mail primarily to respond to your requests. We may forward your e-mail to other employees who are better able to answer your questions. We may also use your e-mail to contact you in the future about our programmes that may be of interest.
8. Subject to your prior approval, we may also use and process your Personal Data for other marketing and promotional related purposes listed below (“**Additional Purposes**”):
- a. Providing or marketing services, products and benefits to you, including promotions and reward programmes;
 - b. Sending you details of services, special offers and rewards, either to our users generally, or which we have identified may be of interest to you;
 - c. Notifying you on events or activities organized by Astor and/or its partners or advertisers, and the processing the registration for such events or activities; and/or
 - d. Matching 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.

9. The Purposes and Additional Purposes may continue to apply for a reasonable period thereafter even in situations where your relationship with us has been terminated or altered in any way.
10. Personal Data may at any time be processed by persons who operate outside Singapore.
11. For research or statistical purposes, we may use and disclose to others anonymised or aggregated Personal Data.

Disclosure of Personal Data

12. We will take reasonable steps to protect your Personal Data against unauthorised disclosure. To the extent permitted by law, we may transfer or disclose your Personal Data for the Purposes and Additional Purposes to the following entities or parties, whether they are located overseas or in Singapore:
 - a. Counterparties and their respective financial institutions in relation to payments and other transactions;
 - b. Agents, contractors or third party service providers who provide operational services to Astor, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services;
 - c. Vendors or other third party service providers, including but not limited to advertisers and event management companies, in connection with promotions and services offered by us;
 - d. Professional advisors and external auditors, including legal advisors, financial advisors and consultants;
 - e. Co-branded and other business partners;
 - f. Any member of our **Group**, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in Section 5 of the Companies Act (Chapter 50);
 - g. Personnel, agents, advisers, auditors, contractors, financial institutions, and service providers in connection with our operations or services (for example staff engaged in the provision of student support services or external providers of ECAs);
 - h. Persons under a duty of confidentiality to us;
 - i. Persons to whom we are required to make disclosure under applicable laws and regulations in any part of the world (including law enforcement agencies, lawyers, auditors government regulators or authorities and, dispute resolution or industry bodies;
 - j. Actual or proposed transferees of our operations (or a substantial part thereof) in any part of the world; or
 - k. Any other party to whom you authorise us to disclose your Personal Data to.

13. Astor will keep your personal data confidential unless you have given the written consent to such disclosure or it is within the ambit of permitted disclosures under prevailing laws/guidelines.

Cookies

14. A cookie is a small file of letters and numbers that, if permitted by your local browser settings, we store on a computer or mobile device to collect and retain information about visitor behaviour to our Properties, such as user preferences and session information. The information contained in cookies is transferred to your computer's hard drive and shared with us.
15. Cookies are used to distinguish you from other users of the Properties, which helps us to improve our Properties and your experience of it.
16. We use persistent cookies and session cookies. A persistent cookie stays in your browser and will be read by us when you return to our Properties or a partner Properties that uses our services. Session cookies only last for as long as the session (usually the current visit to the Properties or a browser session).
17. We may use third-party web services on our Properties. The service providers that administer these services use technologies such as cookies (which are likely to be analytical/performance cookies or targeting cookies), web server logs and web beacons to help us analyse how visitors use our Properties and make the information displayed on it more relevant to your interests. The information collected through these means (including IP addresses) is disclosed to these service providers. These analytics services may use the data collected to contextualise and personalise the marketing materials of their own advertising network.

Third-party Properties

18. Our Properties (and/or our communication with you) may contain links to third party web properties for your convenience and information, and social media features such as the Facebook "Like" button. Please note that these properties and features operate independently from us, and may have their own privacy notices or policies. If you choose to access these properties and/or use these features, you should review their privacy notices or policies to understand their privacy practices. We will not be responsible for your access or use of these properties and/or features.

Security

19. All Personal Data you provide to us is stored on our secure servers or on the servers of partner companies that owe to us strict data management responsibilities. In all cases, reasonable security measures are applied to prevent the unauthorised access, collection, use, disclosure, copying, modification, disposal, erasure, or loss of Personal Data, including both physical and technical measures such as up-to-date antivirus protection. We also review our information collection, storage and processing practices from time to time to guard against unauthorised access, processing or use.
20. We employ security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction or damage. Astor's website has security measures in place to protect the loss, misuse and alteration of the information under our control. Only authorised employees, agents and contractors (who have agreed to keep information secure and confidential) have access to this information.
21. Please note, however, that the transmission of information via the Internet is not completely secure. We cannot completely guarantee the security of any Personal Data and we cannot be responsible for any unauthorised use of Personal Data by third parties that is attributable to factors beyond our reasonable control.

Accessing Your Personal Data and Correction Requests

22. Should you wish to access a copy of or request correction of your Personal Data held by us, you can submit your request to our Data Protection Officer using the address details provided in this Policy.
23. Please note that:
 - a. we may need to ask for identification numbers and other necessary details during the process to verify your identity;
 - b. we reserve the right to refuse your requests to access and/or correct your Personal Data for reasons permitted by law; and
 - c. we reserve the right to charge a reasonable fee for processing your request to access or retrieve your Personal Data.

Opt-Out or Change Your Contact Information

24. Our Website provides users the opportunity to opt-out of receiving communications from us and to update the contact information you have previously provided to us. If you wish, instead, to be completely removed from our database, please make this request to us in writing at dpo@Astor.edu.sg.

Withdrawing Your Consent

25. The consent that you provide for the collection, use and disclosure of your Personal Data in connection with the Purposes will remain valid until such time it is 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 our Data Protection Officer.
26. 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.
27. Please note that:
- a. the withdrawal of your 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.
 - b. depending on the nature and specifics of your objection, as a result of your withdrawal of consent we may not be able to continue to provide our services to you or perform on any contract we have with you.

Changes to this Policy

28. We may update this Policy from time to time. Any changes or updates we make to this Policy will be posted on this page, and your continued use and/or access to our Properties or services following such posting shall constitute your acknowledgement and acceptance of the updated Policy.

Contacting us

29. If you have any questions, comments, notices or requests regarding this Policy please address them to the Company:
- a. By email: dpo@Astor.edu.sg, or
 - b. By mail: The Data Protection Officer, Astor International School Pte Ltd, 1 Kay Siang Road, #05-01/02 Singapore, 248922