

# Protecting Your Privacy

## Privacy Policy

This Privacy Policy applies to all the products and services offered by Star Horizon Learning Pte. Ltd. (we, us, our) and contains important information about the type of personal information we collect, the purposes for which it is used, how it is managed, to whom we disclose it and what measures we take to comply with privacy laws in respect of our website.

This Privacy Policy is governed by the Personal Data Protection Act 2012 (the “Act”). We are bound by the Act and are committed to complying with its provisions. The privacy of your personal information is very important to us.

We may make changes to this Privacy Policy from time to time for any reason. We will publish changes to this Privacy Policy on our website. It is important that you read and understand this Privacy Policy.

### What personal information we collect

The personal information we collect and store about you may include:

- your name;
- contact details (including mobile phone, telephone, address and email);
- age;
- gender;
- Educational and other professional qualifications;
- occupational information;

and such other information which is relevant and necessary to providing products and services to you or to comply with the law.

If you are under 18, please do not send any personal data about yourself to us.

### Why we collect personal information

We will inform you of the main reasons for collecting your personal information at the time we request it. The purposes for which we will generally collect and use your information include considering any application you make to us, providing products and services to you, performing administrative functions, communicating with you, verifying your identity, preventing and detecting fraud or loss, enhancing our products and services and telling you about our other products and services which may include those of our business partners, which we believe may interest you. You may tell us at any time that you do not want us to advise you about other products and services (see “Marketing” below for more details).

### How we collect personal information

In order to provide a better service to you, we may collect and process the following data about you:

- information that you provide by filling in forms on our sites [www.star-horizon.com](http://www.star-horizon.com) or [www.gotutor.sg](http://www.gotutor.sg) ("our sites"). This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may

also ask you for information at other times, for example in connection with a promotion or when you report a problem with our site

- if you contact us, we may keep a record of that correspondence
- we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them
- details of transactions you carry out through our site and of the fulfilment of your orders
- details of your visits to our site and the resources that you access

We only retain personal data for so long as it is necessary. Data may be archived as long as the purpose for which the data was used still exists.

At our offices we may record you using CCTV for quality, training, security and record keeping purposes.

### **Information collected online**

We collect information about visitors using our online resources. Any information collected is used to provide our products and services and to identify online behavioural patterns.

Our online resources include, but are not limited to websites and mobile applications “apps”.

Information collected by these resources may collect the following information:

- Server address/IP address
- Date and time of visit to our site
- Pages visited
- Documents downloaded
- The site you visited prior to visiting our website
- The browser you are using to access our resources
- If you have visited our website before
- Tracking user preferences

In addition to the above, mobile apps may collect location data.

From time to time, we may use data collection devices such as 'cookies' in conjunction with our website. Cookies are commonly used on the internet. They are a small file placed onto a computer by a server. A cookie can later be identified by a server. We may use both 'persistent' and 'session' cookies. We may (or our marketing company may) evaluate the cookie information collected to measure the effectiveness of our advertising and how visitors use our site. Where our marketing company manages the information coming from our site on our behalf, we control how that data may and may not be used. Any information that is collected in this way is used in an aggregated form, we do not use it to identify you as an individual.

We may use cookies for various purposes such as:

- to provide you with better and more customised service and a more effective website
- collecting anonymous statistical information on things such as how many visitors our sites receive, how those visitors use the sites and where they came from.

Most of our online resources use sessions and/or cookies. If you wish, you can configure your browser so it does not accept cookies, but this may affect the functionality of the website.

## Use of Information

- The purposes for which information may be used by us in and outside Singapore include:
- ensuring that content from our site is presented in the most effective manner for you and for your computer
- providing you with alerts, newsletter, education materials or information that you requested or signed up to
- carrying out our obligations arising from any contracts entered into between you and us
- allowing you to participate in interactive features of our service, when you choose to do so
- designing and conducting surveys/questionnaires for user profiling/segmentation, statistical analysis, improving and furthering the provision our products and services
- complying with laws and regulations applicable to us or any of our affiliates in or outside Singapore
- legal proceedings, including collecting overdue fees amounts and seeking professional advices
- researching, designing and launching services or products including seminars/events/forums
- promoting and marketing services and products subject to your exercise of the opt-out right or
- purposes directly related or incidental to the above
- We intend to use your data in direct marketing and we require your consent (which includes an indication of no objection) for that purpose. In this connection, please note that:
- your name, contact details (including address, contact number, email address), products and services information, transaction pattern and behaviour, background and demographic data held by us from time to time may be used by us in direct marketing;
- the following classes of services, products and subjects may be marketed in direct marketing:
  - services and products related to our site and/or our affiliates (including marketing affiliates programs we are a part of)
  - reward, loyalty or privileges programmes, promotional offers and related services and
  - invitations to events such as seminars/webinars/tele-seminars, conferences, live programs or events
- We may conduct direct marketing via fax, email, direct mail, telephone and other means of communication or send e-newsletters to you. You may choose not to receive promotional materials, by simply telling us (see below for contact details), and we will cease to do so, without charge

## Marketing

We will only send you marketing materials about our products and services or those of selected third parties if we have your consent to do so. We will normally obtain your consent when you purchase a policy from us.

We will never sell or disclose your personal information to other companies, however, we may provide your personal information to our business partners so that they can provide you with information about their products and services that you might be interested in (where you have agreed). Should you purchase products or services on our business partner websites, their privacy policy will apply to those products and services.

- If you do not want to receive any marketing material, you can choose to opt out of our marketing activities. To opt out, you can contact us using the Contact Details below.

You can, however, change your mind about opting out of receiving information about our products and services at any time by contacting us using our Contact Details noted below.

### **How we store personal information**

We will store your personal information in a number of ways including:

- in electronic systems and devices;
- in telephone recordings;
- in paper files;
- secure document retention services off-site; and/or
- cloud facilities operated by us (or by third parties on our behalf)

We will only hold your personal information for as long as is necessary for the purposes described in this Privacy Policy or for legal or business purposes.

### **Information Security**

We will take reasonable precautions to ensure that the personal information that we have about you is protected against any unlawful use, unauthorised access, modification or disclosure and these precautions include:

- using appropriate information technology and processes;
- using computer and network security systems with appropriate firewalls, encryption technology and passwords for the protection of electronic files;
- securely destroying or “de-identifying” personal information if we no longer require it subject to our legal obligations to keep some information for certain prescribed periods;
- restricting access to your personal information to our employees and those who perform services for us who need your personal information to do what we have engaged them to do; and
- requesting certain personal information from you when you wish to discuss any issues relating to the products and services we provide to you.

While we undertake reasonable steps to protect your personal information, no guarantee can be given that information sent over the internet is always 100% secure. Sending and receiving information over the internet is at the user's own risk, however we will take all reasonable steps to ensure your data security once we receive it.

### **Disclosure to third parties**

The personal information that we collect from you may be disclosed to other parties who are involved with the provision of our products and services to you or who assist us in the conduct of our business activities in relation to the products and services we provide to you, such as selected marketing services platforms used by us and other relevant service providers. We may also disclose to the police or legal advisors assisting us to provide our services to you.

Our group companies or external companies who help us web-host, maintain our website, provide communication services (such as mailing) may also have access to your personal information for the sole purpose of providing those services.

We impose security and confidentiality requirements on how these parties handle your personal information and we limit the use of it to the specific purpose for which we supplied it.

The information we provide to third parties will be strictly limited to what is required to provide the products and services, where disclosure is required, or authorised by or under law (for example, we may disclose information to government agencies) or where you have requested us to or have consented to the disclosure to a third party. The third parties may include overseas organisations (see below).

### **Exchange of information with overseas parties**

Some of the parties with which we exchange your personal information, including our service providers and other third parties referenced above, may be located outside Singapore. Where we do this, we make sure that such organisations have the appropriate data handling and security arrangements in place.

### **Access to and accuracy of personal information**

You can request access to the personal information we hold about you at any time by contacting us using the Contact Details noted below and we will provide you with that information unless we are prevented by law from giving you that access. If we are unable to provide you with the requested information, we will provide you with a written explanation.

Where access is granted to your information, we may charge a reasonable fee for such access.

We take reasonable measures to ensure that the personal information we hold about you is accurate and up to date. Under the Act, you also have a right to request that we correct information, if you believe your personal information is not accurate and up to date. We would encourage you to inform us by contacting us using the Contact Details noted below. We will promptly update any information that is incorrect.

### **Website Links**

This Privacy Policy applies to websites operated by us or on our behalf which we authorise to provide a link to this Privacy Policy.

When you use a link from our websites to which this Privacy Policy applies, to the websites of third parties, we have no control over these third party websites we may link to. Those third party websites are not subject to our privacy standards and we take no responsibility for the conduct of these third parties. Always read the privacy and security statements when using other websites.

### **How to contact us**

Questions, comments and requests regarding this Privacy Policy are welcome and should be addressed to our Data Protection Officer.

Our Data Protection Officer can be contacted at [enquiry@star-horizon.com](mailto:enquiry@star-horizon.com).

To access or correct your personal information, please refer to “Access to and accuracy of personal information” above.

To unsubscribe from receiving marketing materials, please refer to “Marketing” above.

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