

PRIVACY POLICY

This is the data protection notice ("Notice") of Academic & Career Support Pte. Ltd. (Registration No. 201936418G)("the Company"). Tukija (Registration No. 53391811A) is the registered business name of the Company.

This Notice sets out the basis by which the Company may collect, use, disclose or otherwise process personal data (as defined below) of its customers (as defined below) in accordance with the Personal Data Protection Act ("PDPA"). This Notice applies to personal data in the Company's possession.

By interacting with the Company, using the Company's website, submitting information to the Company, engaging the Company's services or purchasing goods from the Company, the customer agrees and consents to the Company, as well as the Company's service providers and third parties appointed by the Company collecting, using and disclosing personal data in the manner set forth in this Notice.

PERSONAL DATA

1. As used in this Notice:

"customer" means a person (a) who has contacted the Company through any means to find out more about, or otherwise in connection with, any goods and/or services the Company provides or (b) who has entered into a contract with the Company for the supply of any goods and/or services by the Company or (c) to whom the Company is providing goods and/or services pursuant to a contract or other arrangement; and

"personal data" means any and all 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 the Company has access, including data in the Company's records as may be updated from time to time, but excludes business contact information.

2. Depending on the nature of the customer's interaction with the Company, some examples of personal data which the Company may collect from the customer include the customer's name and identification information such as NRIC number, contact information such as address, email address or telephone number, nationality, gender, date of birth, marital status, photographs and other audio-visual information, employment information and financial information such as credit card numbers, debit card numbers or bank account information.
3. 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

4. The Company may collect and use personal data for any or all of the following purposes:
 - a. verifying the customer's identity;
 - b. responding to, handling, and processing any and all queries, requests, applications, comments and other communication from the customer. Without prejudice to the generality of the foregoing, if the customer is in communication with the Company in relation to actual or potential collaboration or employment opportunities, the Company may collect and use personal data to process and assess the customer's proposal or application, as the case may be, perform background checks, verify the customer's credentials and obtain references;
 - c. performing obligations in the course of or in connection with the provision or proposed provision of goods and/or services to the customer;

- d. managing the customer's interaction and relationship with the Company. Without prejudice to the generality of the foregoing, telephone calls may be recorded and CCTV recordings may be taken while the customer is at the Company's registered office or any other premises out of which the Company provides goods and/or services;
 - e. processing payment or credit transactions;
 - f. marketing purposes including sending the customer information about the Company's goods or services and notifying the customer of the Company's marketing events, initiatives and promotions;
 - g. recording or otherwise documenting events hosted by, or involving, the Company;
 - h. complying with any and all 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;
 - i. any other purposes for which the customer has provided the information;
 - j. transmitting to any unaffiliated third parties including the Company's third party service providers and agents and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for any or all of the aforementioned purposes; and
 - k. any other incidental business purposes related to or in connection with the above.
5. The Company may disclose personal data:
- a. where such disclosure is required for performing obligations in the course of or in connection with the Company's provision of goods or services requested by the customer; or
 - b. to third party service providers, agents and other organisations the Company has engaged to perform any of the functions listed in paragraph 4 above for it.
6. The purposes listed in the above paragraphs may continue to apply even in situations where the relevant relationship between the customer and the Company (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter including, where applicable, a period to enable the Company to enforce its contractual rights.
7. Where the Company has been engaged to carry out any work in any jurisdictions outside Singapore, the transfer of personal data records to these jurisdictions may be necessary to give effect to the customer's instructions. The customer hereby understands, acknowledges and agrees that it requests and consents to the Company so transmitting personal data outside Singapore. Personal data may therefore be exported to, processed and accessed in countries whose laws provide a different level of protection, which may not necessarily be comparable to that provided in Singapore.

THE COMPANY'S WEBSITE

- 8. a. The Company's website may be linked, or contain links, to other sites and resources that are operated or provided by third parties with different privacy practices. The Company has no control over and does not take any responsibility for the personal data handling practices of such third parties.
- b. The Company uses cookies for web analytics. The customer may disable such cookies by changing the setting on his/her browser without affecting his/her ability to use the Company's website.

- c. When the customer visits the Company's website, his/her IP address is automatically logged in the server hosting the website. An IP address is a number that is automatically assigned to a computer when it is connected to the Internet. The Company uses the customer's IP address to help diagnose problems with the server and to administer its website. From the customer's IP address, the Company may identify the general geographic area (but not the exact geographic location) from which the customer is accessing its website. The Company does not link IP addresses to anything that will enable identification of the relevant customers unless it is required to do so by applicable laws and regulations.

WITHDRAWAL OF CUSTOMER CONSENT

9. The consent that the customer provides for the collection, use and disclosure of personal data will remain valid until such time it is being withdrawn by the customer in writing. The customer may withdraw consent and request the Company to stop using and/or disclosing personal data for any or all of the purposes listed in this Notice by submitting his/her request in writing to the Company's Data Protection Officer at the contact details provided in paragraph 23 below.
10. Upon receipt of the customer's written request to withdraw its consent, the Company may require reasonable time (depending on the complexity of the request and its impact on the Company's relationship with the customer) for the customer's request to be processed and for the Company to notify the customer of the consequences of the Company acceding to the same, including any legal consequences which may affect the customer's rights and liabilities to the Company.
11. While the Company respects the customer's decision to withdraw its consent, please note that, depending on the nature and scope of the customer's request, the Company may not be in a position to continue providing goods or services to the customer and the Company shall, in such circumstances, notify the customer before completing the processing of his/her request. Should the customer decide to cancel his/her withdrawal of consent, please inform the Company by writing to the Company's Data Protection Officer at the contact details provided in paragraph 23 below.
12. Please note that withdrawing consent does not affect the Company's 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

13. If the customer wishes to make (a) an access request for access to a copy of personal data previously provided by him/her to the Company or information about the ways in which the Company uses or discloses such personal data, or (b) a correction request to correct or update any of its personal data which the Company holds about it, the customer may submit his/her request in writing to the Company's Data Protection Officer at the contact details provided in paragraph 23 below.
14. Please note that a reasonable fee may be charged for an access request. If so, the Company will inform the customer of the fee before processing its request.
15. The Company will respond to the customer's request as soon as reasonably possible. If the Company is unable to provide the customer with any personal data or to make a correction requested by the customer, the Company shall generally inform the customer of the reasons why the Company is unable to do so (except where the Company is not required to do so under the PDPA).

PROTECTION OF PERSONAL DATA

16. The Company discloses personal data both internally and to its authorised third party service providers and agents only on a need-to-know basis.
17. The customer hereby acknowledges and accepts that no method of transmission over the Internet (including email) or method of electronic storage is completely secure and security cannot therefore be guaranteed.

ACCURACY OF PERSONAL DATA

18. The Company generally relies on personal data provided by the customer or the customer's authorised representative. In order to ensure that such personal data is current, complete and accurate, the customer undertakes to update the Company if and when there are changes to such personal data by informing the Company's Data Protection Officer in writing at the contact details provided in paragraph 23 below.

PERSONAL DATA RELATING TO A THIRD PARTY

19. If the customer provides the Company with, or otherwise deals with, any personal data of or relating to a third party, by submitting such personal data to the Company, the customer also represents to the Company, and must ensure that, he/she has notified such third party of the terms of this Notice and obtained such third party's consent thereto.

RETENTION OF PERSONAL DATA

20. The Company may retain 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.
21. The Company will cease to retain personal data, or remove the means by which the data can be associated with the customer 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

22. The Company generally does not transfer personal data to countries outside of Singapore. However, if it does so, it will obtain the customer's consent for the transfer to be made.

DATA PROTECTION OFFICER

23. The Company's Data Protection Officer may be contacted in the following manner:

By email at contact@tukija.sg.

By mail addressed to "Academic & Career Support Pte. Ltd.", marked for the attention of the Data Protection Officer and sent to 1 Scotts Road #24-01, Shaw Centre, Singapore 228208.

EFFECT OF NOTICE AND CHANGES TO NOTICE

24. 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 personal data by the Company. This Notice does not supersede or replace any other consents the customer may have previously provided to the Company in respect of personal data and the customer's consents herein are additional to any other rights the Company may have at law in relation to the collection, use and disclosure of personal data.

25. The Company may revise this Notice at any time and from time to time without prior notice by posting such revised Notice on the Company's website. The customer may determine if any such revision has taken place by referring to the date on which this Notice was last updated. The customer's continued use of the Company's services constitutes his/her acknowledgement and acceptance of such revisions and his/her agreement to be bound by the terms of the Notice as revised from time to time.

CONSTRUCTION

26. a. References to the Company are references to the Company and its branches, associates and affiliates.
- b. References to the Notice or any other document are references to the Notice or that other document, as varied, supplemented or replaced from time to time.
- c. References to any person includes that person's successors and permitted assignees and references to the masculine and feminine genders include the neuter gender.
- d. The word person includes each of the following, even if they have no separate legal personality: an individual, sole proprietorship, firm, partnership, trust, joint venture, body corporate, unincorporated body, association, organization or any government, state or local body or authority.
- e. The word including indicates examples only. It does not limit the general nature of any preceding words.
- f. Words importing the plural shall include the singular and vice versa.

Last Updated: 1 March 2020