

## PRIVACY POLICY

This privacy policy ("**Privacy Policy**") sets out how Bethesda (Depot Walk) Kindergarten Pte. Ltd. manages your Personal Data (as defined below).

**Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.**

By interacting with us, submitting information to us (such as through our church services), or signing up for any of our programmes, you agree and consent to Bethesda (Depot Walk) Kindergarten Pte Ltd, as well as our representatives and/or agents (collectively referred to herein as "**BDWK**", "**us**", "**we**" or "**our**"), collecting, using, and disclosing amongst ourselves your Personal Data, and disclosing such Personal Data to relevant third parties in the manner set forth in this Privacy Policy.

This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which BDWK may have at law to collect, use or disclose your Personal Data. This Privacy Policy does not affect any rights which we may have at law in connection with the collection, use or disclosure of your Personal Data.

BDWK may from time to time update this Privacy Policy to ensure that this Privacy Policy is consistent with our future developments and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Privacy Policy as updated from time to time on our website at [www.bethesdadepotwalk.com](http://www.bethesdadepotwalk.com). Please check the website at [www.bethesdadepotwalk.com](http://www.bethesdadepotwalk.com) regularly for updated information on the handling of your Personal Data.

### 1. **Your Personal Data**

1.1 In this Privacy Policy, "**Personal Data**" means all data that falls within the definition of personal information, personal data, personally identifiable information or similar language under any applicable law relating to the protection, privacy and security, collection, use or disclosure of sensitive or other personally identification information, including the Singapore Personal Data Protection Act 2012 (collectively, "**Data Protection Laws**").

1.2 Examples of such Personal Data which you may provide us for yourself and on behalf of your children include (depending on the nature of your interaction with us):

name, age, NRIC, religion, telephone number(s), mailing address, email address and any other information relating to you which you have provided us in any form you may have submitted to us, or in other forms of interaction with you.

### 2. **Collection of Personal Data**

2.1 Generally, we collect your Personal Data in the following ways:

- (a) when you submit a visitor's form when visiting our premises;
- (b) when you submit an application for your child/ward to be enrolled with BDWK;
- (c) when you interact with our staff, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings, and emails;
- (d) when you request or agree that we contact you or request or agree that you be included in a messaging application list (including WhatsApp), email list or other mailing lists; and/or

- (e) when your images are captured by us via CCTV cameras while you are within our property and/or premises, or via photographs or videos taken by us or our representatives when you attend our events.

2.2 If you provide us with any Personal Data relating to a third party (e.g. information of your guests, dependent, spouse, children and/or parents), by submitting such information to us, you represent and warrant that the collection, use and disclosure of that Personal Data to us, as well as the further processing of that Personal Data by us for the purposes set out below, is lawful, and you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.

### 3. **Purposes for the Collection, Use and Disclosure of Personal Data**

3.1 In general, we collect, use and disclose your Personal Data for the following purposes:

- (a) for facilities management purposes (including but not limited to issuing visitor access to keep you informed of the BDWK and Bethesda Hall Depot Walk's activities, including seminars, training programmes, courses, baptism, retreats, church camps, concerts, and other programmes that we organise from time to time for your prayerful participation;
- (b) to celebrate important milestones (e.g. birthdays and anniversaries);
- (c) for authentication and verification purposes;
- (d) to communicate with you and respond to your queries, requests and complaints via messaging applications (including WhatsApp), email or mail;
- (e) maintenance of records such as membership, participants of activities and programmes;
- (f) processing applications and enrolment with BDWK, including the processing of student waitlist, health, life, insurance and other student records;
- (g) for extra-curricular activity registration;
- (h) responding to requests from child care regulators, medical providers, payment processors and financial institutions;
- (i) supporting BDWK's activities including the teaching and personal and professional development of students and administration of the kindergarten's activities;
- (j) processing, administering and conferring awards of prizes and student or graduation status, and publication or releasing of information of the same;
- (k) to keep you informed of BDWK and Bethesda Hall Depot Walk's ("**BHDW**") activities;
- (l) to process and facilitate payment of invoices and bills;
- (m) to handle disputes and conduct and facilitate investigations and proceedings;
- (n) to protect and enforce our contractual and legal rights and obligations;
- (o) to manage the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- (p) to respond to emergencies;

- (q) to manage our infrastructure operations, administrative operations and to comply with internal policies and procedures;
- (r) to comply with any contractual terms and conditions to which BDWK is bound by;
- (s) to commence, respond to, or act in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution);
- (t) to match any Personal Data held which relates to you for any of the purposes listed herein;
- (u) to communicate with you changes and development to our policies, terms and conditions and other administrative information; and/or
- (v) to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities.

3.2 Furthermore, where permitted under the Data Protection Laws, or with your specific consent, BDWK may also collect, use and disclose your Personal Data by taking or filming photographs and videos and featuring such photographs and/or videos in our articles, websites and/or other publicity materials.

3.3 In relation to your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

3.4 You may withdraw your consent for by contacting us using the contact details set out at paragraph 6 below.

#### 4. **Disclosure of Personal Data**

4.1 Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:

- (a) amongst BDWK, BHDW and their related affiliates (including their respective staff);
- (b) companies providing services relating to insurance or other service providers of BDWK and BHDW;
- (c) agents, contractors, sub-contractors or third party service providers who provide operational services to BDWK and BHDW, such as courier services, telecommunications, information technology, payment, printing, billing, debt recovery, processing, technical services, transportation, training, market research, call centre, security, or other services to BDWK and BHDW;
- (d) external banks, credit card companies, other financial institutions and their respective service providers;
- (e) BDWK and BHDW's professional advisers such as consultants, auditors and lawyers;
- (f) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and/or
- (g) any other party to whom you authorise us to disclose your Personal Data to.

5. **Keeping Your Personal Data Accurate and Up-To-Date**

We encourage you to contact us as soon as possible to enable us to update any Personal Data we have about you. Incomplete or outdated Personal Data may result in our inability or delays in processing any requests and applications you may have made to us.

6. **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data**

6.1 If you:

- (a) have any questions or feedback relating to your Personal Data or about this Privacy Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Privacy Policy; or
- (c) would like to obtain access and make correction to your Personal Data records,

please contact us as follows:

| <b>Method</b> | <b>Contact Particulars</b>        |
|---------------|-----------------------------------|
| By mail       | : 10 Depot Walk, Singapore 109590 |
| By email      | : bdwkdpo@gmail.com               |
|               | Data Protection Officer           |

6.2 Please note that if your Personal Data has been provided to us by a third party (e.g. your employer), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to BDWK on your behalf.

6.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, BDWK may not be in a position to continue to have practical fellowship with you, such as including you in our activities and/or events, or praying for you. BDWK's legal rights and remedies in such event are expressly reserved.

7. **Protection of Personal Data**

We strive to protect the security of your Personal Data in accordance with Data Protection Laws from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

8. **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 Data Protection Laws.

9. **Governing Law**

This Privacy Policy shall be governed in all respects by the laws of Singapore.

PRIVACY POLICY LAST UPDATED: 31 December 2019