

## Genashtim Innovative Learning PTE LTD

### Privacy Policy

This privacy policy has been compiled to better serve those who are concerned with how their personal information is being used online. Personal information is information, whether true or not, about an individual who can be identified either from that information or from that information and other information to which the organization has or is likely to have access. It does not include information where your identity has been removed, which is known as anonymous data. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your personal information.

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### What personal information do we collect from the people that visit our blog, website or app?

When ordering or registering on our site, we may collect, use, store and transfer personal data about you. We have grouped these together as follows:

- **Identity Information** includes name, maiden name, username or similar identifier, country of residence, job title, company information and place of residence;
- **Contact Information** includes your physical address, email address and telephone number;
- **Profile Information** includes username and password, your interests, preferences, feedback and survey responses;
- **Technical Information** includes internet protocol (IP) address, your login data, your location, browser type and version, time zone setting and location, browser plug-in

types and versions, operating system, platform and traffic data relating to services provided by us and used by you;

- **Usage Information** includes information about how you use our websites, platforms and services. It might also include a note or recording of support calls you make to us, live chats or similar interactions; and
- **Marketing and Communications Information** includes your preferences in receiving marketing materials from us and our third parties and your communications preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), nor do we collect any information about criminal convictions and offences.

### How do we collect information?

We collect personal data as follows:

- **Direct Interactions.** You may give us your Identity and Contact Information by filling out a form or enter information on our website, for example when you register, subscribe or sign up to our promotions. This includes personal data you provide when you do any of the following:
  - create an account on our website;
  - use our website;
  - subscribe to our newsletters or alerts;
  - request marketing materials to be sent to you;
  - enter a prize, competition, promotion or survey, or participate in an event or other marketing campaign organized by us; or
  - contact us – for example, if you get in touch to give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Information about your equipment, browsing actions, patterns and other interactions.

We may also receive personal data about you from various third parties and public sources as follows:

- LinkedIn
- Facebook
- Instagram

## **How do we use your information?**

We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- to administer, operate, maintain and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- to personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested;
- to improve our website in order to better serve you; and
- for promotional purposes including sending you newsletters, marketing materials and special offers.

The legal basis for the processing of your personal information is that it is necessary for the performance of a contract with you, where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests, where we need to comply with a legal or regulatory obligation or where we obtain your consent to the processing of your personal information.

## **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purposes. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [singapore@genashtim.com](mailto:singapore@genashtim.com). If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## **How do we protect your information?**

- We do not use vulnerability scanning and/or scanning to PCI standards.
- An external PCI compliant payment gateway handles all CC transactions.
- We use regular Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

### **How long is your information retained?**

We will only hold your information for as long as is necessary for the purposes described in this Privacy Policy or in our terms and conditions, or for legal or business purposes. However, please be advised that we may retain some of your information after you cease to use our services, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

When determining the relevant retention periods, we will take into account factors including:

- (a) our contractual obligations and rights in relation to the information involved;
- (b) legal obligation(s) under applicable law to retain data for a certain period of time;
- (c) our legitimate interest where we have carried out a balancing test;
- (d) statute of limitations under applicable law(s);
- (e) potential or actual disputes;
- (f) if you have made a request to have your information deleted; and
- (g) guidelines issued by the relevant data protection authorities.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **Do we use 'cookies'?**

We do not use cookies for tracking purposes.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your site experience more efficient may not function properly that make your site experience more efficient and may not function properly.

### **Do we make automated decisions?**

We do not envisage that any decisions will be made about you using automated means. However, we will notify you if this position changes.

### **Third-party disclosure**

We do not sell, trade, or otherwise transfer to outside parties your personal information.

### **Third-party links**

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **Google**

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users.

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We have not enabled Google AdSense on our site but we may do so in the future.

If at any time you would like to unsubscribe from receiving future emails, you can email us at [singapore@genashtim.com](mailto:singapore@genashtim.com) and we will promptly remove you from ALL correspondence.

### **Transfer of personal information overseas (e.g. from within the EEA to outside the EEA)?**

When our partners who help us in the administration or operation of our organization are based in other locations, your information may be transferred outside of your country. When your personal data is transferred from within the EEA to outside the EEA, we will always ensure that there is a proper legal agreement or other legal basis that covers the data transfer. When we send your information from a country (not in the EEA) to outside of that country, we will make sure that your information is protected to at least the same standard as that which is required in the originating country, and will work with any such third parties to make sure that they have reasonable security arrangements in place. We may also transfer your information outside of your country in relation to business opportunities but we would only do this with your consent.

## Changes to this Privacy Policy

We may change this Privacy Policy from time to time, to reflect changes at Genashtim, or for legal or regulatory reasons. Unless we are unable to do so, we will give you reasonable notice of any changes to this Privacy Policy, which may be by notifying you via email and/or by posting an updated version on our website.

## Contacting Us

If you would like a copy of some or all of the information we hold about you, please contact us at [singapore@genashtim.com](mailto:singapore@genashtim.com).

We want to make sure that your information is accurate and up-to-date. You may ask us to correct or remove information you think is inaccurate by contacting us at [singapore@genashtim.com](mailto:singapore@genashtim.com).

If there are any other questions regarding this privacy policy, you may contact us using the information below.

### **Genashtim Innovative Learning Pte Ltd**

1 Coleman Street #10-10 The Adelphi

Singapore, 179803

Email: [singapore@genashtim.com](mailto:singapore@genashtim.com)

## Your Legal Rights

You have various rights in relation to your personal information, including your right to:

- (a) request access to your personal information about you and to request the correction of any error in relation to your personal information or to object to the processing of your personal information;
- (b) obtain information about the use of your personal information, including: (i) the purposes for which your personal information is being used; (ii) the categories of your personal information being used; (iii) to whom your personal data has been or will be disclosed; (iv) where possible, the period for which your information will be obtained; (v) your right to require rectification or erasure of your personal information or restrict or object to its use; (vi) your right to lodge a complaint with the applicable supervisory authority; and (vii) whether your information is subject to any automated decision-making, including profiling;
- (c) have your personal information erased in certain situations, including where: (i) your personal information is no longer needed to be processed for the purposes for which it

- was collected; (ii) your personal information has been processed unlawfully; and (iii) erasure is required by applicable law;
- (d) restrict the processing of your personal information in certain situations, including where: (i) you are contesting the accuracy of your personal data, (ii) your data is being processed unlawfully you do not want your information erased; (iii) your personal information is no longer needed for the purposes for which you provided it but you require that information to help establish, exercise or defend legal claims;
  - (e) receive your personal information in a structured, commonly used and machine-readable format and transmit that information to a third party;
  - (f) lodge a complaint about the way your personal information is being handled or processed with the relevant data protection regulator; and/or
  - (g) if relevant, to withdraw consent. If you do not provide your personal information, or withdraw your consent for the processing of your personal information, where such information is necessary for us to provide services to you, we will not be able to provide these services to you.

If you wish to exercise any of the rights set out above, please contact the DPO at [singapore@genashtim.com](mailto:singapore@genashtim.com). You will not have to pay a fee to access your personal information (or to exercise any of the above rights). However, a reasonable fee may be charged if your request is clearly unfounded, repetitive or excessive. Alternatively, we may be entitled to refuse to act on the request.