



PRIVACY POLICY AND DATA PROTECTION NOTICE

Last updated: [INSERT DATE]

This Privacy Policy and Data Protection Notice ("Privacy Policy") explains how Shapeys Education Pte Ltd. ("Shapeys", "we", "us" or "our") collects, uses, discloses, stores and protects personal data when you visit or interact with the Shapeys website ("Website").

We are committed to protecting personal data in accordance with the **Personal Data Protection Act 2012 of Singapore ("PDPA")** and other applicable laws.

By using the Website or voluntarily providing personal data to us, you acknowledge that you have read this Privacy Policy and understand how your personal data may be handled as described below.

1. Who We Are

The organisation responsible for the collection and processing of personal data through this Website is:

Legal entity: Shapeys Education Pte Ltd

Business address: 10 Anson Road, International Plaza, 18-11, Singapore, 079903

Website: www.shapeys.com

Data Protection Officer / Data Protection Contact: Adrian Alexander

Email: info@shapeys.com

If you have any questions about how we handle personal data, or wish to exercise your rights under the PDPA, please contact us using the details above.

2. What Personal Data We May Collect



Depending on how you interact with the Website, we may collect personal data such as:

- your name;
- organisation, school or company name;
- job title or professional role;
- email address;
- telephone number;
- postal or business address;
- information you provide when making an enquiry;
- information you provide when requesting publisher, licensing or educational materials;
- information you provide when requesting access to teaching resources;
- information contained in communications you send to us;
- information relating to your preferences or areas of interest where you voluntarily provide it; and
- technical information associated with your use of the Website, where collected by Wix or other services used by the Website, such as IP address, browser type, device information and website usage information.

We will only collect personal data that is reasonably necessary for the purposes described in this Privacy Policy or for other purposes notified to you at or before the time of collection.

3. How We Collect Personal Data

We may collect personal data when you:

- contact us through the Website;
- submit an enquiry or contact form;
- request information about Shapeys;
- request publisher or licensing information;
- request access to educational or teaching resources;
- download or request materials where personal information is required;
- subscribe to communications, where such a facility is provided;
- communicate with us by email or other means; or
- otherwise voluntarily provide information to us.

We may also receive limited technical information automatically when you use the Website, depending on the settings and services provided by Wix and any third-party services integrated into the Website.

4. Purposes for Which We Collect, Use and Disclose Personal Data



We may collect, use and disclose personal data for purposes that are reasonably appropriate in the circumstances, including:

Website and enquiries

- responding to enquiries;
- providing information requested by you;
- communicating with you about the Shapeys programme;
- providing requested publications, information packs or educational materials;
- administering access to restricted resources; and
- managing and maintaining the Website.

Publishing, licensing and commercial enquiries

Where you contact us in relation to publishing, distribution, licensing, rights or other business opportunities, we may use your personal data to:

- respond to your enquiry;
- evaluate and discuss potential opportunities;
- communicate with you regarding the relevant opportunity;
- provide requested information or materials; and
- maintain appropriate business records.

Website administration and security

We may use information to:

- maintain the security and integrity of the Website;
- detect and prevent misuse, fraud or security incidents;
- troubleshoot technical problems;
- maintain appropriate records; and
- improve the performance and functionality of the Website.

Legal and regulatory purposes

We may collect, use or disclose personal data where reasonably necessary to:

- comply with applicable laws and regulations;
- respond to lawful requests from public authorities;
- establish, exercise or defend legal rights; or
- investigate or respond to suspected unlawful activity or security incidents.

We will not use personal data for purposes that are incompatible with the purposes for which it was collected unless permitted or required by applicable law.

5. Consent



Where required under the PDPA, we will obtain your consent before collecting, using or disclosing your personal data for the relevant purpose.

By voluntarily providing personal data to us for a stated purpose, you may be providing consent for us to collect, use or disclose that information for that purpose, subject to the PDPA and applicable exceptions.

Where we rely on consent, you may withdraw your consent by contacting us using the details in Section 1.

If you withdraw consent, we will cease collecting, using or disclosing your personal data for the relevant purpose unless otherwise permitted or required by law.

Please note that withdrawing consent may affect our ability to provide certain services, information or resources where the relevant personal data is necessary for that purpose.

6. Marketing Communications

We may, where permitted by applicable law and where appropriate consent has been obtained, use your contact information to send information about Shapeys, including information about the programme, educational resources, publishing opportunities, licensing opportunities or other relevant developments.

You may opt out of receiving marketing communications at any time by:

- using the unsubscribe facility provided in the communication; or
- contacting us using the details in Section 1.

Where applicable, we will also comply with Singapore's **Do Not Call** requirements for relevant marketing communications.

We will not require you to consent to unrelated marketing communications as a condition of providing a service or resource.

7. Disclosure of Personal Data

We do not sell personal data.

We may disclose personal data where reasonably necessary for the purposes described in this Privacy Policy.

This may include disclosure to:



- service providers who assist us in operating the Website;
- Website hosting and technology providers;
- providers of email, communication, storage or document-delivery services;
- professional advisers, such as lawyers, accountants or other professional consultants;
- auditors or other service providers where reasonably necessary;
- government agencies, regulators or law-enforcement authorities where required or permitted by law; and
- other parties where you have provided consent or disclosure is otherwise permitted or required under applicable law.

Where third parties process personal data on our behalf, we will take reasonable steps to ensure that appropriate contractual or other safeguards are in place where required.

8. Wix and Other Third-Party Services

The Website is operated using **Wix** and may use other third-party technology or service providers.

These providers may process certain information on our behalf or automatically collect technical information when you use the Website.

Such information may include information relating to your device, browser, IP address, website interactions and other technical or usage information, depending on the services enabled on the Website.

We will configure and use third-party services in a manner consistent with our data-protection obligations.

You should also refer to the relevant third-party provider's privacy information where appropriate.

9. Cookies and Similar Technologies

The Website may use cookies and similar technologies to provide essential website functionality, improve website performance, understand how visitors use the Website and, where applicable, support other website features.



Cookies may be placed by Wix or by third-party services integrated into the Website.

Where required, we will obtain the appropriate consent before placing or using non-essential cookies or similar technologies.

You may be able to control or disable cookies through your browser settings. Disabling certain cookies may affect the functionality of the Website.

10. International Transfers

Some service providers used by the Website may process or store personal data outside Singapore.

Where personal data is transferred outside Singapore, we will take steps required under the PDPA to ensure that the recipient provides a standard of protection for the personal data that is comparable to the protection required under the PDPA, unless an applicable exception applies.

This may include the use of appropriate contractual, organisational or other safeguards.

11. Protection of Personal Data

We take reasonable security arrangements to protect personal data in our possession or under our control against:

- unauthorised access;
- collection;
- use;
- disclosure;
- copying;
- modification;
- disposal; and
- similar risks.

Security measures may include appropriate technical, administrative and organisational safeguards.



However, no method of transmission or electronic storage can be guaranteed to be completely secure.

12. Retention of Personal Data

We will retain personal data only for as long as it is reasonably necessary to fulfil the purposes for which it was collected or for other legal or business purposes.

When personal data is no longer required, we will take reasonable steps to delete, destroy or anonymise it, unless retention is required or permitted by applicable law.

The appropriate retention period may depend on the nature of the information and the purpose for which it was collected.

13. Accuracy of Personal Data

We take reasonable steps to ensure that personal data collected by us is accurate and complete, particularly where the information is likely to be used to make a decision affecting you or disclosed to another organisation.

You should inform us if any personal data you have provided to us changes or is inaccurate.

14. Access to Personal Data

Subject to the exceptions provided under the PDPA, you may request access to personal data about you that is in our possession or under our control.

You may also request information about how your personal data has been used or disclosed within the period permitted under the PDPA.

Requests should be made in writing to the contact details in Section 1.

We may need to verify your identity before processing an access request.

We will respond to access requests in accordance with the requirements of the PDPA.



Where permitted by law, a reasonable fee may be charged for an access request where applicable costs are incurred in processing the request.

15. Correction of Personal Data

If you believe that personal data held by us is inaccurate or incomplete, you may request that it be corrected.

We will consider and process correction requests in accordance with the PDPA.

We may need to verify your identity before processing a correction request.

Where required under the PDPA, we will communicate relevant corrections to organisations to which the personal data was previously disclosed.

16. Withdrawal of Consent

Where we rely on your consent to collect, use or disclose personal data, you may withdraw your consent by contacting us.

We will explain any reasonably foreseeable consequences of withdrawing consent where applicable.

Following withdrawal, we will cease the relevant collection, use or disclosure unless continued handling is permitted or required by applicable law.

17. Data Breaches

We maintain processes for managing personal-data security incidents.

If we become aware of a data breach, we will assess the breach in accordance with the PDPA.

Where the breach is determined to be notifiable under the PDPA, we will notify the Personal Data Protection Commission and affected individuals as required by law.



18. Children's Personal Data

The Shapeys programme is an educational programme intended for children, parents, teachers and educational organisations.

The Website is primarily intended to provide information to adults, educators, publishers, licensing partners and other interested parties.

We do not knowingly seek to collect personal data directly from children through the Website.

Where personal data relating to a child is provided to us, we expect that it will be provided by a parent, guardian, teacher, school or other authorised adult.

If you believe that a child has provided personal data to us without appropriate authorisation, please contact us so that we can review the matter and take appropriate action.

19. Links to Other Websites

The Website may contain links to websites operated by third parties.

This Privacy Policy does not apply to those external websites.

We are not responsible for the privacy practices, security or content of third-party websites.

We encourage you to review the privacy policies of any external websites that you visit.

20. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our business, Website, technology, legal requirements or data-protection practices.

The updated Privacy Policy will be published on this page with a revised "Last updated" date.

Where required by applicable law, we will provide appropriate notification of material changes.

21. Contact Us



If you have any questions about this Privacy Policy, wish to make an access or correction request, or have concerns about how your personal data has been handled, please contact our Data Protection Officer or designated data-protection contact:

Shapeys Education Pte Ltd

Data Protection Contact: Adrian Alexander

Email: info@shapeys.com

Postal address: 10 Anson Road, International Plaza, 18-11, 079903 Singapore

We will endeavour to respond to your enquiry or request within a reasonable period and in accordance with the requirements of the PDPA.

22. Governing Law

This Privacy Policy is governed by the laws of Singapore.

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