

PRIVACY POLICY

1. Introduction

- 1.1. SISV Services Pte. Ltd. ("**SISVSPL**", "**we**" or "**us**") takes the privacy of your information very seriously. This policy explains how and for what purposes we use the information collected about you via the website (referred to below as the "**Site**"). Please read this privacy policy carefully. By using the Site and any services we offer via the Site, you are agreeing to be bound by this policy in respect of the information collected about you via this Site.
- 1.2. If you have any queries about the policy, please get in touch with us via hello@elearninghub.sg and we will do our best to answer your questions.

2. Personal information collected

- 2.1. Personal information refers to information that identifies you personally. Examples of personal information include your name, your correspondence address, and contact number. Personal information may also include information that may be linked to you. For example, information that we associate with your account on the Site, such as your IP address, may be personal information.
- 2.2. We will collect the following personal information from you:
 - 2.2.1. *When you register for an account on the Site:* Name, email address, contact number, gender, nationality, and work profession.
 - 2.2.2. *When you set up a profile on the Site:* profile picture.
- 2.3. We will also collect information about how you access the Site. Examples of information that we may collect include:
 - 2.3.1. information about the device(s) that you use to access the Site;
 - 2.3.2. the device settings, browser and operating system;
 - 2.3.3. your location and time zone;
 - 2.3.4. your language preferences;
 - 2.3.5. wireless or mobile network information including information on the service provider and network signal strength;
 - 2.3.6. information on the version of the Site that you are using.

- 2.4. We may also collect information on unique identifiers, which are strings of numbers or alphabets and numbers that are unique to particular entities or sources, such as a device or a browser.
- 2.5. Although it is not compulsory to give us this information, if you do not then we may not be able to provide you with the full range of services the Site has to offer.
- 2.6. Information about you may be collected when you submit them to us and/or when you access or use the Site. Information about you may also be collected when you contact others through the Site. We may also collect information about you from our carefully selected partners, such as security partners who provide us with information regarding potential breaches or abuses of your account.

3. Other information collected

- 3.1. Course organizers may require collection of additional information such as for grant application and certification issuance purposes. Examples of such information are: National Identification Number, Date of Birth, Citizenship, Educational Qualifications.

4. Use of this information

- 4.1. We will use this information in order to:
 - 4.1.1. Administer your accounts with us. For example, information we receive will be remembered so that you do not have to re-enter such information each time you use the Site;
 - 4.1.2. Provide you with the functionalities of the Site, such as sending reminder on course expiry and/or availability of course certificate for retrieval;
 - 4.1.3. Communicate with you in any matter relating to the conduct of your account, such as to alert you to suspicious account activity and to inform you of our terms, policies and guidelines;
 - 4.1.4. Analyze problems with the use or access of the Site;
 - 4.1.5. Send you information about new online courses;
 - 4.1.6. Verify your identity;
 - 4.1.7. Carry out marketing analysis so that our partners can assess the scope and effectiveness of their advertisements (where applicable). For more information about how we share such information, please see section 6 below;

- 4.1.8. Make general improvements to our Site;
 - 4.1.9. Provide updates to the Site;
 - 4.1.10. Obtain your views or comments on the services we provide;
 - 4.1.11. Send you information we think you might find useful or which you have requested from us, including information about our products and services provided you have indicated that you are happy to be contacted for these purposes;
 - 4.1.12. Prevent, detect and respond to threats to the safety and/or reliability of our services, including spams, security risks and frauds.
- 4.2. We may also use aggregate information and statistics for the purposes of monitoring Site usage in order to help us to develop our Site and our services. We may also provide such aggregate information to third parties (please refer to section 6.4. below for further elaboration on when we may provide aggregate information to third parties). Such aggregate information and statistics will not contain information that can be used to identify you.
- 4.3. You can ask us not to contact you with information regarding our products and services either at the point such information is collected on the Site or, if you do not wish us to continue to use your information in this way, by following the unsubscribe instructions on any communications sent to you. You can also exercise this right at any time by contacting us using the contact details at the end of this privacy policy.

5. Sharing of this information by Us

- 5.1. Certain services available on this Site are offered in conjunction with our business partners.
- 5.2. Information on the services that we offer in conjunction with our business partners are accessible on each respective course info page.
- 5.3. In order for those services to be provided we provide some necessary details about you to such business partners. We tell you about this at the point we collect that information on the Site. Please note that certain services may be unavailable if you do not want to disclose the personal information you are asked for.

- 5.4. With respect to sensitive personal information, which includes information on your race or ethnicity, gender or health, we will ask for your explicit consent before sharing any such sensitive personal information.
- 5.5. We may disclose aggregate statistics about visitors to and users of the Site in order to describe and/or provide our services to partners and prospective partners and advertisers, but these statistics will contain no personally identifiable information.
- 5.5.1. *Partners* – our business partners may receive aggregate statistics to assist them in understanding how others use the Site. For example, they may receive information on the number of users who accessed a particular page on the Site.
- 5.5.2. *Advertisers* – advertisers may receive aggregate statistics to assist them in understanding the effectiveness and reach of their advertisements. Information that may be provided includes general demographic information such as location. Information that would personally identify you, such as your name and contact details, will not be provided.
- 5.6. We may also provide personal information about visitors to and users of the Site to reputable third parties for external processing of such information. For example, service providers may be provided with information about you so that we may deliver services such as providing statistics reports and providing customer support. Such third parties will process information in accordance with our instructions and in compliance with this Privacy Policy and all other confidentiality and security measures that are appropriate.
- 5.7. We may also share your information, including personal information, with law and enforcement agencies and/or others in the following circumstances:
- 5.7.1. Law and enforcement agencies that make legal requests for information about you, whether through warrants, court orders or subpoenas, may be provided with such information (which may include personal information) if we believe in good faith that we are required to do so by the law. If the request is made by law and enforcement agencies from countries other than Singapore, we will provide such information if we believe in good faith that we are required to do so by the laws of that country.

- 5.7.2. When we believe in good faith that such disclosure is necessary for the purposes of preventing, detecting and/or responding to fraud, violations of our terms or policies, or any other unlawful or illegal activity.
- 5.7.3. When we believe in good faith that such disclosure is necessary for our protection (such as to protect our intellectual property rights), or the protection of others (including you). For example, we may disclose information as part of investigations.
- 5.8. We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganization, but we will take steps with the aim of ensuring that your privacy rights continue to be protected.
- 5.9. In addition, we may pass your information onto one of our carefully selected business partners or to other carefully selected third parties to enable them to send you information which may be of interest to you but only if you have given us permission to do so. You can tell us to stop this at any time by sending an email to hello@elearninghub.sg.
- 5.10. Other than as set out above, we will not disclose any of your personal information without your permission.

6. Information automatically collected from your computer or device

- 6.1. *Log files:* When you visit the Site our web server automatically records your activities. We log the activities to administer clock-in hours to facilitate grant claims required by course organizers.
- 6.2. We may also gather other information (from which we cannot identify you) such as the type of your internet browser which we use to provide you with a more effective service.

7. Cookies and similar technology

- 7.1. When you visit the Site we may store some information (commonly known as a "cookie") on your computer or device. Cookies are small files of information which use a unique identification tag and are stored on your device as a result of using the Site or other services we provide to you. A number of cookies we use last only for the duration

of your session and expire when you close the Site or your browser. Other cookies are used to remember you when you return to the Site and will last for longer. A cookie helps you get the best out of the Site and helps us to provide you with a more customised service. We use cookies for the following reasons:

7.1.1. Necessary session management

7.1.1.1. Managing your login session. This means, for example, that you can move easily from one page to another within the Site and your page requests are loaded in a smooth and secure manner without having to re-enter your details on each page;

7.2. Many browsers will automatically accept cookies but you can amend your browser settings to prevent that or to notify you each time a cookie is set. More information about cookies and how to block cookies across different types of browser is also available at www.allaboutcookies.org. You should note however that certain parts of the Site are reliant on the use of cookies to operate correctly and may not work correctly if you set your browser not to accept cookies.

7.3. Description of cookies

(A) Our Cookies

A description of the cookies and the general purpose we use these for are provided below:

Cookie name	Purpose of cookie	More information
randomized	session token	Authentication token

8. Information about other products and services

8.1. From time to time we may send you information about our services, as well as special features of our Site, that we think may be of interest to you.

8.2. You can tell us to stop this at any time by sending an email to hello@elearninghub.sg.

8.3. Also, as mentioned above, we may pass your information onto one of our business partners or to other selected third parties to enable them to send you information which may be of interest to you but only if you have given us permission to do so. You can tell us to stop this at any time by sending an email to hello@elearninghub.sg

9. Privacy controls

We provide you with controls over the information that we collect and how they are used.

9.1. Access to your information and changes to your details

- 9.1.1. You can always access, review, change and/or update the information that you have shared by logging in to your account on the Site.
- 9.1.2. If you would like to review or change the details of personal information you have supplied us with such as your name and contact number, you may do so at any time by using the ["My Profile"] feature on the Site.

10. Removing or deleting your information

- 10.1. If you choose to delete your account on the Site, we will delete the content which you have made available on or through the Site, such as your personal information that you have shared on the Site. Once such information is deleted, you will not be able to recover them later.
- 10.2. We will remove content that is deleted by you from our active and backup systems. However, in order to account for accidental deletions or deletions that are not intended by you, there might be delays between the time that you delete something, and the time that copies of the thing are removed from our systems. Additionally, there may also be cases where we need to retain data for a limited period of time for legal or legitimate commercial purposes. For more information about how long we take to delete your information, as well as how long data may be retained by us, please email us at hello@elearninghub.sg.
- 10.3. Information about you that is shared by others do not form part of your account, and cannot be deleted by you. If you wish to remove such content from the Site, you may email us at hello@elearninghub.sg, and we will take appropriate action in accordance with the applicable laws.

11. Security

- 11.1. We have implemented technologies and policies to safeguard your privacy from unauthorized access and improper use. We will also use all reasonable efforts to safeguard your information, including the following:

- 11.1.1. [We use secure server software (SSL) to encrypt any financial information you need to input before it is sent to us;]
- 11.1.2. We encrypt your data to keep them private during transmissions;
- 11.1.3. We employ a range of security measures to protect your account and account information. For example, we will ask you for your password, and a one-time password that will be sent to your email address whenever you login to your account;
- 11.1.4. We ensure that only those of our employees, contractors and/or process such information will have access to your information. We impose strict contractual confidentiality obligations on these persons who have access to your personal information, and will take appropriate action against persons who fail to meet such obligations.

12. Linking to third party websites

- 12.1. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our Site and recommend that you check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.
- 12.2. In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third-party site and contact its owner or operator if you have any concerns or questions.

13. Transferring your information

- 13.1. As part of the services offered to you through the Site, the information you provide to us may be transferred to countries outside of your country. By way of example, this may happen if any of our servers are located in a country outside of your country or one of our service providers is located in a country outside of your country. The data protection laws of each country are different, with some countries imposing higher standards of protection than others. Regardless of where your data is processed, however, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy policy.

13.2. If you are dissatisfied with the way that we process your data, you can contact us at our address below. Once a formal written complaint is received by us, we will contact you directly to resolve the matter. If we are unable to resolve the matter with you directly, we will work with the relevant regulatory authorities, including any local data protection authorities, to resolve your complaint.

14. Changes to privacy policy

14.1. We keep our privacy policy under regular review. If we change our privacy policy we will post the changes on this page, and place notices on the Site, so that you may be aware of the information we collect and how we use it at all times. If the changes are significant, we will provide more prominent notices, including notices by way of email.

15. Contact us

15.1. If at any time you would like to contact us with your views about our privacy policies, or with any enquiry relating to your personal information, you can do so by:

15.1.1. sending an email to us at hello@elearninghub.sg; or

15.1.2. writing to us at SISV Services Pte Ltd, 110 Middle Road, #09-00 Chiat Hong Building, Singapore 188968.