

PRIVACY POLICY FOR T.H.E Dance Company Ltd

Your privacy is important to us. The purpose of this Privacy Policy is to inform you of how T.H.E Dance Company. Ltd. (referred to as "T.H.E", "us", "we" or "our") manages personal data in accordance with the Personal Data Protection Act 2012 ("the Act") and the associated regulations and guidelines as may from time to time be issued by the Personal Data Protection Commission of Singapore.

This Privacy Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to help you to make an informed decision before providing us with your personal data.

1. Consent

By interacting with us and/or our web channels which include our email channels and social media platforms (collectively, "our web channels"), you agree and consent to us - as well as our respective representatives - collecting, using, disclosing and sharing your personal data with our partners and other relevant third parties (who may be based outside Singapore), in the manner set forth in this Privacy Policy.

2. Personal Data We Collect

- a. "Personal Data" means data, whether true or not, about an individual who can be identified (i) from that data or (ii) from that data and other information to which we have or are likely to have access.
- b. We collect certain types of Personal Data, including your name, gender, date of birth, identification number, citizenship and employment status, contact information (e.g. address, phone number, email address), school (where applicable), health information, education and professional qualifications, dance experience and expertise, payment information (e.g. credit or debit card information), photographs and video footages taken at auditions, activities and events organised by us and/or our partners and any other information which you may provide in any forms submitted to us or via other forms of interaction with you.
- c. Personal Data is collected in various circumstances, including the following:
 - When you register and/or audition for competitions or concerts organised by us and/or our partners;
 - When you register for and/or participate in classes, workshops, projects or programmes organised by us and/or our partners;
 - When you register for and/or participate in events or conventions organised by us and/or our partners;
 - When you participate in productions (including video productions) made by us and/or our partners;
 - When you take part in contests or surveys conducted by us;
 - When you interact with us via our web channels owned and/or operated by us;
 - When we receive references from partners and third parties (e.g. where you have been referred by them);
 - When you submit an application to us for employment; and
 - When you submit your Personal Data to us for any other reason.
- d. We may also obtain personal data about you from other sources and combine it with information you provide to us. If you provide us with any Personal Data relating to a third party (e.g. information of parents or authorised representatives), by submitting such information to us, you represent to us that you have obtained the consent of the third party to you providing us with their Personal Data for the respective purposes.
- e. Starting from 1st Sep 2019, we will no longer collect, verify or retain NRIC details of customers in our registration procedures. This is in accordance with the rules introduced by PDPC which states that organisations are not allowed to collect, use, disclose or retain NRIC numbers (including Birth

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Certificate numbers, Foreign Identification Numbers, Work Permit number, passport numbers, and driver's license numbers) unless it is a public agency which is exempted from Data Protection Provisions or required under any law.

3. Purposes for collection, use, disclosure and/or processing of Personal Data

a. In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed.

b. Depending on your relationship with us, your Personal Data may be collected, used, disclosed and/or processed for various purposes, including the following:

- To carry out our objective of providing dance education and training;
- To carry out our objective of promoting dance through various avenues;
- To organise, evaluate your suitability for and ensure the smooth running of classes, workshops, programmes, competitions, concerts (including auditions), events, conventions and other marketing and publicity activities;
- To determine your eligibility for activities, events and competitions;
- To provide goods and services to you;
- For use in our marketing and publicity collateral;
- To verify and process your personal particulars and payments;
- To communicate with you and to respond to your queries, requests and/or complaints;
- To send to you information, updates as well as marketing and publicity materials in relation to our goods and services, activities or events and those of our partners or third party organisations;
- To send to you information about any administrative changes, updates and/or amendments to our policies, terms and conditions;
- For marketing research, user profile and statistical analysis and other development activities to improve our goods and services, activities and events for your benefit;
- To protect and enforce our contractual and legal rights and obligations;
- To comply with any applicable laws and regulations or to assist in law enforcement and/or investigations by any governmental authority, public agency, statutory board or similar authority;
- Human resource and recruitment purposes; and
- For any other purposes which we notify you of at the time of obtaining your consent.

If you are an employee or a potential employee:

- To process and evaluate your application;

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- To provide or obtain relevant references for background screening;
- To collect information about your suitability for the position applied for;
- To administer and manage your relationship as our employee;
- To support your learning through organising training and/or development programmes (including but not limited to trainings in the field of dance, dance instruction, choreography and/or management, outdoor activities and overseas trips);
- To apply and/or bid for projects;
- To provide you with tools to facilitate or as required for you to do your job;
- To assess your performance;
- To administer benefits and payroll processing;
- To communicate with you as required by us to comply with our policies and processes; and
- For any other purposes which we notify you of at the time of obtaining your consent.

(Collectively, the "**Purposes**")

4. Sharing of Personal Data

a. In order to facilitate our company operations and provision of goods and services, your Personal Data may be disclosed, for one or more of the Purposes listed above, to the following third parties (whether located in Singapore or abroad):

- Our partners including but not limited to instructors, choreographers, sponsors and other organisations such as schools and companies.
- Agents, contractors or third party service providers who provide operational services to us, such as information technology, training, administration of our web channels and distribution of communications to you about our goods and services or events;
- Anyone to whom we transfer or may transfer our rights and duties;
- Banks, credit card companies and their respective service providers;
- Our professional advisors such as our consultants, auditors and lawyers;
- Relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority; and
- Any other party to whom you authorise us to disclose your personal data.

b. In situations in which a partner or third party under a contract with us collects Personal Data about you, we will require the third party to exercise reasonable care in protecting your Personal Data so that it is in compliance with the Act.

5. Access to and Correction of Personal Data

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Subject to certain exceptions in the Act, you may request to access or correct your information. You may do so by submitting your request to us via email. Please refer to our contact details at paragraph 11 of this Privacy Policy.

6. Retention of Personal Data

We will retain your Personal Data collected for as long as it is necessary to fulfill the purpose for which it is collected, the objectives of T.H.E, and/or as may be required by applicable law. When destroying Personal Data, we will take commercially reasonable and technically feasible measures to make the data irrecoverable or irreproducible, as may be required by applicable law.

7. Accuracy of Personal Data

We will take reasonable efforts to ensure that your Personal Data is accurate and complete, if your Personal Data is likely to be used by us to make a decision that affects you, or disclosed to another organisation. However, this means that you should ensure that all Personal Data submitted to us is complete, accurate, true and correct. You must also update us of any changes in your Personal Data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your Personal Data that you had initially provided us with.

8. Security

We will take reasonable security measures to protect your Personal Data in our possession or under our control in order to prevent unauthorised access, collection, use, disclosure, copying, modification or disposal. However, we cannot assume responsibility for any unauthorised use of your Personal Data by third parties which are wholly attributable to factors beyond our control.

9. Opt-Out

- a. You may inform us via email if you do not wish to be contacted via voice call, text message, post and/or electronic mail regarding our goods and services, activities or events. Please refer to our contact details at paragraph 11 of this Privacy Policy.
- b. If you do not want your Personal Data to be shared with our partners, you may opt-out of such information sharing by contacting us via email. Please refer to our contact details at paragraph 11 of this Privacy Policy.
- c. Please note that if you withdraw your consent for a limited purpose, we may still contact you or use your information for other purposes for which you have not withdrawn your consent and such personal data may still be shared, as permitted under the Act and other applicable law.

10. Third Party Sites

Our web channels may contain links to other web channels operated by third parties such as our partners. We are not responsible for the privacy practices of web channels operated by third parties that are linked to our web channels. You are encouraged to learn about the privacy policies of such third party web channels. Some of these third party web channels may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our web channels, you should check the applicable terms, conditions and policies of the third party web channels to determine how they will handle any information they collect from you.

11. Contact Details

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If you, at any time, wish to:

- Enquire about this policy or about how we may manage, protect and/or process your Personal Data;
- Complain about the way we manage, protect and/or process your Personal Data;
- Access or correct your Personal Data in our control or possession; or
- Withdraw your consent for us to collect, use, disclose and/or process your personal data;

Please do not hesitate to contact our Data Protection Officer at info@the-dancecompany.com. Please attention your email to the 'Data Protection Officer' in the subject header. Such enquiry / complaint / request / withdrawal shall be deemed to have been made when received by us.

12. **No Waiver**

The failure on our part to enforce any part of this Privacy Policy shall not constitute a waiver of any of our rights hereunder for past or future actions.

13. **Governing Law**

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

14. **Changes to Policy**

As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time. We reserve the right to amend the terms of this Privacy Policy at our absolute discretion. We will notify you of changes to this Privacy Policy by posting the amended policy with the date it was revised on our web channels. You are encouraged to visit the web channels from time to time to ensure that you are well informed of our latest policy in relation to Personal Data protection.