



Data Protection Notice/Policy

This Data Protection Notice (“Notice”) sets out the basis upon which Academy of Human Development Pte Ltd (hereinafter, “**AHD**”, “**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act (“PDPA”). This Notice will provide you with an overview on how your personal data is collected, intended to be used, transferred to, stored and accessed. It also covers how we amend and protect your data provided to us.

Here at AHD, we take just as much pride in providing you with data protection. We will continuously update and review our adherence to changes in the PDPA as well as the steps taken to provide security and protection to your data.

APPLICATION OF THIS NOTICE

1. This Notice refers to the collection, use, disclosure or otherwise processing of personal data of our **trainers** and **trainees** will be in accordance with guidelines set out in the government’s data management policy. AHD will comply with the relevant requirements under the government’s data management policy.

PERSONAL DATA

2. As used in this Policy:

“trainers / trainees” means an individual who (a) has contacted us through any means to find out more about any training courses or services we provide, or (b) may, or has, entered into a contract with us for the supply of any courses or services by us; and

“personal data” means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

3. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include :
 - (a) Name or alias, gender, NRIC/FIN or passport number, date of birth, nationality, and country and city of birth

- (b) Mailing address, telephone numbers, email address and other contact details;
 - (c) Employment and training history, if required;
 - (d) Bank account details;
 - (e) Work-related health issues and disabilities;
 - (f) Photographs and other audio-visual information; and
 - (g) Any additional information provided to us by you as a trainer / trainee (that is, prior to being engaged as a trainer / trainee).
4. Other terms used in this Policy shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

5. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
6. We may collect and use your personal data for any or all of the following purposes:
- (a) performing obligations in the course of or in connection with our provision of the services requested by you;
 - (b) verifying your identity;
 - (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - (d) managing your relationship with us;
 - (e) processing payment or credit transactions;
 - (f) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - (g) any other purposes for which you have provided the information;
 - (h) transmitting to any unaffiliated third parties including our third-party service providers, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes;
 - (i) any other incidental business purposes related to or in connection with the above; and
 - (j) offerings of new services that may continue to provide benefit in relation to the services requested by you or recommended by us;

- (k) providing you with regular or ad-hoc updates, information required for your services update, upgrade, enhancement and their respective applications;
- (l) processing of insurance applications meant for the coverage and safety during the delivery of our respective services;
- (m) submission and application for funding and certification processes to professional bodies; and
- (n) website visitor traffic and informatics via cookies stored on our website <https://www.ahd.com.sg/>.

7. We may disclose your personal data:

- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the courses and services requested by you;
- (b) to third party service providers, and other organisations we have engaged to perform any of the functions with reference to the above-mentioned purposes;
- (c) to comply with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority.
- (d) any other party to whom you authorised us to disclose your personal data to, or where necessary to undertake any action requested by you.

8. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

9. To protect your privacy and complying with the Personal Data Protection Act (PDPA). This notice is to inform you about the consequences of not providing the personal data we have requested.

Consequences of Not Providing the Personal Data

If you choose not to provide the requested personal data:

- (a) We may be unable to process with our services either partially or fully.
- (b) Our ability to communicate with you regarding your [account/order/service] may be limited.
- (c) In some cases, we may have to terminate our agreement or contract with you.

Your Rights

You have the right to withdraw your consent for the collection, use, and disclosure of your personal data at any time. However, please note that doing so may result in the consequences mentioned above.

RELIANCE ON LEGITIMATE INTERESTS EXCEPTION

10. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for the legitimate interests of AHD or another person. In relying on the legitimate interests exception of the PDPA, AHD will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.
11. In line with the legitimate interests' exception, we will collect, use or disclose your personal data for the following purposes:
 - (a) Fraud detection and prevention;
 - (b) Detection and prevention of misuse of services;
 - (c) Network analysis to prevent fraud and financial crime, and perform credit analysis; and
 - (d) Collection and use of personal data on company-issued devices to prevent data loss.

The purposes listed in the above clause may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter.

WITHDRAWING YOUR CONSENT

12. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.
13. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within fourteen (14) business days of receiving it.
14. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our courses or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 8 above.

15. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

16. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
17. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
18. We will respond to your request as soon as reasonably possible. In general, our response will be within seven (7) business days. Should we not be able to respond to your request within fourteen (14) days after receiving your request, we will inform you in writing within fourteen (14) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).
19. Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organisation has on record, if the record of your personal data forms a negligible part of the document.

PROTECTION OF PERSONAL DATA

20. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), encryption of data, up-to-date antivirus protection, regular patching of operating system and other software, securely erase storage media in devices before disposal, web security measures against risks, usage of one time password(otp)/2 factor authentication (2fa)/multi-factor authentication (mfa) to secure access, security review and testing performed regularly, credential exposure checks, and device vulnerability assessments and security hardening.
21. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

22. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.
- (a) Requirement of reasonable effort
 - (i) Fei Yue will make reasonable efforts to ensure that personal data collected is accurate and complete, if such data is likely to be used to make a decision that affects the individual, or is likely to be disclosed to another organization.
 - (ii) Reasonable efforts refer to appropriate processes/controls considering the impact on individuals, practicalities, costs and the nature of the data.
 - (b) Ensuring accuracy when personal data is provided directly by the individual
 - (i) When individuals provide personal data directly to us, we will take reasonable steps to confirm the accuracy at the point of collection. This may include verification calls, documentation checks, etc.
 - (ii) Fei Yue will also provide opportunities for individuals to update their data if there changes through Fei Yue website.
 - (c) Ensuring accuracy when collecting personal data from a third-party source
 - (i) When collecting personal data about individuals from third party sources, reasonable steps will be taken to verify the accuracy of the data.
 - (ii) Consent will be obtained from individuals before collecting their personal data from other sources where appropriate.
 - (iii) The accuracy of data purchased from external sources will be formally assessed before use.
 - (d) Accuracy of derived personal data
 - (i) Reasonable verification processes will be implemented to ensure accuracy of any personal data derived or calculated from other data through analytical methods.
 - (ii) Automated verification checks will be performed for derived data where feasible. Accuracy of derived data will be formally assessed periodically.
 - (iii) Individuals have the right to challenge the accuracy of derived data related to them which will be investigated and corrected as appropriate on a case by case basis.

RETENTION OF PERSONAL DATA

23. 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 laws.
24. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.
25. Individual can contact the DPO to request for retention information. DPO contact details can be found in the Privacy Policy on Fei Yue's website <https://www.ahd.com.sg/> or in the following manner:

Name of DPO : Mr. Lee Jit Shin
Contact No. : +65 6460 0888
Email Address : dpo@fyys.org

TRANSFER OF PERSONAL DATA OUTSIDE OF SINGAPORE

26. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

WEBSITE

27. Our website, <https://www.ahd.com.sg/>, may contain links to other sites; These sites do not operate under the Policy set forth for our company and website. You are advised to review the policies displayed in those websites before use.
28. Our websites do contain cookies. These cookies improve the overall experience you have visiting our site and provide us with informatics on how we can better serve you and improve your user experience.
29. We retain the copyrights to the material including logo, photographs and content found on these sites. No part of these websites may be copied, performed in public, utilised and/or adapted without our written consent.

DATA PROTECTION OFFICER

30. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Name of DPO : Mr. Lee Jit Shin
Contact No. : +65 6460 0888
Email Address : dpo@fyys.org

EFFECT OF POLICY AND CHANGES TO NOTICE

- 31. This Policy applies in conjunction with any other Policies, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

- 32. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date : 07/03/2025
Last updated : 07/03/2025