

Privacy Policy

This Privacy Policy relates to personal information collected and the circumstances under which it may be used or disclosed by Owlinker.

Owlinker is committed to respect your privacy and we aim to maintain a high level of trust with all clients and prospective clients by adhering to the principles of applicable data protection and privacy laws in each country of operation.

Owlinker collects personal information so that we can provide an experience that is responsive and customized to your needs. Examples of personal information we collect include:

- Personal data about you and your family members, which may include names, identification particulars, contact details, preferences, demographic data;
- Information and data generated in the course of any continual relationship with us, for example, change of tutors, and other information and records you choose to provide by various modes of communication including mail, telephone, SMS, fax, email, internet and market research;
- Information from cookies, other technologies deployed for the analysis of website usage or other information technology applications used.

Owlinker collects personal information from you, your family members, your authorized representatives, publicly available sources, our website, mobile services and other channels including emails, phone conversations and face-to-face interactions with our employees, officers and directors.

The purposes for which Owlinker collects, uses and discloses personal information include:

- To provide, operate and administer Owlinker's services, or to process applications for Owlinker services, business or financial transactions, and to maintain service quality levels and train staff;
- To provide product-related services and support, including the provision of administrative support, technical assistance and customer alerts;



- To facilitate operational processes including but not limited to tutor/student management, payment administration and statistical analysis;
- To maintain accurate client information and enable customized experiences that meet your preferences and needs;
- To manage Owlinker's relationship with you, which may include providing information on Owlinker's products and services, where specifically consented to or where permissible under applicable laws and regulations;
- For marketing and communication;
- To facilitate product development and service refinements via customer feedback, data analysis and market research;
- To perform internal management, to operate management information systems, to carry out and enable internal and external audits;
- To monitor and record calls and electronic communications with clients for record-keeping, quality control, training and case investigations;
- To enforce or defend the rights of Owlinker, its employees, officers and directors;
- For safety, legal and regulatory compliance; and
- Purposes relating directly thereto.

Owlinker may disclose personal information for any of the Allowed Purposes to:

- Professional advisors, third party service providers, agents or contractors engaged to support Owlinker's business operations under a duty of confidentiality;
- Any person or entity which is part of Owlinker although only to the extent necessary to fulfil the Allowed Purpose;
- Any person to whom disclosure is required under applicable laws or regulations;



• Any court, tribunal, regulator, or other authority to whom disclosure is necessary under applicable laws or regulations.

Personal information may be transmitted to data storage facilities outside Singapore. Regardless of the location where personal information is transferred or stored, Owlinker will make reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to your personal information.

We retain personal information in accordance with legal, regulatory, business and operational obligations.

You have the right to request a copy of your personal information held by us and to request for any inaccurate personal information to be rectified. A request can be submitted by email (Details in the "Contact Us" section). Kindly note that we reserve the right to charge an administrative fee for providing a copy of your personal information.