

# **Privacy Policy**

Universal Stage is committed to safeguarding the personal data entrusted to it by the Individuals. This Privacy Notice ("Notice") explains how Universal Stage collects, uses and discloses your personal data so we can serve you better. It also sets out how you can update us, withdraw consent or request to be unsubscribed from our records.

Collection, use, disclosure or otherwise processing of personal data of our service users on behalf of government ministries or statutory boards will be in accordance with guidelines set out in the government's data management policy. Universal Stage will comply with the relevant requirements under the government's data management policy.

### 1. Your Personal Data

In this Notice and under the Personal Data Protection Act 2012 including all amendments thereafter ("PDPA"), "Personal Data" refers to any data or information (whether true or not) about you from which you can be identified, either (i) from that data; or (ii) from that data and other information to which we have or are likely to have access. It includes information such as:

- a) Individual's name, identification number, address, mobile phone number, email addresses;
- b) Photos and video images of the person;
- c) Employee data of Universal Stage such as salaries, medical records and educational records are also recognized as personal data and are subject to all the obligations of the PDPA.

## 2. Collection, Use and Disclosure of Personal Data

- 2.1. Universal Stage may collect, use and/or disclose your Personal Data for the purposes listed below as well as for other purposes you specifically consent to:
  - a) Marketing and Advocacy;
  - b) Administration and Servicing;
  - c) Analytics, research, business development and improvement;
  - d) To comply with legal process or legal requirements of any government agencies;
  - e) Any other purpose relevant to Universal Stage's objectives of which you will be notified and we will ask for your consent.



- 2.2. Universal Stage may collect your Personal Data in various ways, such as when you:
  - a) Visit our websites or use our mobile applications;
  - b) Attend/participate in our events, as photos and/or video recordings may be taken;
  - c) Register with us for our services or events/activities;
  - d) Interact with any of our employees, interns, volunteers, board and committee members e.g. via meetings (physical and online), emails or telephone calls;
  - e) Respond to our request for additional Personal Data;
  - f) Request that we contact you, e.g. to be included in a mailing list;
  - g) Respond to our initiatives or programmes;
  - h) Participate in any research and/or survey conducted by us or our partners/vendors.

Your Personal Data may also be disclosed to Universal Stage by third parties with your consent, or where otherwise permitted by law.

We may also collect, use and disclose personal data where required or permitted by laws or regulations binding on Universal Stage for any purpose.

- 2.3. Universal Stage shall always seek consent from individual to collect, use or disclose the individual's personal data, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law or where consent is deemed given by law.
  - Universal Stage may assume individual has consented to collection, usage and disclosure of their personal data in situations where the individual provided information for obvious purposes.
- 2.4. Universal Stage shall collect personal data directly from the individual. However, Universal Stage may also collect individual's personal data from third parties i.e. other agencies provided the consent was obtained from the individual or required by law.
  - Prior or during collecting personal data, Universal Stage shall make known to the individual the purpose for which the personal data was collected, except when such personal data is provided by an individual for an obvious purpose.
- 2.5. Universal Stage generally rely on personal data provided by you (or your authorised representative). 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 at the contact details provided below.

Universal Stage will not be responsible for relying on inaccurate or incomplete Personal Data provided to us. Failure to provide complete and accurate information may result in our inability to provide you with services you have requested and/or other administrative delays.

2.6. Universal Stage may disclose individual personal data to internal/external/overseas organizations for necessary and appropriate purposes. Such transfer shall be done in a manner that is secure and appropriate align with PDPA requirements.

# 3. Security and Storage

3.1. We will endeavour to protect your Personal Data in our possession and will guard against risks of unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction, through reasonable and appropriate security measures.

We strive to ensure that our systems are secure and that they meet the industry standards and have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Personal Data in our possession.

3.2. We will only retain your Personal Data for as long as it is necessary for our business or legal purposes.

You may request that your Personal Data be deleted by contacting our Data Protection Officer (DPO) (refer to Section 9 (Contacting Us)). Do note that we will not be able to delete your Personal Data if we require it for business or legal purposes. In such circumstances, you may nevertheless withdraw your consent to the further use or disclosure of your Personal Data (refer to Section 4 (Withdrawal of consent).

#### 4. Withdrawal of Consent

- 4.1. If you wish to withdraw your consent to any collection, use or disclosure of your Personal Data as set out in this Notice, you may contact the DPO (refer to Section 9 (Contacting Us).
- 4.2. Please note that if you withdraw your consent to the collection, use, and/or disclosure of your Personal Data, depending on the nature of your



request, we may not be able to continue providing our services or perform our contractual obligations to you. Such withdrawal may also result in the termination of any agreements or arrangements you have with us. Universal Stage's legal rights and remedies are expressly reserved under such circumstances.

### 5. Access and Correction of Personal Data

- 5.1. 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 about you. Please submit your request to Universal Stage's DPO (refer to Section 9 (Contacting Us) identifying yourself and indicating the Personal Data that the request concerns.
- 5.2. Universal Stage will respond to your request as soon as reasonably possible. However, please note that we may refuse your request under certain circumstances as laid out under the PDPA. Please note that a reasonable fee may be charged for an access request. If so, Universal Stage will inform you of the fee before processing your request.
- 5.3. If we are unable to respond to your access or correction request within 30 days after receiving your request, we will inform you in writing within 30 days of the time by which we would be able to respond to your request.

## 6. Use of Cookies

- 6.1. We may collect or analyse anonymised information from which individuals cannot be identified ("Aggregate Information"), such as number of users and their frequency of use, the number of page views (or page impressions) that occur on our websites/applications and common entry and exit points into our websites/applications.
- 6.2. We use "cookies" where a small data file is sent to your browser to store and track Aggregate Information about you when you enter our website or use our mobile applications. The cookie is used to track information such as the number of users, their frequency of use, profiles of users, and their preferred sites.
- 6.3. The Aggregate Information collected is used to assist us in analysing the usage of our websites/applications and improving our websites, mobile applications and services.



6.4. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our websites, mobile applications or services.

# 7. Third-Party Sites

7.1. Our websites and mobile applications may contain links to other websites and applications operated by third parties for your convenience and information. You access these websites and applications at your own risk. To the fullest extent permitted under the law, we cannot be responsible for a third-party's acts, omissions, data policies or their use of cookies nor the content or security of any third-party websites and applications, even if linked to our websites and applications. We recommend that you check the applicable data protection policy of the third party to determine how they will handle any information they collect from you. Any such liability is expressly disclaimed and excluded.

#### 8. Data Breach Notification

8.1. Even with reasonable protection measures in place, there may be a possibility of a data breach. In the event the data breach is assessed to be notifiable, Universal Stage will notify the affected individuals as soon as practicable, at the same time or after notifying the Commission. If the breach warrants notification to the Commission, Universal Stage will make notification as soon as practicable but no later than three (3) calendar days upon our assessment.

# 9. Contacting Us

9.1. Should you have any questions or feedback relating to the collection, use or disclosure of your Personal Data, or if you wish to know more about our data protection policies and practices, please contact our DPO at results\_admin@ustage.com.sg.

# 10. Changes to the Notice

10.1. We reserve the right to modify or change this Notice at any time. This Notice may be amended in tandem with changes in the legislation.