

## PRIVACY POLICY

This Privacy Policy is a document associated with the Terms of Service of the Coding Giants' ("Service Provider", "we", "us", or "our") site available at the following address ("Terms of Service"):

[www.Codinggiants.sg](http://www.Codinggiants.sg)

Coding Giants and Giganci Programowania (the corporate company), together are co-administrators of codinggiants.sg website and therefore are co-administrators of personal data.

Definitions of terms used in this Privacy Policy are set forth in the Terms of Service. The provisions of the Terms of Service shall apply accordingly.

This Personal Data Protection Policy ("Policy") sets out the basis which we may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act ("PDPA"). This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

### 1. COLLECTION OF PERSONAL DATA

- 1.1 The types of personal data that we collect depend on the purposes for the collection or the nature of the activity/transaction involved. We may collect the following types of data which may amount to personal data:
- 1.2 Information relating to any transactions or in relation to the web portal, including information relating to any class and workshop bookings.
- 1.3 Information that you provide to us for the purpose of class and workshop registration.
- 1.4 Any other information such as demographics and/or interests.
- 1.5 Pictures and videos taken during classes and workshops.
- 1.6 If you provide personal data relating to your dependent or children, you represent and warrant that the consent of that third party has been given/obtained for our collection, use and disclosure of their personal data in connection with the purposes specified below and that such personal data is accurate and complete.

### 2. DATA RECIPIENTS

- 2.1 The Service Provider may contract third parties to process personal data in order to carry out specific activities. Then the recipients of individual data may be the hosting provider for the Service Provider, the provider of the instant messenger, the company providing technical support, the provider of the e-mails service, the legal office, the accounting office.
- 2.2 Personal data collected by the Service Provider may also be made available to relevant State authorities upon their request on the basis of relevant provisions of law or to other persons and entities - in cases provided for by law.
- 2.3 Each entity to which the Service Provider provides personal data for processing on the basis of a personal data processing agreement (hereinafter "Processing Agreement") shall guarantee an appropriate level in terms of security and confidentiality of personal data processing. The entity processing personal data of data subjects on the basis of the Processing Agreement may process them through another entity only on the basis of prior consent of the Service Provider.
- 2.4 The Service Provider may share your personal data with organisers. The purpose of such access is to enable the organisers to conclude and then perform the concluded agreement.
- 2.5 Each organiser to whom we provide your personal data applies appropriate technical and organisational security measures to guarantee the security and integrity of data.
- 2.6 Personal data may be disclosed to entities not authorized under this Privacy Policy only with the prior consent of the person concerned.

### 3. RIGHTS OF THE DATA SUBJECT

- 3.1 You have the right to: (a) have personal data collected about you deleted both from the system belonging to the Service Provider, as well as from databases of entities which the Service Provider cooperate or has cooperated with, (b) have the processing of data limited, (c) transfer personal data collected by the Service Provider, (d) demand from the Service Provider access to their personal data and their correction, (e) object to processing, (f) withdraw your consent granted to the Service Provider at any time without affecting the legality of processing which was performed on the basis of consent before its withdrawal.

### 4. OTHER DATA

- 4.1 The Service Provider may store http queries, and therefore some information may be stored in server log files, including the IP address of the computer which the request was received from, the name of the station of the data subject - identification via the http protocol, if possible, the date and system time of registration on Service Provider's

website and receipt of the request, the number of bytes sent by the server, the URL address of the page previously visited by you if you entered the website of the Service Provider using a link, information about the browser, information about errors that occurred during the http transaction. Logs may be collected as material for the proper administration by the Service Provider. Only persons authorised to administer the information system have access to the information. The log files may be analyzed to compile statistics about the traffic on the Service Provider's website and the errors that occur. A summary of such information does not identify an individual.

## 5 SAFETY

- 5.1 The Service Provider shall apply technical and organizational measures to protect the processed personal data accordingly to the threats and the category of data protected and in particular, it shall protect technical and organizational data against removal or access by unauthorized persons, processing in breach of the Act and change, loss, damage or destruction. The collected personal data is stored on a secure server and the data is also protected by the Service Provider's internal procedures on personal data processing and information security policy.
- 5.2 At the same time, you should be aware that the use of the Internet and services provided electronically may be threatened by the ingress of malicious software (malware) to the ICT system and the user's device, as well as unauthorized access to data, including personal data, by third parties. In order to minimize these risks, you shall apply appropriate technical safeguards, e.g. up-to-date anti-virus software or software protecting his/her identification on the Internet. In order to obtain detailed and professional information on maintaining security on the Internet, we recommend consulting entities specializing in this type of IT services.

## 6 COOKIES

- 6.1 For the website to function properly, the Service Provider uses cookie technology. Cookies are packages of information stored on user's device via the Service Provider, usually containing information consistent with the purpose of the file by means of which the user accesses the website of the Service Provider - these are usually: the address of the service, the date of placing, the expiry date, a unique number and additional information consistent with the purpose of the file.
- 6.2 The Service Provider uses two types of Cookies: (a) session cookies, which are deleted permanently when the user's browser session ends; (b) persistent cookies, which remain on the user's device after the end of the browser session until they are deleted.
- 6.3 Based on cookies, both session and persistent, it is not possible to determine the identity of a user. The Cookies mechanism does not allow any personal data to be collected.
- 6.4 Cookies of the Service Provider are safe for the device of a given user, in particular they do not allow viruses or other software to enter the device.
- 6.5 Files generated directly by the Service Provider cannot be read by other sites. External Cookies (i.e. Cookies placed by entities cooperating with the Service Provider) can be read by an external server.
- 6.6 The user in question can change his/her cookie settings at any time, specifying the conditions for storing cookies, through the settings of his/her web browser or by configuring the service.
- 6.7 First of all, a given user may disable the storing of Cookies on his/her device in accordance with the instructions of the browser's manufacturer, but this may result in unavailability of some or all functions of the Provider's website.
- 6.8 The User may also delete the cookies stored on his/her device at any time in accordance with the instructions of the browser manufacturer.
- 6.9 The Service Provider uses its own Cookies for the following purposes: the configuration of the website and adapting the content of the pages to the preferences or behavior of the User; analysis and study of the audience, the number of clicks and paths through the site to improve the design and organization of content on the site, time spent on the site, the number and frequency of visitors to the website of the Service Provider.
- 6.10 The Service Provider uses External Cookies for the following purposes:
  - creating (anonymous) statistics allowing to optimize the functionality of the Service Provider (Google Analytics)
  - creating statistics of advertisements and remarketing groups (Facebook Pixel, LinkedIn, Twitter, Adwords)
- 6.11 Detailed information on the use of Cookies is available in the settings of the Internet browser used by the data subject.

This Privacy Policy is effective as of 08-11-2021.