

Privacy Policy

Effective date: September 23, 2019

Privacy Policy Statement

Fantasiium Group Pte. Ltd. (“**Fantasiium**”, “**us**”, “**we**”, or “**our**”) operates the <https://www.fantasiium.group> website (the “**Website**”).

This Privacy Policy regarding the collection, storage, use, processing and disclosure of personal data when you use our Service and the choices you have associated with that data.

We will comply with the Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore (the “**PDPA**”) and other applicable data protection and privacy laws, such as the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the Protection of Natural Persons with Regard to the Processing of Personal Data and on the Free Movement of Such Data, and Repealing Directive 95/46/EC (the “**GDPR**”).

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

This Policy may be amended from time to time and we will provide notice of such amendments by posting the revised Policy on the Website.

Definitions

- “**Activities**” mean organised by Fantasiium and its Affiliates studio classes, holidays camps and workshops, corporate events and private parties involving virtual reality (“**VR**”) experience.
- “**Cookies**” are small pieces of data stored on your device (computer or mobile device).
- “**Data Controller**” means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.
- “**Data Processor (or Service Provider)**” means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.
- “**Data Subject (or User)**” is any person who is using our Service and is the subject of Personal Data.
- “**Participant**” means a person who is registered to participate in Activities, including a Student or participant of the corporate event or private party.
- “**Personal Data**” means data about a natural person who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
- “**Usage Data**” is data collected automatically either generated by the use of the Website or from the Website infrastructure itself (for example, the duration of a page visit).
- “**Website**” is the <https://www.fantasiium.group> website operated by Fantasiium.

We value our Participants' privacy and inform in accordance with the PDPA and GDPR:

Data Controller

Company Name: Fantasium Group Pte. Ltd.
Address: 30 Cecil Street #10-08
Prudential Tower
Singapore 049712
Email: info@fantasium.group

Data Protection Officer

Contact details of our data protection officer:
Address: 30 Cecil Street #10-08
Prudential Tower
Singapore 049712

Email: info@fantasium.group

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Website.

Types of Data Collected

Personal Data

While registering to participate in the Activities, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“**Personal Data**”). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name (parent)
- First name and last name (child)
- Phone number
- Address, Postal code, City
- Cookies and Usage Data
- Photographs and videos of in-class activities or at events

In addition, the definition of personal data under the GDPR may be wider than that under the PDPA or other privacy laws, and includes sensitive personal information, such as your race, ethnicity, religion and any medical condition you may have. We do not require you to provide us with the sensitive personal information (such as your race, ethnicity or religion) when using our Website or participate in the Activities and make this sensitive personal information publicly available.

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving

any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

Usage Data

We may also collect information how the Website is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device.

Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Website.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Website.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Website.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

Use of Data

Fantassium uses the collected data for various purposes:

- To provide and maintain our Website
- To notify you about changes to our Website
- To allow you to participate in interactive features of our Website when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Website
- To monitor the usage of our Website and participation in the Activities
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

- Photographs and videos might be used for marketing purposes such as publicising or promoting our workshops/camps/events and the students' accomplishments on Fantasiu's websites or on our partners' websites.

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), we are required to disclose the legal basis for collecting and using your Personal Data under this Privacy Policy.

We may process your Personal Data because:

- We need to perform a contract with you or take steps prior to entering into a contract with you;
- You have given us permission to do so;
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

Retention of Data

Fantasiu will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Fantasiu will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Website, or we are legally obligated to retain this data for longer time periods.

For EU residents, we will endeavour to delete data within 30 days of a request for deletion or contact you if it will take longer.

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Singapore and choose to provide information to us, please note that we transfer the data, including Personal Data, to Singapore and process it there.

If you are an EU resident, and if we do store any of your data in the European Economic Area ("EEA"), when we transfer the data outside the EEA, this is done either on the basis that it is necessary for the performance of the services provided to you by us, or that the transfer is subject to the European Commission's model contracts for the transfer of personal data to third countries, pursuant to Art.44-46 GDPR.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Fantasium will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of Data

Business Transaction

If Fantasium is involved in a merger, acquisition or asset sale, your Personal Data may be transferred to the new owners so that we can continue to provide you with the services related to the Activities. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

Disclosure for Law Enforcement

Under certain circumstances, Fantasium may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

Fantasium may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation or assist government enforcement agencies
- To protect and defend the rights or property of Fantasium
- To prevent or investigate possible wrongdoing in connection with the Website and Activities
- To protect the personal safety of the Participants or the public
- To protect against legal liability

Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Do Not Track

We do not support Do Not Track (“DNT”). DNT is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable DNT by visiting the Preferences or Settings page of your web browser.

Your Rights Under PDPA

Under the PDPA, you may, by a written request to us, ascertain whether the information we hold about you is accurate and current, and you may also access and correct your personal data. Details of such rights are set out as follows.

The right to access. Subject to the exceptions referred to in section 21(2) of PDPA, you have the right to request a copy of the information that we hold about you.

Once we have sufficient information to deal with your request, we will seek to provide you with the relevant Personal Data or information within thirty (30) days of your request, unless otherwise stated.

The right to correction or rectification. We want to ensure that your Personal Data is accurate and up to date. If any of the information that you have provided to us changes, for example if you change your email address, name or contact number, please let us know the correct details by sending an email to info@fantasium.group.

Withdrawal of consent to use your Personal Data. Additionally, you have the right to ask us not to collect, use, process, or disclose your Personal Data in any of the manner described herein. For that, you can give us notice of your intention at any time by contacting us at info@fantasium.group. We will stop using your Personal Data and ensure that the parties to whom we transferred your Personal Data will comply with your request. Please note that if you withdraw your consent to use your Personal Data we will not be able to provide you with all or some of our services.

Your Data Protection Rights Under GDPR

If you are a resident of the EEA, you have certain data protection rights. Fantasium aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- **The right to access, update or to delete the information we have on you.**
Whenever made possible, you can access, update or request deletion of your Personal Data directly. If you are unable to perform these actions yourself, please contact us to assist you.
Under the GDPR there is no right of deletion if the processing of personal data is necessary for (i) the exercise of the right to freedom of expression and information, (ii) the fulfilment of a legal obligation to which we are subject (e.g. statutory retention obligations) or (iii) the assertion, exercise or defence of legal claims.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data. The right to object exists only within the limits provided for under the GDPR. In addition, our interests may prevent the processing from being terminated, so that we are entitled to process your Personal Data despite your objection.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.

- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where Fantasium relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests. You have the right to complain to a data protection authority, in particular, in the member state to the GDPR of your place of residence, work or suspected infringement, about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the EEA.

Service Providers

We may employ third party companies and individuals to facilitate access to our Website (“Service Providers”), to perform Website-related services or to assist us in analyzing how our Website is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Where your consent has been provided, the Personal Data you provide us may be transferred to third parties as may be advised to you, either within or outside Singapore, as may be necessary for any of the purposes stated above. We will comply with our obligations under the PDPA in relation to such transfer, or processing for as long as the data remains within our possession or control.

If you are an EU resident, and if we do store any of your data in the EEA, when we transfer the data outside the EEA, this is done either on the basis that it is necessary for the performance of the services provided to you by Fantasium, or that the transfer is subject to the applicable laws in the EU or under the GDPR.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

- **Google Analytics.** Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.
- You can opt-out of having made your activity on the Website available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.
- For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

Behavioral Remarketing

Fantasion uses remarketing services to advertise on third party websites to you after you visited our Website. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Website.

- Google AdWords. Google AdWords remarketing service is provided by Google Inc.
- You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>
- Google also recommends installing the Google Analytics Opt-out Browser Add-on – <https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.
- For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>
- Facebook. Facebook remarketing service is provided by Facebook Inc.
- You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>
- To opt-out from Facebook’s interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>
- Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.
- For more information on the privacy practices of Facebook, please visit Facebook’s Data Policy: <https://www.facebook.com/privacy/explanation>

Payments

We may provide paid products and/or services within the Website. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their privacy policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

Links to Other Sites

Our Website may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party’s site. These third party sites have separate and independent privacy policies. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Website, prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: info@fantasium.group

To facilitate any request in respect of your personal data, you should indicate “**PDPA Request**” in your email or other communication to us.

If you do not consent to any of the terms of this Privacy Policy, our use of your Personal Data or have any complaint or grievance regarding about how we handle your Personal Data, we welcome you to contact us with further details at:

E-mail address: info@fantasium.group
(please attention it to the ‘**Data Protection Officer**’)

Office address:
30 Cecil Street #10-08
Prudential Tower
Singapore 049712
(please attention it to the ‘**Data Protection Officer**’)