

PIXIE PLAY CLUB

Data Protection Notice

Effective Date: 23 September 2026 | Privacy Contact: elisa.tan@pixieplayclub.com.sg

This Data Protection Notice ("Notice") explains how Pixie Play Club ("the Club", "we", "us" or "our") collects, uses, discloses and otherwise processes personal data in accordance with Singapore's Personal Data Protection Act 2012 ("PDPA"). The Club operates as PIXIE PLAY CLUB LLP. This Notice applies to personal data in our possession or under our control, including personal data processed on our behalf by service providers that support our registration, communication, website and webapp operations.

1. Personal Data

In this Notice, "you" means a parent, guardian, prospective customer or other individual who interacts with the Club. "Participant" means a child registered or being considered for registration in a Club programme. "Personal data" has the meaning given in the PDPA and generally means information about an identifiable individual.

Depending on how you interact with us, the Club may collect personal data including:

- Parent or guardian name, residential address, email address, telephone number and relationship to the child
- Participant name, gender, date of birth or age, and programme or booking information
- Medical conditions, allergies, dietary requirements and medication information reasonably necessary for programme safety
- Emergency contact details and authorised collection information
- Information submitted through the Club's Parent Messages feature, such as name, email address, topic, message content and date/time of submission
- Photographs or videos where separate photography/media consent has been provided

The Club accepts programme payments separately, including by PayNow where offered. We do not ask parents to submit online-banking passwords, card PINs or other banking login credentials through the Club's registration form or webapp.

If you provide the Club with personal data about another individual, such as an emergency contact or authorised collector, you should ensure that you are authorised to provide that information and that the individual is aware of the relevant purpose.

2. Collection, Use and Disclosure of Personal Data

We generally collect personal data when it is provided voluntarily by you or an authorised representative after the relevant purposes have been notified, or where collection, use or disclosure without consent is permitted or required by the PDPA or other applicable law. We will seek additional consent before using personal data for a new purpose where required by law.

The Club may collect and use personal data for purposes including:

- Administering enquiries, registrations, programme bookings and attendance
- Managing authorised collection and parent/guardian contact arrangements

- Safeguarding children and supporting their health, safety and wellbeing during the programme
- Managing medical conditions, allergies, dietary requirements and medication information
- Contacting parents, guardians, emergency contacts or relevant persons and responding appropriately in an emergency
- Responding to requests, applications, complaints and feedback and managing our relationship with you
- Maintaining appropriate programme, incident, safeguarding and operational records
- Complying with applicable laws, regulations, codes, guidelines, insurance requirements and lawful requests from governmental or regulatory authorities
- Using photographs, videos or optional promotional contact information only where separate consent or another lawful basis applies

The Club may disclose personal data where reasonably necessary for the purposes above, including to:

- Service providers that the Club has engaged to provide registration, database, web hosting, communications or related operational services
- The host venue or relevant programme partners where the information is reasonably necessary for programme delivery, child safety or safeguarding
- Healthcare providers, emergency services or other relevant persons where reasonably necessary for an emergency or safety response
- Insurers, professional advisers or service providers where reasonably necessary for an incident, complaint, claim or legal/business purpose
- Governmental, regulatory or law-enforcement authorities where required or permitted by law

The Club does not sell personal data. Optional marketing or promotional communications are treated separately from essential programme, safety, booking and emergency communications.

3. Third-Party Service Providers and Overseas Transfers

The Club uses third-party technology providers to support its operations. These include Cognito Forms for online registration, Supabase for app database and authentication functionality, Cloudflare for webapp hosting and security services, and Vodien for hosting of the Club's website. The Club's website does not itself collect personal data; it provides a link directing visitors to the online registration form hosted on Cognito Forms. These providers process personal data in connection with the services they provide to the Club and are subject to their applicable service terms, privacy commitments and security safeguards.

Some personal data may be processed or stored outside Singapore. Cognito Forms states that its customer data and the servers that process that data are stored in geo-redundant data centres in the United States. Other service providers may also process data in overseas locations depending on their infrastructure and service arrangements.

Where the Club transfers personal data outside Singapore, the Club will take appropriate steps to ensure that the transfer is made in accordance with the PDPA and that the transferred data receives a standard of protection comparable to that required under the PDPA. Depending on the service and circumstances, these steps may include reviewing a provider's security and privacy practices and relying on appropriate contractual or other legally recognised safeguards.

4. Withdrawing Your Consent

Consent that you provide for the collection, use or disclosure of personal data remains valid until withdrawn. You may submit a written request to withdraw consent by emailing our Data Protection Officer at the contact details below.

We will generally seek to process a withdrawal request within five (5) business days. We may first need to clarify the scope of the request and explain any consequences of withdrawal.

Withdrawal of optional consent, such as photography/media consent or optional marketing consent, will not by itself prevent a child from participating in the Club's programme. However, if consent is withdrawn for information reasonably necessary for the Club to provide the programme safely — for example essential emergency, medical or authorised-collection information — the Club may be unable to continue providing the relevant service or accept the participant into the programme. We will explain this before completing the withdrawal process.

Withdrawal of consent does not require the Club to immediately destroy every existing record and does not affect collection, use, disclosure or retention that is permitted or required without consent under applicable law or that remains necessary for a valid legal or business purpose.

5. Access to and Correction of Personal Data

You may request access to personal data that the Club holds about you or your child, information about how it has been used or disclosed where applicable, or correction of personal data that is inaccurate or incomplete. Requests should be submitted in writing to our Data Protection Officer.

A reasonable fee may be charged for an access request where permitted. If a fee applies, the Club will inform you before processing the request.

We will respond as soon as reasonably possible and generally aim to respond within ten (10) business days. If we are unable to respond to an access request within thirty (30) days after receiving it, we will inform you in writing within that period of when we expect to respond. Exceptions under the PDPA may apply to particular access or correction requests.

6. Protection of Personal Data

The Club takes reasonable administrative, physical and technical measures to protect personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. Measures include data minimisation, authentication and access controls, good password practices, restricting access to authorised Club personnel on a need-to-know basis, secure web connections and encryption provided by our technology platforms, and limiting the transmission of sensitive child or medical information through ordinary email or messaging channels. Additional security controls may be introduced as our systems and operations evolve.

The Club will review and strengthen its security arrangements as its systems and operations evolve. No method of electronic transmission or storage can be guaranteed to be completely secure, but the Club will take reasonable steps to protect personal data under its control.

7. Accuracy of Personal Data

The Club generally relies on the information provided by parents, guardians or authorised representatives. Please notify us promptly if relevant information changes, especially contact details, authorised collection arrangements, allergies, medical conditions, medication information or emergency contacts.

8. Retention of Personal Data

The Club may retain personal data for as long as reasonably necessary to fulfil the purpose for which it was collected, to administer the programme, or to meet legal, regulatory, insurance, safeguarding or other legitimate business requirements.

When personal data is no longer required for any legal or business purpose, the Club will cease to retain it or remove the means by which it can be associated with an identifiable individual, where appropriate. Different categories of information may have different retention periods. Records relating to incidents, complaints, safeguarding matters, insurance or legal issues may need to be retained longer than routine enquiry or programme-administration records.

9. Data Breach Management

If the Club becomes aware of a suspected personal data breach, we will take reasonable steps to contain, assess and remediate it. Where the breach is notifiable under the PDPA, the Club will notify the Personal Data Protection Commission as soon as practicable and, in any event, no later than three (3) calendar days after determining that the breach is notifiable. Where notification to affected individuals is required, the Club will notify them as soon as practicable, at the same time as or after notifying the Commission.

10. Data Protection Officer

You may contact the Club's Data Protection Officer regarding this Notice, our personal data protection practices, a withdrawal of consent, an access or correction request, or any privacy-related enquiry or complaint:

- **Data Protection Officer:** Elisa Tan
- **Email:** elisa.tan@pixieplayclub.com.sg

Please avoid sending unnecessary sensitive child or medical information through ordinary email unless the Club specifically asks you to do so using an appropriate process.

11. Effect of Notice and Changes to Notice

This Notice should be read together with the Club's Terms and Conditions, registration consent wording and any specific consent notice that applies to a particular activity, such as photography/media consent.

The Club may update this Notice from time to time to reflect changes in our services, systems, legal obligations or data-handling practices. The current version will show the date on which it was last updated. Where a change requires fresh consent under applicable law, the Club will seek that consent before relying on the new purpose.