ICR Pte Ltd
601 MacPherson Road,
#06-15 Grantral Complex,
Singapore 368242

T +65 6484 1271

sg.icanread.asia

Privacy Policy

EffectiveDate: 4June2026

Applicability:

This Privacy Policy apply to the provision of all Services run by ICR Pte Ltd and its related companies, including onSponge Pte. Ltd. and its franchises under the “I Can Read”, “Oodles Math”, “onSponge” and “Yue Xue Le” brand names.

1. Introduction

At ICR Pte Ltd and our related companies ("**Group**", "**we**", "**us**", or "**our**") including onSponge Pte. Ltd., we recognise the importance of the personal data you have entrusted to us. We are committed to managing, protecting, and processing your personal data in strict compliance with the Singapore Personal Data Protection Act 2012 ("**PDPA**") and its subsequent amendments.

This Privacy Policy outlines how we collect, use, disclose, and manage the personal data of our students, parents, guardians, customers, employees, and users of our physical centres, e-commerce stores, and digital portals.

2. Personal Data We Collect

"Personal Data" refers to any data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which we have or are likely to have access.

Depending on your interactions with us (whether enrolling in a course or purchasing a publication), the personal data we collect may include:

- **Parent/Guardian & Customer Information:** Name, contact details (email address, mobile number), residential and shipping addresses, payment/billing information, and signature.
- **Student Information:** Name, age, date of birth, gender, school level, literacy and mathematics diagnostic results, academic progress reports, medical information (e.g., severe allergies relevant to classroom safety), and attendance records.
- **Digital & Forum Data:** IP addresses, login credentials, browser type, forum interactions, and usage data when accessing our online portals, learning platforms, e-commerce stores, or the onSponge community platforms.

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- **Media:** Photographs, video recordings, and CCTV footage captured within our learning centres or during our events.

Note on NRIC/FIN: In compliance with PDPA guidelines, we do not collect full NRIC, FIN, or passport numbers unless strictly required by law or necessary to establish your identity to a high degree of fidelity.

3. Purposes for Collection, Use, and Disclosure

We collect, use, and disclose your personal data for the following purposes:

A. Educational and Centre Operations

- Conducting literacy and academic and diagnostic assessments.
- Enrolling students in suitable programmes (e.g., I Can Read, Yue Xue Le, Oodles Math learning programmes).
- Tracking, evaluating, and reporting on student academic progress.
- Managing administrative tasks, including billing, fee collection, and attendance tracking.
- Communicating with parents/guardians regarding student progress, centre updates, and emergencies.

B. E-Commerce, Publications, and Retail

- Processing orders, payments, and fulfilling the delivery of physical publications (e.g., *+hinkingMath* workbooks) and digital goods.
- Managing customer accounts for our online stores, e-learning platforms, and community forums.
- Handling customer service inquiries, product exchanges, or refunds.

C. Business, Franchise, and Intra-Group Operations

- Facilitating seamless operations across our Group, which includes sharing relevant administrative data between ICR Pte Ltd, onSponge Pte Ltd, and our respective brands to manage your accounts efficiently.
- Facilitating the operations of our franchise network, requiring the sharing of necessary operational data with authorised master or single-unit franchisees under strict confidentiality agreements.

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- Conducting internal audits, financial reporting, and market research to improve our curriculum, publications, and pedagogy.

D. Marketing and Promotional Activities

- Expressed consent shall be obtained for the purpose of sending you updates on new programmes, workshops, holiday camps, publications, or educational fairs across all our Group's brands.
- Featuring student achievements, classroom activities, or events on our social media channels or marketing collateral.
- **Do Not Call (DNC) Registry Compliance:** If your telephone number is registered with the Do Not Call (DNC) Registry, we will not send you promotional messages via SMS, WhatsApp, or phone calls unless you have provided us with clear and unambiguous consent to do so.

4. Consent and Withdrawal

By providing your personal data to us, registering your child for an assessment, purchasing our products, or enrolling in our programmes, you consent to our collection, use, and disclosure of your personal data as described in this policy.

Data of Minors: As our educational services and products are designed for children, we require a parent or legal guardian to provide consent on behalf of any minor (under the age of 18) for the collection, use, and disclosure of their personal data.

You may withdraw your consent for any or all purposes at any time by providing reasonable advance notice:

- **Marketing Withdrawal:** You can opt out of promotional emails by clicking the "unsubscribe" link or by contacting our staff.
- **General Withdrawal:** If you withdraw your consent for core operational or e-commerce purposes, please note that we may no longer be able to provide educational services to your child or fulfil your product orders.

To withdraw consent, please submit a written request to our Data Protection Officer (DPO) listed in Paragraph 12.

5. Access and Correction

You have the right to request access to the personal data we hold about you or your child, and to request corrections to ensure the data is accurate and up-to-date.

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- **Access:** We will respond to your access or correction request as soon as reasonably possible, and generally within thirty (30) calendar days of receiving it. If we require more time, we will inform you in writing. We will provide you with a copy of your personal data and a history of how it has been used or disclosed. A nominal administrative fee may apply for complex access requests.
- **Correction:** The data you provide must be accurate. Please inform your respective learning centre or update your online account immediately of any changes to your contact details or shipping address.

6. Protection of Personal Data

We implement robust administrative, physical, and technical security measures to protect your personal data from unauthorised access, collection, use, disclosure, copying, modification, or disposal:

- Restricting access to personal data only to authorised teachers, centre managers, and HQ personnel on a "need-to-know" basis.
- Securing digital records with enterprise-grade encryption, firewalls, and password protection on our backend systems (including Cenopsys2) and associated digital portals.
- **Data Intermediaries:** Where we engage third-party data intermediaries (e.g., courier services for book deliveries, cloud hosting providers, or IT platform partners) to process personal data on our behalf, we ensure they are bound by strict contractual agreements to implement robust security arrangements and comply fully with the PDPA.
- **Data Breach Notification:** In the unlikely event of a data breach that is likely to result in significant harm or affects a large scale of individuals, we will notify the Personal Data Protection Commission (PDPC) and affected individuals in accordance with PDPA requirements.

7. Retention of Personal Data

We will retain personal data only for as long as it is necessary to fulfil the purposes for which it was collected, or as required for legal and business purposes. Once the data is no longer required, we will cease retention by securely destroying physical documents and permanently anonymising or deleting digital records.

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8. Transfer of Personal Data Outside Singapore

As a global organisation, your data may be stored on cloud servers or accessed by affiliated entities outside of Singapore. When we transfer personal data overseas, we will ensure that the receiving jurisdiction offers a standard of protection comparable to the PDPA, achieved through legally binding corporate rules or standard contractual clauses.

9. Photography, Filming, and CCTV

- **CCTV:** We deploy CCTV cameras in common areas of our physical learning centres for safety and security purposes. Footage is strictly controlled, retained for a limited period, and only accessed for incident investigation.
- **Event Photography:** During open houses, classes, and graduation events, we may take photographs or videos. We will seek explicit consent before using any media containing recognisable images of your child for public marketing purposes.

10. Cookies and Digital Portals

Our websites, e-commerce stores, and learning portals use cookies to enhance user experience, remember login sessions, and analyse web traffic. You may configure your web browser to refuse cookies; however, doing so may restrict your access to certain functionalities of our digital platforms, such as the ICR Online, ICR Connect app, Student portals, Oodles Math portals, or onSponge forums.

Third-Party Analytics: We may also use third-party analytics tools (such as Google Analytics) to measure website traffic and improve our online services. These third parties may collect your IP address and browsing data in accordance with their own privacy policies.

11. Changes to this Policy

We reserve the right to review and amend this Privacy Policy periodically to reflect changes in our business operations, technological advancements, or regulatory requirements. Any updated policy will be made available at our centres and published on our websites. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

12. Contacting the Data Protection Officer

If you have any questions regarding this Privacy Policy, wish to make a request for access/correction, or have a complaint regarding how we handle your personal data across any of our brands, please contact our Data Protection Officer at:

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The Data Protection Officer
ICR Pte Ltd (for I Can Read and Yue Xue Le)
601 MacPherson Road #06-15 Grantral Complex Singapore 368242
Email: dpo@icanread.asia
Phone: +65 3158 5888

The Data Protection Officer
onSponge Pte Ltd (for Oodles Math and onSponge)
601 MacPherson Road #06-15 Grantral Complex Singapore 368242
Email: dpo@onsponge.com
Phone: +65 3158 5888

13. Governing Law

This Privacy Policy and your use of our services shall be governed by and construed in accordance with the laws of the Republic of Singapore.