

# Privacy Policy

Last Updated: May 6, 2026

At **Cyberland Consultancy Pte Ltd**, we take privacy seriously. This policy explains how we handle personal data in two capacities: as a **Data Controller** (for our own business operations) and as a **Data Intermediary** (when processing data on behalf of our clients).

## 1. Our Roles in Data Processing

### A. Cyberland as a Data Controller

We act as the Data Controller for personal data collected directly through <https://cyberland.sg>, or when you engage with us for marketing, sales, or support. We determine why and how this data is processed.

### B. Cyberland as a Data Intermediary

For the majority of our client projects, Cyberland acts as a **Data Intermediary**. This means we process personal data strictly according to the instructions provided by our clients (the "Organization").

- In these cases, our clients remain responsible for obtaining your consent and managing your data access requests.
- As an intermediary, we are legally bound by the PDPA to ensure the **Protection** and **Retention** of that data.

## 2. Contact Details

If you have questions about this policy or our data practices, please contact our Data Protection Officer:

- **Legal Entity:** Cyberland Consultancy Pte Ltd
- **Contact Name:** Casey (Data Protection Officer)
- **Email:** [casey@cyberland.edu.sg](mailto:casey@cyberland.edu.sg)
- **Address:** 5022 Ang Mo Kio Ind Park 2, #04-23, Singapore 569525

## 3. Data We Collect and Why

### When We Are the Controller:

- **Communication Data:** Emails, contact forms, and social media messages. Used to respond to inquiries and for record-keeping.
- **Customer Data:** Details related to purchases (name, billing address, contact info). Used to fulfill contracts.

- **Technical & User Data:** IP addresses and site usage via analytics to improve our website security and performance.

### **When We Are the Intermediary:**

We process data provided by our clients (which may include their own customers' or employees' data) solely to provide the services outlined in our service agreements. This may include data hosting, software development, or analytics.

## **4. Protection and Security**

Whether acting as a Controller or an Intermediary, we have implemented stringent security measures:

- **Access Control:** Data is only accessible to employees/partners with a "need to know."
- **Technical Safeguards:** We use encryption and secure hosting environments to prevent unauthorized access, alteration, or disclosure.
- **Breach Protocol:** We have procedures to handle suspected breaches and will notify the relevant Organization (our client) or the PDPC where legally required.

## **5. Data Retention**

- **As a Data Controller:** We keep your data for as long as necessary to fulfill the purpose it was collected for (e.g., 7 years for tax and accounting records).
- **As a Data Processor/Intermediary:** We retain data only as instructed by our client or as required by the specific project contract. Upon termination of service, we will securely delete or return the data within 30 days, unless a different timeline is required by the client's stipulated instructions.

## **6. Your Rights**

Under the PDPA, you have the right to access and correct your personal data.

- **Direct Inquiries:** If your data was collected directly by Cyberland (e.g., via our website), contact us at [casey@cyberland.edu.sg](mailto:casey@cyberland.edu.sg).
- **Client Projects:** If your data was processed by Cyberland on behalf of one of our clients, please **contact that client (the Organization) directly**. As a Data Intermediary, we must refer your request to the relevant client to ensure it is handled according to their specific privacy protocols.

## **7. International Transfers**

If we transfer data outside of Singapore (e.g., to a cloud service provider), we ensure it receives a standard of protection comparable to the PDPA through data transfer agreements or by utilizing providers with recognized security certifications.

## **8. Third-Party Links & Cookies**

Our website may link to third-party sites. We do not control these sites and are not responsible for their privacy practices. We use cookies to improve your experience; you can manage these through your browser settings.