

# Insightful Leadership Pte Ltd

**My Development Space (MDS)**  
**[www.mydevelopmentspace.com](http://www.mydevelopmentspace.com)**

## **Terms and Conditions**

### **Privacy and Data Protection Policy**

This policy was last updated on 23 August 2018.

Insightful Leadership Pte Ltd (“Insightful”, “we”, “us”), a Singapore private company, offers an online leadership development portal called “My Development Space” (MDS) as an online tool for use in leadership and communication coaching, training and development.

The copyright for MDS rests with Insightful. Insightful is owned by Ian C Woodward, Sameer Hasija and Paddy Padmanabhan. All three are currently professors at INSEAD.

The domain website [www.mydevelopmentspace.com](http://www.mydevelopmentspace.com) is registered with Melbourne IT registry in Australia. The site is housed by Amazon Web Services under contract to enable people using MDS (“MDS Participants”, “you”, “your”) to enter information. The data for your personal leadership development work is then held in their data servers under Insightful administration.

If you are using the MDS, it is likely you are doing so at the request of a leadership and/or communication professor, teacher or coach, who is working with you to improve or develop your communication and/or leadership skills. This person is a Registered MDS User. Insightful is your Data Controller because we collect and process your data when you use the MDS site. This privacy policy describes how we collect, use and disclose that data.

## **1. Data we Collect**

We collect the personal data you provide to us when you use the MDS (“your personal data”). This data includes your name and email address, and any other information you input to the MDS. We also collect data from your Registered MDS User (such as your professor, teacher or coach) when they input information, in the form of assignment results and/or feedback and/or reference materials. We provide you with a unique MDS account to allow your ongoing use of your materials within the MDS.

We do not collect data about you from any source other than you and your Registered User.

We do not collect browser or device data; nor do we use tracking technology to collect data. Contractors to Insightful are required to have equivalent privacy and data protection policies to those set for the MDS.

## **2. How we use your Personal Data**

We treat your personal data with confidentiality. We use your personal data to create a platform which allows you: to store, monitor and manage your communication and/or leadership development information; to manage your communication and/or leadership goals; and to communicate and exchange information with your Registered MDS User (such as your professor, teacher or coach). We do not share your information with anyone other than you and your Registered MDS User. We do not use your data to contact you or interact with you, either directly or indirectly, unless you specifically request us to do so.

We may use data, including your personal data, to analyze, improve and modify our services but do not disclose this to any external party. We may also use your personal data anonymously, with all identifying information removed, for our own research purposes, such as to further improve the MDS design into the future.

## **3. How we Disclose Data**

Insightful does not sell, rent or share any of your personal data with any third parties. We do not share the information you input to the MDS with your Registered MDS User or with anyone else. You control what information is shared with your Registered MDS User.

The only exceptions to this would be should we believe it necessary:

- under applicable law, or payment method rules;
- to enforce our terms and conditions;
- to protect our rights, privacy safety or property, and yours; and
- to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities.

#### **4. Security**

Insightful uses reasonable organizational, technical and administrative measures to protect personal and all other data within our organization. If you have reason to believe that the security of your data residing with us is no longer secure, please contact us immediately using the contact information in section 8 below.

#### **5. Jurisdiction and Cross-Border Transfer**

Insightful is a Singapore-based business, but its services are global. Therefore, data, including personal data, may be transferred to Insightful personnel, and stored and processed by Insightful in any country where we operate. We will take all reasonable measures to ensure that any such transfers comply with applicable data protection laws and your data remains protected to the standards described in this Privacy Policy.

#### **6. Your Rights in Regard to your Personal Data**

##### **6.1 Access**

You have the right to request a copy of your personal data held by us. Our contact information appears at section 8 below.

##### **6.2 Correction**

Please contact us at any time if you would like to review, correct, or update personal data that you have previously disclosed to us. Our contact information appears at section 8 below.

### *6.3 Erasure and Restriction*

You have the right to ask us to erase your personal data, or under some circumstances, to restrict us from processing your personal data. Our contact information appears at section 8 below.

### *6.4 Object*

If you have any concerns about how we process your personal data, please contact us to discuss this. We may not be able to offer our services to you if you do not want us to process your personal data in the manner we consider it necessary to provide our services. Our contact information appears at section 8 below.

### *6.4 Portability*

You may have the right to request the personal data you have given to us in a machine-readable format, provided this would not infringe the rights, including intellectual property rights, of other people. Our contact information appears at section 8 below.

## **7. Retention Period**

We will retain your personal and other data for the period necessary to fulfil the purposes outlined in this Privacy Policy and in line with our legal and regulatory obligations. In most cases this will be for three years from the time you complete your communication/leadership development studies for which you are using the MDS. If the period is shorter you would be notified. You may also request us to hold this longer if you wish by making contact as shown in section 8 below.

## **8. Contact**

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

- In writing, at Insightful Leadership Pte Ltd, 8 Dover Rise, #20-11, Heritage View, Singapore 138679; or
- By email, at: [admin@mydevelopmentspace.com](mailto:admin@mydevelopmentspace.com)

## **9. Complaints**

*Within Singapore:* If you are dissatisfied with our handling of any complaint you raise with us under this privacy policy, you have the right to contact the Personal Data Protection Commission (<https://www.pdpc.gov.sg/Individuals/Complaints-and-Reviews/Report-a-Personal-Data-Protection-Concern> ).

*Within Australia:* If you are dissatisfied with our handling of any complaint you raise with us under this privacy policy, you have the right to contact the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).

*In other jurisdictions:* If you are dissatisfied with our handling of any complaint you raise with us under this privacy policy, you have a right to complain to the relevant independent supervisory authority in your jurisdiction.

## **10. Updates to this Privacy Policy and Notifications**

We may update and change this Privacy Policy. The “Last Updated” legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised.

We will contact you through the email address listed in your MDS account with us to advise you of any material updates or revisions to our Privacy Policy, as well as any disclosures or alerts regarding the Privacy Policy or your personal data.

Electronic updates and disclosures and notices have the same meaning and effect as if we had provided you with a hard copy. Updates, disclosures and notices shall be considered to be received by you within 24 hours of the time they are sent to you by email.

## **11. Consent**

By checking the MDS site onscreen box and clicking the accept button, as well as proceeding to use the MDS, you are agreeing to our Privacy Policy and giving explicit consent for us to collect and process the personal data you enter into the MDS.

If you wish to withdraw your consent at any time after entering information into the MDS, please contact us immediately using the contact information in section 8 above. If you choose to withdraw consent after entering information into the MDS, your withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.