

SCREEN LMS

Children and Young Persons Data Notice

Age-appropriate transparency, parental/guardian considerations, minimisation and heightened safeguards for users under 21.

LEGAL AND ASSURANCE STATUS: Operational draft for implementation and UAT. It has not been represented as approved by Singapore-qualified counsel, an accredited certification body or an external auditor.

Document code	CHILD-001	Version	1.0
Effective date	2026-07-12	Next review	2027-07-12
Owner	Data Chord Pte. Ltd.	Audience	all
Status	Pending review by Singapore-qualified counsel and the appointed DPO	Acknowledgement	Notice / point-of-use control

Change history

Version / effective date	Change	Owner	Approval status
1.0 / 2026-07-12	New age-appropriate privacy notice.	Data Chord Pte. Ltd.	Pending required approval and legal review

Controlled copy: the current LMS-published version. Printed or forwarded copies are uncontrolled. A material change creates a new version; earlier versions and acceptance evidence are preserved.

Purpose and scope

Age-appropriate transparency, parental/guardian considerations, minimisation and heightened safeguards for users under 21.

This document applies to Screen LMS application operations, relevant Azure services, authorised users, administrators, service providers and records within its stated audience.

Governance principles

- Apply Singapore law, contractual commitments and approved organisational policy using documented, risk-based decisions.
- Use data minimisation, least privilege, separation of duties and secure defaults.
- Preserve evidence sufficient to demonstrate what was decided, implemented, tested and reviewed.
- Escalate uncertainty; do not treat this operational draft as legal advice or certification evidence by itself.

Roles and responsibilities

- The document owner maintains this controlled version, monitors changes and initiates review after a material legal, technical, supplier or business change.
- Managers assign accountable control owners, approve resources and review significant exceptions, risks, incidents and overdue actions.
- Users and authorised suppliers follow the policy, complete required training, protect credentials and report suspected incidents or nonconformities promptly.
- The Data Protection Officer reviews personal-data implications and the security owner reviews confidentiality, integrity and availability implications.

Age-appropriate transparency

Screen LMS provides concise, understandable explanations of what data is used, why it is needed, who receives it and how to obtain help. A known user under 21 is shown this notice as a current-version acknowledgement.

Minimisation and safeguards

Collect only information needed for the learning or safety purpose, use protective defaults, avoid behavioural advertising and disproportionate profiling, restrict communication and sharing, and apply heightened review to biometrics or high-impact decisions.

Parents, guardians and support

Where appropriate to age, capacity, contract and law, the organisation engages a parent or guardian while respecting the young person's rights and circumstances. The DPO assesses uncertain or high-risk cases.

High-risk processing review

- Complete a documented privacy and security review before enabling biometric, adaptive-profiling, behavioural-monitoring or public-sharing features for children or young persons.
- Provide a practical non-biometric or human-review route where the enabled feature may materially affect access or assessment.
- Escalate safeguarding concerns through approved organisational channels without exposing the young person to unnecessary disclosure.

Records and evidence

- Keep the approved version, superseded versions, approval record, publication record, acceptance evidence where required, training evidence, exceptions and review decisions.
- Apply role and tenant access restrictions, protect evidence from unauthorised change, and use the approved retention and secure-disposal schedule.
- Do not place secrets, passwords, access tokens or unnecessary personal data in governance evidence or issue trackers.

Monitoring, exceptions and review

The owner reviews the policy at least by the scheduled date and after a material incident, audit finding, law change, supplier change, architecture change or significant processing change.

- Record each exception with business justification, affected assets or data, risk, compensating controls, approver, owner, expiry and review date.
- Track findings and overdue actions through the corrective-action process and verify effectiveness before closure.
- A material change creates a new controlled version. Where the policy is an access condition, the LMS presents the new version for renewed acceptance while preserving earlier evidence.

Official sources and external references

Sources were checked during the 12 July 2026 policy refresh. The document owner must verify the current official version during every review. A source citation does not mean the issuing body has approved Screen LMS or this document.

- **Attorney-General's Chambers, Singapore: Personal Data Protection Act 2012 (Singapore Statutes Online)** — <https://sso.agc.gov.sg/Act/PDPA2012>
- **Personal Data Protection Commission: Advisory Guidelines on the PDPA for Children's Personal Data in the Digital Environment** — <https://www.pdpc.gov.sg/organisations/regulations-decisions/regulatory-guidance/advisory-guidelines-on-the-pdpa-for-childrens-personal-data-in-the-digital-environment>
- **Personal Data Protection Commission: Advisory Guidelines for the Education Sector (updated 25 April 2024)** — <https://www.pdpc.gov.sg/organisations/regulations-decisions/regulatory-guidance/advisory-guidelines-for-the-education-sector>

Approval and review record

Role	Name	Decision / date	Notes
Document owner	To be completed	Pending	Required before representing this document as fully approved
Information security	To be completed	Pending	Required before representing this document as fully approved
Data Protection Officer	To be completed	Pending	Required before representing this document as fully approved
Singapore-qualified legal reviewer	To be completed	Pending	Required before representing this document as fully approved