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	Document Classification:	Internal
	Effective Date	10 June 2024
PERSONAL DATA VERIFICATION PROCESS	Doc No	DPMP-PRO-05
	Revision	1.0

AMENDMENTS LOG

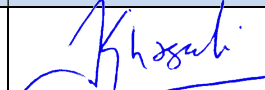
Revision History

Version	Date	Revision Author	Summary of Changes
1.0	10 June 2024	Edwin Soedarta DPO	First Release

Distribution

Name	Location
<i>All employees</i>	<i>Shared Folder</i>

Review & Approval

Name	Position	Signature	Date
Khasali M	Director		10 June 2024

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RECORDS FOR DOCUMENT REVIEW

To ensure the continuing suitability, adequacy and effectiveness of the documented information and its relevancy, a review of its contents should be conducted at a planned interval or when significant changes occur. The review should include assessing opportunities for improvement of the documented information and the approach to managing data protection in response to changes to the organization environment, business circumstances, legal conditions as well as the technical environment.

Instruction Guide:

Version 1.0, 2.0, 3.0... Version changed with amendments

Version 1.0 Version remained unchanged but update the last and next date of review

VERSION	REVIEW BY	DATE OF REVIEW	NEXT REVIEW DATE
1.0	Edwin Soedarta (DPO) Khasali M (Director)	10 June 2024	9 June 2025

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PURPOSE

This document describes the mechanisms and approaches in ensuring that personal data under our possession or control is accurate and complete for the intended purposes of use or disclosure.

SCOPE

This applies to personal data in the organization’s possession or under its control, and where relevant to third parties that the personal data is disclosed to.

RESPONSIBILITIES AND AUTHORITIES

The Management has the prime responsibility and approval authority for this procedure.

The Data Protection Officer (“DPO”) shall ensure that the process owners follow this procedure.

PROCEDURES

1. OVERVIEW

In most circumstances, personal data (PD) under our possession and control are directly provided to us by the individual, and therefore we presume it is accurate and complete. In addition, we require the individual to make a written declaration that the PD provided is accurate and complete for the personal data we solicit in relevant data collection forms.

In order to ensure that PD is accurate and complete, we shall make reasonable efforts depending on the exact circumstances at hand to ensure that:

- PD we collect are accurately recorded;
- PD we collect include all relevant parts thereof (so that it is complete);
- We have taken the appropriate reasonable steps in the circumstances to ensure the accuracy and correctness of the PD; and
- We have considered whether it is necessary to update the information based on the necessary purposes for which it is processed, throughout its lifecycle.

2. VERIFICATION STEPS

Individuals	Verification of Accuracy & Completeness
Job Applicant	<ul style="list-style-type: none"> • Self-declaration of accuracy and completeness in the Employment Application Form • sighting image of applicable identification card / document e.g., NRIC or FIN and Passport (for foreigners)

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	<ul style="list-style-type: none"> • Checking the completeness of the application form or for any errors and asking the individual to correct and complete it • Reference check, where necessary for the role
Employees / Contract Staff	<ul style="list-style-type: none"> • Self-declaration of accuracy and completeness in the Application Form • Collecting copies of identification documents e.g., NRIC or FIN and Passport (for foreigners) • Collecting copies of relevant qualifications e.g., diploma, certificates • Collecting copies of other relevant documents to confirm marital status, childbirth, etc. e.g., marriage certificate, childbirth certificate • Ability to change / update particulars in the HR system by the employees / contract staff • Unique user accounts for each authorized user for the use of the HR system • HR to remind employees / contract staff at least once every year to update their particulars
General Enquirers	<ul style="list-style-type: none"> • Confirmation of particulars and enquiry details when attending to enquiries • Asking for supporting documents depending on the type of request, and on the requester e.g., authorization letter

3. UNSOLICITED PERSONAL DATA

All data fields to be reflected in our collection forms are only those that are mandatory to be filled. Should there be personal data provided to us that we did not solicit and with no business need or legal need for retention, the unsolicited personal data will not be retained and verified. If it is part of a document submitted that we need, it will be masked off in the document. If received by email, the unsolicited personal data will be deleted right away. If received by telephone, it will not be recorded.

4. PERSONAL DATA OBTAINED FROM THIRD PARTY SOURCES

We shall take appropriate steps to ascertain the accuracy and completeness of personal data collected from third party (where applies) by any of the following:

- Ensuring that the third party is acting with authority to disclose the personal data.
- Obtaining confirmation from the third-party source that it had reasonably verified the personal data being disclosed to us for accuracy and completeness.
- Requiring an undertaking from the third party or through contractual agreement to ensure that personal data disclosed to us is accurate and complete.

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5. DISCLOSING PERSONAL DATA TO THIRD PARTIES

We shall ensure accuracy and currency of the personal data before disclosing to another organization, where required, through any of the following:

- Use latest supporting documents to validate whether the data is accurate and up to date before disclosing.
- Validate with individuals on the accuracy and currency of their personal data before any disclosure, where necessary.

Where necessary, we will inform third parties to whom the personal data was disclosed to on the on changes or deletion of personal data, if required, where there is inaccurate, incomplete or out of date information. This will be done through e-mail and in accordance with [DPMP-PRO-10 Personal Data Sharing, Transfer & Disclosure](#).

Where relevant, we will include a clause in the data processing agreement of the obligation of the third party to notify us of any inaccurate, incomplete or outdated personal data disclosed to them upon their detection without undue delay.