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	Document Classification:	Internal
	Effective Date	10 June 2024
CONSENT, PURPOSE & NOTIFICATION	Doc No	DPMP-PRO-07
	Revision	1.0

AMENDMENTS LOG

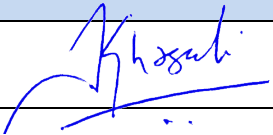
Revision History

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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PURPOSE

This document describes the mechanisms and approaches in ensuring that consent, notification and purpose limitation obligations are fulfilled by the organization in its collection, use and/or disclosure of personal data.

SCOPE

This applies to personal data collected, used and/or disclosed by the organization.

RESPONSIBILITIES AND AUTHORITIES

The Top 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

The Company shall ensure that collection, use, processing and disclosure of personal data is limited only for purposes that are reasonable, and which have been notified to the individuals concerned through the applicable notices (e.g., website privacy policy, data protection notice) and consent has been obtained (unless an exception applies). Compliance with consent, notification and purpose limitation obligations shall be verified during the quarterly compliance inspection in accordance with DPMP-PRO-12 Compliance Monitoring & Violation Handling.

A. Consent

The Company shall ensure that consent for the collection, use or disclosure of personal data is obtained in writing (e.g., consent declaration in relevant personal data collection forms such as application form where individual is required to sign) or recorded in a manner that is evident and accessible (e.g., deemed consent declarations). Such consent shall provide clearest indication that the individual has consented to notified purposes of the collection, use or disclosure of his/her personal data.

In situations where it may be impractical to obtain express consent in writing, it may choose to obtain verbal consent. As a good practice, the organization shall adopt the following practices in cases where verbal consent is obtained, to prove that consent had been given, in the event of disputes:

- Confirm the consent in writing with the individual (e.g., email the individual to confirm the consent obtained verbally); and

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- Register the fact that the individual had provided verbal consent in [DPMP-PRO-07-F2 Consent Register](#).

If consent is obtained from a person validly acting on behalf of an individual, the person shall be similarly notified of the purposes, and the identity and authorization of the person shall be verified that can validate that the individual has given consent for those purposes e.g., requiring an authorization letter and/or verifying valid relationship with the individual through certain documents or declaration statement that confirms the individual has been notified and consent has been obtained for his/her data to be shared.

If the personal data is obtained from third party sources, the organization shall verify that that third party source had obtained valid consent from individuals. The organization shall establish contractual agreements (where applies) with third parties or ask for undertaking from third parties to ensure valid collection of personal data such that necessary consent has been obtained from the individuals by the third parties on the disclosure of their personal data to the organization.

If the organization intends to rely on deemed consent by notification, the following must be satisfied:

- Conduct an assessment to determine and eliminate or mitigate adverse effects, and to consider any measures to be taken by the organization to eliminate, reduce the likelihood of or mitigate the adverse effects identified before relying on deemed consent by notification. The DPO shall use the [Assessment Checklist for Deemed Consent by Notification](#) provided by PDPC to conduct the assessment;
- Must notify the individual of the purpose of the intended collection, use and/or disclosure of his/her personal data;
- Give reasonable means and period by which to opt-out of the collection, use and or disclosure of his/her personal data for the purpose; and
- The individual does not opt-out within the period.
- The organization must not rely on deemed consent by notification for the purpose of sending direct marketing messages to individuals.

The organization may also rely on an exception to collect personal data without consent such as:

- Relying on vital interests of the individual for the purpose of contacting the next-of-kin or emergency contact person of any injured, ill or deceased individual.
- Relying on legitimate interests exception (LIE) for the purposes such as detecting or preventing illegal activities or threats to physical safety and security, IT and network security, preventing misuse of services, and carrying out other necessary corporate due diligence (e.g., the collection, use and disclosure of personal data for the consolidation of official watch lists).

Where the organization is relying on LIE for the lawful collection, use or disclosure of personal data without consent, the organization must clearly identify the situation or purpose that qualifies as a legitimate interest. The organization shall conduct an assessment to identify any adverse effect and measures that need to be implemented to eliminate, reduce the likelihood of

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or mitigate the adverse effect on the individual, and conduct a balancing test to determine that the legitimate interests outweigh any likely residual adverse effect to the individual. The DPO shall use the [Assessment Checklist for Legitimate Interests Exception](#) provided by PDPC to conduct the assessment. Any reliance on the legitimate interest exception shall be disclosed by the organization e.g., data protection notice intended for the specific audience.

B. Purpose and Notification

The Company ensures clear and concise notification to individual regarding purpose(s) on or before collecting their personal data in the manner described below:

Audience	Notification
Job Applicants	DP Notice for Job Applicants
Employees / Contractors	DP Notice for Employees / Contractors
Clients, Website Users, General Enquirers and the Public	Website Privacy Policy

Policies, processes, notices, data inventory map and relevant forms will be reviewed at least once a year by the Data Protection Committee to ensure that consent obtained, purposes and notifications for the collection, use, processing and disclosure of personal data are still reasonable and appropriate.

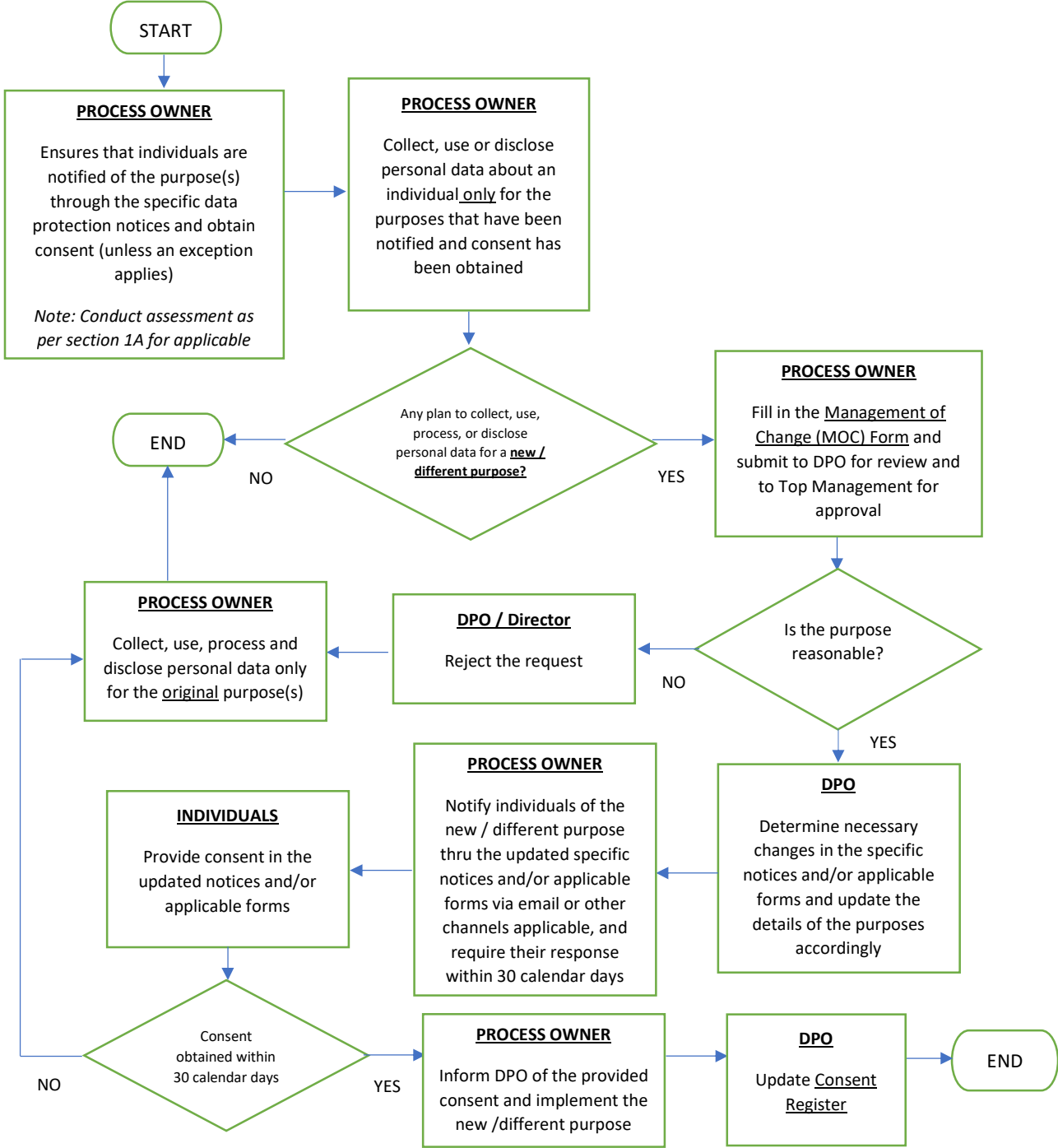
The DPC shall verify the following during the yearly review:

- Notification on individual's choices in relation to the collection, use and disclosure of their personal data, and how to withdraw consent;
- Notification on exceptions that the organization may rely on when collecting, using and disclosing personal data without consent;
- Assessments are conducted to eliminate, reduce the likelihood of or mitigate the adverse effect on the individual if the organization relies on deemed consent by notification or LIE; and
- Purpose(s) are clearly identified and documented in the notices;
- If there is a plan to use personal data for a new or different purpose other than legal obligation or function set out in the law, specific notification to the individual is carried out and consent is obtained for the new or different purpose (unless an exception applies).

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2. PROCESS FLOW

For any activity that involves the collection, use, processing and disclosure of personal data, the below process shall apply to ensure that consent, notification and purpose limitation obligations are fulfilled.



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FORMS

DPMP-PRO-07-F1 Management of Change Form

DPMP-PRO-07-F2 Consent Register