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	Document Classification:	Internal
	Effective Date	10 June 2024
PERSONAL DATA SHARING, TRANSFER & DISCLOSURE	Doc No	DPMP-PRO-10
	Revision	1.0

AMENDMENTS LOG

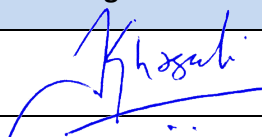
Revision History

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 sets out the steps in executing sharing, transferring and disclosure of personal data to third parties.

SCOPE

This control applies to all personal data sharing, transfer, and disclosure to third parties.

RESPONSIBILITIES & AUTHORITIES

Top Management has the prime responsibility and approval authority for this control.

The Data Protection Officer (DPO) shall ensure that this document is followed when sharing, transferring, and disclosing personal data to third parties.

PROCEDURE

A. Requests from Public Agencies, Courts, or Law Enforcement Agencies to Disclose Personal Data

- 1) When required for the purposes of investigations or proceedings, the organization will disclose personal data to public agencies, courts, or law enforcement agencies without informing and obtaining consent from the individuals as allowed under the PDPA or other applicable written laws.
- 2) Such requests will be attended to by the DPO only upon verification of the identity of the officer requesting (e.g., physical sighting of identity card) and/or of the written authorization signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that personal data is necessary for the purposes of the functions or duties of the officer requesting for it.
- 3) Upon verification of the integrity and authenticity identity of the requester and of the request, the DPO will respond to the request within the timeline prescribed, if indicated in the written request. If not, the DPO will confirm with the officer the timeframe to respond to them with the requested personal data.
- 4) The disclosure made due to such requests shall be recorded in the DPMP-PRO-10-F1 Disclosure of Personal Data.

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B. Personal Data Disclosure Within Singapore

- 1) For any disclosure of personal data to external parties within Singapore, the organization will ensure consent that had been obtained from the individual covers such disclosure, unless an exception or prohibition under the PDPA or other applicable written laws applies.
- 2) The organization will ensure that the disclosure is covered by an agreement (e.g., ND or confidentiality agreement in the contract and data processing agreement) to protect the personal data according to the requirements of Singapore PDPA, unless an exception or prohibition under the PDPA or other applicable written laws applies.
- 3) Any disclosure made will be recorded in the DPMP-PRO-10-F1 Disclosure of Personal Data.

C. Personal Data Transfers Outside of Singapore

- 1) For any transfer of personal data that may need to be made outside of Singapore, the organization will ensure that the personal data receives a comparable standard as that which it would receive under the Singapore PDPA.
- 2) The organization will ensure that the recipient is bound by legally enforceable obligations to provide to the personal data transferred a standard of protection that is comparable to that under the PDPA. In this regard, legally enforceable obligations include obligations imposed on the recipient under:
 - a) Any law;
 - b) Any contract that:
 - i. Requires the recipient to provide the personal data transferred to the recipient a standard of protection that is at least comparable to the protection under the PDPA; and
 - ii. Specifies if further transfer is prohibited. If not, specify clearly countries and territories to which the personal data may only be transferred under the contract;
 - c) Any binding corporate rules that:
 - i. Require every recipient of the transferred personal data to provide the personal data transferred to the recipient a standard of protection that is at least comparable to the protection under the PDPA; and
 - ii. Specify the recipients of the transferred personal data to which the binding corporate rules apply; the countries and territories to which the personal data may be transferred under the binding corporate rules; and the rights and obligations provided by the binding corporate rules; or
 - d) Any other legally binding instrument.
- 3) The organization will ensure that the identities of the countries and international organizations to which personal data can possibly be transferred in normal operations, including the identities of the countries arising from the use of subcontracted processing, are made available to the individuals through the notices or upon request, unless the identity of the countries cannot be

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specified in advance, or is prohibited by applicable jurisdictions to preserve the confidentiality of a law enforcement investigation.

- 4) Should any cloud service provider (CSP) be used where server maybe located overseas, we will ensure its cloud security and complete a Cloud Service Provider (CSP) Questionnaire for this purpose to ensure that personal data which will be hosted in cloud are protected in line with the requirements of PDPA.
- 5) Any transfer made will be recorded in the DPMP-PRO-10-F1 Disclosure of Personal Data.

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DPMP-PRO-10-F1 Disclosure of Personal Data