

THE SOFTWARE PRACTICE PTE LTD

DATA PROTECTION NOTICE FOR EMPLOYEES AND CONTRACT STAFF

This Data Protection Notice (“**Notice**”) sets out the basis upon which The Software Practice Pte Ltd (“**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of employees and contract staff in accordance with the Personal Data Protection Act (“**PDPA**”). This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

APPLICATION OF THIS NOTICE

1. This Notice applies to all persons engaged in a contract of service with us (whether on a part-time, contract-based or full-time basis) and interns and trainees working at or attached to us and all references to “**employment**” shall apply equally to contract staff, internships and traineeships (as may be applicable).

PERSONAL DATA

2. As used in this Notice, “**personal data**” means data, whether true or not, about an employee or contract staff who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.
3. Personal data which we may collect in the context of your employment with us includes:
 - a) Full Name
 - b) Contact Number
 - c) Personal Email Address
 - d) Date of Birth
 - e) Country of Residence
 - f) Nationality
 - g) Residential Address
 - h) Date of Joining
 - i) Bank Name, Bank Account Name and Number
 - j) Address as per Bank Record, City, Postal Code
 - k) Marital Status
 - l) Gender
 - m) Copies of NRIC or FIN and Passport
 - n) Relevant Educational, Professional or Training Certificates
 - o) Emergency Contact: Name, Contact Number, Email Address and Relationship with Contact
 - p) Photographs and Video Recording
 - q) Any other personal data you have provided to us as a job applicant (that is, prior to being engaged as an employee / contract staff)
4. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

5. We generally collect personal data that (a) you knowingly and voluntarily provide in the course of or in connection with your employment or job application with us, after you have been notified of the purposes for which the data is collected, and you have provided written consent to the collection, use and disclosure of your personal data for those purposes, or (b) collection, use and disclosure of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
6. You have choices regarding our collection, use or disclosure of your personal data. If you choose not to provide us with the personal data described in this notice, we may not be able to perform our obligations under or in connection with your contract of employment with us or facilitate the purposes listed in clause 7 of this notice. You have the right to object to the processing of your personal data and withdraw your consent in the manner described in clause 9 of this notice. We may collect, disclose, or use your personal

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data pursuant to an exception under the Personal Data Protection Act or other written law such as during the following situations:

- (a) To respond to an emergency that threatens your life, health and safety or of another individual; and
 - (b) Necessary in the national interest, for any investigation or proceedings.
7. Your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:
- (a) performing obligations under or in connection with your contract of employment with us, including payment of remuneration and tax;
 - (b) all administrative and human resources related matters within our organisation, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your insurance, health benefits and other benefits, processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;
 - (c) managing and terminating our employment relationship with you, including monitoring your internet access and your use of our intranet email to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances;
 - (d) assessing and evaluating your suitability for employment/appointment or continued employment/appointment in any position within our organisation;
 - (e) representing the organisation in communication materials and official social media pages;
 - (f) performing obligations under or in connection with the provision of our goods or services to our clients including processing of security clearance at the client premises where required;
 - (g) ensuring business continuity for our organisation in the event that your employment with us is or will be terminated; and
 - (h) facilitating our compliance with any laws, customs and regulations which may be applicable to us.

Furthermore, if you choose to share personal data of other people (such as family members or emergency contact) with us, it is your responsibility to notify such other people, whose personal data you provide, and obtain their consent about the use of their personal data as set out in this Notice.

8. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to your employment contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

WITHDRAWING YOUR CONSENT

9. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.
10. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

ACCESS TO AND CORRECTION OF PERSONAL DATA

11. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to

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correct or update any of your personal data which we hold, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

12. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) calendar days. Should we not be able to respond to your request within the said timeframe after receiving your request, we will inform you in writing within thirty (30) calendar days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).
13. Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organisation has on record, if the record of your personal data forms a negligible part of the document.
14. There is no fee that will be charged for an access or correction request.

PROTECTION OF PERSONAL DATA

15. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal, or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, access control, password protection or encryption, and disclosing personal data only on a need-to-know basis.
16. When we disclose your personal data to third parties, we will ensure that they provide sufficient guarantees to us to have implemented the necessary security measures to protect your personal data.
17. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

18. We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete, not misleading and kept up-to-date. We generally rely on personal data provided by you. In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing HR.

RETENTION OF PERSONAL DATA

19. We may retain your personal data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws. You may write in to our DPO at the contact details provided below to find out information on the retention and disposal of your personal data.
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TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

21. Where your personal data is to be transferred out of Singapore, we will comply with the Singapore PDPA in doing so. In this regard, this includes obtaining your consent for the transfer to be made and us taking appropriate steps to ascertain that the overseas recipient of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the Act. This may include us entering into an appropriate contract with the overseas

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recipient dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or other applicable law(s) permit us to.

DATA BREACH NOTIFICATION

22. In the event of a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, we shall promptly assess the impact and if appropriate report this breach within 3 calendar days to the Personal Data Protection Commission (PDPC). We will notify you when the data breach is likely to result in significant harm to you after our notification to PDPC. We may also notify other relevant regulatory agencies, where required.

DATA PROTECTION OFFICER

23. You may contact our Data Protection Officer at tsp-dpo@thesoftwarepractice.com if you have any enquiries or feedback on our personal data protection policies and procedures; or if you have any complaint or wish to make any personal data related request or would like to know how we collect, use, disclose, retain and/or dispose your personal data, in the following manner:

Any query, request or complaint should include, at least, your name and contact information.

We treat such queries and feedback seriously and will deal with them confidentially and within reasonable time.

EFFECT OF NOTICE AND CHANGES TO NOTICE

24. This Notice applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
25. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued employment constitutes your acknowledgement and acceptance of such changes.

Last updated : 10/06/2024