

Teknor Apex Asia Pacific
External Data Protection Policy (Personal Data)
Effective 1 May 2018

1. Introduction

We at Teknor Apex Asia Pacific Pte Ltd (“TAAP”) respect the privacy and confidentiality of the personal data of our Clients, Customers, Visitors and others whom we interact with in the course of providing our services. We are committed to implementing policies, practices and processes to safeguard the collection, use and disclosure of the personal data you provide us, in compliance with the Singapore Personal Data Protection Act (PDPA) 2012.

We have developed this Data Protection Policy to assist you in understanding how we collect, use, disclose, process and retain your personal data with us.

2. How We Collect Your Personal Data

The PDPA defines personal data as “data, whether true or not, about an **individual** who can be **identified** (a) from that data; or (b) from that data and other information to which the organisation has or is likely to have access.”

We collect your personal data when you:

- leave your contact details with us after attending our events e.g. tradeshow;
- leave your contact details with us after visiting our websites and portals, or making enquiries;
- interact with our Employees, Partners and Services Providers e.g. via telephone calls, faxes, text messages, face-to-face meetings or emails;
- visit our office / plant premises;
- fill in our application, registration, enquiry or survey forms;
- respond to our job advertisements in newspapers, websites, etc;
- submit your job application form and CV to us;
- provide feedback or make a complaint to us.
- Are referred to us by one of our clients or customers
- Communicate with us via emails or written correspondences
- Register at the reception counter when you visit our physical premises
- Submit your CV and job application form to us in response to our recruitment advertisements
- Submit your CV to recruitment firms or job portals, which are in turn forwarded to or retrieved by us

3. Types of Personal Data We Collect About You

The types of personal data we collect about you include:

- Personal contact information;
- Personal particulars;
- CCTV footage in our premises;
- Educational and professional qualifications – for job applicants; and
- Work experience – for job applicants, customers

4. How We Use Your Personal Data

We use the personal data you provide us for one or more of the following purposes:

- Process payment for products and services, purchases and transactions
- Enhance customer experience and improve our products and services
- Respond to inquiries and feedback to improve our quality of service
- Security and investigative reasons relating to surveillance
- Process job applications, recruitment and selection
- Carry out our obligations arising from any contracts entered into between you and us
- Comply with legal obligations and regulatory requirements

5. Who We Disclose Your Personal Data To

We disclose some of the personal data you provide us to the following parties or organisations outside Teknor Apex in order to fulfill our services to you:

- Provident Fund Board, Ministry Of Manpower, Inland Revenue Authority of Singapore, Workforce Development Agency – Client's and Employee's particulars;
- Industry associations – Employees'/Associates' particulars; and
- External service providers (mailing houses, courier services, delivery services) – Client's contact information.

Where required to do so by law, we will disclose personal data about you to the relevant authorities or to law enforcement agencies.

Where permitted by law, your personal data may also be transferred to, stored and processed in Singapore or our corporate HQ in US (Teknor Apex Company) or other jurisdiction, or from which the third party contractor provides us services. Teknor Apex shall ensure the necessary measures equivalent to Singapore's PDPA requirements.

We may also share some of your personal data, after they are anonymised, with third parties to improve our products and services to you.

6. How We Manage the Collection, Use and Disclosure of Your Personal Data

6.1 Obtaining Consent

Before we collect, use or disclose your personal data, we will notify you of the purpose why we are doing so. We will obtain written confirmation from you on your expressed consent. We will not collect more personal data than is necessary for the stated purpose.

Under certain circumstances, we may assume deemed consent from you when you voluntarily provide your personal data for the stated purpose, e.g. when you apply for a job with us using our job application forms.

6.2 Withdrawal of Consent

If you wish to withdraw consent, you should give us reasonable advance notice. We will advise you of the likely consequences of your withdrawal of consent, e.g. without your personal contact information we may not be able to inform you of future services offered by us.

Your request for withdrawal of consent can take the form of an email or letter to us.

6.3 Use of Cookies

We use “cookies” to collect information about your online activity on our website. A cookie is a small text file created by the website that is stored in the user's computer to provide a way for the website to recognise you and keep track of your preferences. The cookie makes it convenient for you such that you do not have to retype the same information again when you revisit the website or in filling electronic forms.

Most cookies we use are “session cookies”, which will be deleted automatically from the hard disk of your computer at the end of the session.

You may choose not to accept cookies by turning off this feature in your web browser. Note that by doing so, you may not be able to use some of the features and functions in our web application.

7. How We Ensure the Accuracy of Your Personal Data

We will take reasonable precautions and verification checks to ensure that the personal data you provide us is accurate, complete and up-to-date. From time to time, we may do a data verification exercise with you to update us on any changes to your personal data.

8. How You Can Access and Make Correction to Your Personal Data

You may write in to us to find out how we have been using or disclosing your personal data over the past one year. Before we accede to your request, we may need to verify your identity by checking your NRIC or other legal identification document. We will try to respond to your request as soon as possible, or within 30 days, as stipulated in the PDPA. If we are unable to do so within the 30 days, we will let you know and give you an estimate of how much longer we require. We may also charge you a reasonable fee for the cost involved in processing your access request.

You may also ask us to correct an error or omission in the personal data we hold about you. We will correct the personal data as soon as practicable, or within 30 days, unless we are satisfied on reasonable grounds that a correction should not be made.

9. How We Protect Your Personal Data

We have implemented appropriate information security measures (such as data encryption, firewalls and secure network protocols) to protect the personal data you provide us against unauthorised access, use, disclosure, or similar risks. We will take reasonable and appropriate measures to maintain the confidentiality and integrity of your personal data, and will only share your data with authorised persons on a 'need to know' basis.

10. How We Retain Your Personal Data

We have a document retention policy that keeps track of the retention schedules of the personal data you provide us, in paper or electronic forms. We will not retain any of your personal data when it is no longer needed for any business or legal purposes. We will dispose of or destroy such documents containing your personal data in a proper and secure manner.

11. Contacting Us

If you have any query or feedback regarding this Policy, or any complaint you have relating to how we manage your personal data, you may contact our Data Protection Officer (DPO) at: dpo@teknorapex.com

Any query or complaint should include, at least, the following details:

- Your full name and contact information
- Brief description of your query or complaint

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