

DATA PROTECTION NOTICE

1 Introduction

At NeutraDC Singapore Pte. Ltd. ("**NeutraDC Singapore**") we respect the privacy and confidentiality of the personal data of our customers, partners, vendors, guests 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 2012 ("**PDPA**").

We have developed this Data Protection Notice to assist you in understanding how we collect, use, disclose, process, protect and retain your personal data that is in our possession.

2 How We Collect Your Personal Data

Personal data refers to any information that can uniquely identify an individual person (a) on its own; or (b) when combined with other information. Under the PDPA, business contact information (e.g. full name, business address, business telephone number) is not considered as personal data so long as it is used strictly for business-to-business (B2B) transactions.

We collect your personal data when you:

- inquire, sign up, subscribe to or renew our services, or enter into a service agreement / contract with us;
- respond to or attend one of our marketing or promotion campaigns such as our electronic direct mails ("**EDMs**"), customer's event, etc.;
- are referred to us by our customers, vendors or partners;
- provide feedback to us on our quality of service;
- visit our websites and leave behind your contact information;
- communicate with us via emails or written correspondences;
- 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;
- submit your visa and employment pass application forms through us to apply to the relevant government agencies on your behalf; or
- visit our data centres, office or our premises, and leave your details, e.g. phone number, last 3 numerical digits of your NRIC No./FIN No. and the checksum, your image in photo or video format when captured by our CCTV cameras.

3 Types of Personal Data We Collect About You

The types of personal data we collect about you include:

- Your personal Contact information (Name, Address, Phone No., Email Address);
- Your Personal Particulars (Name, last 3 numerical digits of your NRIC No./FIN No. and the checksum/Passport No.);
- Job Applicant's personal details (Name, last 3 numerical digits of your NRIC No./FIN No. and the checksum/Passport No.);
- Job Applicant's educational and professional qualifications (Highest education level, Qualifications, Schools Attended, Academic transcripts, Membership of professional bodies, Certifications); and
- Job applicant's professional and work experience (Job title, Occupation, Employment history, Employment pass status, Work experience, Curriculum Vitae).

4 How We Use Your Personal Data

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

- Process account payables/receivables;
- Process billing, payment and other credit-related activities;
- Conduct direct marketing and lead generation activities;
- Communicate with customers and website visitors;
- Respond to inquiries and feedback to improve our quality of service;
- Analyse the use of our products, services or websites, in order to create new applications, products or services, or to deliver better products and services;
- Conduct risk assessment, or analyse risk and business results;
- Process employment passes of prospective employees with the relevant government agencies;
- Process job applications, recruitment and selection;
- Carry out our obligations arising from any contracts entered into between you and us;
- Comply with or fulfil legal obligations and regulatory requirements;
- Detect and protect against error, fraud and other criminal activities;
- Investigate complaints, claims and disputes;
- Process video footage for crime prevention and employee safety;
- Registering new vendor / partner for procurement.

5 Who We Disclose Your Personal Data To

We may, where applicable only, disclose, where required, the personal data you provide us to the following entities or organisations outside NeutraDC Singapore in order to fulfil our services to you:

- Government Agencies (eg. such as Ministry of Manpower, CPF Board, IRAS etc);
- Marketing vendors to marketing activities such as events and EDM;
- Appointed Facilities Service Provider, Security Service Providers;
- Certification Authorities, Education Departments / Ministries;
- External Professional Services (Recruiters, Auditors, Financial Advisors, Lawyers, etc);
- Other Service Providers for background check, benefits administration, tax services etc.

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

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. We will seek fresh consent from you if the original purpose for the collection, use or disclosure of your personal data has changed.

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.

We may rely on exceptions to the need for consent under the PDPA for the collection, use or disclosure of your personal data under the following circumstances (only those relevant to NeutraDC Singapore are included):

- The personal data is publicly available;
- The personal data is disclosed by a public agency or disclosed to a public agency;
- The personal data is necessary for any investigation or proceedings;
- The personal data is necessary for evaluative purposes (e.g. determining the suitability of a job applicant for the job applied for);
- The personal data is necessary to recover a debt owed by an individual to NeutraDC Singapore, or for NeutraDC Singapore to pay a debt owed to the individual;
- The personal data is necessary for the purpose of managing or terminating an employment relationship; or
- The personal data is necessary for a business asset transaction.

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. we may not be able to inform you of future services offered by us without your personal contact information.

Your request for withdrawal of consent can take the form of an email or letter to us, or through the “UNSUB” feature in an online service.

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 your 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 applications.

7 How We Ensure the Accuracy of Your Personal Data

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.

From time to time, we may do a data verification exercise for you to update us on any changes to the personal data we hold about you. If we are in an ongoing relationship with you, it is important that you update us of any changes to your personal data (such as a change in your mailing address).

8 How We Protect Your Personal Data

We have implemented appropriate information security and technical measures (such as data encryption, firewalls and secure network protocols) to protect the personal data we hold about you against loss; misuse; destruction; unauthorised alteration/modification, access, disclosure; or similar risks.

We have also put in place reasonable and appropriate organisational 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.

When we engage third-party data processors to process personal data on our behalf, we will ensure that they provide sufficient guarantees to us to have implemented the necessary organisational and technical security measures, and have taken reasonable steps to comply with these measures.

9 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 when the retention limit is reached.

10 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 (1) 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 respond to your request as soon as possible, or within 30 days from the date we receive your request. 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.

If you find that the personal data we hold about you is inaccurate, incomplete, misleading or not up-to-date you may ask us to correct the data. Where we are satisfied on reasonable grounds that a correction should be made, we will correct the data as soon as possible, or within 30 days from the date we receive your request.

11 Transfer of Personal Data

Where there is a need to transfer your personal data to another country outside Singapore, we will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA. If this is not so, we will enter into a contractual agreement with the receiving party to accord similar levels of data protection as those in Singapore.

12 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:

(I) dpo@sg.neutradc.com

or

(II) **Data Protection Officer**
NeutraDC Singapore Pte. Ltd.
1 HarbourFront Avenue
Keppel Bay Tower #03-12/13
Singapore 098632

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

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

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

13 Changes to this Data Protection Notice

We may update this Data Protection Notice from time to time. We will notify you of any changes by posting the latest Notice on our website. Please visit our website periodically to note any changes.

Changes to this Notice take effect when they are posted on our website.