

# DATA PROTECTION NOTICE

## Objective

1. This Data Protection Notice (“Notice”) sets out the basis upon which SimplifyNext Pte Ltd (“we”, “us” or “our”) may collect, use, disclose or otherwise process personal data that it collects or receives via this website, any sub-domain, other SimplifyNext website (collectively, the “Sites”), or through your use of the services we provide to you in accordance with the Personal Data Protection Act (“PDPA”). This Notice 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

2. This Notice applies to the following:
  - a. all persons who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; (collectively referred to as “customer”)
  - b. all persons engaged in a contract of service with us (whether on a part-time, temporary, or full-time basis) and interns and trainees working at or attached to us (collectively referred to as “employees”), and all references to “employment” shall apply equally to internships and traineeships (as may be applicable).
  - c. all persons who have applied for any employment position with us (“job applicants”).

## Personal Data

3. As used in this Notice, “personal data” means data, whether true or not, about a customer, an employee or a job applicant 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.
4. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your name, contact information such as your address, email address or telephone number, nationality, gender, date of birth, marital status, photographs and other audio-visual information, employment information, education background, and information about your usage of and interaction with our website.

5. 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**

6. We generally do not collect personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”, which may include your job placement agent), after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use 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).
7. Your personal data will be collected and used by us for the following purposes:
  - a. performing obligations under or in connection with the provision of our goods or services to you;
  - b. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you.
  - c. assessing and evaluating your suitability for employment in any current or prospective position within the organization;
  - d. verifying your identity and the accuracy of your personal details and other information provided; and
  - e. all administrative and human resources related matters within our organisation;
  - f. managing your relationship with us;
  - g. processing payment or credit transactions; and
  - h. facilitating our compliance with any laws, customs and regulations which may be applicable to us or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority.
8. We may collect, disclose or use your personal 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.
9. You have choices regarding our collection, use or disclosure of your personal data. You have the right to object to the processing of your personal data and withdraw your consent in a manner described in clause 13.
10. We may disclose your personal data:
  - a. With your consent, where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you;
  - b. to comply with any applicable laws, regulations, codes of practice, guidelines or rules (e.g. in an emergency or when we receive a subpoena to disclose your personal data); or
  - c. With your consent, to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above-mentioned purposes. Any third parties engaged by us will be contractually bound to keep all personal data confidential.
11. If you choose not to provide us with your personal data for the purposes listed in paragraphs 7 and 10, you may submit a request in writing to our Data Protection Officer at the contact details provided below or indicate in the personal data collection form submitted to us (if any). Depending on the complexity of the request and its impact to our relationship with you, we will not collect or, within 30 days of our receipt of your request, cease using and/or disclosing your personal data in accordance with your request.
12. The purposes listed in Paragraph 7 may continue to apply even in situations where your relationship with us (for example, pursuant to a 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 Consent**

13. 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 for any or all of the

purposes listed above by submitting your request in writing to our Data Protection Officer at the contact details provided below.

14. 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 and effect your request within thirty (30) days of receiving it.
15. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and extent of your request, we may not be in a position to continue providing our goods or services to you or process your job application. We shall, in such circumstances, notify you before completing the processing of your request (as outlined above). Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described above.
16. 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.

#### **Access to and Correction of Personal Data**

17. 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 correct or update any of your personal data which we hold, you may submit your request in writing to our Data Protection Officer at the contact details provided below.
18. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
19. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) days. Should we not be able to respond to your access request within thirty (30) days after receiving your access request, we will inform you in writing within thirty (30) 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).
20. 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.

21. If your request relates to personal data which we are processing on behalf of another organisation, we will instead forward your request to the relevant organisation for their necessary action.

### **Protection of Personal Data**

22. 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, encryption, etc to secure storage and transmission of personal data by us and disclosing personal data both internally and to our authorised third-party service providers and agents only on a need-to-know basis.
23. 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**

24. We generally rely on personal data provided by you (or your authorised representative). To ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing via the contact details provided below.

### **Retention of Personal Data**

25. 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.
26. We will cease to retain your personal data or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data were collected, and are no longer necessary for legal or business purposes.

### **Transfers of Personal Data Outside of Singapore**

27. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and will take steps to ensure that

your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

### **Data Breach Notification**

28. In the event 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. If we are a Data Intermediary, we shall inform the Data Controller immediately of any data breach so they can promptly assess the impact and comply with their data breach notification obligation.

### **Data Protection Officer**

29. You may contact our Data Protection Officer if you have any enquiries, feedback or complaint on our personal data protection policies and procedures; or if you wish to make any request, in the following manner:

30. You may contact our Data Protection Officer via <https://www.simplifynext.com/contact-dpo>.

### **Effect of Notice and Changes to Notice**

31. 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.

32. 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 use of our services, employment and participation in our recruitment process constitute your acknowledgement and acceptance of such changes.

This Notice is effective as of March 1, 2023.