

Revision History

REVISION	DATE	NAME	REASON FOR UPDATE
1.0	18 July 2023	Ngieng Hui Yee	Initial release

Prepared by	Signature	Date
Ngieng Hui Yee		
Approved by	Signature	Date
Dr. Tan Chien Hsiang		

PRIVACY NOTICE FOR CUSTOMER

We at Tritech SysEng (S) Pte Ltd respect the privacy and confidentiality of our clients' personal data. 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.

This Data Protection Notice ("**Notice**") sets out the basis upon which Tritech SysEng (S) Pte Ltd ("**we**", "**us**" or "**our**") may collect, use, disclose or otherwise process personal data of job applicants 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 Company which we have engaged to collect, use, disclose or process personal data for our purposes.

A. APPLICATION OF THIS NOTICE

1. This Notice applies to all persons who have applied for any such position with us ("customer" or "client").

B. PERSONAL DATA

- As used in this Notice, "customer" means an individual 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; and "personal data" means data, whether true or not, about a customer 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.
- 2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include full name, email address, telephone number (Business Contact Information).
- 3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

C. COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

- 1. 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, or via a third party who has been duly authorised by you to disclose your personal data to us (your "authorized representative" which may include your job placement agent), after (i) you (or your authorized representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorized representative) have provided written consent to the collection and use 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 written 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 when permitted or authorised by law).

- 2. Your personal we collect from you may be used for one or multiple of the following purposes ("**Purposes**"):
 - (a) Verify your identity.
 - (b) Responding to, handling, and processing queries, requests, applications, complaints, and feedback from you.
 - (c) Complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority.
 - (d) Any other purposes for which you have provided the information.
 - (e) Transmitting to any unaffiliated third parties including our third-party service providers and agents and relevant governmental and/ or regulatory authorities, whether in Singapore or aboard, for the aforementioned purposes.
 - (f) Any other incidental business purposes related to or in connection with the above.
- 3. We may disclose your personal data:
 - (a) 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; or
 - (b) To third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above-mentioned purpose.
- 4. The purposes listed in the above clauses 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 a contract with you).

D. WITHDRAWING CONSENT

- 1. You have choices regarding our collection, use and disclosure of your personal data. If you choose not to provide us with the personal data described in this Privacy Notice, we may not be able to process your required services. You have right to object to the processing of your personal data and withdraw your consent by submitting your request to our DPO via the email address in the contact details below.
- 2. If you wish to withdraw consent, you should give us reasonable advance notice. Upon receipt of your email request, we will notify you of the consequences of us acceding to your withdrawal request, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process and in effect your request within fourteen (30) days of receiving it.

E. ACCESS TO AND CORRECTION OF PERSONAL DATA

1. You may write 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 sighting 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 30 days, we will let you know and give you an estimate of how much time we require. We may also charge you a reasonable fee for the cost involved in processing your access request.

- 2. If you find that the personal data that we hold about you is inaccurate, incomplete 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, and we will correct the data as soon as possible, or within 30 days from the date we receive your request.
- 3. If we are unable to provide you 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 when we are not required to do so pursuant to exceptions in the PDPA.
- 4. 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 nor 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 Company has no record, if the record of your personal data forms a negligible part of the document.

F. PROTECTION OF PERSONAL DATA

- 1. 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 bout you against loss; misuse; destruction; unauthorized alteration/modification, access, disclosure; or similar risks. These are governed by our internal data protection and information security policy.
- 2. We have also put in place reasonable and appropriate organizational measures to maintain the confidentiality and integrity and availability of your personal data, and will only share your data with authorized persons on a 'need to know' or 'need to use' basis.
- 3. When we engage third-party data processors personal data on our behalf, we will ensure that they provide sufficient guarantees to us to have implemented the necessary organizational and technical security measures, and have taken reasonable steps to comply with these measures.

G. ACCURACY OF PERSONAL DATA

- 1. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is up-to-date, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.
- 2. We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete and not misleading and kept up to date.

3. Periodically, we may conduct a data verification exercise to update us on any changes to the personal data we hold about you. If we have 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 home address, emergency contacts, mobile number, bank account and professional qualifications etc.).

H. RETENTION OF PERSONAL DATA

- 1. 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.
- 2. 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 in a secure manner. This applies to both paper documents and (if) electronic data stored in databases.

I. TRANSFERS OF PERSONAL DATA TO THIRD PARTIES

1. When it is necessary to transfer your personal data to another country outside Singapore (offshore), we will ensure that the standard of data protection in the recipient country is comparable to Singapore's PDPA. If the standards are not comparable, we will enter into a contractual agreement with the receiving party to provide similar levels of data protection as those in Singapore. Additionally, we will obtain your prior consent before making the transfer.

J. FAILURE TO PROVIDE PERSONAL DATA

1. If you failure to provide certain personal data to us (or if we are not permitted by you to process your personal data), it may result in our inability to process, administer and/or manage our relationship with you. Depending on the extent to which you do not permit us to process your personal data or the extent of personal data that you do not provide to us, this may impact our ability to maintain the relationship with you and administer it accordingly.

K. DATA PROTECTION OFFICER

- 1. You may contact our Data Protection Officer at **dpo@syseng.com.sg.** If you have any enquiries or feedback regarding this Notice or any complaint you have relating to how we manage your personal data.
- 2. Any queries or complaints should include, at the minimum, the following details
 - Your full name and contact information
 - A brief description of your query or complaint

L. EFFECT OF NOTICE AND CHANGES TO NOTICE

1. 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.

2. 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 participation in our recruitment process constitute your acknowledgement and acceptance of such changes.

Effective date	:	12 April 2024
Last updated	:	12 April 2024