

# PRIVACY POLICY

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Your privacy is important to us. This Data Protection Policy outlines how your Personal Data will be collected, used, disclosed, managed and handled by Achieve Career Consultant Pte Ltd, Achieve Talents Pte Ltd, Achieve Technology Asia Pacific Pte Ltd and Achieve HR Consulting Pte Ltd (hereinafter collectively referred to as “ACHIEVE GROUP”, “we”, “our” or “us”) in accordance with the Personal Data Protection Act 2012 (“PDPA”) which strives to protect personal data of individuals.

Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we may collect, use and/or disclose your Personal Data.

This Privacy Policy supplements but does not supersede nor replace any other consents which you may have previously provided to us nor does it affect any rights that we may have at law in connection with the collection, use and/or disclosure of your Personal Data. We may from time to time update this Privacy Policy to ensure that this Privacy Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements.

Subject to your rights at law, the prevailing terms of the Privacy Policy shall apply.

## 1. Your Personal Data

1.1 In this Data Protection Policy, “Personal Data” refers to any 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 we have or are likely to have access, including data in our records as may be updated from time to time.

1.2 Examples of such Personal Data you may provide to us include

- a) your name, NRIC, passport or other identification number;
- b) telephone number(s), mailing address, email address, network data; and
- c) any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

1.3 Cessation of Collection of full NRIC Numbers:

In compliance with the Personal Data Protection Act and commitment to protect candidates/ personal data, Achieve Group will cease to collect, process or use full NRIC numbers during our screening and job application process.

Kindly ensure your resume provided to us does not contain your full NRIC number and full home address during your job application.

## **2. Purposes for the Collection, Use and Disclosure of Your Personal Data**

2.1 Generally, ACHIEVE GROUP may collect, use and/or disclose your Personal Data for the following purposes, depending on the nature of our relationship with you, in accordance with the PDPA:

- a) the purposes for which we have specifically obtained your consent; and
- b) the purposes for which you have provided your Personal Data to us.

2.2 In addition, ACHIEVE GROUP may collect, use and/or disclose your Personal Data for the following purposes:

- a) Job applications, matters relating to your employment in ACHIEVE GROUP, and any other related purposes;
- b) Submit resume to our client for job placement;
- c) Communicating with you to inform you of changes and updates or other relevant administrative information;
- d) Verification of your identity;
- e) Responding to your queries and requests and handling complaints;
- f) Fulfilling of referral requests;
- g) Conducting market research for statistical profiling and other purposes to understand and determine demographics in order for us to review, develop and improve the services which we are providing to you;
- h) Group Medical Insurance Policies;
- i) Our marketing initiatives (including without limitation receiving our Electronic Direct Mailers – EDM, newsletters which you have signed up to receive or information of any existing/new services and products) and branding activities (including without limitation photographs or written or video/audio recordings of your quotes and testimony for media pitching, press releases and ACHIEVE GROUP’s internal publications and broadcasts);

- j) Work Pass Application and any other Passes (Airport Pass, secured premise or worksite Pass and etc) which you may require during your employment with us;
- k) Archival of documents and records in both electronic and physical form for record keeping purposes;
- l) Preventing, detecting and investigating crime, including fraud and any form of financial crime, and analyzing and managing other risks;
- m) Employment training and Training Grant Application;
- n) Compliance with any applicable local or foreign statute, rule, law, regulation, judgment, decree, directive, code of practice, guideline, administrative requirement, sanctions regime, court order, agreement between any ACHIEVE GROUP company and an Authority (as defined in section 3.1(g) of this Data Protection Policy), agreement or treaty between Authorities, international guidance and internal policies or procedures, which may apply to any ACHIEVE GROUP company or which any such company is subject to; or
- o) To assist in or with law enforcement and investigations by any Authority or to comply with any request from an Authority; and
- p) Subject to applicable law, any other purposes which may be required from time to time during your employment with us or using our employment agency / labour supply service.

2.2 When you browse our website, you generally do so anonymously, but please see section 4 below on cookies.

2.3 You should ensure that all Personal Data submitted to us is correct, accurate and complete. You shall update us in a timely manner of all changes to the information provided to us. Failure on your part to do so may result in our inability to provide you with services you have requested.

2.4 Where personal data is submitted by you on behalf of another individual or concerns another individual other than yourself, you represent and warrant to us that all the necessary consents (procured in accordance with all applicable data protection legislation, including without limitation the PDPA, for such purposes stated in the relevant sections of this Data Protection Policy) have been obtained from the relevant

individuals and that you have retained proof of these consents, such proof to be provided to us upon our request.

### **3. Disclosure of Personal Data**

3.1 Personal Data will be protected and kept confidential but, subject to the provisions of any applicable law, may be disclosed for the purposes listed above (where applicable) to the following parties:

- a) ACHIEVE GROUP companies; Page 4 of 6
- b) ACHIEVE GROUP corporate clients, for the purpose of processing your job applications;
- c) Third party service providers who provide services (including but not limited to mailing, information technology, data processing, storage and archival) to ACHIEVE GROUP;
- d) The Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres, whether in Singapore or otherwise;
- e) Our professional advisers such as our auditors and lawyers;
- f) Any judicial, administrative or regulatory body, any government or public or government agency, instrumentality or authority, any domestic or foreign tax, revenue, fiscal or monetary authority or agency, securities or futures exchange, self-regulatory organization, trade repositories, central counterparties, court, central bank or law enforcement body or any agents thereof, having jurisdiction over any ACHIEVE GROUP company (collectively referred to as “Authorities” and each an “Authority”);
- g) Any other person in connection with the purposes set forth above.

### **4. Use of Cookies**

4.1 We may collect or analyse anonymised information from which individuals cannot be identified (“Aggregate Information”), such as number of users and their frequency of use, the number of page views (or page impressions) that occur on our websites and common entry and exit points into our websites.

4.2 We use “cookies”, where a small data file is sent to your browser to store and track Aggregate Information about you when you enter our websites. The cookie is used to

track information such as the number of users and their frequency of use, profiles of users and their preferred sites.

4.3 The Aggregate Information collected is used to assist us in analysing the usage of our websites and improving our websites.

4.4 Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our websites.

## **5. Third-Party Sites**

5.1 Our website may contain links to other websites operated by third parties, and we are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third-party websites. Some of these third-party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable Privacy Policy of the third party to determine how they will handle any information they collect from you

## **6. Access and Correction of your Personal Data / Withdrawal of Consent**

6.1 You may request access to or make corrections to your Personal Data records, but ACHIEVE GROUP has the right to charge a reasonable fee for processing your request. Please submit your request to our Data Protection Officer for us to proceed.

6.2 If you wish to withdraw your consent to any use or disclosure of your Personal Data as set out in this Data Protection Policy, you may contact our Data Protection Officer.

6.3 Please note that if you withdraw your consent to any or all use or disclosure of your Personal Data, depending on the nature of your request, we may not be in a position to continue to provide our services to you or administer any contractual relationship in place. Such withdrawal may also result in the termination of any agreement you may have with us.

6.4 ACHIEVE GROUP's legal rights and remedies are expressly reserved in such event.

## **7. Retention of Personal Data**

7.1 Your Personal Data is retained to the extent one or more of the purposes for which it was collected remains valid and for other legal or business purposes for which retention may be necessary.

## **8. Contacting Us**

8.1 If you have any questions or complaints relating to the use or disclosure of your Personal Data, or if you wish to know more about our data protection policies and practices, please contact our Data Protection Officer via [dpo.pdpa@achievegroupp.com](mailto:dpo.pdpa@achievegroupp.com)

## **9. Opt-out Policy for Newsletters / Marketing Materials**

9.1 ACHIEVE GROUP may from time to time send you newsletters, job openings and marketing materials based on the personal information and data that you have provided us. Suitable measures are implemented to allow you to “opt-out” of receiving such materials. You may choose to sign up or unsubscribe for such materials by clicking on the automatic link appearing in each newsletter.

Last Updated: 16 Jun 2020