



# External Data Protection Policy

02 May 2022

POLICY NOTICE

## 1 Introduction

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All staff at ScienTec Consulting Pte Ltd ("STC") respect the privacy and confidentiality of the personal data of our job applicants, clients, service providers and other individuals whom we interact with in the course of providing our products and 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 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

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Personal data refers to any information that can uniquely identify an individual person either (a) on its own (e.g., NRIC No., FIN No.), or (b) when combined with other information (e.g., Full Name + Full Address).

We collect your personal data:

- When you apply for a job and seek to be recruited through us
- When you enquire and/or use any of our services;
- When you interact with us on our digital/online platforms;
- When you provide us with goods and services as our service providers
- When you provide feedback to us on our products and services or quality of service
- When you communicate with us via emails or written correspondences

## 3 How We Use Your Personal Data

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The types of personal data we might collect include but are not limited to:

- Mailing address, telephone numbers, email address and other contact details;
- Resume, educational qualifications, professional qualifications and certifications and employment references
- Employment and training history
- Salary information and bank account details
- Details of your next-of-kin, spouse and other family members;
- Work-related health issues and disabilities
- Photographs

## 4 How We Use Your Personal Data

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

- Inform you of possible employment opportunities, relevant candidates, and/or other services that are of relevance to you and with your consent
- Assessing and evaluating your suitability for employment in any current or prospective position within the organisation;
- Verifying your identity and the accuracy of your personal details and other information provided;

- Performing obligations under or in connection with your contract of employment with us, including payment of remuneration and tax;
- All administrative and human resources related matters within our organisation, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your insurance and other benefits, processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;
- Managing and terminating our employment relationship with you, including monitoring your internet access and your use of our intranet email to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances;
- Assessing and evaluating your suitability for employment/appointment or continued employment/appointment in any position within our organisation;
- Ensuring business continuity for our organisation in the event that your employment with us is or will be terminated;
- Performing obligations under or in connection with the provision of our goods or services to our clients;
- Facilitating any proposed or confirmed merger, acquisition or business asset transaction involving any part of our organisation, or corporate restructuring process
- Facilitating our compliance with any laws, customs and regulations which may be applicable to us.

## **5 Who We Disclose Your Personal Data To**

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We may disclose some of the personal data you provide us to the following entities or organisations outside STC in order to fulfil our services to you:

- Government Agencies & Regulatory Authorities such as Ministry of Manpower, Health Promotion Board, Central Provident Fund
- Providers of Professional Services such as Auditors, Lawyers, Consultants
- Banks, Payment Card Processing Companies, and other Financial Institutions
- Data Processing and Hosting Companies such as IT Service Providers, Webhosting Companies and Cloud Service Providers
- Providers of Goods or Services such as Training Providers, Freight and Courier Services
- Clients of STC, for the purposes of employment

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**

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### **6.1 Obtaining Consent**

Before we collect, use or disclose your personal data, we will notify you of the purpose of data collection. We will obtain verbal confirmation from you on your expressed consent, with an acknowledgment sent via email/text afterwards. 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.

**[Legitimate Interests:** We may rely on the legitimate interest's exception to consent in the following circumstances which are our organisation's lawful interests. When we rely on this exception, we conduct an assessment as required under law and will provide such documented assessments to PDPC upon their request.]

## 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 employment opportunities with STC or with STC's clients.

Your request for withdrawal of consent can take the form of an email to us. To withdraw consent, please send a written request for withdrawal of consent via email to our Data Protection Officer (DPO) at [dpo@scienteconsulting.com](mailto:dpo@scienteconsulting.com).

## 7 How We Ensure the Accuracy of Your Personal Data

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We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete 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

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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.

## 9 How We Retain Your Personal Data

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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**

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You may write in to us to find out what personal data about you that we have in our possession or under our control and how it may have been used and/or disclosed by us in the previous 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 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 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 How We Transfer Your Personal Data**

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If there is a need for us to transfer your personal data to another organisation outside of Singapore (e.g., our subsidiaries within Asia), 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 that in Singapore.

## **12 Contacting Us**

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

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

- Your full name and contact information
- Nature of your query or complaint
- 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**

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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.