

## PERSONAL DATA POLICY

This Data Protection Notice (“**Notice**”) sets out the basis upon which *HEATEC JIETONG* (“**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of job applicants/ employees/ non-employees 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 organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

### PERSONAL DATA

1. As used in this Notice, “**personal data**” means any data or information that related to you, including but not limited to: Name, last 4 digits of your NRIC, Date of birth, gender, nationality, contact means, residential and/ or mailing address.
2. Despite the accuracy of the data, personal data means someone 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.

### COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

3. We generally collect personal data that 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 “**authorised representative**”, which may include your job placement agent), after (i) you (or your authorised representative)
4. Your personal data will be collected and used by us for the following purposes, and we may disclose your personal data to third parties where necessary for the following purposes including but not limited to:
  - (a) assessing and evaluating your suitability for employment in any current or prospective position within the organization.
  - (b) managing and terminating our employment/ business relationship with you
  - (c) facilitating any proposed or confirmed merger, acquisition or business asset transaction involving any part of our organization, or corporate restructuring process; and
  - (d) facilitating our compliance with any laws, customs and regulations which may be applicable to us.

### HEATEC JIETONG PTE. LTD.

### **RELIANCE ON THE LEGITIMATE INTERESTS EXCEPTION**

5. In compliance with the PDPA, we may collect, use, or disclose your personal data without your consent for the legitimate interests of *HEATEC JIETONG* or another person. In relying on the legitimate interests exception of the PDPA, *HEATEC JIETONG* will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.
6. In line with the legitimate interests' exception, we will collect, use, or disclose your personal data for the following purposes:
  - a. Fraud detection and prevention.
  - b. Detection and prevention of misuse of services.
  - c. Network analysis to prevent fraud and financial crime, and perform credit analysis; and
  - d. Collection and use of personal data on company-issued devices to prevent data loss.

### **WITHDRAWING CONSENT**

7. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
8. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request) for your request to be processed. In general, we shall seek to process and effect your request within **thirty (30) days** of receiving it.

### **ACCESS TO AND CORRECTION OF PERSONAL DATA**

9. If you wish to:
  - (a) request for access to the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or
  - (b) request to correct or update any of your personal data which we hold.

You may submit your request in writing or via email to our Data Protection Officer at the contact details provided below. We will respond to your request as soon as reasonably possible.

### **PROTECTION OF PERSONAL DATA**

10. 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 minimised collection of personal data, authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), encryption of data, up-to-date antivirus protection, regular patching of operating system and other software, and web security measures against risks.

### **RETENTION OF PERSONAL DATA**

11. 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.
12. We will cease to retain your personal data or remove how 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.

### **DATA PROTECTION OFFICER**

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

Email Address : [DPO@HEATEC.COM.SG](mailto:DPO@HEATEC.COM.SG)  
Post to : 10 Tuas South Street 15, Singapore 637076

### **EFFECT OF NOTICE AND CHANGES TO NOTICE**

14. 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.
15. We may revise this Notice from time to time without any prior notice.

Effective date : 07/11/2022