



VSTECS (SINGAPORE) PTE LTD DATA PROTECTION POLICY

Last revised on 1 March 2019

This Personal Data Protection Policy Statement sets forth the policies relating to the collection, use and disclosure of personal data by VSTECS (Singapore) Pte Ltd and its subsidiaries, hereinafter called VSTECS. It explains how VSTECS collects and handles personal data of individuals in compliance with the requirements of the Personal Data Protection Act 2012 of Singapore and its regulation(s) (“PDPA”).

We also have other policies which deal with data protection, which may be in connection with specific functions or business activities. VSTECS’ Personal Data Protection Policy is categorized into:

- a) Corporate Data Protection Policy
- b) Recruitment Data Protection Policy
- c) Marketing Data Protection Policy
- d) Website Data Protection Policy

Corporate Data Protection Policy

Summary

Personal data may be collected, used or disclosed for reasonable business purposes only if there is consent or deemed consent from the individual involved. The individual concerned shall be informed of the purpose of collecting such personal information and be notified. Should there be a legal or statutory requirement, we may also collect, use or disclose personal data if it is required or authorised under applicable laws.

Collection of Personal Data

We may collect personal data from clients, customers, business contacts, partners, personnel, contractors and other individuals. Such personal data may be provided to us in forms (hardcopy or electronic) filled out by individuals at our events and seminars, marketing and promotional messages, email messages, face to face meetings, telephone conversations, through our websites or provided through third parties. If any individuals contact us, we may keep a record of that contact.

We only collect these personal data when it is necessary for business purposes. We will only collect, hold, process, use, communicate and/or disclose such personal data, in accordance with this policy. For personal data obtained from intermediaries or third parties, the intermediary or third party has to undertake that such personal data is obtained in compliance with the PDPA. VSTECS will seek the third party's or intermediary's undertaking to this effect.

Use of Personal Data

We use personal data for the following purposes:

- to respond to the individual's request or for the purposes for which it was provided to us maintain contact
- to keep clients and other contacts informed of the services we offer, industry developments, service offerings, seminars and other events we are holding, that may be of interest to them
- for general management and reporting purposes, such as invoicing and account management
- for recruitment purposes



- for purposes related to the employment of our personnel and providing internal services to our personnel
- all other purposes related to our business.

Any individual may choose to unsubscribe from mailing lists, registrations, or elect not to receive further marketing information from us by contacting our Data Protection Officer, or if we have contacted such individual by email, such individual may use the unsubscribe function in that email to notify us. Such requests will be processed within 7 working days.

Disclosure of Personal Data to Third Parties

We do not disclose personal data to third parties except when required by law. Should we engaged third parties such as marketing agencies, data intermediaries or subcontractors to assist with our company's activities, such third parties whom we engage will be bound contractually to keep all information confidential through a non-disclosure agreement.

We may disclose personal data to other member companies in the VSTECS Group where it is necessary (i) to meet the purpose for which such individual has submitted the information; or (ii) to enable such individual to be provided with information at a later date which may be of relevance and interest to such individual based on the nature and purpose of such individual's voluntary requests. We may also transfer all data in our possession to a successor-in-interest to our business or assets.

Access to and Correction of Personal Data

Upon request, we will provide the individual with access to their personal data or other appropriate information on their personal data in accordance with the requirements of the PDPA.



Upon request, we will correct an error or omission in the individual's personal data that is in our possession or control in accordance with the requirements of the PDPA.

Withdrawal of Consent

Upon reasonable notice being given by an individual of his/her withdrawal of any consent given or deemed to have been given in respect of our collection, use or disclosure of his personal data, we will cease (and cause any of our data intermediaries and agents to cease) collecting, using or disclosing the personal data unless it is required or authorised under applicable laws.

Accuracy of Personal Data

We will make a reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.

Security and Protection of Personal Data

We have implemented generally accepted standards of technology and operational security to protect the personal data in our possession or under our control and to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. All VSTECS personnel follow a network-wide security policy. Only authorised VSTECS personnel are provided access to personally identifiable information and these personnel have agreed to ensure confidentiality of this information.

Retention of Personal Data

We will cease to retain personal data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.



Transfer of Personal Data outside of Singapore

We will ensure that any transfers of personal data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

Privacy on Our Websites

This Policy also applies to any personal data we collect via our websites. Cookies may be used on some pages of our websites. We may provide a number of links to third party websites. We assume no responsibility for the information practices of these third party websites that visitors are able to access through ours. When a visitor to our website links to these third party websites, our privacy practices no longer apply.

Data Protection Officer

If an individual believes that information we hold about him is incorrect or out of date, or if an individual has concerns or further queries about how we are handling his personal data, or any problem or complaint about such matters, please contact our Data Protection Officer Paul Chong, at enquiry@ecs.com.sg

Modifications

We reserve the right to modify or amend this Policy at any time. The effective date will be displayed at the beginning of this Policy.

Recruitment Data Protection Policy

Why do we collect personal data?

As part of our recruitment process, we collect necessary personal data about you to consider you for employment with our company. During the course of the recruitment and selection process, we may request further information about you to assess your suitability for positions with our company. In doing so, we only collect personal data that is necessary for recruitment decisions. The procedures used by the firm to gather further information about you might include:

- selection interviews;
- assessment centres;
- referee reports;
- security vetting; and,
- necessary pre-employment activities.

References from your current or former employer(s) or other sources will only be obtained with your consent. In some cases, pre-employment checking may be necessary. Failure to provide requested information may influence the processing and outcome of your application.

How do we use personal data?

We use the personal data for the following purposes:

- managing your application(s) for employment, evaluating you for open positions within the VSTECS Group, and managing your candidate profile;



- evaluating your suitability for employment with VSTECS (including for example providing your personal information to third parties to conduct background checks);
- sending you email notifications and other announcements, requesting additional information, or otherwise contacting you about your candidacy;

We will not collect or use personal data in ways other than as described in this policy unless we have obtained your consent. We may specifically request a consent form to be signed. In other cases consent may be implied (for instance, you give us information after being fully advised of how it will be used).

Disclosure of personal data

Your personal data will be used only by staff directly involved in the recruitment process. Information will not be disclosed to third parties except when required by law, when we have your consent or in cases where the third party is a contractor or supplier whom we have engaged specifically to assist with our firm's activities. All such contractors will be bound contractually to keep all information confidential.

How long is information kept?

Because VSTECS must process your personal data in order to consider you for a position as part of the recruitment process, if you revoke your consent, VSTECS may need to terminate your application. VSTECS may retain certain information related to your application for a reasonable but limited period to meet applicable legal or records retention requirements. To request us to delete your personal data submitted to VSTECS, please send your request to personnel@ecs.com.sg



Correction and Concerns

If you believe that information we hold about you is incorrect, if you have concerns about how we are handling your personal data, or if you changed your mind about our usage of your data, please email us at personnel@ecs.com.sg we will try to resolve those concerns.

Marketing Data Protection Policy

Why do we collect personal data and how do we use it?

The personal data submitted to VSTECS will be used by VSTECS for the purposes of conveying relevant promotional activities organised by VSTECS such as, but not limited to, seminars, marketing events and promotional materials (electronic or hardcopy). We may also send you communications from time to time, for example, to advise you of updates or ask you to participate in surveys.

Retention of Personal Data

Personal data which is kept by VSTECS will be destroyed after a reasonable period from the time when it becomes outdated or is no longer required for the purpose for which it was collected or when we receive your request to delete it.

How is this personal data secured?

The personal data submitted to VSTECS is stored in our contacts database or similar system and is available to only authorised VSTECS staff.

Access to and Correction of Personal Data

If you wish to access, delete or correct your personal data provided to us or if you have any concerns about how we handle information about you, please send your request to our Data Protection Officer, Paul Chong, at enquiry@ecs.com.sg

Upon request, we will correct an error or omission in the individual's personal data that is in our possession or control in accordance with the requirements of the PDPA.



Withdrawal of Consent

Upon reasonable notice being given by an individual of his withdrawal of any consent given or deemed to have been given in respect of our collection, use or disclosure of his personal data, we will cease (and cause any of our data intermediaries and agents to cease) collecting, using or disclosing the personal data unless it is required or authorised under applicable laws.

Disclosure of Data to Third Parties

The personal data submitted will not be disclosed to third parties except when required by law, when we have your explicit consent or in cases where the third party is a contractor or supplier whom we have engaged specifically to assist with our company's activities. All such contractors will be bound contractually to keep all information confidential.

Contact our Data Protection Officer

If an individual believes that information we hold about him is incorrect or out of date, or if an individual has concerns or further queries about how we are handling his personal data, or any problem or complaint about such matters, please contact our Data Protection Officer Paul Chong, at enquiry@ecs.com.sg

Website Data Protection Policy

This privacy policy (the “Policy”) details what to expect when personal data is collected through our website(s).

The Policy pertains to information collected via:

- i) visitors to our websites (the “Sites”); and
- ii) users who register their emails with us.

VSTECS is committed to maintaining the security of personal information. We have put in place appropriate procedures and measures to safeguard your personal information.

1. TYPE OF INFORMATION COLLECTED FROM VISITORS

Personal data like e-mail and contact numbers may be collected. Cookies and tracking devices, for example, Google Analytics may be used. For example, we may monitor the number of times you visit our sites and the pages visited. This information will be used for profiling purposes. Please see further the section on “Our Use of Cookies” below.

2. INFORMATION COLLECTED FROM USERS WHO REGISTER AT OUR SITES

When you register your emails with us, we may use it to send you electronic marketing and promotional messages, contact you about products and services we think may be of interest to you.

3. ACCESSING & UPDATING OF PERSONAL INFORMATION

Subject to the exceptions referred to in section 21(2) of the Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore (“PDPA”), you have the right to request a copy



of the information that we hold about you. If you would like a copy of some or all of your personal information, please send an email to enquiry@ecs.com.sg

4. USE OF COOKIES

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. The information is used to track visitor use of the Site and to compile statistical reports on Site activity. For further information about cookies visit www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our Site features may not function if you remove cookies from your browser.

5. NON-DISCLOSURE

VSTECS does not sell, trade, or otherwise transfer to third parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, as long as these parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect our and others' rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

6. LINKS TO OTHER WEBSITES

Our sites may contain links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.



7. CHANGES TO PRIVACY POLICY

VSTECS keep's its privacy policy under regular review. If we change our privacy policy we will post the changes on this page, and place notices on other pages of the Site, so that you may be aware of the information we collect and how we use it at all times.