

Data Protection Policy

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INTRODUCTION

PDPA in Singapore

The Personal Data Protection Act 2012 (the "PDPA") establishes a general data protection law in Singapore which governs and regulates an organisation's activities relating to the collection, use and disclosure of individuals' personal data.

The **Personal Data Protection Act** is intended to set the minimum standards that all organizations in Singapore must observe.

Personal Data Protection Commission set up on 2 Jan 2013.

The Personal Data Protection Commission (PDPC) is a Singapore Government statutory body established on 2 January 2013 to administer and enforce the Personal Data Protection Act 2012 (PDPA). The other roles of PDPC include undertaking public education and engagement programmes to help organisations understand and comply with PDPA as well as to promote greater awareness of the importance of personal data protection in Singapore.

Website: www.pdpc.gov.sg

OBJECTIVE

To ensure that Hawk Asia Pacific Pte Ltd (Hawk) is in compliance with the Personal Data Protection Act 2012 (PDPA) in the collection, use, disclosure, maintaining accuracy, handling and security of personal data in a manner that recognises both the right of individuals to protect their personal data and the need of the organisation to collect, use and disclose personal data for purpose that a reasonable person would consider appropriate in the circumstance.

SCOPE

The policy defines the responsibilities of Hawk in ensuring compliance to the PDPA by executing good control and consistency in the collection, usage and disclosure of personal data.

APPOINTMENT

Hawk will appoint a Data Protection compliance officer.

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DEFINITION

1. What is Data Protection?

- a. It's the control over the collection, storage, accuracy, use and dissemination of personal information.
- b. Ensure that personal data is not improperly used without the knowledge or consent of the individual.
- c. Prevent the processing of incorrect or inaccurate personal data about a specific individual.
- d. Both employers and employees are responsible for complying with the PDPA.

The PDPA does NOT apply to:

- Personal data about an individual that is contained in a record that has been in existence for at least 100 years
- Personal data of a deceased individual (for 10 years from death) except the need to make reasonable security arrangements to protect such data compliance with requirement in relation to disclosure.

2. What is Personal Data?

In this Data Protection Policy, "Personal Data" refers to any data or information about you from which you can be identified. Examples of such Personal Data include:

- a. your name,
- b. NRIC, passport or any other identification number,
- c. telephone number(s),
- d. mailing address,
- e. email addresses,
- f. your employment and education background
- g. your offering and titles
- h. information with regards to your spouse, children and/or extended families
- i. any other information relating to you which you have provided to Hawk or which Hawk has collected in its interaction with you

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3. What do we do?

To preserve the confidentiality of all information you provide to Hawk, we maintain the following privacy principles:

- a. We only collect personal information that we believe to be relevant and required so
- b. Hawk will not disclose information collected about you to 3rd parties such as vendors and contractors
- c. We may be required from time to time to disclose your personal information to any Singapore Government Authority example Land Transport Authority, Traffic Police and etc.
- d. We aim to keep your personal information on our records accurate and up-to-date and require you to update us of any changes.
- e. We maintain strict security systems designed to prevent unauthorised access to your personal information. All administration team members of Hawk are required to observe our confidentiality obligations and they sign an undertaking upon first joining service.

4. How is data collected?

Hawk may collect your Personal Data in various ways, including the following:

- a. When you submit any form, including but not limited to application forms or others forms relating to any of our products and services.
- b. When you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our products and services.
- c. When you interact with our staff, including customer service officers, for example, via telephone calls (which may be recorded), letter, fax, face-to-face meetings, social media platforms and emails.
- d. When you use our electronic services, or interact with us via our websites or use services on our websites.
- e. When you request that we contact you or request that you be included in an email or other mailing list.
- f. When you respond to our promotions, initiatives or to any request for additional Personal Data.
- g. When you submit an employment application or when you provide documents or information including your resume and/or CVs in connection with any appointment as an officer, director, representative or any other position.
- h. When your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events at our premises.
- i. When you are contacted by, and respond to, our marketing representatives and customer service officers.

- j. When we seek information about you and receive your Personal Data in connection with your relationship with us, including for our products and services or job applications, for example, from business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities and/or
- k. When you submit your Personal Data to us for any other reasons.

Please see **APPENDIX** on last page

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5. Protection Obligation

- a. Hawk will keep all personal data confidential and accessible to only authorised and need-to-know personnel.
- b. Soft copy databases will be password protected where applicable and stored in the dedicated ministries.
- c. Access to the softcopy databases will only be given to authorized members of Hawk.
- d. All members are not allowed to save any copies of databases in their personal computer hard drives or portable storage drives, except for the purpose of transfer of information from one computer to another and contents will be deleted once the said purpose is achieved.

6. Existing Data

The Personal Data Protection Commission (PDPC) a Singapore Government statutory body established on 2 January 2013, to administer and enforce the Personal Data Protection Act 2012 (PDPA) states under Section 18.2 (c)

An organisation may continue to use personal data that was collected before the appointed day for the purposes for which it was collected **unless consent is withdrawn** under the PDPA or the individual had otherwise indicated that he does not consent to such use.

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APPENDIX

Privacy Policy and Consent to use of Data

By interacting with, submitting information to or signing up document by Hawk Asia Pacific Pte Ltd, you agree and consent Hawk collecting, using, disclosing and sharing amongst the relevant administration team on your personal data information. Hawk respects personal data and privacy, and will not share such information with any third party. Should you wish to withdraw or limit your consent, please write with full particulars to:

Data Protection Officer
Hawk Asia Pacific Pte Ltd
10 Bukit Batok Crescent
#11-03 The Spire
Singapore 658079