

## **PICARDATA PRIVACY POLICY**

This privacy policy (“**Policy**”) outlines how Picardata collects, maintains, stores and discloses personal information and data we hold about individuals (“**Personal Data**”). This Policy forms part of the Terms and Conditions of Use for all products, software and services provided by Picardata.

For the purposes of this the Policy, please note that:

- a) “Picardata” refers to Picardata Pte Ltd and its related corporations
- b) “We / Our / Ours / Us” refers to Picardata and its respective officers, servants or agents whether situated in or outside of Singapore
- c) “Services” refers to the Picardata products and services you have applied for or are using, including but not limited to payroll and staffing services, software, products and support provided by Picardata

Personal Data in this Policy includes any data about an individual who can be identified from that data such as the individual’s name, NRIC, passport or other identification number, their contact details, work experience, qualifications, aptitude test results, salary and payroll details, incidents at the workplace, and other information obtained or received by us in connection with the Services.

### **How we use your Personal Data**

1. We are a data intermediary. We may collect, use and disclose Personal Data of your employees, directors, beneficial owners, shareholders, authorised representatives or of any other individual supplied to us by you for one or more of the following purposes:
  - a. processing an application for any products or services offered or distributed by us (including but not limited to third party products)
  - b. providing products and services requested by you or individuals associated with your organisation
  - c. generating marketing, regulatory, management, statistical or other related reports and performing analytics
  - d. meeting or complying with our internal policies and procedures and any applicable laws or court orders
  - e. legal purposes
  - f. handling complaints or feedback
  - g. facilitating proposed or actual assignment, transfer, participation or sub-participation in an of our rights or obligations in respect of your relationship with us
  - h. for any insurance claim or proposal that requires disclosure of your personal information
  - i. for our direct marketing and business development to you (including but not limited to third party products)
  - j. for other internal business purposes to allow us to improve our services to you and individuals associated with your organisation
  - k. conducting market research, surveys and data analysis relating to any service or product provided by us (whether or not conducted jointly with another party) which may be relevant to you or individuals associated with your organisation
  - l. other purposes which are reasonably related to the purposes above.

2. Personal Data of individuals is kept confidential. However to carry out the purposes listed above, Picardata may share such Personal Data with its related or affiliated corporations, entities and contractors whether in Singapore or elsewhere. When doing so, we require them to ensure that the Personal Data disclosed is kept confidential and secure. Please note that technical or customer support involving access to personal data may be provided by Picardata representatives located outside Singapore.
3. Where you or an individual associated with your organisation applies for or holds a product or service which is jointly offered by Picardata and a co-brand partner, Picardata may also collect, use and disclose Personal Data for the purpose of sharing it with the co-brand partner for offering, marketing and promoting to you any products, services, offers or events which the co-brand partner thinks may be of interest to you or that individual.

### **Disclosure of your Personal Data**

4. We may disclose Personal Data of individuals associated with your organisation to:
  - a. Co-branded partners of Picardata and related or trusted third parties (subject to you opting into services that require this disclosure)
  - b. Our insurers
  - c. A professional association or body that has a legitimate interest in the disclosure of that person's Personal Data
  - d. External education or training providers to individuals associated with your organisation
  - e. Employees, officers and agents of Picardata located within and outside Singapore to assist us in providing the Services
5. We will otherwise treat such Personal Data as private and confidential and apart from the parties stated above, we will not disclose such data to any other party except:
  - a. where permission has been given by the individual
  - b. where we are required or permitted to do so by law
  - c. where required or authorised by any court order
  - d. where we are required to meet our obligations to any relevant regulatory authority

### **Security of Personal Data**

6. Picardata takes breaches of privacy very seriously. Our employees and contractors are trained to handle the personal data securely and with utmost respect and confidentiality, failing which they may be subject to disciplinary action. Employees and contractors of Picardata located outside Singapore are contractually obligated to keep secure any personal data they may handle.
7. We store Personal Data in secure computer storage facilities and (where necessary) paper-based files and other records and take reasonable steps in the circumstances to protect the personal information we hold from misuse, interference and loss, unauthorised access, modification or disclosure. We may need to maintain records for a significant period of time. However, when

we consider information is no longer needed, we will delete all details that identify the individual and/or destroy all records of such Personal Data.

8. We have appointed a Data Protection Officer to ensure that Personal Data is managed in accordance with this Policy, with the Personal Data Protection Act and other similar legislation in the countries in which we operate.

### **Accuracy of Personal Data**

9. We take reasonable steps to ensure that all Personal Data is up-to-date and accurate and recognise that contact details and other data may change frequently. Please keep us advised of any changes in information.
10. If an individual associated with your organisation wishes to delete their Personal Data held with us, please contact our Data Protection Officer. Picardata may retain certain information about individuals where required to do so by law.

### **Rights to access and correct Personal Data**

11. We can assist you to access and correct Personal Data held by us.
12. To make a request to access Personal Data, or where you are of the opinion that such Personal Data held by us is inaccurate, incomplete or misleading, the individual to which that data relates will need to complete an application form which sets out what Personal Data is required and verifying their identity. Please contact our Data Protection Officer for the application form or further information about how to access your Personal Data.
13. We will respond to any such request within 30 days of receiving a duly completed written request and provide the relevant individual with access to their Personal Data. If we cannot comply with the request within this timeframe, we will respond and advise when we can. Please anticipate that it may take some time to process the application as there may be a need to retrieve information from storage and review it. There may also be a small but reasonable fee for the access request. Please discuss this with our Data Protection Officer.
14. Please note that we may have to withhold access to Personal Data in certain situations, for example when we are unable to confirm the identity of the person requesting the data.
15. An individual may request that we correct the Personal Data we hold about them if they deem it to be inaccurate, incomplete, out-of-date, irrelevant or misleading. We will take reasonable steps to correct the information as soon as practicable and send the corrected personal information to other organisations in accordance with the Personal Data Protection Act 2012

### **Consent**

16. If you do not agree with this Policy, please DO NOT continue to use or access the Services.

17. By disclosing or providing to us Personal Data relating to individuals associated with your organisation, you represent and warrant that:
  - a. the consent of those individual(s) has been obtained for the collection, use and disclosure of the Personal Data for the purposes listed above;
  - b. you agree with this Policy; and
  - c. you have obtained the clear and unambiguous consent from such individuals that they may be contacted by us or our affiliates on their telephone numbers in relation to marketing or other purposes, notwithstanding any listing on the Do Not Call Registry.
  
18. If an individual to which this Policy applies withdraws their consent, you agree to inform us in writing immediately. As a result of such withdrawal, Picardata may not be in a position to continue to provide our products or services to you. The withdrawal may be considered a termination by you of any contractual relationship which you may have with us and a breach of your contractual obligations or undertakings, and our legal rights and remedies in such an event are expressly reserved.

### **Website cookies**

19. We use cookies on our website. Cookies are files we put on your computer which record information about your visit and use of the website in order to enhance your viewing experience.
  
20. We use cookies for the following purposes:
  - a. to improve the user experience on the website;
  - b. to assist us in monitoring the performance of the website;
  - c. to remember your preferences;
  - d. to monitor traffic on the website;
  - e. to assist the website in functioning properly.
  
21. You can disable or enable cookies through your web browser settings. If you disable or block the cookies on our website, you may not be able to access the entire scope of functions ordinarily performed by our website.
  
22. Personal Data that we collect from you through our cookies may be passed onto third party service providers (whether within or outside Singapore), for managing or improving our website, for data hosting or backup or for one or more of the purposes set out in paragraph 20 above.
  
23. Your use of our website constitutes consent to the use of cookies by us as governed by this Policy.

### **Enquiries, requests and complaints**

24. For enquiries, requests and complaints regarding Personal Data, please contact our Data Protection Officer at [\[INSERT EMAIL\]](#). Alternatively you may telephone us on any of the contact numbers listed on our website.