

DATA PROTECTION POLICY FOR TRAINEE

This Data Protection Policy ("Policy") sets out the basis upon which Hai Leck ("we") may collect, use, disclose or otherwise process personal data of trainees and job applicants 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.

APPLICATION OF THIS POLICY

1. This Policy applies to all persons engaged interns and trainees working at or attached to us (collectively referred to as "trainee")

PERSONAL DATA

2. As used in this Policy, "personal data" means data, whether true or not, about an trainee or a job applicant who can be identified: (a) from that data; or (b) from that data and other information to which we have access.

3. If you are an applicant/a trainee, personal data which we may collect includes, without limitation, your:

- a. name or alias, gender, NRIC/FIN or passport number, date of birth, nationality, and country and city of birth;
- b. mailing address, telephone numbers, email address and other contact details;
- c. resume, educational qualifications, professional qualifications and certifications and employment references;
- d. training-related health issues and disabilities;

- e. employment and training history; (e) work-related health issues and disabilities; and
- f. photographs and other audio-visual information taken at the training venue.

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We generally collect personal data that (a) 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 company staff

registering agent), after (i) you (or your authorised representative) have been notified of the purposes for which the

data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection

and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is

permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional

personal data and before using your personal data for a purpose which has not been notified to you (except where

permitted or authorised by law).

PROTECTION OF PERSONAL DATA

5. 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

up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of

personal data by us, and disclosing personal data both internally and to our authorised third party service providers

and agents only on a need-to-know basis.

6. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is

completely secure. While security cannot be guaranteed, we strive to protect the security of your information and

are constantly reviewing and enhancing our information security measures.

7. We shall also seek your consent that training centre shares with learners' photographs/ videos taken at training

events by posting these photographs/ videos on communication platforms and our website. We also use some of

these photographs in our publicity materials, such as publications and brochures.

RETENTION OF PERSONAL DATA

8. 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.

9. We will cease to retain your personal data, or remove the means by which 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.

EFFECT OF POLICY AND CHANGES TO POLICY

10. This Policy 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.

11. We may revise this Policy from time to time without any prior notice. You may determine if any such revision has

taken place by referring to the date on which this Notice was last updated. Your continued employment and

participation in our recruitment process constitute your acknowledgement and acceptance of such changes.