

### HR Law Academy's Personal Data Protection Policy

Protection of your Personal Data is of paramount importance to us at HR Law Academy Pte Ltd (the "HR Law Academy"). Being a training academy where we conduct employment laws and providing consultancy services, we endeavour to upkeep the statutory requirements as set out under the Personal Data Protection Act 2012 (the "PDPA").

This personal data protection policy is designed to assist you in understanding how we collect, use and/or disclose the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

### **1. POLICY STATEMENT**

- 1.1 This Policy statement provides information on the obligations and policies of HR Law Academy in respect of an individual customer's Personal Data. HR Law Academy undertakes to use reasonable efforts in applying, where practicable, those principles and the processes set out herein to its operations.
- 1.2 We will collect your personal data in accordance with the PDPA. In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used and/or disclosed, as well as obtain your consent for the collection, use and/or disclosure of your personal data for the intended purposes.

### 2. PURPOSES FOR COLLECTION, USE & DISCLOSURE OF PERSONAL DATA

- 2.1 The personal data which we collect from you may be collected, used and/or disclosed for the following purposes:
- (a) providing you with consultancy services in respect of employment laws and industrial relations issues which is the forte of our business;
- (b) to meet your training needs and provide you with the services that you require that may be of interest to you;
- (c) to facilitate a business transaction, for example, course registration, direction to HR Law Academy training centre, cancellation of the workshop due to the trainer being on medical leave, etc.;
- d) to update you on the latest development in regards to our area of specialisation in employment laws and related human resource management matters;
- (e) managing enquiries and instructions from you; and
- (f) sending you invitations to events and workshops held by us.

# 3. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- 3.1 As in any business, should we be required to disclose your personal date, rest assured that we will not disclose your personal data without your permission except when it is warranted for the following purpose:
- (a) is required based on the applicable laws and/or regulations;
- (b) is clearly in your interests, and if consent cannot be obtained in a timely way;
- (c) is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual which cannot be obtained in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;
- (d) is necessary for any investigation or proceedings; and
- (e) is necessary to verify your personal particulars and process payment requests in relation to the provision of the services which you may be entitled to or which you may have requested for.
- 3.2. The above is not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA.
- 3.3. In all other instances of disclosure of personal data to third parties with your express consent, we will endeavour to provide adequate supervision over the handling and administration of your personal data by such third parties, as well as to provide for adequate forms of protection over such personal data.

# 4. REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

4.1 You may request to access and/or correct the personal data currently in our possession at any time by submitting your request through the following methods:

- (a) Telephone: +6566595919
- (b) E-mail: contract@pmeacademy.com.sg
- (c) Office address: 190 Clemenceau Avenue, #02-31, Singapore 239925
- (d) Data Protection Officer: Mr Arthur Khong
- 4.2 For a request to access personal data, we will provide you with the relevant personal data within a reasonable time from such a request being made.
- 4.3 For a request to correct personal data, we will undertake the following:
- (a) we will correct your personal data as soon as practicable after the request has been made; and
- (b) send the corrected personal data to every other organisation to which the personal data was disclosed by HR Law Academy within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

- 4.4 Notwithstanding paragraph 4.3(b), we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.
- 4.5 Depending on the nature of your access request, we may be required to charge you a reasonable fee for the handling and processing of your requests to access your personal data to recover administrative costs. Where such a fee is imposed, we shall provide you with a written estimate of the fee for your consideration. We shall only begin processing your access request upon receiving your agreement to the payment of the fee.

# 5. REQUEST TO WITHDRAW CONSENT

- 5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control at any time by submitting your request to the above email/address of HR Law Academy.
- 5.2 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter refrain from collecting, using and/or disclosing your personal data in the manner stated in your request.

### 6. MANAGEMENT AND SECURITY OF PERSONAL DATA

- 6.1 We will take appropriate measures to keep your personal data accurate, complete and updated.
- 6.2 We will also take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties, which are wholly attributable to factors beyond our control.
- 6.3 We will also take commercially reasonably efforts to ensure that the personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

### 7. DATA INTERMEDIARY

7.1 We do not process your personal data on behalf of other organisations, hence, this will not be applicable as per PDPA.

#### 8. UPDATES ON DATA PROTECTION POLICY

- 8.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
- 8.2 You may visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.
- 8.3 If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer as in the contact.

With effect: 1 January 2017