

FIRSTCOM ACADEMY PTE LTD

DATA PROTECTION NOTICE FOR EMPLOYEES

This Data Protection Notice (“**Notice**”) sets out the basis upon which FIRSTCOM ACADEMY PTE LTD (“**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of employees in accordance with the Singapore Personal Data Protection Act (“**PDPA**”) and all associated regulations and guidelines which may from time to time be issued by the Personal Data Protection Commission (PDPC) of Singapore.

APPLICATION OF THIS NOTICE

1. This Notice applies to all persons engaged in a contract of service with us (whether on a part-time, temporary or full-time basis) and interns working at or attached to us (collectively referred to as “**employees**”).
2. This Notice applies to personal data of all persons described above which are 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.

TYPES OF PERSONAL DATA WE COLLECT

3. As used in this Notice, “**personal data**” means data, whether true or not, about the person engaged in a contract of service with us who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.
4. Personal data which we may collect in the context of your employment with us includes, without limitation, your:
 - (a) Name;
 - (b) Contact Number;
 - (c) Email Address;
 - (d) Nationality;
 - (e) Educational History & Employment History;
 - (f) Residential and Postal Address;
 - (g) NRIC or FIN for foreigners, Employment Pass and Passport Details;
 - (h) Emergency Contact Details (Next-of-Kin Name, Relationship, Contact Number);
 - (i) Bank Account;
 - (j) Facial Image & Fingerprint;
 - (k) Any personal data (e.g. resume) you have provided to us as a job applicant (that is, prior to being engaged as an employee).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

5. We generally collect personal data that (a) you knowingly and voluntarily provide in the course of or in connection with your employment 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 the references you provided), 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).
6. You have choices regarding our collection, use or disclosure of your personal data. If you choose not to provide us with the personal data described in this notice, we may not be able to perform our obligations under or in connection with your contract of employment with us or facilitate the purposes listed in section 7 below. You have the right to object to the processing of your personal data

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and withdraw your consent in the manner described in section 9 below. We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law such as during the following situations:

- (a) To respond to an emergency that threatens your life, health and safety or of another individual; and
- (b) Necessary in the national interest, for any investigation or proceedings.

7. Your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:

- (a) performing obligations under or in connection with your contract of employment with us, including payment of remuneration and reporting for tax purpose;
- (b) all administrative and human resources related matters within our organization, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your insurance and other benefits, processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;
- (c) managing and terminating our employment relationship with you, including monitoring your internet access and your use of company email to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances;
- (d) assessing and evaluating your suitability for employment/appointment, continued employment/appointment or transfer in any position within our organization including in regional offices;
- (e) ensuring business continuity for our organization in the event that your employment with us is or will be terminated;
- (f) performing obligations under or in connection with the provision of our goods or services to our clients; and
- (g) facilitating our compliance with any laws and regulations which may be applicable to us.

Furthermore, if you choose to share personal data of other people (such as family information and emergency contact information) with us, it is your responsibility to inform such other people, whose personal data you provide, about the use of their personal data as set out in this Notice.

8. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

WITHDRAWING YOUR CONSENT

9. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data by submitting your request to HR or via email to our Data Protection Officer at the contact details provided in section 27 below. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

10. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it. Should we require more

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time to give effect to a withdrawal notice, we will inform you of the time frame by which the withdrawal of consent will take effect.

ACCESS TO AND CORRECTION OF PERSONAL DATA

11. You have the right to know what personal data we hold about you, use or disclose. You may write in to HR to find out how we have been using or disclosing your personal data over the past one year.
12. You are also entitled to have incorrect personal data about you corrected or update any of your personal data which we hold. You can also object to certain personal data about you being processed and request that processing of your personal data be limited.
13. Before we accede to your access or correction request, we may need to verify your identity by checking identification document, and the legitimacy of your request. Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. We are not obliged to provide you with access to records or decisions that the organization has created for evaluative purposes.
14. We will respond to your access or correction request as soon as reasonably possible, or within thirty (30) calendar days from the date we receive your request. If we are unable to do so within 30 calendar days, we will let you know and give you an estimate of how much longer we require.
15. There is no fee that will be charged for your access or correction request.

PROTECTION OF PERSONAL DATA

16. 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, access control, password protection, secure authentications and encryption in our HR system etc.
17. When we disclose your personal data to third parties, we will ensure that they provide sufficient guarantees to us to have implemented the necessary security measures to protect your personal data.
18. 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.

ACCURACY OF PERSONAL DATA

19. We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete, not misleading and kept up-to-date. We generally rely on personal data provided by you (or your authorized representative). It is your responsibility to ensure, to the best of your knowledge, that the personal data you provide us with are accurate, complete and up-to-date.
20. In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing HR.

RETENTION OF PERSONAL DATA

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21. 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.
22. 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.
23. We dispose of or destroy such documents containing your personal data in a secure manner when the retention limit is reached and it is reasonable to assume that the permitted purpose is no longer being served by their retention.
24. Your records will be kept for 5 years after the end of your employment. It will be disposed of in a secure manner immediately after the said retention period. You may contact HR or our DPO in the contact details provided below for any request for information about the duration and the purposes for which your personal data is retained and how we will destroy your personal data once the retention period is over.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

25. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so in line with the purposes listed in section 7, we will obtain your consent for the transfer to be made and will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA, including entering into an agreement with the receiving party to accord similar levels of data protection as those in Singapore.

DATA BREACH NOTIFICATION

26. In the event of a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, we shall promptly assess the impact and if appropriate report this breach within 3 calendar days to the Personal Data Protection Commission (PDPC). We will notify you when the data breach is likely to result in significant harm to you after our notification to PDPC. We may also notify other relevant regulatory agencies, where required.

DATA PROTECTION OFFICER

27. If you have any questions or feedback regarding this Notice, or any complaint you have relating to how we manage your personal data, you may contact our Data Protection Officer (DPO) via this email address:

Dpo@fca.edu.sg

Any query or complaint should include, at least, your name and contact information.

We treat such queries and feedback seriously and will deal with them confidentially and within reasonable time.

EFFECT OF NOTICE AND CHANGES TO NOTICE

28. This Notice 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.
29. We may revise this Notice 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.

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30. Your continued employment with us constitutes your acknowledgement and acceptance of such changes.

Declaration

- I have read and agree to the Data Protection Notice for Employees of FIRSTCOM ACADEMY PTE LTD, and hereby give my consent to them to collect, use and disclose my personal data for the purposes related to my employment.
- By submitting other individuals' information as described in this Notice, I confirm that I have notified the individuals I stated and have obtained their consent to their data being collected, used and/or disclosed by FIRSTCOM ACADEMY PTE LTD for the purposes related to my employment.
- I declare that the information provided by me in relation to my employment are true and correct to the best of my knowledge and that I have not wilfully suppressed any material fact. I accept that if any of the information given by me is in any way false or incorrect, any offer of employment may be withdrawn or my employment with FIRSTCOM ACADEMY PTE LTD may be terminated summarily or I may be dismissed.

Acknowledged by:

Signature

Name of Employee:

Date: