

**Association of Process Industry (ASPRI) /
ASPRI Dormitory Pte Ltd (ADPL)**

DATA PROTECTION POLICY (DPP)

At ASPRI/ADPL, we strive to protect and safeguard the personal data which we have collected. Every employee *including all our Associate trainers, temporary staff and vendors* are required to sign a Declaration to Secrecy and an Undertaking to comply with the Personal Data Protection Act (PDPA).

This Personal Data Protection Policy describes the types of personal data we collect from our operations. The Policy also sets forth how we use, disclose, store and protect your personal data, and who to contact if you have any questions or concerns.

This Data Protection Policy (DPP) covers the following areas:

1. Obligations
2. Collection of personal data
3. Purpose of collection
4. Notification
5. Consent and right to withdraw consent
6. Access and correction
7. Accuracy of personal data
8. Security, Storage and Protection of personal data
9. Retention of personal data
10. Disclosure of personal data
11. Exceptions and exclusion of liability
12. Effect of changes
13. Governing law

1. Obligations

a) Consent Obligation

ASPRI/ADPL will collect, use or disclose personal data after consent was obtained from the individual.

ASPRI/ADPL allows withdraw of consent with reasonable notice and shall inform the individual of the likely consequences of withdrawal. Upon withdrawal of consent to the use or disclosure for any purpose, we will cease such use or disclosure of the individual personal data.

b) Purpose Limitation Obligation

ASPRI/ADPL may collect, use or disclose the individual personal data only for the purposes that would consider appropriate and after the individual has given consent.

ASPRI/ADPL may not, as a condition of providing a service, require you to consent to the collection, use or disclosure of your personal data beyond what is reasonable to provide that service.

c) Notification Obligation

ASPRI/ADPL will notify the individual of the purposes to collect, use or disclose of individual's personal data on or before such collection, use or disclosure.

d) Access and Correction Obligation

Individual personal data and how their personal data was used or disclosed should be provided upon a reasonable request. However, ASPRI/ADPL will prohibit in providing the individual access if the provision of the personal data or other information could reasonably be expected to:

- cause immediate or grave harm to his safety or physical or mental health;
- threaten another individual safety, physical and mental health;
- reveal another individual personal data;
- reveal the identity of another individual who has provided the personal data, and the individual has not consented to the disclosure of his identity; or
- Contradict or threat to national interest.

ASPRI/ADPL shall correct any error or omission in your personal data upon your request. Unless ASPRI/ADPL is satisfied on reasonable grounds that the correction should not be made, ASPRI/ASPL should correct the personal data as soon as practicable and send the corrected data to other organisations to which the personal data was disclosed before the correction is made, or with your consent, only to selected organisations.

e) Accuracy Obligation

ASPRI/ADPL will make reasonable effort to ensure that personal data collected is accurate and complete, if the personal data is used to make decisions that will affect the individual, or to be disclosed to another organisation and/or government agencies.

f) Protection Obligation

ASPRI/ADPL shall make reasonable security arrangements to protect the personal data that ASPRI/ADPL possesses or controls to prevent unauthorised access, collection, use, disclosure or similar risks.

g) Retention Limitation Obligation

ASPRI/ADPL will cease retention of personal data when the purpose of retention is no longer necessary for any business or legal purposes.

h) Openness Obligation

ASPRI/ADPL will fulfil its obligations, implement and disclose its data protection policy and data breach management policy upon a reasonable request.

2. Collection of Personal Data

ASPRI/ADPL will only collect personal data for specific purposes. The types of Personal Data collected may be in the form of the followings (non-exorcise):

Types of Personal Data Collected	Types of Personal Data Collected
<p>A. <u>Job Applicants</u></p> <ul style="list-style-type: none"> • Personal Details (eg. full name, NRIC, Fin no. Passport no. address, date of birth, race, religion, marital status) • Personal Contact Information (eg. date of birth, gender, race, nationality) • Salary Range • Academic Background • Professional Qualifications • Employment Details (job applicants) • Family Background Details (job applicants) 	<p>B. <u>Executive Councils (EC) / Co-opted members</u></p> <ul style="list-style-type: none"> • Name • Address • NRIC number • Contact details • Academic Background • Professional Qualifications • Photographs • Videos • Medical Details/Health Information • Passport details
<p>C. <u>Employees</u></p> <ul style="list-style-type: none"> • Personal Details • Personal Contact Information • Academic Background • Professional Qualifications • Employment Details • Bank Details • Family Background Details • Medical Details/Health Information • Birth Certificate for Children (if applicable) • Marriage Certificate (if applicable) • Residential address • Photographs • Videos • Passport details 	<p>D. <u>Members</u></p> <ul style="list-style-type: none"> • Personal Details • Employment Details • Photographs • Video • Members Hp number • Academic Background • Professional Qualifications of elected candidates

3. Purpose of Collection

The Personal Data provided by you to us or collected by us from you or through other sources as necessary for the fulfillment of the purposes (“collected”) at the time it was sought or collected, will be used for such purpose and/or for the following reasons (collectively “Purposes”):

- a) Evaluating application for membership.
- b) Evaluating application for employment.
- c) Evaluating application for council election.
- d) Providing services, to process billing/payment transactions.
- e) Administering participation in any programme/event/activity organised by ASPRI/ADPL.
- f) For Financial processing purposes
- g) For the maintenance and upkeep of internal records, filing and operations or meeting any legal or regulatory requirements relating to our provision of services and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us or our affiliates.
- h) For entering into the any agreements and/or contracts.
- i) For handling the report for lost item, customer complaints and taking appropriate action relating to it.
- j) For security and crime prevention purposes, risks management, safeguarding ASPRI/ADPL in the event of any claims or litigation suits.
- k) For any other reasonably related purposes or reasons.

4. Notification

ASPRI/ADPL will inform you of the purposes for which your personal data to be collected, used and disclosed in order to obtain your consent. Our collection, use and disclosure are limited to the purposes for which notification has been made to you. For example, this may take place when entering into a contract or enrolling for courses with us under which we require certain personal data from you.

5. Consent and Right to Withdraw Consent

You shall be invited to express consent to ASPRI/ADPL collecting, using and disclosing your personal data for the purposes of membership soliciting, events, courses registration, research activities and future events notification and publicity as well as news dissemination.

By so indicating your acceptance of the terms of this Policy, you shall be deemed to have expressly consented to the processing of your Personal Data by ASPRI/ADPL or any of our authorized staff, partners and/or contractors for the Purposes outlined above.

You may at any time withdraw your consent to ASPRI/ADPL by sending to us at the address set out below in a written notice of withdrawal. We shall take all necessary measures to give effect to your withdrawal of consent, to the extent that such withdrawal does not conflict with any of our legal obligations. However, by withdrawing your consent, ASPRI/ADPL might not be able to render adequate service to you or you might be disqualified for certain services/participation.

6. Access and Correction

If you wish to make an access request to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or a correction request to correct or update any of your personal data which we hold, you may submit your request in writing or via email to our Data Protection Officer (DPO) provided.

	<u>ASPRI and ADPL</u>
Name:	Dennis Cheok
Contact No:	6560 5051
Email:	dennis@aspri.com.sg
Address:	ASPRI Secretariat 9 Jurong Town Hall Road #04-11 Trade Association Hub Jurong Town Hall Singapore 609431

Please note that a reasonable fee may be charged for an access and/or correct request. If so, we will inform you of the fee before processing your request.

We will respond to your access request as soon as reasonably possible. Should we be not be able to respond to your access request within thirty (30) days after receiving your access request, we will inform you in writing within thirty (30) days. We shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

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 document requested, and not to the entire documents.

7. Accuracy of Personal Data

We generally rely on personal data provided by you (or your authorised representative). 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 our Data Protection Officer in writing or via email.

8. Security, Storage and Protection of Personal Data

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 and encryption.

We shall protect the confidentiality of all personal data that you have shared with us. In cases where we share personal information with our subsidiaries, partners or affiliates, we will protect that personal information with a strict confidentiality as stated in our agreement. Companies hired by us to provide support services or to act as our agent must conform to our privacy standards.

Our policies stipulate that any staff with access to confidential customer information is not permitted to use or disclose such information except for business purposes. All staff are required to sign the Confidentiality Clause and to take every precaution to ensure all personal data under their possession are being kept confidential at all times.

In all cases, your personal data is protected by a strictly confidentiality agreement. We do not allow any non-affiliated organisations to retain your personal data any longer than it is necessary unless you have granted us permission to do so.

9. Retention of Personal Data

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.

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.

10. Disclosure of Personal Data

Subject to the provision of any applicable law, your Personal Data may be disclosed for the purposes listed to the following:

- a) Within ASPRI/ADPL and our business partners (e.g. Centurion Corporation Ltd (CCL)/Westlite Accommodation) and our affiliates including and not limited to Marshall Cavendish that provide related services in connection with our services;
- b) Our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed;
- c) Our third-party service providers including as IT vendors and other data intermediaries¹(who would be asked to sign an undertaking to comply with the PDPA) with the exclusion of “Excluded Organisations²” in connection with our services;
- d) Our third-party management companies, sub-contractors or other parties as considered necessary to facilitate your dealings with us;
- e) Our appointed service providers in fulfilling our services or providing technical services to our website; and
- f) Any statutory authorities and/or industry regulators, government agencies, persons whom we are required to do so pursuant to any law/regulations and policies.

¹ Organisations which are data intermediaries are partially excluded from the application of the Data Protection Provisions.

² “These categories of organisations are therefore excluded from the application of the Data Protection Provisions:

- a) Any individual acting in a personal or domestic capacity;
- b) Any employee acting in the course of his or her employment with an organisation;
- c) Any public agency; and
- d) Any organisation in the course of acting on behalf of a public agency in relation to the collection, use or disclosure of personal data.

Third parties are legally tasked with processing your Personal Data in line with principles specified by ASPRI/ADPL and may not use it for any other purposes. Third parties are also held responsible for securing your Personal Data at an appropriate level of security in relation to applicable data protection laws and widely accepted industry standards. Third parties will be required to sign a Non-Disclosure Agreement (NDA) with ASPRI/ADPL that include an undertaking to comply with Personal Data Protection Act (PDPA).

ASPRI/ADPL will reserve its right to use or disclose any data upon your request or as required by any government regulations, law, legal request or for the purpose to cooperate in any law enforcement investigation or an investigation on public safety related matters.

11. Exceptions and Exclusion of Liability

ASPRI/ADPL reserves the right to refuse to process any request for withdrawal of consent, access or correction in the following circumstances:

- Where there is an insufficiency of information provided by any party making a request to enable ASPRI/ADPL to locate or identify the Personal Data in question;
- Where there is reasonable doubt surrounding the identity of the person making the request or where ASPRI/ADPL feels that the requesting party is not in fact the owner or the subject of the Personal Data in question and is not lawfully entitled to make any requests in relation to the Personal Data;
- Where permitting access or correction would be tantamount to a violation of an order of Court;
- In requests for access or for correction (excluding instances of withdrawal of consent):
 - I. where the burden or expense of processing the request for access or correction is disproportionate to the privacy of the party making a request;
 - II. where compliance with the request would involve the unauthorised disclosure of Personal Data belonging to a third party;
 - III. where compliance would result in the disclosure of confidential commercial information; or
 - IV. where access is regulated by another law

ASPRI/ADPL will not be liable for any purported violation, breach or non-compliance with any precepts of privacy or the protection of Personal Data in the following instances:

- Where an act of nature or event happened outside the control of ASPRI/ADPL resulted in the damage or malfunction or destruction in any equipment or technologies used to secure, store or process Personal Data;
- Where Personal Data is readily available or able to be found in the public domain; and
- Where despite ASPRI/ADPL best efforts, there is an unauthorised access, modification, alteration, misuse, tampering and abuse of Personal Data caused by the malicious, fraudulent, criminal acts and conduct of a third party not being under the control or direction of ASPRI/ADPL.

12. Effect of Data Protection Policy (DPP) Changes

This DPP is effective as of October, 2017 and is subject to updates to ensure that the DPP is consistent with any changes in legal or regulatory requirements. If we change our policy, we will update the revised version here, so please check here periodically for the updated version of our DPP. No change will not be retroactively applied and all changes will comply with the PDPA.

13. Governing Law

This Data Protection Policy (DPP) shall be governed in all respects by Singapore's regulatory regulations and law.

FAQ on PDPA for ASPRI-IPI

Q1) Is ASPRI-IPI subjected to PDPA?

ASPRI-IPI is a division from ASPRI and is appointed by SSG (formerly WDA) as a public Approved Training Organization to develop and deliver training and assessment leading to Statements of Attainment (“SOA”) under the Workforce Skills Qualifications (“WSQ”) system. The appointment is subjected to the terms and conditions set out by the letter of Appointment. This includes maintaining proper records of all training and expenditure details for the Programme, *including trainee particulars, training attendance records, assessment / performance records, employment details including names of employers and job titles, payment receipts and invoices*. All records and supporting documents pertaining to the Programme *shall be retained for audit purposes for five years after the end of the funding period*.

ASPRI-IPI is not subjected to PDPA in relation to ***the collection, use or disclosure of the personal data on behalf of a public agency***.

Application of Act

4.(1) Parts III (GENERAL RULES WITH RESPECT TO PROTECTION OF PERSONAL DATA) to VI (COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA) shall not impose any obligation on (c) any public agency or an organisation in the course of acting on behalf of a public agency in relation to the collection, use or disclosure of the personal data.

Q2) How about courses not accredited under WSQ or programme not leading to SOA?

Under PDPA Collection, use and disclosure without consent

17.— (1) An organisation may collect / use / disclose personal data about an individual, without consent or from a source other than the individual, only in the circumstances and subject to any condition in the Second / Third / Fourth Schedule.

Second Schedule: Collect of personal data without consent

(n) the personal data is included in a document —

- (i) produced in the course, and for the purposes, of the individual’s employment, business or profession; and
- (ii) collected for purposes consistent with the purposes for which the document was produced;

Third Schedule: Use of personal data without consent

(j) the data was collected by the organisation in accordance with section 17(1) and is used by the organisation for purposes consistent with the purpose of that collection.

Fourth Schedule: Disclosure of personal data without consent

(l) the personal data about the current or former students of the organisation, being an education institution, is disclosed to a public agency for the purposes of policy formulation or review;

(n) the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;

- (p) (ii) is about an employee, customer, director, officer or shareholder of the organisation;
and
(iii) relates directly to the part of the organisation or its business assets with which the business asset transaction is concerned.

For plant specific courses, ASPRI-IPI is appointed by the plant owners to administer, support and / or conduct the training programme include maintaining of trainees training records.

Q3) How about resident's personal data from ASPRI-WESTLITE Dormitory when self-registered for resident's courses and activities?

Residents from ASPRI-WESTLITE Dormitory are entitled to 48 heavily-subsidized training hours yearly. The collect and use of personal data is required to verify their status and track the usage of this entitlement for subsidized training, workshop, events and activities.