



Personal Data Protection Policy

Your personal data is important to us. We respect individuals privacy rights and the confidentiality of information. The Personal Data Protection Policy (“Policy”) of Chiyoda Singapore (Pte) Limited (“CSL”) outlines how we manage and handle the personal data we collected. In compliance with the Personal Data Protection Act in Singapore, CSL define the types of Personal Data and how we collect, use, share and disclose of such information. Our Policy also outlines how you can update your Personal Data and channel your feedbacks and complaints to us.

1. The types of personal data collected by CSL

We may collect & hold personal data of persons/entities including but not limited to:

- Clients
- Job Applicants & employees
- Service Providers
- Vendors
- Sub-contractors and
- Other people who may come into contact with CSL

Examples of such personal data include:

- Full name
- NRIC number / FIN number / Passport Number
- Gender
- Date of birth
- Your employment history, education background, and income levels
- Personal Data of your family members, such as emergency contact, next of kin, spouse and children
- Photograph
- Contact numbers
- Personal email address
- Thumbprint
- Name and residential address
- Name and residential telephone number
- Vehicle number
- Bank account information
- Video and CCTV footage
- Medical records



2. How the personal data are collected

Your personal data can be derived directly or indirectly from you or your authorised representatives in various ways but not limited to the followings:

- When you submit a job application, certificates, testimonials, resume or relevant documents for employment.
- When you sign any agreement or contract in respect of your interactions with us
- When you interact/correspond with any of our staff such as telephone calls (subject to recording), letters, face-to-face meetings and emails
- When you give us your consent to contact/request to be included in an email or other mailing list
- When you respond to our queries, initiatives or to any request for additional Personal Data information
- Any images, photographs or videos recorded via CCTV and cameras while you are in CSL premises or any outdoor activities organised by CSL
- When you submit your Personal Data to us for any other reasons and any information that requested by us for business purposes and statutory requirement

3. The purpose of collecting your personal data

In general, we may use your personal data for the following purposes:

- Employment/job rotation within CSL including work pass application
- Pre-employment check-up
- Process payroll & pay slip
- CPF & income tax submission
- Staff loan
- Staff benefits such as salary review, profit sharing, annual increment, promotion, attendance bonus and AWS
- Performance evaluations
- Exit clearance process/termination of service
- Secondment/assignment to overseas office
- Insurance coverage e.g. work injury compensation insurance , travel insurance, foreign medical insurance
- Company events & activities (e.g. most dedicated employee award)
- Training course/seminar/conference registration
- Ministry of Manpower Labour Market Survey
- Project proposal for tender purposes and billing to Clients for contracted projects
- Obtain reference and background screening on job applicants
- Statutory Board e.g. Ministry of Manpower, MINDEF, IRAS, CPF Board
- Security clearance/entry access into CSL premises (application security passes for home office and site office)
- Travel arrangement services for clients/vendors/expatriates/staff
- Accommodation arrangement for clients/vendors/expatriates/staff
- Payment of rental/services provided (e.g. rental with individual)
- Other people who we may come into contact



4. How personal data are use and/or disclosed by CSL

Any usage, disclosure and/or transfer of your personal data will be notified to you and subjected to your consent and approval or which are permitted under applicable laws and regulations.

No personal data will be released to third parties for commercial purposes without your consent.

5. How personal data are shared internally & externally

Any disclosure or transfer of your personal data will be handled discreetly. Data may be used but not limited to the followings:

- Division/Department within CSL or organisation within Chiyoda group
- Affiliates associates
- Employment agencies
- Statutory Board e.g. Ministry of Manpower, MINDEF, IRAS, CPF Board
- Our clients, vendors and business partners in relation to managing project tenders
- Third party service providers who provide operational services to the organisation such as courier services, telecommunications, information technology, transportation, training, security, cleaning, and laundry
- Hospitals and clinics on employees medical, dental consultation or hospitalisation
- Insurance companies on relevant insurance claims
- Our professional advisers such as auditors, lawyers and doctors
- External banks, financial institutions and their respective service providers
- Foreign embassies, travel agencies and hotels in relation to facilitating overseas travel arrangements
- In compliance with any laws, rules, guidelines and regulations imposed by government body, statutory board and relevant law enforcement agencies
- Any other party to whom you authorise us to disclose your Personal Data

Where personal data is disclosed or transferred to third party (e.g. external organisation or overseas). We will undertake reasonable steps to ensure the third party to whom we had disclosed your personal data information to abide to/protect the confidentiality of such data.

In addition, where personal data is transferred to overseas, we will ensure that such transfer is in compliance with the Act and this policy or is permitted under applicable laws & regulations.



6. How your personal data is being managed, protected and stored

We have appointed a Data Protection Officer (“DPO”) from CHR Division to oversee our management of personal data in accordance with the Act.

Measures to safeguards and protect your Personal Data from any unauthorised access, collection, use, disclosure, copying, modification, disposal will be taken in accordance with the appropriate guidelines.

All precautionary safety measures will be taken to protect your personal data from risks such as cyber-attacks, hacking, spyware and viruses. At the same time we encourage you to take precautionary measures to minimise unauthorised disclosure, access and loss of your personal data.

Your personal data will be maintained and updated as and when required. Any obsolete data will be disposed of by a certified waste disposal vendor.

7. How your personal data are kept accurate and updated and how you can exercise your right to correct the personal data that is kept by CSL

All measures will be taken to ensure that we keep your personal data as accurate as possible & up-to-date. Should there be a change in your personal information, please update us by completing the “Personal Data Correction Form” and submit it to the DPO via email or mailing address. The DPO will acknowledge receipt of your request within a week upon receiving your request.

Email address : Data Protection Officer
csldpo@chiyoda.com.sg

Mailing address : Data Protection Officer
Chiyoda Singapore (Pte) Limited
14 International Business Park
Singapore 609922

8. How you can exercise your right to obtain access or to make correction to the personal data

You can access or update your Personal Data records we hold about you by completing the “Request to access Personal Data Form” and submit it to the DPO via email or mailing address per section 7.

9. How to exercise your right to withdraw your consent ?

Should you wish to withdraw your consent previously given, please complete the “Withdrawal of Consent Notice” and submit it to the DPO via email or mailing address per section 7.



10. What if you have a complaint or feedback ?

All feedback/complaint can be channelled to the DPO by completing the “Feedback and Complaint Form” by email or mailing address per section 7. Your concern will be addressed to promptly.

CSL will not be responsible to update the Personal Data provided/received from third party. Should there be a need to make queries, complaints, access and correction requests under such circumstances, you have to contact the original source of information provider.

Updates to this Policy

This policy will be reviewed from time to time to take into consideration of new laws & technology and changes to the business environment and it may be subjected to change without prior notice to you.

Reference :

1. Personal Data Correction Form
2. Request to Access Personal Data
3. Withdrawal of Consent Notice
4. Complaint and Feedback Form



CHIYODA SINGAPORE (PTE) LIMITED

Personal Data Correction Form

I would like to update my personal data.

New Update		
<u>Personal Details</u>		
Name (as in NRIC/Identification):		
NRIC No.:		
Fin/Work Permit No.:	Issued Date:	Expiry Date:
Passport No.:	Issued Date:	Expiry Date:
Nationality:	Marital Status:	
<u>Contact Details</u>		
Contact No.: (H) _____ (H/P) _____ (Overseas) _____		
Email Address :		
<u>Mailing Address</u>		
Local:		Overseas:
<u>Educational Details</u>		
<u>In case of Emergency, please contact</u>		
Name:	Relationship:	Contact No.:
<u>Any other information</u>		

* Please attach relevant documents for the changes made, if applicable

Acknowledgement

- I certify the above information provided by me are true, complete and correct to the best of my knowledge and belief and I authorise investigation of information provided. I further understand that any misrepresentation or information omission provided renders me liable to any legal action.
- I hereby authorise CSL to release/disclose the updated information to organisation with whom we need to share these updates.
- All requests to access data will be made in person by submitting the "Personal Data Correction" form, via email or through mailing address. CSL will respond to your request within a week.
- I understand any inaccuracies, errors or omissions in the information provided may result in delay in processing request and/or our inability to process your request.
- I acknowledge that CSL reserve the right to refuse to process the Personal Data Correction Form in accordance with Section 22 and Sixth Schedule of the PDPA.

Name & Signature : _____ Date : _____

For official use	
Received by :	Date :
Processed by :	Date :



CHIYODA SINGAPORE (PTE) LIMITED

Request to Access Personal Data

I, name (as in NRIC/Identification) _____, NRIC/Identification No. _____ would like to make a request to access my personal data which are kept by the CHR Dept of CSL. I can be contacted at:

My Contact Details

Contact No.: (H) _____ (H/P) _____ (Overseas) _____

Email Address :

Mailing Address :

The following are the information required:

1. Please Specify Your Requirement

2. Date/Time Period of Record (if applicable)

3. Venue of Record (if applicable)

Acknowledgement

1. I certify the above information provided by me are true, complete and correct to the best of my knowledge and belief and I authorise investigation of information provided. I further understand that any misrepresentation or information omission provided renders me liable to any legal action.
2. I hereby authorise CSL to release/disclose the updated information to organisation with whom we need to share these updates.
3. I understand any inaccuracies, errors or omissions in the information provided may result in delay in processing request and/or our inability to process your request.
4. I acknowledge that CSL reserve the right to refuse to process the Personal Data Correction Form in accordance with Section 21 and Fifth Schedule of the PDPA.
5. All requests to access data will be made in person by submitting the "Request to Access Personal Data" form, via email or through mailing address. CSL will respond to your request within a week.
6. Due to the confidentiality nature of the personal data information, request through phone call/third party will not be entertained.

Name & Signature : _____

Date : _____

For official use	
Received by :	Date :
Processed by :	Date :



CHIYODA SINGAPORE (PTE) LIMITED

Withdrawal of Consent Notice

The withdrawal of Consent is only applicable for the followings:

1. Client
2. Vendor
3. Third Party Service Provider
4. Business Associate

In order to facilitate the Withdrawal of Consent Notice, please provide the following details:

Name (as in NRIC/Identification)	
Contact Number(s)	
Email Address	
Mailing Address	
Please state the reason(s) of your withdrawal	
Your relationship with CSL (please tick)	<input type="checkbox"/> Client <input type="checkbox"/> Vendor <input type="checkbox"/> Third Party Service Provider <input type="checkbox"/> Business Associate <input type="checkbox"/> Others : Please specify _____

Acknowledgement

1. I acknowledge that the withdrawal of my personal data may affect CSL's provision or services to me or the organisation for or whom I am working for (if applicable) in future and may carry legal or practical consequences, which will continue to apply.
2. All requests to access data will be made in person by submitting the "Withdrawal of Consent Notice" form, via email or through mailing address.
3. I understand that the withdrawal of my consent will not take immediate effect. All usage and sharing of data will ceased within 14 working days upon receipt of your request for withdrawal.

Name & Signature : _____

Date : _____

For official use	
Received by :	Date :
Processed by :	Date :



Acknowledgement

1. I certify the above information provided by me are true, complete and correct to the best of my knowledge and belief and I authorise investigation of information provided. I further understand that any misrepresentation or information omission provided renders me liable to any legal action.
2. I hereby authorise CSL to release/disclose the above information to concern party/organisation for investigation purposes.
3. I understand any inaccuracies, errors or omissions in the information provided may result in delay in processing request and/or our inability to process your request.
4. All feedback and/or complaints will be made in person by submitting the "Feedback and Complaint" form, via email or through mailing address. CSL will respond to your feedback and complaint within 7 and 30 working days respectively. Should CSL require longer time for investigation relating to complaint, you will be notified on the estimated respond time within 30 working days.

Name & Signature : _____ Date : _____

For official use	
Received by :	Date :
Processed by :	Date :
Case Number :	



FIFTH SCHEDULE

Section 21(2)

EXCEPTIONS FROM ACCESS REQUIREMENT

1. An organisation is not required to provide information under section 21(1) in respect of —
 - (a) opinion data kept solely for an evaluative purpose;
 - (b) any examination conducted by an education institution, examination scripts and, prior to the release of examination results, examination results;
 - (c) the personal data of the beneficiaries of a private trust kept solely for the purpose of administering the trust;
 - (d) personal data kept by an arbitral institution or a mediation centre solely for the purposes of arbitration or mediation proceedings administered by the arbitral institution or mediation centre;
 - (e) a document related to a prosecution if all proceedings related to the prosecution have not been completed;
 - (f) personal data which is subject to legal privilege;
 - (g) personal data which, if disclosed, would reveal confidential commercial information that could, in the opinion of a reasonable person, harm the competitive position of the organisation;
 - (h) personal data collected, used or disclosed without consent, under paragraph 1(e) of the Second Schedule, paragraph 1(e) of the Third Schedule or paragraph 1(f) of the Fourth Schedule, respectively, for the purposes of an investigation if the investigation and associated proceedings and appeals have not been completed;
 - (i) the personal data was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he was appointed to act —
 - (i) under a collective agreement under the Industrial Relations Act (Cap. 136) or by agreement between the parties to the mediation or arbitration;
 - (ii) under any written law; or
 - (iii) by a court, arbitral institution or mediation centre; or
 - (j) any request —
 - (i) that would unreasonably interfere with the operations of the organisation because of the repetitious or systematic nature of the requests;
 - (ii) if the burden or expense of providing access would be unreasonable to the organisation or disproportionate to the individual's interests;
 - (iii) for information that does not exist or cannot be found;
 - (iv) for information that is trivial; or
 - (v) that is otherwise frivolous or vexatious.



**PART V
ACCESS TO AND CORRECTION OF
PERSONAL DATA**

Access to personal data

Section 21.

- (1) Subject to subsections (2), (3) and (4), on request of an individual, an organisation shall, as soon as reasonably possible, provide the individual with —
 - (a) personal data about the individual that is in the possession or under the control of the organisation; and
 - (b) information about the ways in which the personal data referred to in paragraph (a) has been or may have been used or disclosed by the organisation within a year before the date of the request.
- (2) An organisation is not required to provide an individual with the individual's personal data or other information under subsection (1) in respect of the matters specified in the Fifth Schedule.
- (3) An organisation shall not provide an individual with the individual's personal data or other information under subsection (1) if the provision of that personal data or other information, as the case may be, could reasonably be expected to —
 - (a) threaten the safety or physical or mental health of an individual other than the individual who made the request;
 - (b) cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
 - (c) reveal personal data about another individual;
 - (d) reveal the identity of an individual who has provided personal data about another individual and the individual providing the personal data does not consent to the disclosure of his identity; or
 - (e) be contrary to the national interest.
- (4) An organisation shall not inform any individual under subsection (1) that it has disclosed personal data to a prescribed law enforcement agency if the disclosure was made without the consent of the individual pursuant to paragraph 1(f) or (n) of the Fourth Schedule or under any other written law.
- (5) If an organisation is able to provide the individual with the individual's personal data and other information requested under subsection (1) without the personal data or other information excluded under subsections (2), (3) and (4), the organisation shall provide the individual with access to the personal data and other information without the personal data or other information excluded under subsections (2), (3) and (4).



SIXTH SCHEDULE

Section 22(7)

EXCEPTIONS FROM CORRECTION REQUIREMENT

1. Section 22 shall not apply in respect of —
 - (a) opinion data kept solely for an evaluative purpose;
 - (b) any examination conducted by an education institution, examination scripts and, prior to the release of examination results, examination results;
 - (c) the personal data of the beneficiaries of a private trust kept solely for the purpose of administering the trust;
 - (d) personal data kept by an arbitral institution or a mediation centre solely for the purposes of arbitration or mediation proceedings administered by the arbitral institution or mediation centre; or
 - (e) a document related to a prosecution if all proceedings related to the prosecution have not been completed.



**PART V
ACCESS TO AND CORRECTION OF
PERSONAL DATA**

Correction of personal data

Section 22.

- (1) An individual may request an organisation to correct an error or omission in the personal data about the individual that is in the possession or under the control of the organisation.
- (2) Unless the organisation is satisfied on reasonable grounds that a correction should not be made, the organisation shall —
 - (a) correct the personal data as soon as practicable; and
 - (b) subject to subsection (3), send the corrected personal data to every other organisation to which the personal data was disclosed by the organisation 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.
- (3) An organisation (not being a credit bureau) may, if the individual consents, send the corrected personal data only to specific organisations to which the personal data was disclosed by the organisation within a year before the date the correction was made.
- (4) When an organisation is notified under subsection (2)(b) or (3) of a correction of personal data, the organisation shall correct the personal data in its possession or under its control unless the organisation is satisfied on reasonable grounds that the correction should not be made.
- (5) If no correction is made under subsection (2)(a) or (4), the organisation shall annotate the personal data in its possession or under its control with the correction that was requested but not made.
- (6) Nothing in this section shall require an organisation to correct or otherwise alter an opinion, including a professional or an expert opinion.
- (7) An organisation is not required to comply with this section in respect of the matters specified in the Sixth Schedule.