



## **Personal Data Protection Policy**

*As updated on 15<sup>th</sup> March 2021*



Your privacy is important to us. This Personal Data Protection Policy applies to MavenTree Technology Pte. Ltd. (“MavenTree”) which are established in Singapore (collectively referred to herein as “Organisation”, “us”, “we” or “our”). This policy governs the collection, use and disclosure of personal data submitted to MavenTree, and explains how we collect and handle personal data of individuals and comply with the requirements of the Personal Data Protection Act 2012 of Singapore and its regulation(s) (“PDPA”). In this policy, “personal data” shall have the meaning ascribed to it in the PDPA.

We want you to understand the way in which we collect, use, disclose and/ or retain your Personal Data. This Personal Data Protection Policy sets out:

- a. our policies on how we manage your Personal Data;
- b. the types of Personal Data we collect, use, disclose and/ or retain;
- c. how we collect, use, disclose and/ or retain your Personal Data; and
- d. the purpose(s) for which we collect, use, disclose and/ or retain your Personal Data.

From time to time, we may update this Personal Data Protection Policy to ensure that our Policy is consistent with any regulatory changes. Should any revision(s) be made to this Personal Data Protection Policy, updates will be published on our public site (<https://www.maventree.com/pdpa>). Subject to your legal rights in Singapore, the prevailing terms of the Personal Data Protection Policy shall apply.

By submitting your personal data to us, you agree and consent to us, the Organisation, and our authorised service providers and third parties to collect, use and disclose and/ or retain your Personal Data in the manner set forth in this Personal Data Protection Policy.

## Your Personal Data

In this Personal Data Protection Policy, “Personal Data” refers to any data and/or information about you from which you can be identified by, either (a) from that data; or (b) from that data and other information to which we may have legitimate access to. Examples of such Personal Data include but are not limited to:

- a. your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided in any forms you may have submitted to use, or in other forms of interaction with you;
- b. your photos;
- c. your employment history, education background, and income levels;
- d. Personal Data of your family members, such as next of kin, spouses, and children;
- e. information relating to payments, such as your bank account;

## **Collection of your Personal Data**

We collect personal data from clients, customers, business contacts, partners, personnel, contractors and other individuals. Such personal data may be provided to us in forms filled out by individuals, face to face meetings, email messages, telephone conversations, through our websites or provided by third parties. If you contact us, we may keep a record of that contact. We collect these personal data when it is necessary for business purposes or to meet the purposes for which you have submitted the information.

Generally, we may collect your Personal Data through the following ways:

- a. when you submit your curriculum vitae (CV) or resume to us for a job application;
- b. when you interact with any of our employees;
- c. when you respond to our request for additional Personal Data;
- d. when you request that we contact you;
- e. when you submit your Personal Data to us for any other reason.

## **Purposes for the Collection, Use and Disclosure of Your Personal Data**

Generally, we may collect, use, disclose and/ or retain your Personal Data for the following purposes:

- a. to provide our services;
- b. to provide you with employment and employability services;
- c. to manage your employment including recruitment, processing and termination of your employment;
- d. to provide you with training;
- e. to assist you with your enquiries;
- f. to provide you with industrial relations related services;
- g. to improve customer services, such as resolving complaints and handling requests and enquiries;
- h. to administer benefits and payroll processing;
- i. to conduct interviews, ranking and performance appraisal, career progressions, onboarding and exit management;
- j. to keep you updated on our events;
- k. to maintain contact with clients and other contacts
- l. to keep clients and other contacts informed of the services we offer, industry developments, service offerings, seminars and other events we are holding, that may be of interest to them;
- m. to comply with applicable laws and regulations; and
- n. all other purposes related to our business.



### **Disclosure of your Personal Data**

We may disclose your Personal Data to the following group of external organisation for purposes mentioned above, subjected to the requirements of applicable laws:

- a. hospitals, clinics or insurance companies in connection with claims;
- b. agents, contractors, data intermediaries or third party service providers who provide services, such as telecommunications, mailing, information technology, payment, payroll, data processing, training, market research, carding, storage and archival, to the Organisation;
- c. external banks, financial institutions, credit card companies and their respective service providers;
- d. our professional advisers such as our auditors;
- e. relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any government authority;
- f. business partners or clients that engage any of our services; and
- g. any other person in connection with the purposes set forth above.

### **Third-Party Sites**

Our website may contain links to other websites operated by third parties independent of the Organisation. We are not responsible for the privacy practices of such websites operated by third parties even though it is linked to our website.

We encourage you to learn about the privacy policies of such third party website(s) by checking the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

### **Protection of your Personal Data**

We maintain appropriate security safeguards and practices to protect your Personal Data unauthorised access, collection, use, disclosure, copying, modification disposal or similar risks, in accordance with applicable laws. Only authorised MavenTree personnel are provided access to personally identifiable information and these personnel have agreed to ensure confidentiality of this information.

### **Accuracy of your Personal Data**

We take all reasonable measures to ensure that your Personal Data remains accurate, complete and up-to-date. You may also keep us informed when there are any updates to your Personal Data by contacting us directly.



### **Access to and Correction of Personal Data**

Upon request, we will provide the individual with access to their personal data or other appropriate information on their personal data in accordance with the requirements of the PDPA.

Upon request, we will correct an error or omission in the individual's personal data that is in our possession or control in accordance with the requirements of the PDPA.

We may charge for a request for access in accordance with the requirements of the PDPA.

### **Retention of Personal Data**

We will retain your Personal Data for up to 6 years from the date of termination of the contract and possibly for a longer period if an investigation or legal proceedings should commence within that period. We will cease to retain personal data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.

We shall ensure the disposal of personal data is performed appropriately with little possibility to recover the information from disposal process. Such method may include shredding paper records and permanent delete and wiping of electronic records.

### **Withdrawal of Consent**

Upon reasonable notice being given by an individual of his withdrawal of any consent given or deemed to have been given in respect of our collection, use or disclosure of his personal data, we will inform the individual of the likely consequences of withdrawing his consent. We will cease (and cause any of our data intermediaries and agents to cease) collecting, using or disclosing the personal data unless it is required or authorised under applicable laws.

If you wish to withdraw your consent to any use or disclosure of your Personal Data as set out in this Personal Data Protection Policy, you may contact us at [dpo@maventree.sg](mailto:dpo@maventree.sg).