**DATA PROTECTION NOTICE**

## 1 Introduction

Triple ‘S’ Protection Pte Ltd, hereinafter referred to as “the Organisation”, recognise the importance of protecting Personal Data. We respect the privacy and confidentiality of the personal data of all whom we interact with in the course of providing our products and services. We are committed to implementing policies, practices and processes to safeguard the collection, use and disclosure of the personal data you provide us, in compliance with the Singapore Personal Data Protection Act (PDPA) 2012.

We have developed this Data Protection Notice to assist you in understanding how we collect, use, disclose, process, protect and retain your personal data that is in our possession.

## ​2 How We Collect Your Personal Data

Personal data refers to any information that can uniquely identify an individual person either (a) on its own (e.g., NRIC No., FIN No.), or (b) when combined with other information (e.g., Full Name + Full Address).

We collect your personal data:

* When you enquire of our products and services
* When you use our products and services
* When you interact with us on our digital/online platforms
* When you provide us with goods and services as our vendors and service providers
* When you enter our physical premises
* When you provide feedback to us on our products and services or quality of service
* When you communicate with us via emails or written correspondences
* When you submit your CV and job application form to us in response to our recruitment advertisements or through recruitment firms or job portals

## 3 Types of Personal Data We Collect About You

The types of personal data we collect about you include:

* Personal Contact Information (such as Name, Residential Address, Phone No., Email Address)
* Personal government-issued identification numbers such as NRIC/Passport/FIN/Work Permit; as required by law or necessary to accurately establish or verify your identity to a high degree of fidelity)
* Identity data (photos and CCTV videos)
* Professional Profile (such as Job Title, Certification, Educational level, Professional Qualification)

## 4 How We Use Your Personal Data

We use the personal data you provide us for one or more of the following purposes:

* Fulfil requests, orders and delivery of products and services
* Customer care and customer relationship management
* Respond to queries and feedback, and provide customer service and support
* Investigate incidents, complaints, claims and disputes
* Registration and security purposes
* Reporting and audit purposes
* Process job applications, recruitment and selection
* Fulfil legal obligations and regulatory requirements

## 5 Who We Disclose Your Personal Data To

We may disclose some of the personal data you provide us to the following entities or organisations outside the Organisation in order to fulfil our services to you:

* Government Agencies & Regulatory Authorities such as Ministry of Manpower, Health Promotion Board, Central Provident Fund
* Providers of Professional Services such as Auditors, Lawyers, Consultants
	+ Banks, Payment Card Processing Companies, and other Financial Institutions
* Data Processing and Hosting Companies such as IT Service Providers, Web Hosting Companies and Cloud Service Providers
* Providers of Goods or Services such as Training Providers, Freight and Courier Services

Where required to do so by law, we may disclose personal data about you to the relevant authorities or to law enforcement agencies.

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## 6 How We Manage the Collection, Use and Disclosure of Your Personal Data

### 6.1 Obtaining Consent

We only collect, use and disclose personal data with your consent or deemed consent or as otherwise permitted under the Personal Data Protection Act 2012(PDPA) or other applicable laws and regulations.

The provision of your personal data to us will be deemed as consent to our collection, use and disclosure of your personal data for the purposes set out in this Privacy Notice.

Before we collect, use or disclose your personal data, we will notify you of the purpose of data collection. We will obtain verbal confirmation from you on your expressed consent, with an acknowledgment sent via email/text afterwards. We will not collect more personal data than is necessary for the stated purpose. We will seek fresh consent from you if the original purpose for the collection, use or disclosure of your personal data has changed.

If you provide us with personal data of another person (for instance, a potential employee/referral), you are responsible for ensuring that such person is made aware of the data contained in this Privacy Policy and that the person has given you his/her consent for sharing the data with us.

In order to provide you with the best service, we need to process certain personal data about you. We will only ask for and use information that we genuinely need to provide you with the best possible service. You can refuse to provide us with your personal data. However, if you do not give us certain information, we may not be able to provide our services to you.

**Legitimate Interests:** We may rely on the legitimate interest’s exception to consent in the following circumstances which are our organisation’s lawful interests. When we rely on this exception, we conduct an assessment as required under law and will provide such documented assessments to PDPC upon their request. We will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.

## 6.2 Withdrawal of Consent

If you wish to withdraw consent, you should give us reasonable advance notice. We will advise you of the likely consequences of your withdrawal of consent, e.g., without your personal contact information we may not be able to inform you of future employment opportunities with us or with our clients.

In the event that you wish to withdraw consent to our use of your personal data, please drop us an email at dpo@triplesp.com.sg with the subject title “Withdrawal of Consent Request”, stating the following details:

* 1. Your full name; and
	2. Your email address;

## 7 How We Ensure the Accuracy of Your Personal Data

We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete and kept up-to-date. From time to time, we may do a data verification exercise for you to update us on any changes to the personal data we hold about you. If we are in an ongoing relationship with you, it is important that you update us of any changes to your personal data (such as a change in your mailing address).

## 8 How We Protect Your Personal Data

We have implemented appropriate information security and technical measures (such as data encryption, firewalls and secure network protocols) to protect the personal data we hold about you against loss; misuse; destruction; unauthorised alteration/modification, access, disclosure; or similar risks.
We have also put in place reasonable and appropriate organisational measures to maintain the confidentiality and integrity of your personal data and will only share your data with authorised persons on a ‘need to know’ basis.

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.？

## 9 How We Retain Your Personal Data

We have a document retention policy that keeps track of the retention schedules of the personal data you provide us, in paper or electronic forms. We will not retain any of your personal data when it is no longer needed for any business or legal purposes.
We will dispose of or destroy such documents containing your personal data in a proper and secure manner when the retention limit is reached. When we act as a data processor to our clients, we will retain your personal data in accordance with the retention periods prescribed by our clients.

## 10 How You Can Access and Make Correction to Your Personal Data

You may write to us to find out what personal data about you that we have in our possession or under our control and how it may have been used and/or disclosed by us in the previous one year. Before we accede to your request, we may need to verify your identity by checking your NRIC or other legal identification document. We will respond to your request as soon as possible, or within 30 days from the date we receive your request. If we are unable to do so within the 30 days, we will let you know and give you an estimate of how much longer we require. We may also charge you a reasonable fee for the cost involved in processing your access request.

If you find that the personal data we hold about you is inaccurate, incomplete or not up-to-date you may ask us to correct the data. Where we are satisfied on reasonable grounds that a correction should be made, we will correct the data as soon as possible, or within 30 days from the date we receive your request.

If you have any queries regarding access or correction to your personal data about you, please email us at: dpo@triplesp.com.sg with the subject title “Access Request” or “Correction Request”, stating the following details:

* 1. Your full name and contact information; and
	2. The nature of your Access or Correction Request.

## 11 How We Transfer Your Personal Data

If there is a need for us to transfer your personal data to another organisation outside of Singapore, we will ensure that the standard of data protection in the recipient country is comparable to that of Singapore’s PDPA. If this is not so, we will enter into a contractual agreement with the receiving party to accord similar levels of data protection as that in Singapore.

## 12 Contacting Us

If you have any query or feedback regarding this Data Protection Notice, or any complaint you have relating to how we manage your personal data, please email us at: dpo@triplesp.com.sg with the subject title “Data Protection Query” or “Data Protection Feedback”, stating the following details:

* 1. Your full name and contact information; and
	2. The nature of your query or feedback.

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

## 13 Changes to this Data Protection Notice

This Notice applies in conjunction with other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data to us.

We may update this Data Protection Notice from time to time. We will notify you of any changes by posting the latest Notice on our website. Please visit our website periodically to note any changes. Your continued employment and participation in our recruitment process constitute your acknowledgement and acceptance of such changes.

Changes to this Notice take effect when they are posted on our website.

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