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## **DATA PROTECTION AND PRIVACY**

This statement demonstrates Blue Connect Pte Ltd commitment to respect your privacy on this website and to manage, protect and process your personal data. This Data Protection Policy outlines how your personal data will be managed in accordance with the Personal Data Protection Act 2012 (the "Act") which strives to protect personal data of individuals. Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we may collect, use and/or disclose your personal data.

### **PERSONAL DATA**

As used in this Data Protection Policy, "**personal data**" means data to any data or information about you from which you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

Personal data that we collect from you includes but is not limited to:

- Full name;
- Contact details (including address, telephone number, e-mail address);
- Personal and professional details contained in your curriculum vitae when you apply to us for a job (Employment references, Professional Qualifications, Training History, Educational Qualifications and Certifications, Salary Information and Bank Account Information);
- Performance assessments and disciplinary records;
- Medical records; and
- Other information relating to you which you have provided to us in any forms you may have submitted to us, or in other forms of interaction with you.

### **PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE**

Personal information and data may be collected, used or disclosed to third parties where necessary for the following purposes:

- To provide, operate and administer Blue Connect Pte Ltd projects / jobs / products / services, or to process applications for Blue Connect Pte Ltd projects / jobs / products / services
- To provide product-related, projects / jobs / services and support
- To process job applications, recruitment and selection

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- To perform background verification checks and reference checks for verification of your identity for employment purposes.
- To process employment passes of our employees with the relevant government agencies
- To process employment pass applications of our employees and customer's employees with the relevant government agencies
- To process all administrative and human resources related matters within our organisation, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your benefits, processing claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies
- For managing and terminating our employment relationship with you, including monitoring your internet access and your use of our intranet email to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances
- To carry out our obligations arising from any contracts entered into between you and us
- To facilitate operational processes including but not limited to statistical analysis
- To deliver customised experiences that meet your needs and preferences
- To perform internal management, operate management information systems, and conduct internal and external audits
- To monitor electronic communications and calls with customers for record management quality control and training
- To enforce or defend the rights of Blue Connect Pte Ltd, its employees and directors
- To comply with any applicable regulations, code of practice, rules and laws or to assist in law enforcement and investigations conducted by any form of governmental and/or regulatory authority
- Any other incidental business purpose related to or in connection with the above
- To provide employee/subcontractor's employees with security clearance at project sites
- To provide security clearance to Blue Connect Pte Ltd's office

(hereinafter collectively referred to as the "Purposes").

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Should there be any need to use your personal information and data for any other purposes, Blue Connect Pte Ltd will notify you and obtain prior permission and consent.

By providing personal data relating to a third party (e.g. spouse, children, parents, referees and/or employees), the individual shall represent and warrant that prior consent is obtained from such third party for the collection, use or disclosure of personal data.

We may collect, use and disclose your personal data pursuant to an exception under the Personal Data Protection Act or as required/authorised under any other written law.

By providing us with your personal information and data or by accessing or viewing the website or any of its products/services, functions or contents, it is deemed that you have agreed to each and all the terms, conditions and notices stated in this policy.

## **CONSEQUENCES OF NOT CONSENTING AND/OR PROVIDING PERSONAL DATA NECESSARY FOR TRANSACTION/SERVICE/APPLICATION**

Please be noted that should you not consent and provide us with the relevant personal data to fulfil the “Purposes” of collection, use and disclosure of your personal data by Blue Connect Pte Ltd, it may hinder our ability to continue to interact with you.

*For Job applicants:* We may not be able to make a decision on your suitability for recruitment and employment or comply with the law and therefore, we may not be able to make an offer of employment.

*For Blue Connect Pte Ltd Employees:* We may not be able to fulfil the Purposes listed in the Personal Data Protection Policy, Section 4.2.1.

*Visitors :* We may not be able to identify the identity for the entrance to our office for security purposes.

## **WITHDRAWAL OF CONSENT**

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. If you wish to withdraw your consent to any use or disclosure of your Personal Data as set out in this Data Protection Policy, you may write to our Data Protection Officer at [corporate@blueconnect.sg](mailto:corporate@blueconnect.sg).

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Please understand that your withdrawal of consent for all of the purposes necessary to Blue Connect Pte Ltd fulfilling our contractual duties towards you or facilitating your request or providing our services to you may carry consequences. We will review and inform you on the consequences of the withdrawal prior to processing your request.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data pursuant to an exception under the PDPA or as required/authorised under any other written law.

## **USE OF COOKIES BY BLUE CONNECT PTE LTD WEBSITE**

When you visit or interact with the websites and services of the Company, the Company and/or its authorized service providers may use cookies, web beacons, and other similar technologies for collecting, processing and storing information about how you use the websites and services in order to improve the quality of service provided to you and to provide you with a better, faster, and safer web experience. For more information on the types of cookies used and how these work, please refer to the Cookie Policy accessible at [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function if you remove cookies from your browser.

The Cookie Policy forms part of the Singapore Data Protection Policy. The Cookie Policy may be updated from time to time and the Company will provide notice on its website of such updates. It is your responsibility to check back regularly for updates to the same.

## **HOW WE PROTECT YOUR INFORMATION**

We are committed to maintaining the security of personal information according to the Personal Data Protection Act. We have implemented appropriate information security and technical measures (such as encryption, firewalls and secure network protocols) to safeguard your personal information such as the misuse; destruction; unauthorised alteration/modification, access, disclosure; or similar risks to minimise the risk of brute force attacks on our website.

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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.

When we engage third-party data processors to process personal data on our behalf, we will ensure that they provide sufficient guarantees to us to have implemented the necessary organisational and technical security measures and have taken reasonable steps to comply with these measures (as required under the PDPA).

## **TRANSFER OF DATA**

Where applicable, your Personal Data may be stored in external servers located overseas. In addition, as described above, in the course of our business operation needs, we may be required, from time to time, to transfer your Personal Data with and between our related corporations and/or organisations and their affiliates, and third-party service providers, some of which may be located in countries outside of Singapore. The personal data transfer will be in accordance with requirements prescribed under the PDPA or applicable data protection law to ensure that organization provide a standard of protection to personal data.

## **DATA BREACH NOTIFICATION**

While there may be occurrences in the future where personal data could be compromised, we will do our utmost to assess the situation. Once the data breach is deemed to be notifiable, the affected individuals and/or the Commission where it is assessed to be notifiable.

## **DATA PORTABILITY**

Derived personal data is defined under the PDPA to refer to personal data about an individual that is derived by an us in the course of business from other personal data about the individual or another individual, in the possession or under the control of Blue Connect Pte Ltd. It generally refers to new data elements created through the processing of personal data (e.g. through mathematical, logical, statistical, computational, algorithmic, or analytical methods based on the application of business-specific rules). Derived data is a general term but in the context of data portability, it does not include personal data derived by the organisation using any prescribed means or methods which are commonly known and used by the industry (e.g. simple mathematical averaging or summation).

## **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

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any of your personal data when it is no longer need 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.

## **ACCESS TO YOUR INFORMATION AND UPDATING AND CORRECTING YOUR INFORMATION**

Subject to the exceptions referred to in section 21(2) of the Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore ("PDPA"), you have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact us at the email address found on this website. We may make charge a reasonable fee for processing your request. Such a fee depends on the nature and complexity of your access request.

We want to ensure that your personal information is accurate and up to date. If any of the information you have provided to Blue Connect Pte Ltd changes, for example, if you change your name, email address or payment details, please update us with the correct information by sending an email to [corporate@blueconnect.sg](mailto:corporate@blueconnect.sg). You may ask us, or we may ask you, to correct information you or we may think is inaccurate, and you may also ask us to remove information which is inaccurate. 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.

## **NON-DISCLOSURE**

We do not sell, trade or otherwise transfer to third parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, as long as these parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours and others' rights, property or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising or other uses.

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## **LINKS TO OTHER WEBSITES**

Our website may contain links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## **REVIEW AND CHANGES TO PRIVACY POLICY**

We keep our privacy policy under regular review. If we change our privacy policy, we will post the changes on this page, and place notices on other pages of our website, so that you may be aware of the information we collect and how we use it at all times. This privacy policy was last updated on the 1 Jan 2023.

## **HOW TO CONTACT US**

We welcome your views about our website and our privacy policy. If you have any questions about this privacy policy or any concern you have relating to how we manage your personal data, please contact our Data Protection Officer (DPO) at [corporate@blueconnect.sg](mailto:corporate@blueconnect.sg).