

Data Protection Notice for Employees and Job Applicants

SimplifyNext Pte Ltd

This Data Protection Notice ("**Notice**") sets out the basis upon which SimplifyNext Pte Ltd ("**SimplifyNext**", "we", "us" or "our") may collect, use, disclose or otherwise process the personal data of employees and job applicants in accordance with the Personal Data Protection Act 2012 ("**PDPA**"). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

Application of this Notice

1. This Notice applies to all persons engaged in a contract of service or contract for service with us (whether on a part-time, temporary or full-time basis) and interns and trainees working at or attached to us (collectively, "**employees**"), as well as persons who have applied for any such position with us ("**job applicants**"). All references to "employment" apply equally to internships and traineeships, where applicable.

Personal Data

2. As used in this Notice, "**personal data**" means data, whether true or not, about a job applicant and/or employee who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.
3. If you are a **job applicant**, personal data which we may collect includes, without limitation, your:
 - (a) name or alias, gender, date of birth, nationality, and country and city of birth;
 - (b) mailing address, telephone numbers, email address and other contact details;
 - (c) resume, educational qualifications, professional qualifications and certifications;
 - (d) employment references;
 - (e) employment and training history;
 - (f) vaccination status, where required;
 - (g) work-related health issues and disabilities; and
 - (h) photographs and CCTV footage.
4. If you are an **employee**, personal data which we may collect in the context of your employment with us includes, without limitation, your:
 - (a) name or alias, gender, NRIC or passport number, date of birth, nationality, and country and city of birth;
 - (b) mailing address, telephone numbers, email address and other contact details;
 - (c) employment, training and certification history;
 - (d) salary information and bank account details;
 - (e) details of your next-of-kin, spouse, children and/or other family members, and your emergency contact persons;
 - (f) work-related health issues and disabilities;
 - (g) records of leave of absence from work;
 - (h) photographs and other audio-visual information, including CCTV footage;

- (i) performance assessments and disciplinary records; and
 - (j) any additional information provided to us by you as a job applicant (that is, prior to being engaged as an employee).
5. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

Collection, Use and Disclosure of Personal Data

6. We generally collect personal data that (a) you knowingly and voluntarily provide in the course of or in connection with your employment or job application with us, or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”, which may include your job placement agent), after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes; or (b) where collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
7. If you are a **job applicant**, your personal data will be collected and used by us for the following purposes, and we may disclose your personal data to third parties where necessary for these purposes:
- (a) assessing and evaluating your suitability for employment in any current or prospective position within our organisation; and
 - (b) verifying your identity and the accuracy of your personal details and other information provided, including through background checks.
8. If you are an **employee**, your personal data will be collected and used by us for the following purposes, and we may disclose your personal data to third parties where necessary for these purposes:
- (a) performing obligations under or in connection with your contract of employment with us, including payment of remuneration and tax;
 - (b) 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 insurance and other benefits, processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;
 - (c) managing and terminating our employment relationship with you, including monitoring your internet access and your use of our intranet and email to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment-related grievances;
 - (d) assessing and evaluating your suitability for employment or appointment, or continued employment or appointment, in any position within our organisation;
 - (e) ensuring business continuity for our organisation in the event that your employment with us is or will be terminated;
 - (f) performing obligations under or in connection with the provision of our goods or services to our clients;
 - (g) facilitating any proposed or confirmed merger, acquisition or business asset transaction involving any part of our organisation, or any corporate restructuring process; and

- (h) facilitating our compliance with any laws, customs and regulations which may be applicable to us.
9. Where you are present at our office premises, whether as an employee or as a job applicant attending an interview, your personal data will also be collected and used for the following **safety and security** purposes:
 - (a) maintaining the safety and security of our premises, employees, visitors and property, including through CCTV surveillance;
 - (b) detecting, preventing and investigating security incidents, accidents, unauthorised access, unlawful acts or misconduct;
 - (c) responding to emergencies and supporting evacuation and incident management; and
 - (d) disclosing records or footage to law enforcement or regulatory authorities where required or permitted by law.
 10. The purposes listed in paragraphs 7 to 9 may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).
 11. We may also collect, use or disclose your personal data without your consent where permitted under an exception in the PDPA or other written law, including:
 - (a) to respond to an emergency that threatens your life, health or safety, or that of another individual; and
 - (b) where necessary in the national interest, or for any investigation or proceedings.
 12. We may disclose your personal data:
 - (a) with your consent or deemed consent, where such disclosure is required in connection with the purposes listed above;
 - (b) to comply with any applicable laws, regulations, codes of practice, guidelines or rules; or
 - (c) with your consent or deemed consent, to third-party service providers, agents and other organisations we have engaged to perform any of the functions listed in paragraphs 7 to 9 for us. Any third parties engaged by us will be contractually bound to keep all personal data confidential.

Personal Data of Third Parties

13. Where you provide us with the personal data of other individuals (for example, your next-of-kin, spouse, children or other family members, emergency contact persons and referees), including for the purposes of emergency contact, processing leave applications (such as childcare, maternity, paternity or compassionate leave), and administering insurance and other benefits, you warrant that you have:
 - (a) informed those individuals of the purposes for which their personal data will be collected, used and disclosed, as set out in this Notice; and
 - (b) obtained their consent, before providing their personal data to us, for us to collect, use and disclose their personal data for those purposes.

We rely on this warranty when collecting, using and disclosing such personal data.

Your Choices

14. You have choices regarding our collection, use and disclosure of your personal data, and you have the right to object to the processing of your personal data and to withdraw your consent.

If you choose not to provide us with any of your personal data, you may submit a request in writing to our Data Protection Officer at the contact details provided below, or indicate this in the personal data collection form submitted to us (if any). Whilst we respect your decision, please note that depending on the nature and extent of your request, we may not be in a position to process your job application and/or your employment relationship with us may be affected if the personal data is not provided. We shall, in such circumstances, notify you within thirty (30) calendar days of receiving your request, before completing the processing of your request.

Withdrawing Your Consent

15. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. You may withdraw your consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing to our Data Protection Officer at the contact details provided below.
16. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of acceding to it, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process and effect your request within thirty (30) calendar days of receiving it.
17. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and extent of your request, we may not be in a position to process your job application and/or your employment relationship with us may be affected if the withdrawal proceeds. We shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in paragraph 15.
18. Withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws and/or for compliance with regulatory obligations.

Access to and Correction of Personal Data

19. If you wish to request (a) access 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 (b) correction or updating of any of your personal data which we hold, you may submit your request in writing to our Data Protection Officer at the contact details provided below.
20. A reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
21. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your access request within thirty (30) calendar days after receiving it, we will inform you in writing within thirty (30) calendar days of the time by which we will be able to respond. If we are unable to provide you with any personal data or to make a correction requested by you, 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).
22. Depending on the request being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us simply to provide you with confirmation of the personal data that we have on record, if the record of your personal data forms a negligible part of the document.

23. If your request relates to personal data which we are processing on behalf of another organisation, we will instead forward your request to the relevant organisation for its necessary action.

Protection of Personal Data

24. 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, encryption and the use of privacy filters, to secure all storage and transmission of personal data by us, and we disclose personal data both internally and to authorised third parties and agents only on a need-to-know basis.
25. However, 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 personal data and are constantly reviewing and enhancing our information security measures.

CCTV at Our Premises

26. CCTV operates at our office premises, as indicated by signs displayed on site. Footage is accessible only to authorised personnel and is retained only for as long as necessary for safety and security purposes, or as required by law.

Accuracy of Personal Data

27. We generally rely on personal data provided by you (or your authorised representative). To ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by submitting a request in writing to our Data Protection Officer.

Retention of Personal Data

28. We may retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected, or as required or permitted by applicable regulations and/or laws.
29. 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 was collected and is no longer necessary for legal or business purposes.

Transfers of Personal Data Outside of Singapore

30. We generally do not transfer your personal data to other jurisdictions unless required for business-related needs. If we do so, we will obtain your consent for the transfer and take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

Data Breach Notification

31. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, we shall promptly assess the impact and, if appropriate, report the breach to the Personal Data Protection Commission ("PDPC") within three (3) calendar days. We will notify you where the data breach is likely to result in significant harm to you, after our notification to the PDPC. We may also notify other relevant regulatory agencies, where required. Where we act as a data intermediary, we shall inform the relevant organisation immediately of any data breach so that it can promptly assess the impact and comply with its own notification obligations.

Contacting Our Data Protection Officer

32. You may contact our Data Protection Officer if you have any enquiries, feedback or complaints on our personal data protection policies and procedures, if you believe that information we hold about you is incorrect or outdated, or if you wish to make any request under this Notice, via email at **dpo@simplifynext.com**.

Effect of Notice and Changes to Notice

33. This Notice applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
34. We may revise this Notice from time to time without prior notice. You may determine whether any such revision has taken place by referring to the date on which this Notice was last updated. Your continued employment and participation in our recruitment process constitute your acknowledgement and acceptance of such changes.

This Notice was first effective on 10 October 2022 and was last updated on 23 September 2026.