

# Verity Partners PDPA Policy

*(Effective date: 2 December 2019)*

This data protection policy applies to Verity Partners and her affiliates which are established in Singapore (“VP” or “we”). This policy governs the collection, use and disclosure of personal data submitted to VP including through [veritypartners.com.sg](http://veritypartners.com.sg), 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.

This policy statement supplements but does not supersede nor replace any other consent you may have otherwise provided to us in respect of your personal data.

## **Main Data Protection Policy**

### **Summary**

We will collect, use or disclose personal data for reasonable business purposes only if there is consent or deemed consent from the individual and information on such purposes have been notified. We may also collect, use or disclose personal data if it is required or authorised under applicable laws.

### **Collection of Personal Data**

We collect these personal data when it is necessary in order for us to provide our services to you, for a purpose authorized by you or for purposes that are reasonably appropriate.

We collect the following personally identifiable information, as necessary, from you:

- a) Your name, NRIC, passport or other identification number, personal telephone number(s), personal residential and mailing addresses, personal mailing address, bank account number(s), employment history, education background;
- b) Photos, film, CCTV and/or video recordings of you;
- c) Information about your use of our website, including cookies, IP addresses, etc
- d) Any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interactions with us.

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 any individuals contact us, we may keep a record of that contact.

We will only collect, hold, process, use, communicate and/or disclose such personal data, in accordance with this policy. If any party is acting as an intermediary or otherwise on behalf of a third party individual or supplying us with information regarding a third party individual (such as a friend, a colleague, an employee etc), such intermediary party (IP) undertakes that he/she is an authorised representative or agent of such third party individual and that he/she has obtained all necessary consents from such third party individual to the collection, processing, use and disclosure by us of their personal data. Because we are collecting the third party individual’s data from IP, IP undertakes to make the third party individual aware of all matters listed in this policy preferably by distributing a copy of this policy to them or by referring them to our website. Failure on IP part to ensure compliance may result in us being unable to provide you with the services you have requested or require.

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## Use of Personal Data

We use personal data for the following purposes:

- to provide our services
- to respond to the individual's request or for the purposes for which it was provided to us as stated at the time of the collection (or as is obvious from the context of collection)
- to maintain contact with clients and other contacts
- 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
- for general management and reporting purposes, such as invoicing and account management
- for recruitment purposes
- for purposes related to the employment of our personnel and providing internal services to our personnel
- all other purposes related to our business.

Any individual may choose to unsubscribe from mailing lists, registrations, or elect not to receive further marketing information from us by contacting our [Data Protection Officer](#), or if we have contacted such individual by email, such individual may use the unsubscribe function in that email to notify us. Such requests will be processed within 28 days.

## Disclosure of Personal Data to Third Parties

We do not disclose personal data to third parties except when required by law, when we have the individual's consent or deemed consent or in cases where we have engaged third parties such as data intermediaries or subcontractors specifically to assist with our firm's activities. Any such third parties whom we engage will be bound contractually to keep all information confidential.

We may disclose personal data to other affiliated entities in the Verity Partners network of firms, where it is necessary (i) to meet the purpose for which such individual has submitted the information; or (ii) to enable such individual to be provided with information at a later date which may be of relevance and interest to such individual based on the nature and purpose of such individual's voluntary requests. We may also transfer all data in our possession to a successor-in-interest to our business or assets.

## 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.

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## **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.

## **Accuracy of Personal Data**

We will make a reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.

## **Security and Protection of Personal Data**

We have implemented generally accepted standards of technology and operational security to protect the personal data in our possession or under our control and to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. All VP personnel follow a network-wide security policy. Only authorised VP personnel are provided access to personally identifiable information and these personnel have agreed to ensure confidentiality of this information. VP's policy is to use secure socket layer technology for the protection of credit card information submitted through web forms. This policy is also required for any fulfilment agents of VP.

## **Retention of Personal Data**

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.

## **Transfer of Personal Data outside of Singapore**

We will ensure that any transfers of personal data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

## **Privacy on Our Websites**

This Policy also applies to any personal data we collect via our websites. Cookies may be used on some pages of our websites. "Cookies" are small text files placed on your hard drive that assist us in providing a more customised website experience. Cookies are now used as a standard by many websites to improve users' navigational experience. If individuals are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, a visitor may refuse a cookie and still fully navigate our websites, however other functionality in the site may be impaired. After termination of the visit to our site, a visitor can always delete the cookie from his system if he wishes.

Because we want visitors' website experience to be as informative and resourceful as possible, we may provide a number of links to third party websites. We assume no responsibility for the information practices of these third party websites that visitors are able to access through ours. When a visitor to our website links to these third party websites, our privacy practices no longer apply. We encourage visitors to review each website's privacy policy before disclosing any data.

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## Data Protection Officer

If an individual believes that information we hold about him is incorrect or out of date, or if an individual has concerns or further queries about how we are handling his personal data, or any problem or complaint about such matters, please contact our Data Protection Officer at [office@veritypartners.com.sg](mailto:office@veritypartners.com.sg)

## Modifications

We reserve the right to modify or amend this Policy at any time. The effective date will be displayed at the beginning of this Policy. To keep you informed, we will notify changes to this Policy by prominently identifying the alteration for a period of not less than two weeks on our home page at <http://www.veritypartners.com.sg>

## Inquiries

If you require more information relating to this policy statement or require access to correct or update your personal data or to withdraw your consent, please contact us at:

[office@veritypartners.com.sg](mailto:office@veritypartners.com.sg).

## Recruitment Data Protection Policy

Verity Partners firms which are established in Singapore (“VP” or “we”) believe that privacy is an important individual right and this policy provides information regarding our use and disclosure of personal data collected from individuals including via our websites for recruitment purposes. VP's information handling practices are in accordance with current privacy and data protection legislation in Singapore.

For more general information about the privacy practices of VP, please refer to our [Main Data Protection Policy](#).

## Why do we collect personal data?

As part of our recruitment process, we collect necessary personal data about you to consider you for employment with our firm. During the course of the recruitment and selection process, we may request further information about you to assess your suitability for positions with our firm. In doing so, we only collect personal data that is necessary for recruitment decisions. The procedures used by the firm to gather further information about you might include:

- selection interviews;
- assessment centres;
- written skills tests;
- referee reports;
- security vetting; and,
- necessary pre-employment activities.

References from your current or former employer(s) or other sources will only be obtained with your consent. In some cases, pre-employment checking may be necessary. Any checking is "tailor-made"

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and the extent and nature of information sought is no more than is justified by the particular position being filled. Failure to provide requested information may influence the processing and outcome of your application.

## How do we use personal data?

We use the personal data for the following purposes:

- managing your application(s) for employment, evaluating you for open positions throughout the VP network, and managing your candidate profile;
- evaluating your suitability for employment with VP (including for example providing your personal information to third parties to conduct background checks);
- sending you email notifications and other announcements, requesting additional information, or otherwise contacting you about your candidacy;
- conducting statistical analyses and reports including for example, demographic analyses of candidates, reports on VP recruitment activities, and analyses of candidate sourcing channels; and
- relating to any other purposes for which you provided the information to VP.

We will not collect or use personal data in ways other than as described in this policy unless we have obtained your consent. In some cases we may specifically request a consent form to be signed. In other cases consent may be implied (for instance, you give us information after being fully advised of how it will be used).

## Cookies and log files

This policy also applies to any personal data we collect via our websites. Cookies may be used on some areas of our website. "Cookies" are small text files placed on your hard drive that assist us in providing a more customised website experience. Cookies are now used as a standard by many websites to improve users' navigational experience. If you are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, a visitor may refuse a cookie and still fully navigate our websites, however other functionality in the site may be impaired. After termination of the visit to our site, you can always delete the cookie from your system if you wish.

In order to properly manage our website and related email services, we may anonymously log information on our operating systems about the number and duration of visits to our website and identify categories of visitors by items such as domains and browser types, and to track document identification number by way of email acknowledgement or return receipt. These statistics are reported in the aggregate to our webmaster and system administrators. In addition, site statistics are compiled by third parties, and therefore your IP address will be passed to third parties for statistical reporting only. This is to ensure that our website presents the best web experience for visitors and is an effective information resource.

Whenever a registered member visits our website, they may be required to identify themselves in order to gain entry. This data is logged by VP primarily to measure website performance and in assisting to resolve any website technical difficulties.

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## Disclosure of personal data

Your personal data will be used only by partners and staff directly involved in the recruitment process. Information will not be disclosed to third parties except when required by law, when we have your consent or in cases where the third party is a contractor or supplier whom we have engaged specifically to assist with our firm's activities. All such contractors will be bound contractually to keep all information confidential.

## Transfer of Data to Other Countries

Personal data collected by VP may be transferred internationally to other Verity Partners' entities world-wide, where it is necessary to meet the recruitment purposes. By submitting your personal data to VP whether through our websites or otherwise, you are providing explicit consent to transborder transmission of such data collected by VP whether through our websites or otherwise for the fulfilment of recruitment applications.

## How is this information secured?

VP has implemented generally accepted standards of technology and operational security in order to protect your personal information from loss, misuse or destruction. In particular, VP has put in place appropriate confidentiality obligations and technical and organisational security measures to prevent any unauthorised or unlawful disclosure or processing of such information and the accidental loss or destruction of or damage to such information.

## How long is information kept?

Because VP must process your personal data in order to consider you for a position as part of the recruitment process, if you revoke your consent, VP may need to terminate your application. VP may retain certain information related to your application for a reasonable but limited period to meet applicable legal or records retention requirements. To request us to delete your personal data submitted to VP whether through our websites or otherwise, please send your request to [office@veritypartners.com.sg](mailto:office@veritypartners.com.sg).

Access to your personal data can be made by request to us unless granting access would infringe another person's privacy. If you wish to gain access to your personal data, please send your request to [office@veritypartners.com.sg](mailto:office@veritypartners.com.sg).

## Correction and Concerns

If you believe that information we hold about you is incorrect, if you have concerns about how we are handling your personal data, or if you changed your mind about our usage of your data, please email us at [office@veritypartners.com.sg](mailto:office@veritypartners.com.sg) and we will try to resolve those concerns.

## Changes to the Verity Partners Recruitment Data Protection Policy

VP reserves the right to modify or amend this policy at any time and for any reason. However, VP commits to ensure that the privacy rights of individuals are maintained.

In order to keep visitors informed, VP will ensure that we notify users of changes to our Recruitment Data Protection Policy by identifying the alteration for a period of not less than two weeks on our home page and identifying the effective date at the beginning of this policy.

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## Contact our Privacy Office

We welcome your enquiries or comments about our Recruitment Data Protection Policy and any queries or concerns that you may have about this website.