

## PERSONAL DATA PROTECTION POLICY

### Greyform Pte Ltd and its' Related Companies (Greyform)

Greyform Pte Ltd & its' related companies respect the privacy of your Personal Data. Greyform's Personal Data Protection Policy sets out the guidelines on how we comply with the [Personal Data Protection Act 2012 \("PDPA"\)](#).

As far as possible, we will not collect more personal data than necessary for the stated purpose.

By providing your personal data, you are deemed to have agreed and consented to Greyform, our authorized service providers and third parties to collect, manage, use, disclose, **share**, and retain your Personal data in the matter set forth in this Personal Data Protection Policy.

#### 1. Personal Data

Under the PDPA, **Personal Data** refers to any data and/or information about an individual who can be identified either.

1. from that data.
2. From that data and other information to which Greyform has or is likely to has legitimate access.

Examples of Personal Data Information include but not limited to:

1. your name, gender, date of birth, nationality, country/city of birth, NRIC, passport or other identification number, contact number(s), residential address, mailing address, email address and any other information relating to you which you have provided, in any forms you may have submitted, and/or **from** interaction **with** you.
2. your photographs, other audio-visual and biometric information.
3. your **employment** history, performance assessment and disciplinary records.
4. your training history, performance assessment and disciplinary records
5. personal information of your **family** members such as next-of-kin, spouse, siblings, and children.
6. information on payments and billings details such as bank account details.
7. Information from your usage and interaction with **our** website and/or services including computer and connection information, device capability, bandwidth, statistics on page views and traffic **to** and from our website.

#### 2. Collection of Personal Data

Greyform may collect personal data when you or your authorized representatives (i.e., persons whom you have authorized, persons who have been validly identified as being you or your authorized representative) interact with us in the following ways:

1. contact us for enquiry or request for assistance.
2. visit our website.
3. When you interact with us, for example, via telephone calls, letters, face-to-face meetings, online forms, or emails.
4. when you request that we contact you, be included in an email or other mailing lists.
5. when you are contacted by and respond to our representatives.
6. when you submit a job, internship, or a scholarship application.
7. when you purchase or/and engage our products and services.
8. when we receive references from business partners and third parties, where you have been referred by them,
9. when you visit our premises.
10. when you request for our technical support or services.
11. CCTV recordings, photos, videos, and other medias while you are at our premises.
12. when you submit your Personal Data to us for any other reasons.

Greyform also reiterates that submission of your personal data is voluntary.

If you provide Greyform with any Personal Data belonging to a third party, you have the responsibility for obtaining the consent for the use and transfer of data to Greyform.

### **3. Use of Personal Data**

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

1. for administrative and human resource matters including granting access to our premises and computer systems, processing leave application, developing human resource policies and resolving disciplinary and employment related grievances.
2. for recruitment purposes.
3. to provide you with training.
4. for employee communication.
5. to process payment for your employment, services rendered or any other purchases.
6. for assessing and evaluating suitability for employment/continued employment in any position and your career development.
7. to improve customer services, such as resolving complaints and handling requests, enquiries, and feedback.
8. to meet legal, regulatory, and other requirements including providing to law enforcement, judicial and other government agencies.
9. to respond to enquiries and requests from you or people you have authorized.
10. to ensure the safety and security of our properties and systems, including the use of CCTV surveillance, conducting security clearance and issuance of visitor passes.
11. to support security and risk management.
12. to process any medical related claims.
13. to handle claims and disputes, protecting and enforcing our contractual, legal rights and obligations.
14. to process insurance claims and payments arising from various policies.

15. to meet obligations of conducting our business such as tendering and securing of businesses.
16. to facilitate any corporate restructuring process.
17. to facilitate any arrangements of company related travels and events.
18. to use for company's marketing of products, internal newsletters, website, and other analytics purposes.
19. to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third parties whether situated in Singapore or outside of Singapore, for one or more of the above-stated purposes. Such third-party service providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated purposes.

In the event your Personal Data is required for purposes not listed above, Greyform will contact you in advance to obtain your consent.

Greyform shall not use your Personal Data for purposes other than what we have informed you, or which are permitted under local laws and regulations.

#### **4. Sharing your information**

We may share your information with:

1. Business partners, clients, developers, consultants, contractors, vendors, recruitment agencies, survey firms and other stakeholders including insurance companies and medical providers we work with.
2. Industry regulators and other government organizations, as required by local laws and regulations.
3. Financial institutions for payments and facilitating payroll payments.
4. Our professional advisers such as lawyers, auditors, and other contract service providers.
5. Agents, contractors, third party service providers and specialist advisers who provide operational, administrative, financial, research or other services, such as but not limited to telecommunications, information technology, payments, payroll processing, construction services, training, event organizing, market research, storage, and archival services.

In some cases, we shall encrypt, anonymize and/or aggregate the information before sharing it. Anonymizing means stripping the information of personally identifiable features. Aggregating means presenting the information in groups or segments, e.g.: age groups,

#### **5. Accuracy of Personal Data**

You should ensure that all Personal Data submitted to us is complete, accurate, true, and correct. You have a responsibility to keep us informed when they are any updates to your

Personal Data.

## **6. 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 are a job applicant, you may withdraw 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 or via email to our Data Protection Officer at the contact details provided below.

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 us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we respond to your request with 30 calendar days and by which time we will give you an estimate how long it need to process and effect your request, and how much the charge is for processing the request.

Do note that if you withdraw your consent, depending on the nature of your request, we may no longer be in position to continue administer or fulfill any contractual relationship in place.

## **7. Protecting your information**

We endeavor to take precautions to ensure that the information you have provided is protected against unauthorized or unintended use, access, or disclosure. We have disseminated information to our employees on implementing measures to secure and protect your information to our employees on implementing measures to secure and protect your information such as training of our employees on handling your Personal Data with respect to confidentiality, securing your data, taking steps to prevent misuse, loss, unauthorized access and disclosure.

However, we cannot be held responsible for unauthorized or unintended use, access, disclosure, or loss that is beyond our control which includes cyber-attacks such as hacking, spyware, and viruses.

## **8. Retention of Personal Data**

Personal Data are retained for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.

Greyform 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 were collected, and are no longer necessary for legal or business purposes.

We will ensure that Personal Data that no longer has any business or legal use, to be destroyed or disposed of in a secure manner. This applies to both paper documents and electronic data stored in databases.

## 9. Data Protection Officer

If you have concerns or further queries about your Personal Data, you may contact the following:

### Data Protection Officer

Email: [dpo@greyform.sg](mailto:dpo@greyform.sg)

Address: Greyform Pte Ltd  
No. 21 & 23 Kaki Bukit Road 6  
#01-01, Greyform Building  
Singapore 415806

Telephone Number: +65 6812 7777

Any query or complaint should include, at least the following details:

- Full name and contact information of the data subject.
- Brief description of the query or complaint

## 10. Cookies

This website uses cookies to monitor browsing preferences and help us analyse data about web page traffic in order to make website improvements based on customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

A cookie does not give us access to your computer or any information about you, other than the data you choose to share with us. Most Internet browsers automatically accept cookies, but you can usually modify your browser settings according to your preference. If you choose not to accept cookies, you may not be able to experience all of the features of our website.

## 11. Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over the privacy practices employed by other websites. Therefore, we cannot be responsible for the

protection and privacy of any information which you provide whilst visiting such sites as they are not governed by this privacy statement.

## **12. General**

If you wish to access, update, withdraw any information that you provide to us, please contact.

We may amend or modify this Policy from time to time, such as in response to changes to legislation. We remain committed to safeguarding your information and being open about our data protection practices.

If you have further questions about this Policy or wish to contact us regarding this policy, please do not hesitate to contact us at [dpo@greyform.sg](mailto:dpo@greyform.sg)