

## Personal Data Protection Policy (For Job Applicants)

### 1. Policy

- 1.1 This policy sets out how MoneyOwl Private Limited (“**MoneyOwl**”) treats personal data and how we comply with the Personal Data Protection Act 2012 (“PDPA”). The terms “we”, and “our” used herein refer to MoneyOwl.
- 1.2 **Application of this policy.** This Policy applies to individuals seeking employment/internship/training with MoneyOwl (collectively referred to as “**Applicants**”).
- 1.3 **Amendment to this policy.** MoneyOwl may amend this Policy from time to time. The updated Policy will supersede earlier versions and will apply to personal data provided to us previously. All Applicants are expected to read and agreed with the amended Policy. If you do not accept any amendment to the Policy, please contact our Data Protection Officer.

### 2. Personal Data

- 2.1 **Personal data.** “Personal data” is data that can be used to identify a natural person. Examples of personal data include, but not limited to, name, address, contact details, NRIC, or other identification number, telephone numbers, email address, photograph, video image, personal data of family members, education background, employment history, references and results of employment checks.
- 2.2 **Voluntary provision of personal data.** Your provision of personal data to us is voluntary. However, if you choose not to provide us with the personal data we require, it may not be possible for us to employ you, contact you, process your application, or consider you for employment.
- 2.3 **Providing personal data belonging to others.** If you provide the personal data of anyone other than yourself (such as your character references or family members), you warrant that you have informed him/her of the purposes for which we require his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes.
- 2.4 **Accuracy and completeness of personal data.** You must ensure that all personal data that you provide is true, accurate and complete and promptly inform us of any changes to the personal data.
- 2.5 **Protection of personal data.** 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 disclosing personal data both internally and to our authorised third party service providers and agents only 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.

### 3. Purpose For Collection, Use And Disclosure Of Personal Data

3.1 MoneyOwl collects, uses and discloses the following types of personal data for the purposes stated below:

Type of personal data	Purpose
<ul style="list-style-type: none"> <li>• Name or alias</li> <li>• Email address</li> <li>• Phone Number</li> <li>• Required detail as stated on the MoneyOwl Employment Application Form (only for successful candidates)</li> <li>• Copy of NRIC or Identification Document (only for successful candidates)</li> </ul>	<ul style="list-style-type: none"> <li>• For the purposes of:               <ul style="list-style-type: none"> <li>- assessing, administering and processing your application,</li> <li>- identifying and evaluating you for positions available within the NTUC Enterprise Group</li> <li>- monitoring and reviewing our recruitment policies,</li> <li>- validating with the references provided and conducting employment checks.</li> </ul> </li> <li>• For our business purpose, including:               <ul style="list-style-type: none"> <li>- conducting HR research and analysis</li> </ul> </li> </ul>

3.2 We also capture and collect personal data for the purpose of security. For example, your image may be captured by security camera on our premises.

### 4. Disclosure Of Personal Data

4.1 You agree that:

- (a) we may disclose the personal data collected from you to other entities within the NTUC Enterprise Group in order to consider you for other positions available within these entities and/or
- (b) we may obtain information relating to you from third parties (such as character referees), and that we may also disclose your personal data to such third parties.

4.2 **Disclosure to vendors.** We may disclose the personal data you have provided to our service providers who are appointed to provide services to us where it is necessary for such service providers to provide the required services to us. Such service providers include IT vendors, outsourced payroll administrators, banks, insurance companies, travel agents, event organisers, security companies etc.

4.3 **Disclosure permitted by the law.** We may also disclose your personal data as required or permitted by law. We may disclose your personal data to regulatory authorities, statutory bodies or public agencies for the purposes of complying with their respective requirements, policies and directives.

## **5. Transfer Of Personal Data Out Of Singapore**

You agree that we may transfer your personal data out of Singapore for any of the purposes set out in Paragraphs 3 and 4 above. When transferring personal data outside Singapore, we will ensure that the recipient of the personal data provides a standard of protection that is comparable to the protection which your personal data enjoys under the laws of Singapore. Where these countries or territories do not have personal data protection laws which are comparable to that in Singapore, we will enter into legally enforceable agreements with the recipients to ensure that they protect your personal data to the same standard as required under the laws of Singapore.

## **6. How Long Do We Keep Your Personal Data**

We keep your personal data only for so long as we need the data to fulfil the purposes we collected it for, and to satisfy our business and legal purposes, including audit, accounting or reporting requirements. How long we keep your personal data depends on the nature of the data, e.g. we keep personal data for at least the duration of the limitation period for bringing claims if the personal data may be required to commence or defend legal proceedings. Certain information may also be retained for longer, e.g. where we are required to do so by law. Typically, our data retention period is from 6 years upwards, depending on the limitation period. In the absence of a need to retain personal data, we will either delete or aggregate it or, if this is not possible then we will securely store your personal data and isolate it from any further processing until deletion is possible.

## **7. Access and Correction Of Personal Data**

You may correct your personal data, or request for access to your personal data held by us at any time by contacting the HR.

If you wish to make (a) an access request for 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) a correction request to correct or update any of your personal data which we hold, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

Data Protection Officer  
dpo@moneyowl.com.sg

Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request. We will respond to your access request as soon as reasonably possible. Should we not be able to respond to your access request within thirty (30) days after receiving your access request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. 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).

Please note that depending on the request that is 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 to simply provide you with confirmation of the personal data that our organisation has on record, if the record of your personal data forms a negligible part of the document.

## **8. 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. As an 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.

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 shall seek to process and effect your request within 30 days of receiving it.

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 (as the case may be). We shall, in such circumstances, notify you before completing the processing of your request (as outlined above). Should you decide to cancel your withdrawal of consent, please inform us in writing.

Please note that 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.

## **9. Consequences of Not Providing Personal Data And/Or Consent**

Please note that should you not provide us with the relevant personal data and/or consent to use such personal data to fulfil the purposes of collection, use and disclosure of your personal information by MoneyOwl, it may hinder our ability to continue to interact with you. 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.

## **10. Concerns and Contacting Us**

If you have any feedback or issues in relation to your personal data, or about this Policy, or wish to make a complaint to us, you may contact our Data Protection Officer whose contact details are set out below. If you wish to make a formal complaint, you may also do so with any data protection regulator or authority having jurisdiction over us.

Data Protection Officer  
dpo@moneyowl.com.sg