

## PRIVACY POLICY SINGAPORE

As part of our compliance with the Personal Data Protection Act 2012, HFG (Singapore) Pte Ltd requests you read the following information regarding how we collect your personal data and how we maintain, use, store and disclose your personal information in connection with your possible or actual work placements.

It is the policy of HFG to respect the confidentiality of data and the privacy of individuals. HFG are bound by the Personal Data Protection Act 2012. The HFG privacy policy will be reviewed and updated from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Please regularly check our privacy policy so that you are aware of these updates and changes. Any data we hold will be governed by the most current version of the HFG privacy policy.

### **Types of personal data held by HFG**

Personal data means any type of information relating to you and which enable your direct or indirect identification. It includes data regarding your contact details, work experience, qualifications, aptitude test results, opinions about your work performance (eg references), incidents at the workplace, and other data obtained or received by us in connection with your possible and actual work placements.

### **We may collect personal or sensitive information about you when:**

- You complete one of our registration forms or provide any other information in connection with your application
- You supply your CV
- We receive any reference about you
- We receive results of enquiries that we might make of your former employers, work colleagues, professional associations or registration body
- We receive the results of any competency or medical test or background checks
- We receive any complaint or other information from or about you in the workplace
- You provide us with any additional information about you

### **Your personal and sensitive information may be used in connection with:**

- Your actual or possible work placement
- Career guidance or management
- Our assessment of your ongoing performance and prospects
- Any test or assessment (including medical tests and assessments) that you might be required to undergo
- Informing you of possible work opportunities or other events such as training or information sessions by direct mail/email/sms
- Our direct marketing to you (including telemarketing using your telephone number)
- Any insurance claim or proposal that requires disclosure of your personal information
- Undertaking criminal background checks

### **Disclosure:**

We may disclose your personal data (including to trusted third parties) for the purposes for which it is primarily collected, used or held or for a related secondary purpose. Your personal data may be disclosed to:

- Potential and actual employers, clients of HFG and trusted third parties
- HFG employers located in:  
Hong Kong & the United Kingdom (and any other countries where HFG may provide its services in the future) regarding possible or actual work placements and to assist us in providing our services to you
- Referees

- External providers of online training and induction
- Our insurers
- Central Provident Fund
- A professional association or registration body that has a proper interest in the disclosure of your personal information
- A Workers Compensation or social security body
- Any person with a lawful entitlement to obtain the information

**If you do not give us the information we seek:**

- We may be limited in our ability to locate suitable work for you; and
- We may be limited in our ability to place you in work

**Management of personal data**

At HFG, we train our staff to respect the confidentiality of customer data and the privacy of individuals. HFG regard breaches of your privacy very seriously and any breach will result in disciplinary action being taken, dependent upon severity. HFG have appointed an Individual to ensure that our management of personal data is in accordance with this policy and the Personal Data Protection Act.

**How do we store and protect personal data?**

Safeguarding the privacy of your data is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium. We hold personal data in a combination of secure computer storage facilities and paper-based files and other records and take such steps as are reasonable in the circumstances to protect the personal data we hold from misuse, interference and loss, unauthorised access, modification or disclosure. We may need to maintain records for a period of time in line with our retention policy. However, when we consider data is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

**Enquiries & complaints**

You can make enquiries, requests to access/delete or correct your data, or complain about alleged breaches of the Personal Data Protection Act 2012 to our Privacy team.

**Complaints**

We aim to acknowledge receipt of all complaints within 10 working days, and aim to resolve all complaints within 30 working days. This may not be possible in all circumstances depending on the contents of the complaint. In this situation, we will respond to your complaint in a reasonable time.

**Correction**

Subject to some exceptions you may request that we correct the personal data that we hold about you if you deem it to be inaccurate, incomplete, out-of-date, irrelevant or misleading. We will take reasonable steps under the circumstances to correct the data as soon as practicable and send the corrected personal data to other organisations in accordance with the Personal Data Protection Act 2012.

If we refuse to correct your personal data as we are satisfied on reasonable grounds that a correction should not be made, we will notify you in writing of the reasons detailing our refusal to correct the data and the process for escalation regarding this refusal. Should we refuse your data correction request, we shall annotate your personal data with the correction that was requested but not made. If you wish to exercise your rights of correction you should contact our Privacy Team.

**Contact details**

Privacy Team  
HFG (Singapore) Pte. Ltd  
Email: [privacy@hfg.com.sg](mailto:privacy@hfg.com.sg)