

## **HREASILY PRIVACY POLICY (FOR INDIVIDUALS)**

This privacy policy (“**Policy**”) outlines how HReasily collects, maintains, stores and discloses personal information and data we hold about individuals (“**Personal Data**”). This Policy forms part of the Terms and Conditions of Use for all products, software and services provided by HReasily.

For the purposes of this Policy, please note that:

- a) “BusinessHR” refers to PT HRE Berjaya and its related corporations
- b) “We / Our / Ours / Us” refers to BusinessHR and its respective officers, servants or agents whether situated in or outside of Singapore
- c) “Services” refers to the BusinessHR products and services you or your employer have applied for or are using, including but not limited to payroll and staffing services, software, products and support provided by BusinessHR

Personal Data in this Policy includes any data about an individual who can be identified from that data such as the individual’s name, NRIC, passport or other identification number, their contact details, work experience, qualifications, aptitude test results, salary and payroll details, incidents at the workplace, and other information obtained or received by us in connection with the Services.

### **How we use your Personal Data**

1. We may collect, use and disclose Personal Data for one or more of the following purposes:
  - a. to establish your identity and background to prevent fraud
  - b. processing an application for any products or services offered or distributed by us (including but not limited to third party products)
  - c. providing products and services requested by you
  - d. generating marketing, regulatory, management, statistical or other related reports and performing analytics
  - e. meeting or complying with our (or our affiliated third party organisation’s) internal policies and procedures and any applicable laws or court orders
  - f. legal purposes
  - g. handling complaints or feedback
  - h. facilitating proposed or actual assignment, transfer, participation or sub-participation in an of our rights or obligations in respect of your relationship with us
  - i. for any insurance claim or proposal that requires disclosure of your personal information
  - j. (with your consent ) for our direct marketing and business development to you (including but not limited to third party products). You may withdraw your consent to this at any time
  - k. to process transactions and payments
  - l. to allow us to improve our services to you, enhance the user experience and functionality of our products
  - m. conducting market research, surveys and data analysis relating to any service or product provided by us (whether or not conducted jointly with another party) which may be relevant to you
  - n. other purposes which are reasonably related to the purposes above.
2. Where you or your employer applies for or holds a product or service which is jointly offered by BusinessHR and a co-brand partner, BusinessHR may also collect, use and disclose your Personal Data for the purpose of sharing it with the co-brand partner to legitimately provide the services in conjunction with the purposes outlined in Clause 1 above.

### **Transfer of Personal Data**

3. Personal Data of Individuals is kept confidential. However to carry out the purposes listed above, BusinessHR may share such Personal Data with its related or affiliated corporations, entities and contractors whether in Singapore or elsewhere. When doing so, we require them to ensure that the Personal Data disclosed is kept confidential and secure. Please note that technical or customer support involving access to personal data may be provided by BusinessHR representatives located outside Singapore.

For individuals located within the EU who are choosing to use any of our non-EU specific products, by using our Services and disclosing Personal Data, you need to be aware that your Personal Data will not be stored within the EEA or any country with the same standard of protection as a country within the EEA. Your data will primarily be transferred to Singapore and may also be transferred to Malaysia, Hong Kong, Thailand, Indonesia, the Philippines or Australia. You should be aware of the risks of cross border data transfer due to the absence of an adequate level of data protection in these countries located outside the EEA. Your Personal Data will be handled by the employees and contractors of BusinessHR and its related entities in these countries. You may revoke your consent to this at any time, in which case you must inform us of this consent revocation immediately. Your data will be deleted and you will then no longer have access to our services.

### **Disclosure of your Personal Data**

1. In order to deliver services to you, there may be times when we need to pass your information on to a third party. We may disclose your Personal Data to:
  - a. Your employer, co-branded partners of BusinessHR and related or trusted third parties with adequate security protection
  - b. Our insurers for legitimate legal purposes
  - c. A professional association or body that has a legitimate legal interest in the disclosure of your Personal Data
  - d. The Central Provident Fund or any equivalent fund outside of Singapore
  - e. External education or training providers to you
  - f. Employees, officers and agents of BusinessHR located within and outside Singapore to assist us in providing the Services
  
2. We will otherwise treat your Personal Data as private and confidential and apart from the parties stated above, we will not disclose your data to any other party except:
  - a. where you have given permission
  - b. where we are required or permitted to do so by law
  - c. where required or authorised by any court order
  - d. where we are required to meet our obligations to any relevant regulatory authority.

### **Security of Personal Data**

1. BusinessHR takes breaches of privacy very seriously. Our employees and contractors are trained to handle the personal data securely and with utmost respect and confidentiality, failing which they may be subject to disciplinary action. Employees and contractors of BusinessHR located outside Singapore are contractually obligated to keep secure any personal data they may handle.
  
2. We store Personal Data in secure computer storage facilities and paper-based files and other records and take reasonable steps in the circumstances to protect the personal information we hold from misuse, interference and loss, unauthorised access, modification or disclosure. We may need to maintain records for a significant period of time. However, as soon as your information is no longer needed, we will delete all details that identify you and/or destroy all records of your Personal Data.
  
3. We have appointed a Data Protection Officer to ensure that your Personal Data is managed in accordance with this Policy, with the Personal Data Protection Act and other similar legislation in the countries in which we operate.

### **Accuracy of Personal Data**

1. We take reasonable steps to ensure that all Personal Data is up-to-date and accurate and recognise that contact details and other data may change frequently. Please keep us advised of any changes in your information.
  
2. If you wish to delete your Personal Data held with us, please contact our Data Protection Officer. BusinessHR may retain certain information about you only where required to do so by law.

## **Rights to access and correct Personal Data**

1. We can assist you to access and correct your Personal Data held by us.
2. To make a request to access your Personal Data, or where you are of the opinion that such Personal Data held by us is inaccurate, incomplete or misleading, you will need to complete an application form which sets out what Personal Data you require and verifying your identity. Please contact our Data Protection Officer for the application form or further information about how to access your Personal Data.
3. We will respond to your request within 30 days of receiving a duly completed written request and provide you with access to your Personal Data. If we cannot comply with your request within this timeframe, we will respond and let you know when we can. You should anticipate that it may take some time to process your application as there may be a need to retrieve information from storage and review it. There may also be a small but reasonable fee for the access request. Please discuss this with our Data Protection Officer.
4. Please note that we may have to withhold access to your Personal Data in certain situations, for example when we are unable to confirm your identity.
5. You may request that we correct the Personal Data we hold about you if you deem it to be inaccurate, incomplete, out-of-date, irrelevant or misleading. We will take reasonable steps to correct the information as soon as practicable and send the corrected personal information to other organisations in accordance with the Personal Data Protection Act 2012

## **Consent**

1. If you do not agree with this Policy, please DO NOT continue to use or access the Services.
2. By disclosing Personal Data to us or continuing to utilise the Services you are deemed to:
  - a. agree with this Policy and consent to the purposes above for which we collect and use your Personal Data; and
  - b. have provided your clear and unambiguous consent to being contacted by us or our affiliates on your telephone number in relation to marketing or other purposes, notwithstanding any listing on the Do Not Call Registry.
3. You may withdraw your consent at any time by providing us with a notice in writing.

## **Website cookies**

1. We use cookies on our website. Cookies are files we put on your computer which record information about your visit and use of the website in order to enhance your viewing experience.
2. We use cookies for the following purposes:
  - a. to improve the user experience on the website;
  - b. to assist us in monitoring the performance of the website;
  - c. to remember your preferences;
  - d. to monitor traffic on the website;
  - e. to assist the website in functioning properly.
3. You can disable or enable cookies through your web browser settings. If you disable or block the cookies on our website, you may not be able to access the entire scope of functions ordinarily performed by our website.
4. Personal Data that we collect from you through our cookies may be passed onto third party service providers (whether within or outside Singapore), for managing or improving our website, for data hosting or backup or for one or more of the purposes set out in paragraph 21 above.
5. Your use of our website constitutes consent to the use of cookies by us as governed by this Policy.

## Your rights

1. At any point whilst BusinessHR is in possession of or processing your Personal Data, you have following rights:
  - a. Right of access - you have the right to request a copy of the information that we hold about you.
  - b. Right of rectification - you have a right to correct data that we hold about you that is inaccurate or incomplete.
  - c. Right to be forgotten - in certain circumstances you can ask for the data we hold about you to be erased from our records.
  - d. Right to restriction of processing - where certain conditions apply you have a right to restrict the processing of your Personal Data
  - e. Right of portability - you have the right to have the data we hold about you transferred to another organisation.
  - f. Right to object - you have the right to object to certain types of processing such as direct marketing.
  - a. Right to object to automated processing, including profiling - you also have the right not to be subject to the legal effects of automated processing or profiling. BusinessHR at your request in writing can confirm what information it holds about you and how it is processed.
  
2. You can request the following information
  - b. Contact details of our data protection officer.
  - c. The purpose of your data processing as well as the legal basis for the processing.
  - d. If the data processing is based on the legitimate interests of BusinessHR or a third party, information about those interests.
  - e. The categories of Personal Data collected, stored and processed.
  - f. Recipient(s) or categories of recipients that the data is/will be disclosed to.
  - g. How long your Personal Data will be stored.
  - h. Details of your rights to correct, erase, restrict or object to such processing.
  - i. Information about your right to withdraw consent at any time.
  - j. How to lodge a complaint
  - k. Whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
  - l. The source of personal data if it was not collected directly from you.
  - m. Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing

## Data Protection Breach

1. Should there be a data breach; BusinessHR will inform the relevant governing authority within 72 hours. The information provided will include:
  - a. What has happened
  - b. When and how we found out about the breach;
  - c. The people that have been or may be affected by the breach;
  - d. What we are doing as a result of the breach

## Enquiries, requests and complaints

For enquiries, requests and complaints regarding Personal Data, please contact our Data Protection Officer at [theo@hreasily.com](mailto:theo@hreasily.com). Alternatively you may telephone us on any of the contact numbers listed on our website or send mail to HReasily, 138 Robinson Road, #14-01, Oxley Tower, Singapore 068906