

## PERSONAL DATA PROTECTION POLICY STATEMENT

Personal data in Singapore is protected under the Personal Data Protection Act 2012 (PDPA).

New West Coast Pte Ltd (NWC) are committed to complying with the Act and respects their choices.

The purpose of this policy is to govern the collection, use and disclosure of personal data by NWC and Associated companies; in a manner that recognizes both the right of individuals to protect their personal data and the need of NWC to collect, use or disclose personal data for purposes that a reasonable person would consider appropriate under such circumstances.

In the event of a pandemic (e.g. COVID-19), NWC may collect visitors' NRIC, FIN or passport numbers to accurately identify individuals for purposes of contact tracing and other response measures in the event of an emergency that threatens the life, health or safety of other individuals.

With the growing concerns about how personal data is being used, a data protection regime to govern these concerns and to maintain individuals' trust in how NWC manages the data we received.

### Collection of Personal Data

Where possible, we will collect Personal Data directly from individuals after we have received and secured the relevant consent from them. Generally, NWC may collect Personal Data of personnel in the following ways:

- a) submitting an application to register for our training courses /services;
- b) responding to our enquiries regarding our training services/products we offer;
- c) when asked to be included in an email or other mailing list;
- d) when requested to contact individuals or companies;
- e) when responding to our initiatives, marketing or promotions;
- f) applications for employment;
- g) data that is previously on file prior to PDPA being implemented ;and
- h) voluntarily giving out their business card.
- i) Photograph or video image/CCTV footage with permission when within our premises.
- j) travel health clearance / visitor entry declaration form
- k) in the event of pandemic (e.g. COVID-19), employees and visitors to use the Government-developed TraceTogether app to support the Government's contact tracing efforts and to use SafeEntry system to check in by using the deploying devices (e.g. smart phones, tablets, etc.), where the SafeEntry is not complied with, visitors/staff/students may be denied entry into the premises
- l) when Personal Data is submitted to us for any other reason;

We will not collect, use or disclose personal information for other purposes without first obtaining the consent of the individual, except when authorised or required by law or the courts to do so with documented proof.

### Purposes for the Collection, Use and Disclosure of Personal Data

NWC and its subsidiary companies may collect, use or disclose personal data in an appropriate manner for the following purposes:

- a) evaluating and providing advice and/or recommendations to individuals regarding the type of products and services suited to your needs;

## PERSONAL DATA PROTECTION POLICY STATEMENT

- b) assessing and processing any applications or requests made by individuals for products and services offered by NWCGroup;
- c) communicating with individuals to inform of changes and updates to our products and services we provide which are relevant to existing relationship with us;
- d) offering updated marketing and promotional packages that individuals can benefit from, including products and services offered by our selected accredited bodies/partners;
- e) verification of individual's identity for the purpose of providing our services;
- f) responding to enquiries regarding training courses, and other services we offer and handling complaints, feedbacks and comments;
- g) processing request, orders and administering accounts
- h) archival of documents and records in both electronic and physical form for record keeping purposes;and
- i) conducting credit checks and ensuring ongoing credit worthiness, and the collection of amounts outstanding from individuals any person providing security or guarantees for your obligation's.
- j) in an event of an emergency that threatens the life, health or safety of other individuals.
- k) when legally required to do so.

### Disclosure of Personal Data

When providing or advertising a product or service, we may sometimes need to disclose individuals Personal Data to others. It is generally not NWC policy to disclose Personal Data to external organisations unless NWC has the individuals consent &/or are required to disclose the Personal Data as required in the normal course and scope of our business in the provision of our services, &/or for contractual, legal and regulatory requirements.

Some examples of the types of external organizations NWC may need to disclose information to in the course of providing a product or service are:

- Regulatory bodies and agencies, e.g. Ministry of Manpower (MOM)etc.
- Funding agencies e.g, SkillsFuture Singapore (SSG)etc.
- Insurers and financiers
- In the event of a pandemic(e.g.COVID-19),the Government may request us to disclose personal data to assist in its contact tracing effort.
- NWC data intermediaries, programme partners, other companies or individuals, including legal counsel and information technology service providers, who assist us in providing services or who perform functions on our behalf, who are contract-bound to comply with our Privacy Policy and that of the Personal Data Protection Act 2012 (Act 26 of2012).

### Direct Marketing

From time to time, we may send our email "Newsletter" to inform individuals about our products and services or about special offers and promotions that we think may be of interest.

Individuals can let us know at any time if they no longer wish to receive marketing material by clicking on the "Unsubscribe" button or by contacting us directly and we will remove your contact details from our direct marketing database.

## PERSONAL DATA PROTECTION POLICY STATEMENT

NWC will not disclose Personal Data to external organizations outside NWC for the purposes of allowing them to directly market their products and services, unless expressly authorised by individuals or companies.

### **Do Not Call Registry**

The Do Not Call (DNC) Registry prohibits the sending of unsolicited telemarketing messages (“specified messages”) to Singapore telephone numbers through voice calls, text or fax messages registered on the DNC Registers, unless the organisation sending the messages have the user’s/subscriber’s clear and unambiguous consent to do so in written or other accessible forms.

Incompliance with the DNC Registry provisions, NWC will not send specified messages to telephone or facsimile numbers that appear on the DNC Registry unless the user/subscriber has given us clear and unambiguous consent to do so.

If an individual or company has given us such consent, we will continue to send specified messages until advised in writing (contact details below) of withdrawal of consent.

NWC will continue to contact individual or companies on the details provided in the limited circumstances allowed under the DNC Registry, even if these telephone or facsimile number/s are registered with the DNC.

We will still contact individuals and companies in the most effective and efficient mode where required by law.

### **Withdrawal of Consent**

Should an individual wish to withdraw their consent for NWC to send them anything via all other modes of communications e.g., mail, email, and telephone calls, they must notify us by email at [nwcgroup@singnet.com.sg](mailto:nwcgroup@singnet.com.sg). We will remove their details from our direct marketing/client database.

It may require up to 2 weeks, upon receipt of the request, for the change to take effect.

Regardless of who provides Personal Data to NWC, it will always be handled in accordance with this Personal Data Protection Policy and the Personal Data Protection Act 2012 (Act 26 of 2012).

### **Staff Training**

NWC will provide training to all personnel so that they are familiar with the policies relevant to their roles.

It is vital that all NWC staff understand the importance of protecting personal data ;that they are familiar with our organisation’s data protection policy; and put into practice.

The responsibilities of individual staff members for protecting personal data, including the possibility that they may commit criminal offences if they deliberately try to access, or to disclose, information with out authority and permission;

Staff are to be wary of people who may try to trick them into giving away personal details;

The effectiveness of staff training relies on the individual concerned being reliable in the first place. The Data Protection Act requires them to take reasonable steps to ensure there liability of any staff member who has access to personal data.

### **Ensuring Accuracy and Correction of Personal Data**

NWC relies on the Personal Data kept in our records which are provided by our interaction with our clients, when conducting business. Therefore, it is very important that the Personal Data recorded is accurate, complete and up- to-date.

## PERSONAL DATA PROTECTION POLICY STATEMENT

NWC will do our best to ensure that the Personal Data on record is accurate, complete and up-to-date when ever it is collected or use it. This means that from time to time, NWC will ask if there are any changes to Personal Data. If the Personal Data on record is incorrect, NWC will request the new details and update the records.

### Access to Personal Data by Individual

Individual can access most of the Personal Data on NWC records by contacting NWC. NWC will require a formal written request to our Data Privacy Officer.

Access to Personal Data may be refused in an umber of circumstances, such as where the Personal Data relates to anticipated legal proceedings or the request for access is frivolous or vexatious. If NWC deny or restrict access, NWC will explain why as required by applicable laws.

### Security of Personal Data

Security of Personal Data is important to NWC and we take all reasonable precautions to protect Personal Data from misuse, loss, unauthorized access, modification or disclosure. Some of the ways we protect Personal Data include:

- a) internal and external security measures with visitors; (e.g. visitors to our premises shall be escorted, and employees shall be prior informed to keep personal data out of sight).
- b) restricting access to Personal Data only to staff who need it to perform their day to day functions;
- c) maintaining technology products to prevent unauthorized computer access or damage to electronically stored information, such as requiring identifiers and passwords, firewalls and anti-virus software; and
- d) maintaining physical security over paper records.

### Data Retention

NWC will retain Personal Data for a reasonable period for the purposes as cited in NWC Retain of Documented Information manual or until requested to delete the Personal Data, or as required by law.

When no longer required, personal information is destroyed or disposed.

### Cookies: Privacy and our websites

The type of Personal Data NWC collects on our website depends on how the site is used. When visiting websites, the host records server address, domain name, the date and time of the visit and the pages viewed. This information may be collected by using cookies (data sent to your web browser, which generally allows the website to interact more efficiently with computers). If the cookies are disabled, use of website may be affected. Information collected about any visits to our site is retained for statistical and website development reasons and is not in a form which would enable to identify you.

Visitors to NWC websites will not be required to provide NWC with any Personal Data, unless they have requested for a specific NWC's product or service, or respond to a contest or promotion, or providing a feedback. In such cases, NWC will ask for contact details along with other information required to respond to the request or allow access to enter the contest, promotion or feedback location.

The Personal Data and information provided may be retained for product planning purposes, and NWC may use your Personal Data to make contact for direct marketing purposes with authorised consent provided by the individuals/parties involved.

## PERSONAL DATA PROTECTION POLICY STATEMENT

### Incoming E-mails

If the individual send NWC an email containing their Personal Data, we will take reasonable steps to ensure the confidentiality of that information. The content of emails is sometimes monitored by our internet host for maintenance and fault detection purposes. NWC may also monitor emails for legal compliance purposes.

Although NWC take steps to protect Personal Data and information sent by email ,email Is not a secure method of communication and if there are any concerns about sending Personal Data to NWC in this manner, contact us by any of the other means e.g. Dropbox, file transfer protocol (ftp) or any other system may be possible.

### Resolving concerns

If the privacy of an individual Personal Data has been compromised, please contact NWC Data Protection Officer at +65 62686308 or email us at [nwcgroup@singnet.com.sg](mailto:nwcgroup@singnet.com.sg) and we will take the relevant steps to address the concerns.

### Use of Other's Information

NWC agree to respect and protect other users' personal information that we obtain through the website or through any of our Site-related communication or transaction.

In addition, under no circumstances will NWC disclose personal information about another user to any third party without their consent and the consent of such other user after adequate disclosure. Please note that law enforcement personnel and other rights holders are given different rights with respect to information they access.

NWC does not tolerate the sending of any form of spam content.

### Control of Username and Password to E-Learning Student

When provided access to NWC Learning Management System, the individual is then responsible for all actions taken while using username and password. Username and Passwords should therefore not be disclosed to any third parties.

If disclosed, there is a risk of the student's e-learning account being compromised or hijacked. This may result in the student having their assignments deleted or modified reducing the student's chances of passing the course".

If a password has been compromised for any reason, change the password immediately and notify NWC of the potential security breach.

### Remedial Plan in the event of Data Breach

NWC shall act as soon as it is aware of a data breach.

NWC may consider the following measures, where applicable

- a) Shut down the compromised system that led to the databreach
- b) Put a stop to practices that led to the data breach (e.g. shredding paper documents containing personal data)
- c) Establish whether steps can be taken to recover lost data and limit any damage caused by the breach (e.g. remotely disabling a lost notebook containing personal data of individuals).
- d) Isolate the causes of the data breach in the system, and where applicable, change the access rights to the compromised system and remove external connections to the system.
- e) Prevent further unauthorised access to the system. Reset passwords if accounts and passwords have been compromised.
- f) Address lapses in processes that led to the data breach
- g) Notify the police if criminal activity is suspected and preserve evidence for

## PERSONAL DATA PROTECTION POLICY STATEMENT

investigation (e.g. hacking, theft or unauthorised system access by an employee)

### **Transfer Limitation Obligation**

Some of NWC's customers may be located overseas (if any) and, as a result, Personal Data collected and held by NWC, such as data storage in the cloud may be transferred overseas; thus NWC will ensure that the country to which the data is being transferred **offers a comparable level of data protection** as is provided by the PDPA. Additionally, NWC is conforming to EUGDP Regulations for submission of personal data within the EU, thus that standard of protection is accorded to the data.

Unless otherwise required or permitted by law, NWC will only disclose Personal Data with full consent (implied or expressed), and NWC will also take reasonable steps to ensure the external organisation to whom the information is disclosed is also legally bound to protect the privacy of the Personal Data.

### **Right to Amend our Online Privacy Statement**

NWC reserve the right to amend this Personal Data Protection Policy at any time.

If NWC make any changes to this Personal Data Protection Policy and the way in which Personal Data is used; NWC will inform of the change on NWC websites and will notify individuals and companies of any significant changes. Please check the Personal Data Protection Policy on a regular basis.

### **Contacting us**

For any questions relating to NWC Personal Data Protection Policy, you may contact NWC Data Protection Officer at +65 62686307 or email us at [nwcgroup@singnet.com.sg](mailto:nwcgroup@singnet.com.sg)