

Your privacy is important to us. The purpose of this Data Protection Policy is to inform you how Ley Choon Group Holdings Limited and its group of companies (individually or collectively referred to as "Ley Choon", "we", "us", or "our"), collectively manage personal data in accordance with the Personal Data Protection Act 2012.

By interacting with us, submitting information to us or signing up for any services offered by us, you agree and consent to Ley Choon collecting, using, disclosing and sharing amongst ourselves your Personal Data, and disclosing such Personal Data to our authorised service providers and relevant third parties in the manner set forth in this Privacy Policy.

## **1. Personal Data**

**1.1** In this Privacy Policy, "Personal Data" refers to any data, whether true or not, about an individual who can be identified (i) from that data; or (ii) from that data and other information to which we have or are likely to have access. Examples of such Personal Data which you may provide to us include:

- (a)** your name or alias, gender, date of birth, nationality, NRIC, passport or other identification number, telephone number(s), mailing address, email address and other contact details;
- (b)** resume, educational qualifications, professional qualifications and certifications and employment references, employment and training history, work-related health issues and disabilities, family details, and photographs;
- (c)** your payment related information, such as your bank account or credit card information, and your credit history;
- (d)** any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interaction with you.

## **2. Collection of Personal Data**

**2.1** Generally, we collect your Personal Data in the following ways:

- (a) when you purchase and/or engage our products or services;
- (b) when you submit a job application, resume and reference letters;
- (c) when you respond to our request for additional Personal Data;
- (d) when we receive references from business partners and third parties, for example, where you have been referred by them;

- (e) when your images are captured by us via CCTV surveillance cameras or via photos and videos taken by us or our representatives when you are in close proximity of our office and/or site premises;
- (f) when you submit your Personal data to us for any other reasons.

If you provide us with any Personal Data relating to a third party (e.g. information of spouse, children, parents, employees and/or authorised representatives), by submitting such information to us, you represent to us that you have obtained the consent of the third party to you providing us with their Personal Data for the respective purposes.

You should ensure that all Personal Data submitted to us is complete, accurate, and true. Failure on your part to do so may result in our inability to provide you with products and services you have requested.

### **3. Purposes for the Collection, Use and Disclosure of Your Personal Data**

Generally, we collect, use and disclose your Personal Data for the following purposes:

- a) responding to your enquiries, requests, and feedback;
- b) assisting in recruitment and selection process to evaluate suitability for employment in current or prospective position within Ley Choon;
- c) verifying identity and the accuracy of personal details and other information provided;
- d) managing our administrative and business operations and complying with internal policies and procedures (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;
- e) matching any Personal Data held which relates to you for any of the purposes listed herein;
- f) facilitating business asset transactions;
- g) preventing, detecting and investigating crime, including fraud and money-laundering, and analyzing and managing other commercial risks;
- h) complying with applicable laws, regulations, government authorities and other requirements;  
and
- i) any other purposes for which we are required to place CCTV surveillance at worksite.

#### **4. Disclosure of Personal Data**

Ley Choon will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, this Personal Data may be disclosed for the purposes listed above (where applicable), to the following third parties, whether they are located overseas or in Singapore:

- a) our companies within the Group;
- b) professional advisors such as our auditors and lawyers;
- c) agents, contractors, third party service providers, specialist advisers and contractual outsourced parties who provide Ley Choon the goods and services to perform business, support, operational and/or administrative functions;
- d) relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority; and
- e) any other parties which, in Ley Choon's discretion, is expedient for, in accordance to or in connection with the purposes stated above.

#### **5. Protection of Personal Data**

To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks; we have implemented generally accepted standards of technology and operational security arrangements to ensure that your data is adequately protected and secured. In particular, we have put in place appropriate confidentiality obligations and technical and organisational security measures to prevent any unauthorized access, collection, disclosure or processing of your personal data, and the accidental loss or destruction of or damage of your personal data.

#### **6. Retention of Personal Data**

We will retain your personal data for as long as it is necessary to fulfil the purpose for business or legal purposes, or in accordance with applicable laws.

#### **7. Withdrawal, Access and Correction of Personal Data**

Should you wish to withdraw consent to use your Personal Data or obtain access to or make corrections to your Personal Data records, please submit your request in writing to our Data Protection Officer(s) via:



Attention: Data Protection Officer

Email : dpo@leychoon.com

Address : Ley Choon Group Holdings Limited

No. 3 Sungei Kadut Drive, Singapore 729556

Upon request, we will provide the individual with access to their personal data or other appropriate information on their personal data, and make any correction if there is any error or omission in accordance with the requirements of the PDPA. A fee may be charged for processing the access request (if applicable).

If you wish to withdraw consent for the collection, use or disclosure of your personal data, please ensure reasonable notice is given by you and we will inform you of the likely consequences of withdrawing your consent. We will cease (and cause any of our data intermediaries and agents to cease) collecting, using or disclosing the personal data unless it is required or authorised under applicable laws. We shall seek to process and effect your request within 30 days of receiving it.

*Last Updated on: 03 January 2019*