

## **Works Applications Singapore Pte. Ltd. Personal Data Protection Policy**

### **1. Overview**

- 1.1 We, at Works Applications Singapore Pte. Ltd. (“**Works Applications**”, “**we**”, “**our**” and “**us**”) are committed to ensuring the safety and security of Personal Data (as defined below) as well as the confidentiality and privacy of individuals. We only collect such Personal Data that is necessary for us to provide you with the services that you have requested, understand your needs, and serve you better as a whole.
- 1.2 The purpose of this document, Works Applications’ Personal Data Protection Policy (our “**Policy**”), is to inform you as to how Works Applications manages, collects, uses and discloses Personal Data relating to you. In Singapore, such business activities are subject to the Personal Data Protection Act (No. 26 of 2012) (the “**PDPA**”). We conduct our business in compliance with the PDPA and have implemented various measures to ensure that any Personal Data relating to you remains safe and secure.
- 1.3 The PDPA establishes a general data protection law in Singapore which governs an organisation’s activities relating to the collection, use and disclosure of individuals’ Personal Data. The administration and enforcement of the PDPA is handled by the Personal Data Protection Commission (“**PDPC**”), a Singapore Government statutory body established under the authority of the PDPA. The other roles of PDPC include undertaking public education and engagement programmes to help organisations understand and comply with the PDPA as well as to promote greater awareness of the importance of personal data protection in Singapore. Its website address is [www.pdpc.gov.sg](http://www.pdpc.gov.sg).
- 1.4 By interacting with us, submitting information to us, signing up for any products or services offered by us or taking any other action indicating your intent to do so, you agree and consent to Works Applications and our affiliates and other related persons, whether overseas or otherwise (including but not limited to affiliates in the People’s Republic of China, the United States of America and the Republic of India and any of our or their agents, representatives or authorised service providers or any other persons acting on our or their behalf) collecting, using and disclosing your Personal Data in the manner set forth in this Policy.
- 1.5 For the avoidance of doubt, this Policy supplements but does not supersede or replace any other consents which you may have previously provided to us, or which you may specifically provide us.

### **2. Personal Data**

- 2.1 In this Policy, “Personal Data” refers to any data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.
- 2.2 Examples of Personal Data may include:
  - (a) your name;
  - (b) your NRIC, passport or other identification number(s);

- (c) your date of birth;
- (d) your mailing/residential address;
- (e) your telephone number;
- (f) your employment and education background (including, where applicable, your Curriculum Vitae ("CV"));
- (g) your company name;
- (h) your religion;
- (i) information about your spouse, children or extended families;
- (j) your photos or images which may be captured by our surveillance cameras when you are within or near our premises;
- (k) your emergency contacts;
- (l) your network traffic log when you are using our company network;
- (m) any other information relating to you which you have provided to us or which we have collected in our interaction with you.

### **3. Collection of Personal Data**

- 3.1 We may collect Personal Data from or about you as may be necessary for the purposes of Works Applications' use of Personal Data specified in paragraph 4 below.
- 3.2 We may collect Personal Data from or about you when you:
  - register for or purchase our products and services;
  - submit any forms relating to our products and services to us, whether online or otherwise (e.g. feedback and questionnaires);
  - use our services (e.g. cloud services provided through HUE or HUE Classic in the form of "SAAS" or PAAS") and/or when you visit our website or engage us);
  - interact with our employees or staff members;
  - register for events organised by us or our service providers, or respond to our promotions or other initiatives;
  - contact us with enquiries or requests for assistance;
  - request that we contact you;
  - are referred to us by business partners or third parties;
  - submit an employment application or provide documents or other information (including your CV) in connection with our services and/or any appointment as an employee, officer or any other position in Works Applications; and/or
  - when you submit your Personal Data to us for any other reason reasonably related to the above mentioned purposes.
- 3.3 Apart from collecting such Personal Data directly from you, we may also collect Personal Data in other ways (e.g. your use of social media sites, social media applications, from third parties that engage our services, from publicly available sources, or from our company network traffic logs).
- 3.4 Please note that our website uses cookies (being small data files sent to your browser when you visit our website to track information such as number of users, frequency of use, profiles of users and preferred sites) to help us provide you with a more customised website experience and to improve the efficiency of our website. Most internet browsers allow you to disable cookies associated with these technologies (or otherwise turn off the processing of cookies) - in most cases, you will still be able to navigate our website fully, but other

functionality may be impaired as you may not be able to enter certain parts of our website. Please note that you may delete cookies from your browser after visiting our website. We assume no responsibility for the data protection practices, content or security of any third parties whose websites we link to on our website. We recommend that you review each third-party website's data protection and privacy policy before disclosing any data on that website.

#### **4. Use of Personal Data**

4.1 We may use Personal Data relating to you for the following purposes:

- to provide our products and services (e.g. the enterprise resource planning software and Suites offered by Works Applications) and related product information and support information regarding our products and services (e.g. group training, data migration support, validation, confirmation in the introduction or maintenance of our products);
- to respond to questions and/or queries regarding our products and services;
- to provide data migration, technical and maintenance support for our products and services;
- to conduct internal audits (including monitoring customer interactions for quality assurance, employee training and performance evaluation);
- to invite you to Works Applications seminars, meetings, working groups, group training sessions or similar events;
- to send emails to customers who have requested for our email distribution service;
- to complete any of our questionnaires and surveys;
- managing our administrative and business operations, complying with internal policies and procedures and for conducting financial reporting and analysis related to our business operations;
- to carry out security and risk management;
- conducting market research or analysis for profiling or other purposes to enable us to understand customer behaviour, preference and market trends and to review, develop and improve the quality of our products and services;
- legal, regulatory and other compliance requirements (including but not limited to providing assistance to law enforcement, judicial, regulatory or other government agencies and statutory bodies);
- for marketing and promotional purposes;
- performing, protecting and enforcing our contractual or legal rights and complying with applicable laws, regulations and other requirements or guidelines; and
- other purposes reasonably related to the foregoing uses.

(collectively, the "**Purposes**").

4.2 We will not use Personal Data relating to you for purposes which we are not permitted to or required under the PDPA or any other applicable laws.

#### **5. Disclosure of your Personal Data**

5.1 We may share and disclose your Personal Data with:

- companies in the Works Applications group located overseas or otherwise (including but

not limited to in Singapore, Japan, the People's Republic of China, the United States of America and the Republic of India), and such group companies may in turn disclose your Personal Data to third-party service providers engaged by such group companies (i) to store your Personal Data outside Singapore for us and/or our group companies, and/or (ii) in connection with, or which is necessary for, the provision of our services to you (including external human resource agencies);

- partners, vendors, agents, contractors or third-party service providers who provide services relating to insurance, financing, banking and consultancy to us;
- partners, licensors, vendors, agents, contractors or third-party service providers who provide operational services such as courier services, telecommunications, information technology, payment, printing, billing, payroll processing, technical services, training, market research, call centre, security or other such services to us;
- partners, licensees, agents, contractors, or third-party service providers who provide operational services for and on behalf of us (and in particular and where applicable, service providers in Singapore and/or Japan whom we engage (i) to store your Personal Data outside Singapore and (ii) in connection with, or which is necessary for, the provision of our services to you (including external human resource agencies));
- in the event of an actual or prospective business asset transaction (such as any merger, acquisition, business transfer or asset sale), any business partner, investor, assignee, or transferee for the purposes of facilitating such a transaction;
- any relevant government regulators, statutory boards or authorities or law enforcement agencies as required by any applicable laws, rules, guidelines and regulations or schemes imposed by any government to bodies and authorities;
- any other persons to whom you authorise us to disclose your Personal Data; and
- any other persons to whom disclosure is reasonable for the Purposes listed in paragraph 4 above.

5.2 Personal Data shall only be disclosed to the above-mentioned parties for the relevant Purposes. We will not disclose Personal Data relating to you for purposes which we are not permitted to or required under the PDPA or any other applicable laws.

5.3 In exceptional circumstances, we may also be required to disclose Personal Data, where there are grounds to believe that such disclosure is necessary to prevent a threat to life or health, or for law enforcement purposes.

5.4 In some cases, we may encrypt, anonymize, and aggregate Personal Data before disclosing it. Anonymizing means stripping the information of personally identifiable features. Aggregating means presenting the information in groups or segments (e.g. age groups).

5.5 In the event that we transfer Personal Data overseas, we will ensure that the recipient overseas organisations will provide a standard of protection to Personal Data so transferred that is comparable to the protection in accordance with the PDPA. In relation to Personal Data which we may transfer to our parent company in Japan, Works Applications Co., Ltd. from time to time, we have taken appropriate steps to ensure that Works Applications Co., Ltd. is bound by legally enforceable obligations to provide such comparable standard of protection to the PDPA.

## **6. Accuracy and Updating of Personal Data**

- 6.1 We will strive to keep Personal Data provided to us accurate.
- 6.2 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Your failure to do so may result in our inability to provide you with, or delay in our provision of, the products or services requested.
- 6.3 Further, when you provide us with any Personal Data relating to a third party (including your spouse, children, parents and/or employees), you represent to us that you have obtained the consent of the third-party for our collection, use and disclosure of their Personal Data in accordance with this Policy unless otherwise provided in the PDPA.
- 6.4 You may request us to correct any error or omission in your Personal Data that we have in our possession or under our control. If there is any Personal Data relating to you that you are unable to correct or update but which you wish to do so, you may contact our Data Protection Officer (whose details are set out below) and we will be happy to help you as best as we can.

## **7. Access to Personal Data and Respecting your Consent**

- 7.1 If you wish to access the Personal Data that we have relating to you, inquire about the way in which Personal Data relating to you has been used or disclosed by us in the past year, or wish to withdraw your consent to our use of such Personal Data, you may contact our Data Protection Officer (whose details are set out below) and we will seek to attend to your request as best as we reasonably can. Please note that:
- in order for us to provide any personal data we will need to verify your identity and may request further information about your request;
  - we may refuse access to your Personal Data if it would affect the privacy rights of other persons or if it breaches any confidentiality that attaches to that information;
  - we may also refuse your request where we are legally permitted to do so and give you such reasons;
  - you should be aware that we may take a reasonable time to process your application for access as we may need to retrieve information from storage and review the information in order to determine what information may be provided;
  - Please also note that if you withdraw your consent to our use and/or disclosure of Personal Data relating to you, we may not be in a position to continue providing our products or services to you or perform on any contract we have with you; and
  - we may have to charge you a reasonable administrative fee for retrieving Personal Data relating to you.

## **8. Security of Personal Data**

- 8.1 Safeguarding and respecting the confidentiality of your Personal Data is important to Works Applications. We will use our best efforts to protect your Personal Data to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.
- 8.2 The Personal Data provided to us are stored on secure servers which are password

protected where applicable, and can only be accessed by authorised employees. Works Applications also has security measures in place to protect against unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks of any Personal Data under our possession or control. However, please note that we will not be held liable or responsible for any loss, misuse or alteration of Personal Data that may be caused by third parties.

## **9. Retention of Personal Data**

9.1 We will only retain Personal Data relating to you for only as long as there is a business or legal purpose.

9.2 In the event that retention of your Personal Data is no longer necessary for any business or legal purposes or when the purpose for which your Personal Data was collected is no longer being served by the retention of your Personal Data, we will remove, destroy or anonymise your Personal Data as we consider appropriate, including shredding hardcopy documents and irretrievably deleting softcopy records.

## **10. Disclosure of personal information policy and procedure of making a complaint**

10.1 If you believe that we have breached this Policy, or any other applicable privacy or data protection laws or regulations which may apply to Works Applications, then you should make a complaint to Works Applications in the first instance. You should address your complaint in writing to our Data Protection Officer (whose details are set out below), and you should include as much detail as you can about the Personal Data affected, and the circumstances that you believe amount to a breach of this Policy or the applicable privacy or data protection law or regulation.

10.2 If you have any questions about this Policy or concerns about our commitment to your privacy, please feel free to email or write to our Data Protection Officer (whose details are set out below).

## **11. How to contact us**

We have designated a Data Protection Officer to be responsible for ensuring that we comply with the PDPA. Please contact our Data Protection Officer at [contactdpo\\_sg@worksap.co.jp](mailto:contactdpo_sg@worksap.co.jp)

## **12. Changes to the Personal Data Protection Policy**

12.1 Works Applications reserves the right to modify and update this Policy at any time to ensure it is consistent with industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Policy as may be updated from time to time.

## **13. Governing Law**

This Policy shall be governed in all respects by the laws of Singapore.