

## DATA PROTECTION POLICY

This **Data Protection Policy** (“**Policy**”) sets out the basis upon which **Clearlab SG Pte Ltd** (“**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of employees, job applicants and members of the general public making products or general enquiries to our customer service department or our company in accordance with the Personal Data Protection Act (“**PDPA**”).

This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

### APPLICATION OF THIS POLICY

1. This Policy applies to all persons engaged in a contract of service with us (whether on a part-time, temporary or full-time basis) and interns and trainees working at or attached to us (collectively referred to as “**employees**”) as well as persons who have applied for any such position with us (“**job applicants**”), and all references to “**employment**” shall apply equally to internships and traineeships (as may be applicable). It also applies to the persons who write in to our customer service department or to the company to make product or general enquiries.

### PERSONAL DATA

2. As used in this Policy, “**personal data**” means data, whether true or not, about an employee or a job applicant or a member of the general public who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.
3. **If you are a job applicant**, personal data which we may collect includes, without limitation, your:
  - (a) name or alias, gender, date of birth, nationality, and country and city of birth;
  - (b) mailing address, telephone numbers, email address and other contact details;
  - (c) resume, educational qualifications, professional qualifications and certifications and employment references;
  - (d) employment and training history;
  - (e) work-related health issues and disabilities; and
  - (f) photographs.

4. **If you are an employee**, personal data which we may collect in the context of your employment with us includes, without limitation, your:
- (a) name or alias, gender, NRIC/FIN or passport number, date of birth, nationality, and country and city of birth;
  - (b) mailing address, telephone numbers, email address and other contact details;
  - (c) employment and training history;
  - (d) salary information and bank account details;
  - (e) details of your next-of-kin, spouse and other family members;
  - (f) work-related health issues and disabilities;
  - (g) records on leave of absence from work;
  - (h) photographs and other audio-visual information;
  - (i) performance assessments and disciplinary records; and
  - (j) any additional information provided to us by you as a job applicant (that is, prior to being engaged as an employee).
5. **If you are a member of the public**, personal data which we may collect in the context of answering your enquiry includes, without limitation, your:
- (a) name or alias
  - (b) email address
  - (c) telephone numbers
  - (d) home/correspondence address
6. Other terms used in this Policy shall have the meanings given to them in the PDPA (where the context so permits).

#### **COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

7. We generally collect personal data that
- (a) you knowingly and voluntarily provide in the course of or in connection with your employment or job application or making product/general enquiries with us, or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”, which may include your job placement agent), after
    - (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and

- (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or
- (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws.

We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

8. **If you are a job applicant**, your personal data will be collected and used by us for the following purposes without limitation, and we may disclose your personal data to third parties where necessary for the following purposes:
  - (a) assessing and evaluating your suitability for employment in any current or prospective position within the organisation; and
  - (b) verifying your identity and the accuracy of your personal details and other information provided.
9. **If you are an employee**, your personal data will be collected and used by us for the following purposes without limitation, and we may disclose your personal data to third parties where necessary for the following purposes:
  - (a) performing obligations under or in connection with your contract of employment with us, including payment of remuneration and tax;
  - (b) all administrative and human resources related matters within our organisation, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your insurance and other benefits, processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;
  - (c) managing and terminating our employment relationship with you, including monitoring your internet access and your use of our intranet email to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances;
  - (d) assessing and evaluating your suitability for employment/appointment or continued employment/appointment in any position within our organisation;

- (e) ensuring business continuity for our organisation in the event that your employment with us is or will be terminated;
- (f) performing obligations under or in connection with the provision of our goods or services to our clients;
- (g) facilitating any proposed or confirmed merger, acquisition or business asset transaction involving any part of our organisation, or corporate restructuring process; and
- (h) facilitating our compliance with any laws, customs and regulations which may be applicable to us.

10. **If you are a member of the public making product or general enquiries to our customer service department or to the company**, your personal data will be collected and used by us for the following purposes without limitation, and we may disclose your personal data to third parties where necessary for the following purposes:

- (a) assessing and understanding your product needs or requirements;
- (b) referring you to the most convenient optical shops to test your eyesight and eyes conditions, and for you to purchase the product; and
- (c) any other purposes such as marketing or publicity, customer service, improve product or services, after sales services, etc.

11. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

#### **WITHDRAWING CONSENT BY JOB APPLICANTS**

12. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing.

**If you are a job applicant or a member of the public enquiring about our products or making general enquiries**, you may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

13. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of

the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us.

In general, we shall seek to process and effect your request within thirty (30) days of receiving it.

14. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and extent of your request, we may not be in a position to continue on-going business relationship or process your job application (as the case may be).

We shall, in such circumstances, notify you before completing the processing of your request (as outlined above).

Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 12 above.

15. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

#### **ACCESS TO AND CORRECTION OF PERSONAL DATA**

16. If you wish to make
  - (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or
  - (b) a correction request to correct or update any of your personal data which we hold,

you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

17. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
18. We will respond to your access request as soon as reasonably possible.

Should we not be able to respond to your access request within thirty (30) days after receiving your access request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request.

If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

19. Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organisation has on record, if the record of your personal data forms a negligible part of the document.

For example, the organisation may not be obliged to provide the employee with access to the disciplinary records, investigations reports, or decisions to terminate, that the organisation has created for evaluative purposes of the employee.

### **PROTECTION OF PERSONAL DATA**

20. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, use of access cards into the departments that store your data, use of passwords to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
21. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure.

While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

### **ACCURACY OF PERSONAL DATA**

22. We generally rely on personal data provided by you (or your authorised representative).

In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

### **RETENTION OF PERSONAL DATA**

23. We may retain your personal data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.

24. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data were collected, and are no longer necessary for legal or business purposes.

#### **TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

25. We generally do not transfer your personal data to countries outside of Singapore.

However, if we do so, we will obtain your consent for the transfer to be made and will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

#### **DATA PROTECTION OFFICER**

26. You may contact our Data Protection Officers if you have any enquiries or feedback on our personal data protection policies and procedures; or if you wish to make any request, in the following manner:

Email Address: [dp@clearlab.com.sg](mailto:dp@clearlab.com.sg)

#### **EFFECT OF POLICY AND CHANGES TO POLICY**

27. This Policy applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

28. We may revise this Policy from time to time without any prior notice.

You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued employment and participation in our recruitment process constitute your acknowledgement and acceptance of such changes.

Effective date: [1 September 2019]

Last updated: [1 September 2019]

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