

## **Privacy Notice**

This Privacy Notice ("Notice") sets out the basis which HLS Environmental Pte. Ltd. ("we", "us", or "our") may collect, use, disclose or otherwise process personal data of persons in accordance with the applicable personal data protection laws and regulations. This Notice 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 otherwise process personal data for our purposes.

### **Personal Data**

1. As used in this Notice:

"**person**" means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may enter or has entered into a contract with us for the supply of any products or services by us, or (c) has submitted a job or internship application with us; and

"**personal data**" means data, whether true or not, about an individual 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.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your name, contact information such as your address, email address or telephone number, nationality, gender, date of birth, marital status, photographs and other audio-visual information, employment information, education background, and information about your usage of and interaction with our website.
3. Other terms used in this Notice shall have the meanings given to them in the Singapore Personal Data Protection Act (where the context so permits).

### **Collection, Use and Disclosure of Personal Data**

4. We may collect personal data from our business partners, contractors, employees and other individuals such as job applicants. We would only collect data that has been provided to us voluntarily by you.

5. These personal data may be furnished to us in forms filled out by you, face to face meetings, email messages, app sign-up or telephone conversations. We may also keep a record of any contact you have with us. These data would be collected only for business purposes or for the purpose(s) stated by us when we gather the personal data from you.
6. The personal data collected may be used for any or all of the following purposes:
  - to provide our services and/or products to you;
  - as part of our business operations;
  - for job application and recruitment purposes;
  - for follow-up action regarding any complaints, feedback, queries or requests received via our website or any other communication channels; and
  - assisting in law enforcement and investigations conducted by any governmental and/or regulatory authority.
7. We may disclose your personal data:
  - with your consent, where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you;
  - to comply with any applicable laws, regulations, codes of practice, guidelines or rules (e.g. in an emergency or when we receive a subpoena to disclose your personal data); or
  - with your consent, to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in Paragraph 6 above for us. Any third parties engaged by us will be contractually bound to keep all personal data confidential.
8. If you choose not to provide us with your personal data for the purposes listed in paragraphs 6 and 7, you may submit a request in writing to our Data Protection Officer. Depending on the complexity of the request and its impact to our relationship with you, we will not collect or, within thirty (30) days of our receipt of your request, cease using and/or disclosing your personal data in accordance with your request.
9. The purposes listed in Paragraph 6 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).

10. We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law such as during the following situations:
  - a) To respond to an emergency that threatens your life, health and safety or of another individual; and
  - b) Necessary in the national interest, for any investigation or proceedings.
11. In the case where we receive unsolicited personal data via email or any other communication channels, the unsolicited personal data will not be retained and will be securely disposed of immediately.

### **Withdrawal of Consent**

12. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. You may withdraw your 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 to our Data Protection Officer.
13. Depending on the complexity of the request and its impact to our relationship with you, we will cease (and instruct any of our data intermediaries and agents to cease) collecting, using or disclosing the personal data within thirty (30) business days of our receipt of your request, unless required or authorised under applicable laws.

### **Access to and Correction of Personal Data**

14. 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 about you, you may submit your request in writing to our Data Protection Officer at the contact details provided below.
15. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request in writing (including both electronic and non-electronic methods), 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).

16. If your request relates to personal data which we are processing on behalf of another organisation, we will instead forward your request to the relevant organisation for their necessary action.
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.

### **Protection of Personal Data**

18. 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, encryption and the use of privacy filters to secure all storage and transmission of personal data by us and disclosing personal data both internally and to authorised third parties and agents only on a need-to-know basis.
19. However, 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 personal data and are constantly reviewing and enhancing our information security measures.

### **Accuracy of Personal Data**

20. We will make every reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.
21. We generally rely on personal data provided by you. 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 Officers at the contact details provided in paragraph 25.

### **Retention of Personal Data**

22. We may retain your personal data for as long as it is necessary to fulfil the purpose(s) for which it was collected, or as required or permitted by applicable laws.

## **Cross-Border Transfers of Personal Data**

23. Unless for business-related needs, we generally do not transfer your personal data to other jurisdictions. However, if we do so, we will obtain your consent for the transfer to be made and we 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 applicable personal data protection laws and regulations.

## **Data Protection Officer**

24. You may contact our Data Protection Officer if you have any enquiry, feedback or complaint regarding our personal data protection policies and procedures, if you wish to make any request, or if you believe that information we hold about you is incorrect or out-dated.

25. You may contact our Data Protection Officer via email with 'HLS' indicated as subject title at [dpo-ehh@nlarisk.com](mailto:dpo-ehh@nlarisk.com).

## **Modifications**

26. We may revise this Notice at any time without any prior notice. Your continued use of our services and/or products constitutes your acknowledgement and acceptance of such changes.

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Approved by : Kenneth Yeow (Head of Finance)