

## **ALPS Personal Data Policy (Internet)**

The purpose of this document ("Personal Data Policy") is to inform you of how ALPS Pte Ltd ("ALPS") manages Personal Data (as defined below) which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) ("the Act").

Please take a moment to read this Personal Data Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us or submitting information to us or using any of our products and services with us, you agree and consent to ALPS as well as its representatives and/or agents (collectively referred to herein as the "Company", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Company's authorised service providers and relevant third parties in the manner set forth in this Personal Data Policy.

This Personal Data Policy supplements but does not supersede nor replace any other consents you may have previously provided to the Company in respect of your Personal Data, and your consents herein are additional to any rights which the Company may have at law to collect, use or disclose your Personal Data.

We may from time to time update this Personal Data Policy to ensure that this Personal Data Policy is consistent with our future developments, 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 Personal Data Policy as updated from time to time on our website [www.alpshealth.com.sg](http://www.alpshealth.com.sg). Please check back regularly for updated information on the handling of your Personal Data.

This Personal Data Policy was last updated on 1 Aug 2018.

### **1. Personal Data**

- 1.1 In this Data Privacy Policy, "Personal Data" refers to any 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, including data in our records as may be updated from time to time.
- 1.2 Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

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

- 2.1 Generally, we collect Personal Data in the following ways:
  - (a) when you submit forms or applications to us;
  - (b) when you submit your resumes and/or CVs to us;
  - (c) when you submit queries, requests, complaints or feedback to us;
  - (d) when your images are captured by us via CCTV cameras while you are within our premises or photographs or videos taken by us or our representatives when you attend events hosted by us;
  - (e) when you respond to our request for additional Personal Data;
  - (f) when you ask to be included in an email or other mailing list;

- (g) when you respond to our initiatives;
- (h) when you browse our intranet or other websites;
- (i) when you submit your Personal Data to us for any other reasons;
- (j) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services;
- (k) when you interact with our staff, including customer service officers, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings, social media platforms and emails;
- (l) when you submit an employment application or when you provide documents or information including your resume and/or CVs in connection with any appointment to any position in the Company;
- (m) when you are contacted by, and respond to, our marketing representatives and customer service officers; and/or
- (n) when you submit your Personal Data to us for any other reasons.

2.2 When you browse our website, you generally do so anonymously but please see paragraph 5 below for information on cookies and other technologies which we have implemented on our website. We do not, at our website, automatically collect Personal Data unless you provide such information to us.

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

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

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

3.1 **Generally**, the Company collects, uses and discloses your Personal Data for the following purposes:

- (a) responding to, processing and handling your queries, feedback, complaints and requests;
- (b) verifying your identity;
- (c) managing and planning the administrative and business operations of the Company and complying with internal policies and procedures;
- (d) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales);
- (e) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to design our services, and to review, develop and improve the quality of our products and services;
- (f) preventing, detecting and investigating crime and analysing and managing commercial risks;
- (g) managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);

- (h) in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- (i) conducting any form of investigations including but not related to those relating to disputes, billing, fraud, offences, prosecutions etc;
- (j) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
- (k) purposes which are reasonably related to the aforesaid.

3.2 **In addition**, the Company collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship:

- (a) If you are an employee, officer or owner of the Company's corporate clients:
  - (i) managing project tenders and quotations, processing orders or managing the supply of goods and services;
  - (ii) creating and maintaining profiles of our corporate clients in our system database;
  - (iii) processing payments and invoices;
  - (iv) facilities management (including but not limited to issuing visitor access passes and facilitating security clearance); and/or
  - (v) purposes which are reasonably related to the aforesaid.
- (b) If you submit an application to us as a candidate for employment or an internship:
  - (i) conducting interviews;
  - (ii) processing your application (including but not limited to pre-recruitment checks involving your qualifications and facilitating interviews);
  - (iii) obtaining references and for background screening;
  - (iv) assessing your suitability for the position applied for;
  - (v) enrolling successful candidates as our employees and facilitating human resource planning and management (including but not limited to preparing letters of employment, name cards and building access passes); and/or
  - (vi) purposes which are reasonably related to the aforesaid.

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

4.1 Your Personal Data held by us shall be kept confidential. However, your Personal Data may be disclosed to the following parties in connection with the purposes listed above (where applicable):

- (a) our related corporations and affiliates;
- (b) recruitment agencies;

- (c) agents, contractors or third party service providers who provide operational services to the Company, such as courier services, telecommunications, information technology, advertising, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to the Company;
- (d) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any mergers, acquisitions and debt or asset sale);
- (e) local and overseas banks and their respective service providers;
- (f) our professional advisers such as our consultants, auditors and lawyers;
- (g) trade unions;
- (h) our business partners;
- (i) relevant government regulators, government ministries, statutory boards, embassies, or authorities and/or law enforcement agencies, whether local or overseas, including the Inland Revenue Authority of Singapore, the Central Provident Fund Board, and Ministry of Manpower to comply with any directions, laws, rules, guidelines, regulations or schemes issued or administered by any of them;
- (j) other organisations which may request that we provide them with your personal data for evaluative purposes; and/or
- (k) any other party to whom you authorise us to disclose your Personal Data.

## 5. **Use of Cookies, Web Beacons, and Similar Technologies on the website**

- 5.1 When you visit or interact with our sites, services, we or our authorized service providers may use cookies, web beacons, and other similar technologies for collecting and storing information to help provide you with a better, faster, and safer web experience.
- 5.2 The information collected by us or our authorised service providers may recognise a visitor as a unique user and may collect information such as how a visitor arrives at our sites, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).
- 5.3 However, we do not store any of your personal data on any of our cookies or other similar technologies. The use of cookies, web beacons and similar technologies by us on our website has different functions. They are either necessary for the functioning of our services, help us improve our performance, or serve to provide you with extra functionalities.

**Cookies** – Small text files (typically made up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message. Cookies allow a website to recognize a particular device or browser. There are several types of cookies:

- Session cookies expire at the end of your browser session and allow us to link your actions during that particular browser session.
- Persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.
- First-party cookies are set by the site you are visiting
- Third-party cookies are set by a third party site separate from the site you are visiting.

Cookies can be disabled or removed by tools that are available in most commercial browsers. The preferences for each browser you use will need to be set separately and different browsers offer different functionality and options.

**Web beacons** - Small graphic images (also known as “pixel tags” or “clear GIFs”) may be included on our sites and services. Web beacons typically work in conjunction with cookies to profile each unique user and user behaviour.

**Similar technologies** – Technologies that store information in your browser or device utilizing local shared objects or local storage, such as flash cookies, HTML 5 cookies, and other web application software methods. These technologies can operate across all of your browsers. We do not use these technologies for storing information to target advertising to you on or off our sites.

We may use the terms “cookies” or “similar technologies” interchangeably in our policies to refer to all technologies that we may use to collect or store information in your browser or device or that collect information or assist in identifying you as a unique user in the manner described above.

- 5.4 We offer certain site features and services that are available only through the use of these technologies. You are always free to block, delete, or disable these technologies if your browser so permits.

However, if you decline cookies or other similar technologies, you may not be able to take advantage of certain site features or services tools. For more information on how you can block, delete, or disable these technologies, please review your browser settings.

## 6. **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data**

- 6.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our Personal Data Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Personal Data Policy; or
- (c) would like to obtain access to or make corrections to your Personal Data records, please contact the Company as follows:

Email: [pdpa@alpshealthcare.com.sg](mailto:pdpa@alpshealthcare.com.sg)

Call: (65) 6225 0488

Write in: ALPS Pte.Ltd. Data Protection Officer, 168 Jalan Bukit Merah, Surbana One, Singapore 150168

- 6.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, the Company may not be in a position to administer any contractual relationship in place. This may also result in the termination of your employment with the Company and your being in breach of your contractual obligations or undertakings. The Company’s legal rights and remedies in such event are expressly reserved.

- 6.3 Please note that if your Personal Data has been provided to us by a third party (e.g. recruitment agency or a headhunter), you should contact such party directly to make any queries, complaints, and access and correction requests to the Company on your behalf.

## 7. **Governing Law**

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