

Privacy and Security Policy

This Privacy Policy applies to each Impellam Group company operating in Singapore from time-to-time (collectively referred to as the “Company”, “we” or “us”).

The purpose of this Privacy Policy is to provide a general overview about how the Company collects, uses and discloses personal data of individuals including, without limitation, our Candidates, Suppliers, Clients, website users and Employees (see below for further explanation of these terms) in accordance with the *Personal Data Protection Act 2012* (“Privacy Law”).

Personal data is any personally identifiable information, such as your email address, name, home or work address, telephone number, bank details or tax numbers, which can directly or indirectly identify you. We refer to it as “personal data” here.

We collect, use and disclose personal data about an individual with that individual’s consent or deemed consent, or as permitted under the Privacy Law or other applicable laws.

Other Company policies may apply instead of, or in addition to, this Privacy Policy in certain circumstances where we notify you.

1 What information might we collect about you?

We will collect personal data about you during the course of your dealings with us. Generally we will only collect personal data that is necessary for our business functions. The type of personal data we collect will depend on your dealings with us. For example:

Candidates	<ul style="list-style-type: none"> ➤ personal and contact details (for example your name, email address, home address, telephone number, date of birth, gender); ➤ personal and contact details you give us when subscribing to receive emails, newsletters or marketing information from us; ➤ during pre-assignment vetting we will request details from you including your name, your work history, qualifications, contact details (such as email, telephone number and home address), your right to work documents, details required for equality and discrimination legislation checks and your personal preferences, choices and requirements specific to particular requests or services; ➤ details of your education, employment history, bank details and tax identification number, references, right to work and other information you tell us about yourself (e.g. the information contained within your CV) when you engage with us for the provision of services; ➤ information from online sources for example social media activity (such as likes, shares, tweets, social media profiles such as LinkedIn profiles), recruitment websites and job boards; ➤ additional information which you provide voluntarily and/or which we may ask from you to better understand you and your interests.
Suppliers	<ul style="list-style-type: none"> ➤ contact details to enable the provision of your services to us and the fulfillment of our contract obligations, which may include names, email addresses and telephone numbers;

	<ul style="list-style-type: none"> ➤ bank details and any other details required to enable payment for the services supplied.
Clients	<ul style="list-style-type: none"> ➤ your contact details or those of individuals at your organisation (such as names, telephone numbers and email addresses) to enable the provision of services and to facilitate our relationship with you, including relevant marketing.
Prospective employees and contractors	<ul style="list-style-type: none"> ➤ personal and contact details (for example your name, email address, date of birth, gender); ➤ personal and contact details of your emergency contact and referees; ➤ during pre-employment vetting we will request details from you including your name, your work history, qualifications, contact details (such as email, telephone number and home address), your right to work documents, details required for equality and discrimination legislation checks and your personal preferences, choices and requirements specific to particular requests or services; ➤ details of your education, employment history, bank details and tax identification number, references, right to work and other information you tell us about yourself (e.g. the information contained within your CV); ➤ information from online sources for example social media activity (such as likes, shares, tweets, social media profiles such as LinkedIn profiles), recruitment websites and job boards; ➤ additional information which you provide voluntarily and/or which we may ask from you to better understand you and your interests.
Referees and Emergency Contacts	<ul style="list-style-type: none"> ➤ We require a referee's contact details (name, email address and telephone number) to enable us to confirm certain details provided by the Candidate or prospective employee, to facilitate the employment process. ➤ Emergency contact information (a name, email address and telephone number) is required in case of an emergency where we would need to contact someone on your behalf.

2 How do we collect, use and disclose your personal data?

Generally, we collect your personal data directly from you, unless it is impracticable or unreasonable to do so. From time to time we may collect personal data about you from third parties (for example, from a candidate's referees) and from publicly available resources (for example, from social media and other online sources).

Where you provide us with personal data about a third party, you represent, and we collect it on the basis that, you have that person's consent for us to collect and handle their personal data in accordance with this Privacy Policy.

We generally use and disclose your personal data for the purposes for which we collected it and for other related purposes that you would reasonably expect, in other instances with your consent or as otherwise required or permitted by law (for example, with local tax authorities, immigration officials or for audit or other investigative purposes).

The uses and disclosures that we make will depend on your dealings with us. For example, we may exchange your personal data with other members of our corporate group, for the performance of our contracts with clients and suppliers for the purposes described above. Our suppliers may include our subcontractors who provide portions of our services to our clients or candidates on our behalf, suppliers of IT services, payroll services or vetting services and other third parties we engage in connection with our

business operations (“Third Party Suppliers”). When we engage a Third Party Supplier to perform any such services for us, we take all reasonable measures to ensure the Third Party Supplier:

- recognises our obligations under the Privacy Law;
- does not engage in conduct that can cause us to be in breach of the Privacy Law; and
- agrees to protect your personal data as required, or to no lesser extent than is required, by the Privacy Law.

If we are unable to collect the personal data we require, or the information provided is incorrect or incomplete, this may affect our ability to provide products or services to you.

Where your personal data is used or disclosed for marketing and promotional purposes, you can opt-out at any time free of charge by using the “unsubscribe” option included in any marketing e-mail or other marketing material received from us, or by contacting us at optout@impellam.com.

Below are some examples of how we collect, use and disclose personal data in different situations.

Candidates	<p>How and when do we collect your personal data?</p> <p>We may collect your personal data when you apply for a role through us (or otherwise contact us from time to time) by:</p> <ul style="list-style-type: none"> ➤ you responding to an advert on a job board or other website; ➤ by you directly contacting our business; ➤ by you filling in an application form in a branch; ➤ when you speak to one of our consultants by telephone; or ➤ another agency or organisation passes your details to us. <p>Why do we collect, use and disclose your personal data?</p> <p>Examples of the purposes for which we may collect, use and disclose your personal data in connection with the work-searching process and our related business functions include:</p> <ul style="list-style-type: none"> ➤ responding to your queries; ➤ providing work-finding services and/or information to you; ➤ transmitting personal data between our offices or functions for internal administrative purposes; ➤ providing you with marketing and promotional material; ➤ submitting your details to our clients for prospective employment; ➤ setting you up on a work assignment with a client; ➤ completing on-boarding procedures where you have successfully obtained a work-assignment; ➤ fulfilling our reporting obligations to clients; ➤ undertaking management of timesheets, payroll and work performance; and/or ➤ internal disclosure as part of our pre-assignment vetting.
Prospective employees and contractors	<p>How and when do we collect your personal data?</p> <p>We collect your personal data when you come to work with us from:</p> <ul style="list-style-type: none"> ➤ your application to us; and ➤ the information you provide when you complete the necessary forms required by our Human Resources team. <p>Why do we collect, use and disclose your personal data?</p>

	We collect, use and disclose your personal data because it is necessary for the pre-employment or pre-engagement vetting processing and for any subsequent employment or engagement by us.
Suppliers & Clients	<p>How and when do we collect your personal data?</p> <p>We may collect your personal data about you or (if an organisation) your contact personnel when required in the course of our business relationship with you.</p> <p>Why do we collect, use and disclose your personal data?</p> <p>We collect, use and disclose your personal data because it is necessary to obtain certain details from you:</p> <ul style="list-style-type: none"> ➤ to offer services to you or to obtain support and services from you; ➤ to perform certain legal obligations; ➤ in the performance of our contract with you; ➤ to help us to target appropriate marketing campaigns; ➤ in transmitting personal data between our offices or functions for internal administrative purposes; and/or ➤ providing marketing and promotional material.

3. Website

Each of our websites uses cookies. The cookies are used for statistical purposes and to assist with your use of the website. We may also collect click-stream data when you use the website, such as the date and time of your visit, the pages you accessed, your IP address, the type of browser and operating system you are using and the websites you come from and move to. This information is collected for statistical purposes to assist us to find out how our website is used and navigated and to improve our website (find out more about cookies and how we use them in our [Cookie Policy](#)).

We may also collect information which you provide to us voluntarily, such as from your interaction with us on social media (for example likes, shares and tweets), and information you provide if you report a problem with our website or service.

4. International transfers of your personal data

We may transfer your personal data to members of our corporate group and to other third parties described above (such as our Third Party Suppliers) located outside of Singapore. Some of these recipients are located in Australia, New Zealand, United States of America, United Kingdom, Ireland and countries in the European Economic Area.

Any transfer of personal data to a country or territory outside Singapore will be in accordance with the Privacy Law to ensure a standard of protection to personal data so transferred that is comparable to the protection under the Privacy Law. Please contact us for further information on any obligations imposed by us on those third parties in connection with such international transfers of personal data.

5 Security and retention

Generally, we take reasonable steps to employ appropriate security measures to help protect your personal data and guard against unauthorised access, collection, use, modification, copying and disclosure, and from other types of misuse, interference or loss. However, the transmission of information via the Internet is inherently insecure so we cannot guarantee the security of your information when it is transmitted to our website or from third party websites such as job boards.

Generally, we will take reasonable steps to destroy or de-identify your personal data when we no longer require it for any purpose for which it can be lawfully used or disclosed by us. For example, personal data may be retained for the primary purpose for which the personal data was collected and for related secondary business purposes, as well as for insurance and corporate governance purposes, record retention and back-up purposes, to resolve disputes and to comply with any applicable law.

6. Access to, accuracy and correction of personal data

We will take reasonable steps to ensure that the personal data collected by us or on our behalf is accurate and complete.

You may lodge a request to correct personal data that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading. You may also request that we provide you with access to the personal data we hold about you. Generally, we will provide you with access except in limited circumstances where the law permits us to deny access.

Any correction or access requests must be made in writing to our Data Protection Officer via the details shown below. No fee will be incurred for requesting correction or access. If your access request is accepted, we will inform you if any fee will be payable for providing access.

7. Withdrawal of consent

On giving us reasonable notice, you may at any time withdraw any consent given, or deemed to have been given under the Privacy Law, by you in respect of the collection, use or disclosure of personal data about you by us. On receipt of such notice, we will:

- inform you of the likely consequences of withdrawing your consent; and
- cease (and cause our data intermediaries and agents to cease) collecting, using or disclosing the personal data unless it is required or authorised under the Privacy Law or other applicable law.

8. Updates to this Privacy Notice

This Privacy Notice may be updated periodically to reflect changes in our privacy practices and legal updates. We will indicate at the bottom of the notice, which is posted on our websites, when it was most recently updated. You should review our Privacy Notice each time you visit our website or provide us with personal data.

9. Complaints

If you have a complaint about the way in which we handle your personal data please contact us via the details below. We will confirm receipt of your complaint and set out the time frame we require to investigate your complaint and provide you with a response which, generally, will be within 14 days of receiving your complaint.

10. Contact Us

If you have any questions in relation to this Privacy Policy, or if you would like to contact us to exercise your rights as stated in this Privacy Policy, you may contact us at: GDPR@impellam.com or write to:

The Data Protection Officer
Group Legal
Impellam Group plc
800 The Boulevard
Capability Green
Luton
Beds LU1 3BA