

Privacy Policy ("Policy")

This Policy sets out the manner in which SWTS collects, uses, manages and protects personal data (as defined below) in compliance with the provisions of the Personal Data Protection Act 2012.

SWTS may from time to time update this policy to ensure it is consistent with its future developments or business purposes or to accommodate future changes to applicable legal, regulatory or corporate requirements.

Definitions

"Data Protection Officer" means the person designated to be responsible for ensuring that SWTS complies with the PDPA;

"DNC Registry" means the Do-Not-Call registry maintained by the Personal Data Protection Commission, pursuant to the PDPA;

"Individuals" means natural persons, whether living or deceased, and "Individual" means any of them;

"PDPA" means the Personal Data Protection Act 2012;

"Personal Data" means data that is capable of identifying a natural person, whether on its own or in conjunction with other data that is accessible to SWTS

"Personnel" shall include any person engaged under a contract of service or contract for service with SWTS, management personnel, permanent or temporary employees, as well as trainees, interns and volunteers

Collection of Personal Data

SWTS will collect, use or disclose personal data about an individual which it reasonably considers necessary for the relevant purposes underlying such collection, use or disclosure.

Purposes for the Collection, Use and Disclosure of Personal Data

Generally, SWTS may collect, use and/or disclose Personal Data about an Individual for any of (but not limited to) the following purposes:

Personnel

- (a) administering and managing employment relationships with SWTS
- (b) evaluating the performance of Personnel;
- (c) undertaking staff training and quality assurance activities;
- (d) providing Personnel with services, facilities and/or other benefits being offered

General business purposes

- (a) managing the administrative and business operations of SWTS;
- (b) facilitating the completion of transactions with Individuals;
- (c) responding to complaints, queries and/or requests;
- (d) safety and security purposes;
- (e) preventing, detecting or investigating any actual or crime, fraud, misconduct, unlawful action, breach or dispute;
- (f) record-keeping purposes;
- (g) accounting or auditing purposes;
- (h) legal purposes

Consent

Unless otherwise authorised under the PDPA or any other applicable law, SWTS will not collect, use or disclose an Individual's Personal Data without his/her consent.

Verification of Personal Data & Notification of Changes

Where feasible, SWTS will take reasonable steps to verify the accuracy of Personal Data received at the point of collection but Individuals remain primarily responsible and liable to ensure that all Personal Data submitted by them to SWTS is complete and accurate.

Policy on telephone numbers registered with the DNC Registry

SWTS is prohibited from sending unsolicited telemarketing messages (“*specified messages*”) to Singapore telephone numbers through voice calls, text or fax messages registered on the DNC Registers unless SWTS has obtained the relevant Individual’s clear and unambiguous consent in written form.

Protection of Personal Data

SWTS shall make reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to Personal Data in its possession.

Contacting SWTS—Access and Correction of Personal Data

Any Individual who:

- (a) has questions or feedback relating to this Policy;
- (b) would like to obtain access to his/her Personal Data held by SWTS;
- (c) would like to update or make corrections to his/her Personal Data held by SWTS, should contact Data Protection Officer of the company.

SWTS may require up to 4 weeks from the date of the Individual’s request to respond and effect any change.

Governing Law

This Policy shall be governed by and construed in accordance with the laws of Singapore.