

DATA PROTECTION NOTICE

Purpose

This Data Protection Notice (“Notice”) sets out the basis which Singapore National Employers Federation., (“we”, “us”, “our” or “SNEF”) 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, NRIC/FIN or passport number, 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. We use Google reCAPTCHA to protect our website from spam and abuse. When reCAPTCHA is used, information such as your IP address, browser/device information and interaction/security signals may be collected and processed by Google on our behalf for the purpose of detecting and preventing abusive activity.
6. We may collect Personal Data for the purposes set out in paragraph 7 below and in the following (non-exhaustive) manner:
 - a) when you submit an application form or other forms (whether physically or electronically) to us;
 - b) when you interact with our employees, for example, via telephone calls, letters, face-to-face meetings and emails;
 - c) when you use some of our services, for example, websites and applications including establishing any online accounts with us;
 - d) when you request that we contact you, be included in an email or other mailing list;
 - e) when you sign up for our events and training courses, or participate in our survey questionnaires or apply for government schemes administered by us;
 - f) when you are contacted by, and respond to, our employees to update the membership information of your company;
 - g) when you submit your Personal Data to us for purposes and reasons which shall be specified and highlighted to you in any additional and/or ancillary document/requests to be provided to you for the purposes of such data collection/submission.
7. The personal data collected may be used for any or all of the following purposes:
 - a) to provide our services and/or products to you;
 - b) as part of our business operations;

- c) for job application and recruitment purposes;
- d) for follow-up action regarding any complaints, feedback, queries or requests received via our website or any other communication channels; and
- e) assisting in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- f) for payment purposes;
- g) internal record keeping;
- h) to improve our products and services;
- i) updates on our latest news and activities;
- j) market research and data analysis purposes;
- k) to administer and facilitate courses and programmes organised by SNEF;
- l) to process and administer the training grants or government schemes you have applied for;
- m) to update the status of your company's membership with SNEF.

8. We may disclose your personal data:

- a) 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;
- b) 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
- c) with your consent, to third parties include government agencies, our employees, our affiliates, agents, partners or third-party service providers in events and training courses, and where your company is a member of SNEF, your company's appointed SNEF representative whom we have engaged to perform any of the functions listed in Paragraph 7 above for us. Any third parties engaged by us will be contractually bound to keep all personal data confidential.
- d) Government agencies to whom we may disclose Personal Data include the Ministry of Manpower (MOM), the Enterprise Singapore (ESG), the Health Promotion Board

(HPB), the SkillsFuture Singapore (SSG), the Workforce Singapore (WSG) just to name a few.

9. If you choose not to provide us with your personal data for the purposes listed in paragraphs 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) calendar days of our receipt of your request, cease using and/or disclosing your personal data in accordance with your request.
10. The purposes listed in Paragraph 7 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).
11. 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. 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.

Consent

12. An individual is deemed to consent to the collection, use or disclosure of personal data by SNEF for the purposes set out in paragraph 7 above if the individual voluntarily provides the personal data to SNEF and the individual is aware of the use or disclosure and it is reasonable to do so.
13. If you are providing someone else's Personal Data on their behalf, you hereby represent and warrant that you have obtained the consent of that individual for the collection use

and disclosure of their personal data to SNEF in accordance with the terms of this Policy. If the individual has not in fact consented to the provision of their Personal Data to SNEF, you must inform us immediately.

14. Please note that if you do not consent to SNEF's collection, use and disclosure of your Personal Data, this may affect our ability to provide you with our products and services.

Withdrawal of Consent

15. 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 at the contact details provided in paragraph 27.
16. 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 14 calendar days of our receipt of your request, unless required or authorised under applicable laws.

Access to and Correction of Personal Data

17. 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.
18. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) calendar days after receiving your request in writing (including both electronic and non-electronic methods), we will inform you in writing within thirty (30) calendar 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. 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.
20. 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

21. 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 and encryption 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.
22. 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

23. We will make every reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.
24. 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 Officer at the contact details provided in paragraph 27.

Retention of Personal Data

25. 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

26. We store our data in Singapore and within Microsoft cloud services. Generally, we do not transfer your personal data to other jurisdictions unless it is necessary for business-related purposes. If a transfer is required, we will take steps to ensure that your personal data continues to receive protection that is at least comparable to the standards provided under applicable personal data protection laws and regulations. Should the data protection laws in the destination jurisdiction not be comparable to the PDPA of Singapore, we will seek your consent before proceeding with the transfer.

Data Protection Officer

27. You may ask to access the Personal Data we hold, withdraw your consent for the collection, use or disclosure of your own Personal Data or seek correction of your Personal Data by contacting our Data Protection Officer (“DPO”). Any other enquiries or complaints in relation to the collection, use, disclosure and care of Personal Data should also be made to the DPO via the following:

Phone: 62907633

Email: dpo@snef.org.sg

By Post: Data Protection Officer

Singapore National Employers Federation

60 Paya Lebar Road

#13-45 Paya Lebar Square (Lobby 2)

Singapore 409051

Enquiry Form: <https://snef.org.sg/contact-us/>

Modifications

28. 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.

Version: 1

Effective from: 3 September 2024

Date of Latest Review: 6 February 2026

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Approved by: SNEF Management

