



## DATA PROTECTION POLICY

APRO-ASIAN PROTECTION PTE LTD (the “Company”, “Us”, “We”, “Our”) values and respect the privacy of Data you provided to us. We may collect, use, disclose or otherwise process data provided to us in accordance to Singapore Personal Data Protection Act (“PDPA”) and other applicable laws and stringent standards.

### **SCOPE OF THIS POLICY**

1. This Data Protection Policy applies to all individuals (“data subjects”) who interact with the Company, including job applicant, interns, employees (full timer / part timer / contract), customers, and other stakeholders whose Data is collected, used, disclose or process with a reasonable purpose.

### **DEFINITION**

2. Personal 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.
3. Company Data: Any information that is created, collected, processed, stored, or used by the Company in the course of its business operation. This includes but is not limited to:
  - a. Business records, reports, contracts and financial information;
  - b. Operational data, procedures, policies and internal communications;
  - c. Client, vendor and project-related information;
  - d. Security, system, and access-related data; and
  - e. Intellectual property and proprietary information.
4. Personal Data and Company Data shall collectively be referred to as “Data”.
5. Data Intermediary: An organization which processes personal data on behalf of another organization (the data controller).
6. Data Protection Officer (DPO): An individual appointed by the Company to oversee the compliance with the PDPA and manage Data Protection matters.

### **BUSINESS CONTACT INFORMATION**

7. Under Singapore PDPA, Business Contact Information (Name, Business Address, Business Telephone Number, Business Mobile Number etc.) is not considered as personal data so long as it is used strictly for Business-To-Business (B2B) transactions.

### **PERSONAL DATA**

8. Personal data which we may collect includes, without limitation, your:
  - a. Personal details (Name, NRIC / Passport No., Address, Phone Number, Email Address, Citizenship, Nationality, Driving License, Date of Birth, Employment History, Bank Account Information, Details of Next-of-Kin);
  - b. Any additional personal and professional details contained in your curriculum vitae provided to the Company by you as a job applicant;
  - c. Facial image from CCTV and Company events; and
  - d. IP addresses and pages visited while using our online services.
9. Other terms used in this Policy shall have the meaning given to them in the PDPA (where context so permits).



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### COLLECTION, USE AND DISCLOSURE OF DATA

10. We generally collect data that:
  - a. You knowingly and voluntarily provide in the course of or in connection with your employment or job application with us, or via third party who has been duly authorised by you to disclose your data to us (your “authorised representative”, which may include your job placement agent), after:
    - i. You (or your authorized representative) have been notified of the purposes for which the data is collected; and
    - ii. You (or your authorized representative) have provided written consent to the collection and usage of your data for those purposes.
11. Collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional data and before using your data for a purpose which has not been notified to you (except where permitted or authorized by law).
12. We may collect, disclose or use your personal data pursuant to an exception under Singapore PDPA 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.
13. Any unsolicited data received by us will be returned to the sender immediately. If received by email or through website, these unsolicited data will be deleted immediately. If received by telephone, these will not be recorded.
14. If we are a Data Intermediary, we will ensure the limited processing of your personal data to the purposes specified by the Data Controller and according to their instructions.

### PURPOSE OF COLLECTION, USE AND DISCLOSURE OF DATA

15. We may collect and use your data with the following purpose:
  - a. Assessing and evaluating your suitability for employment in any current or prospective position within the organisation;
  - b. Verifying your identity and the accuracy of your personal details and other information provided;
  - c. Respond to inquiries, request, complaints and feedback about our products and services;
  - d. Featuring images from Company events on the Company’s website;
  - e. Monitor the safety and security of our premises via CCTV surveillance;
  - f. To access to project site for security clearance with our provision of the goods and services requested by our customers;
  - g. Performing obligations under or in connection with the provision of our goods or services to our customers; and
  - h. Facilitate our compliance with any laws, customs and regulations which may be applicable to us.
16. We may disclose your data with the following purpose:
  - a. Where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you or our customers;



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- b. To access to project site for security clearance with our provision of the goods and services requested by our customers;
  - c. Where we engaged third party service providers, agents and other organizations to perform any of the functions on our behalf. They will need to access to your personal information needed to perform their functions but may not use it for other purpose;
  - d. Featuring images from Company events on the Company's website; and
  - e. Where we comply with any applicable laws, regulations, codes of practice, guidelines or rules, or to assist in law enforcement and investigation conducted by any government and/or regulatory authority.
17. The purposes listed in the above clauses 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).

### **WITHDRAWING CONSENT**

18. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any/all purposes listed above by submitting your request in writing or via email to our DPO at the contact details provided below.
19. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process and effect your request within thirty (30) calendar days of receiving it.
20. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and extent of your request, we may not be in a position to continue providing our goods or services to you. We shall, in such circumstance, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 18.
21. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

### **COOKIES**

22. Cookies are small text files sent to your device by a website. We use cookies to improve website functionality and enhance user experience. These cookies are essential for the proper functioning of the website's basic features. In general, our website recognizes repeated visits and user's preference.
23. These cookies are stored only in your browser and do not collect personal information that can identify users. You may choose to disable cookies by turning of this feature in your web browser setting. By doing so, you may limit certain access to the features and functions in our web applications.



## **DATA PROTECTION POLICY**

### **ACCESS AND CORRECTION**

24. 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, you may submit your request in writing or via email to our DPO at the contact details provided below.
25. 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.
26. We will respond to your access request as soon as reasonably practicably possible. In general, our response will be within thirty (30) calendar days. Should we not be able to respond to your access request within thirty (30) calendar days after receiving your access request, 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).
27. Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organization has on record, if the record of your personal data forms a negligible part of the document.

### **PROTECTION OF DATA**

28. To safeguard your 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, password protection, and access control to secure all storage and transmission of data by us, and disclosing data both internally and to our authorised third party service providers only on a need-to-know basis.
29. You should be aware, however, that 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 information and data and are constantly reviewing and enhancing our information security measures.

### **ACCURACY**

30. We generally rely on personal data provided by you (or your authorised representative). 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 DPO in writing or via email at the contact details below.

### **RETENTION OF DATA**

31. We may retain your data for as long as it is necessary to fulfil the purposes for which they are collected, or as required or permitted by applicable laws or business agreements.
32. We will cease to retain your data or remove the means by which data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the data were collected and are no longer necessary for legal or business purposes.



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### TRANSFER OF DATA

33. We generally do not transfer your data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and will take steps to ensure that your data continues to receive a standard of protection that is at least comparable to that provided under the PDPA and other applicable standards.

### DATA BREACH NOTIFICATION

34. In the event a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, data, we shall promptly assess the impact and assessed that it is notifiable data breach, we shall report this breach within 3 calendar days to the Personal Data Protection Commission (PDPC). We will notify you when the data breach is likely to result in significant harm to you after our notification to PDPC. We may also notify other relevant regulatory agency, when required.
35. If we act as a data intermediary, we will promptly notify the relevant data controller of any data breach without undue delay, enabling them to assess the impact and fulfil their data breach notification promptly.

### DATA PROTECTION OFFICER (DPO)

36. You may contact our DPO if you have any enquiries or feedback on our personal data protection policies and procedures. If you wish to make any request, in the following manner:

Contact No : +65 6567 6388  
Email Address : [dpo@apro.com.sg](mailto:dpo@apro.com.sg)

### EFFECT OF POLICY AND CHANGES TO POLICY

37. This policy applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your data by us.
38. We may revise this policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this policy was last updated. Your continued services constitute your acknowledgement and acceptance of such changes.

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Li Xiaowen  
Deputy Managing Director  
01<sup>st</sup> January 2026