

## Privacy Policy

JAC Recruitment International Ltd and our related companies in other countries forming the JAC Group (“JAC”) are committed to protect the confidentiality of information and privacy of our candidates, clients and other users of our services.

Such related companies include:

1. JAC Recruitment Pte Ltd (Singapore)
2. Agensi Perkerjaan JAC Sdn Bhd (Malaysia)
3. JAC Personnel Recruitment Ltd (Thailand)
4. PT JAC Consulting Indonesia
5. JAC Recruitment Vietnam Co., Ltd
6. JAC Recruitment India Pvt Ltd
7. JAC Recruitment (Germany) GmbH
8. JAC Recruitment (UK) Ltd
9. JAC Recruitment (US) Inc.
10. JAC Recruitment Korea Co., Ltd

Where you provide JAC with your personal data, in person, by email, through our websites or offices, we will use our best efforts to ensure that the information you submit to us remains private and is only used in accordance with this Privacy Policy. Furthermore, we may also collect your personal data from social media sites, including but not limited to LinkedIn, Twitter and Facebook.

JAC processes your personal data in accordance with the applicable regulations relating to General Data Protection Regulation (“GDPR”), and similar laws in the countries in which we operate. This Privacy Policy explains how JAC, as the data controller, collect, hold, use, and disclose your personal data.

### Definition of Personal Data

Regarding the GDPR, personal data means any information relating to an individual, which enables the identification of such individual, whether directly or indirectly, but not including the information of the deceased persons in particular.

In order to carry out our business as recruitment consultants, JAC may collect your personal information from you, including but not limited to your name, contact details, qualifications, work history, your right to work in a particular country, language skills, professional qualifications and memberships, your work objectives and other information from your CV.

In addition, we may process your personal data of a sensitive nature in accordance with special criteria provided for in the GDPR, including but not limited to your racial, ethnic origin, political opinions, religious or philosophical beliefs, biometric data, criminal records, physical or mental health condition, trade union information and any other data spelled out under the GDPR.

JAC will provide the purpose for the collection of your personal data, and any sensitive personal data we collect will only be disclosed or processed with your explicit consent.

## Source of information

JAC may collect your personal information directly from you or from publicly available sources, as follows:

- i. Deal with us in person, by telephone, letter, fax, email or via our websites;
- ii. Register with us;
- iii. Submit any other information to us, such as CV;
- iv. Attend an event we have organized; and/or
- v. Social media sites not limited to LinkedIn, Twitter and Facebook.

## Purpose of collection to your Personal Data

In order to carry out our business, as recruitment consultants, JAC may collect, hold, use, and disclose your personal data for the following purposes, or otherwise as set out in this Privacy Policy:

- i. To provide our services to you to allow your potential or actual placement into job;
- ii. To match your relevant skills, experience and qualifications with job vacancies;
- iii. To assist us in finding a position that is most suitable to you and for us to send your personal data to our clients in order to apply for jobs where you have provided your prior consent to us;
- iv. For us to direct market our services to you and to advise you of relevant news and industry updates and other information. Where we send such information you will be able to unsubscribe from such communications; and
- v. To generally maintain our business relationship with you as a client or a candidate where you are a user of our website.

We will not use or disclose your personal data for any other purpose without first seeking your consent, unless authorized or required by law.

## Disclosure of your Personal Data

JAC may share and disclose your personal data to the following third parties for the following purposes:

- i. Our clients: For the purpose to provide services to you, we will share your personal data to prospective candidates who may be interested in the role and they owe confidentiality obligations in relation to your personal data to us and to you.
- ii. Our candidates: For the purpose to provide services to you, we will share your personal data to prospective employers to be able to decide your suitability as an applicant for a position within their organization.
- iii. Our suppliers: The personal data shall be limited to the contractual obligations which our suppliers need to perform their work and shall owe confidentiality obligations in relation to your personal data to us and to you.
- iv. In order to comply with any requests from regulatory or law enforcement authorities to release such personal data if disclosure is required.

JAC will inform you to acknowledge and request for consent as necessary to comply with the GDPR.

## Data transfer across International Borders

JAC Recruitment International Ltd and our related companies are part of the JAC Group which operates globally. Certain aspects of JAC Group's infrastructure are centralized including information technology services provided to member companies which certain information will be accessible by all recruitment consultants within the JAC Group organisations. Therefore, your personal data may be shared, transferred, and stored outside of the country which you might be located. JAC have taken appropriate and legal precautions to safeguard the safety and integrity of data that is transferred within the JAC Group organisations by executing with the transferee the standard data protection clauses including Binding Corporate Rules or Data Processing Agreement (if any or whichever is appropriate) pursuant to the GDPR, unless the data transferred country has appropriate data protection standard as prescribed by the Personal Data Protection Committee or we obtain your consent pursuant to the GDPR.

## Management of Personal Information

Our staff are trained to respect the confidentiality of customer information and the privacy of individuals. We have appointed a Data Protection Officer to ensure that our management of personal information is in accordance with this statement.

## Your Rights as a Data Subject

You have the following rights regarding personal data obtained and processed by us. In order for us to process with your request, we will need to verify your identity and may request further information about your request. We may refuse your request where we are legally permitted to do so and give you such reasons.

- **Right to withdraw a consent:** You have the right to withdraw your consent at any time by the method separately designated by us at the timing of obtaining your consent, except the consent provided is necessary to perform legal obligations or contractual obligations. However, your withdrawal of consent will not affect the legality of processing conducted based on your consent before its withdrawal.
- **Right to access to personal data:** You have the right to access and obtain a copy of the processed personal data concerning you and to ask us to disclose where JAC obtained such personal data from. We may refuse access to your personal data if it would affect the privacy rights of other persons or if it breaches any confidentiality that attached to that information. You should be aware that it may take a reasonable time to process your application for access as we may need to retrieve information from storage and review information in order to determine what information may be provided.
- **Right to obtain or transfer your personal data:** You have the right to receive personal data concerning you in a structured, commonly used, and machine-readable format that can be automatically accessed or disclosed, and the right to transfer those data to another controller.
- **Right to object the collection, the use, or the disclosure of personal data:** You have the right to object to the processing of the personal data concerning you.
- **Right to erase your personal data:** You have the right to have us delete or destroy personal data concerning you, or to make such personal data to become the information that cannot identify your identity. Once your data is deleted, JAC might not be of service to you anymore.

such as not able to assist in matching our open job vacancies to you. If you want to use our services in the future, you will need to re-submit your data to JAC.

- **Right to restrict on the processing of personal data:** You have the right to have us stop the processing of personal data concerning you. However, if this involves a request of deletion of your file, please be aware that we may not be required or able to do so, particularly where your file also holds information about our clients. Where permitted to do so, we may charge a fee to cover our administrative costs when accessing and updating requests.
- **Right to rectify on the processing of personal data:** You have the right to have us rectify inaccurate personal data concerning you to be a completed and updated data that will not cause any misunderstanding. We generally update your customer information over the telephone. Please advise your consultant when your personal details change. If you have created a profile with JAC through our website, then you are able to update or delete your personal information whenever you apply for a new position advertised. In order to do this, log into your profile and edit or delete the information you have submitted.
- **Right to lodge complaints:** You have the right to lodge a complaint with a competent data protection supervisory authority when JAC violates or not complies with the laws concerning of personal data protection.

If you intend to exercise any of the aforementioned rights, please inquire using the contact details at the end of this privacy policy.

If you wish to withdraw your consent to the use of your personal data collected by us before the effective date of the GDPR, please contact us at the contact details provided at the end of this privacy policy.

### Retention Period for Personal Data

JAC will retain the confidential and personal data for as long as necessary to fulfill the aforementioned purposes for obtaining and processing your personal data. Specific criteria used to determine our retention periods are the duration JAC have an ongoing relationship with you, the compliance with applicable laws, the compliance with legal prescription to exercise the rights to legal claims or defend against the rights to legal claims and the necessity of retaining the personal data for other legal or business reasons.

Please kindly be ensured that the retention of personal data after the expiry date of retention period will only occur in the necessary circumstance. When the retention period has ended or the retention of such data is no longer necessary (whichever is applicable), JAC will destroy or erase such data from our system.

### Security

JAC takes reasonable steps to keep personal data secure, accurate and up to date. The Internet is not always a secure method of transmitting information. Accordingly, while we seek to protect your personal data by implementing digital security systems in various parts of our website, JAC cannot accept responsibility for the security of information you send to or receive from us over the Internet or for any unauthorized access or use of that information. Where we have links to websites outside the JAC website, we cannot ensure that your privacy will be protected in accordance with this policy. You should consult these other websites' privacy policies as we have no control over them and are

not responsible for any information that is submitted to or collected by these third parties.

### Contact Us

JAC aims to accept the receipt of your right request or complaints either via email or whichever visible methods and shall provide a reply within 21 working days of acceptance. Should the matters require more time, we will provide updates and inform you of the situation.

If you want to exercise any of your rights or complaints, please contact our Data Protection Officer by email [privacyofficer.sg@jac-recruitment.com](mailto:privacyofficer.sg@jac-recruitment.com) or at the following address:

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