privacy statement

At Randstad, protecting your personal data is important to us. We are committed to ensuring that your privacy is respected and maintained at all times and have based this Privacy Statement on the Personal Data Protection Act 2012 (PDPA) as well as our existing obligations of confidentiality.

"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. The following are some examples of personal data: name, address, telephone number, NRIC/passport number and e-mail address.

1. what does this privacy statement cover?

This Privacy Statement explains how Randstad Pte. Limited collects personal data and how we maintain, use and disclose that information. It also provides details about your privacy rights, along with our general rights and obligations in relation to the personal data we keep on record.

By continuing to use our services via our website or by providing personal data to us, you agree to the collection, use and disclosure of your personal data in the manner set out in this Privacy Statement.

Please read the privacy statement for Singapore below.

2. types of information that we collect and hold

The type of information that we typically collect and hold will vary depending on our relationship with you. These relationships are generally categorised as:

- candidates include all individuals who approach us, or who are engaged by us in the process of seeking or performing work with us or our clients;
- **clients** include all individuals/companies who we deal with for the purpose of providing recruitment solutions and services for their business;
- referees include all individuals who we contact in evaluating our candidates' capabilities and suitability for employment; and
- **participants** include all individuals to whom career transition services, career management services, change programs, coaching or other services are provided to.

We may also collect personal data from you if you contact us, for example by phone or email, and do not fall into one of the above categories.

2.1 candidates

If you are a candidate we collect your personal data as reasonably necessary for us to determine your suitability for work with us or through us. Some examples of personal data that we may collect about you as a candidate are:

- your name and contact details, including your address, email address and phone numbers;
- your date of birth;
- your gender;
- information in your cover letter, resume and application forms including your skills, qualifications, work history, references, goals and interests;
- details of your work rights in Singapore/other countries;
- your tax file number and related details;
- information documenting your work history with or through us (including bank account details, salary and work performance information);
- aptitude and psychological assessment results;
- the results of background checks; and
- other information that you, your referees or our clients provide to us, including personal feedback and notes of our interactions with you and/or others in relation to your suitability for work with us or through us.

Randstad only collects, uses and discloses personal data with your consent or deemed consent or as otherwise permitted under the PDPA or other applicable laws and regulations.

2.2 clients

If you are our client, we collect information that is reasonably necessary for us to provide the best recruitment solutions for you and your business needs. The main types of information we collect about you as our client are:

- your contact details including your address and telephone numbers;
- details of your job title/description and organisational needs; and
- records of our interaction with you and confidential feedback you may give us regarding our candidates.

2.3 referees

If you are a referee we collect information that is reasonably necessary for us to determine a candidate's suitability for work with us or through us. The main types of information we collect about referees are:

- your contact details including your address and telephone numbers; and
- details of your job title/description; and
- your confidential opinions about a candidate and their suitability for work with or through us.

2.4 participants

If you are a participant we collect information that is reasonably necessary for us to provide you career transition services, career management services, change programs, coaching or other services provided by us. The main types of personal data we collect about you are similar to the information we collect about candidates (outlined in section 2.1).

3. who will be collecting your personal data

Your personal data will be collected by Randstad for its own use and on behalf of other members of the Randstad Group, who might require access to your personal data in connection with its recruitment services. Each time you visit our web site statistical data is collected. This data is not linked to a particular person and does not provide us with any personal data.

4. how your personal data will be collected

4.1 candidates

Personal data will be collected from you directly when you attend an interview with one of our staff members. At this time or prior to such interview, you will complete our registration paperwork or any other information in connection with your application to us for registration.

Personal data will also be collected when:

- we receive any reference about you;
- we receive results of inquiries that we might make with your former employers, work colleagues, professional associations or registration body;
- we receive the results of your work rights status;
- we receive the results of any competency or medical test;
- we receive performance feedback (whether positive or negative);
- we receive any complaint from or about you in the workplace;
- we receive any information about a workplace accident in which you are involved;
- we receive a response from a job advertisement either written, verbal or email;
- we receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved; and
- you provide us with any additional information about you.

4.2 clients

If you are a client the ways in which we collect information about you are when:

- we meet you or communicate with you in any way; or
- when you provide your opinion or feedback regarding one of our candidates.

4.3 referees

If you are a referee the ways in which we collect personal data about you are when:

- a candidate provides us with your contact details and informs us that you have consented to such collection; and
- when we take notes of our dealings with you including your opinions of the suitability of a candidate for work with or through us.

4.4 participants

If you are a participant the ways in which we collect personal data about you are when you:

- complete a survey or form requesting information from us;
- either apply or are put forward for career transition services, career management services, change programs, coaching or other services provided by us; or
- otherwise provide us with personal data in person or via telephone, email, fax, post or other means, whether at our request or at your own initiative.

4.5 general - visiting our web site & online

You can visit our web site and browse without the need to disclose any personal data.

When you visit the Randstad web site, we record anonymous information such as the date and time of your visit, the server/IP address, which site was visited and the information viewed and/or downloaded. The information gathered cannot be directly matched to an individual and is only used for administration and statistical purposes such as error logging. The information cannot tell us anything about you; it can only tell us about how you used our web site. This information can help us determine what areas of our web site are most beneficial to our visitors. No attempt is made by Randstad to identify users or their browsing activities.

If you visit the Candidate Registration web site and register on-line for employment opportunities or, visit the client resources site to register a vacancy, we do collect some personal data about you, which you volunteer by filling in your details. The information required may include providing basic personal details such as your name, address, phone number and email address etc. You may also submit your resume or a position description. The information gathered at this point is stored in our database for retrieval and use by a Randstad staff only for the purposes for which it was intended. By submitting your personal data in this way, you acknowledge and accept our Privacy Statement.

When submitting a time sheet via our web site, the information is transmitted directly to our payroll division, where it is only used for the intended purpose and is not disclosed to anyone outside the organisation. There is no collection of personal data until you have completed the time sheet and submit it to Randstad for processing.

You can also view our advertisements on authorized third party recruitment websites which may either direct you to the Randstad website for you to log in and submit your application with personal data, or allow you to submit such data via the submit function of the third party website. If you submit your information to us through a third party website, please ensure that you read their privacy statement. Any personal data we receive we will assume that you have consented to allow us to collect, use, and disclose (as described in this Privacy Statement) your personal data for the purposes of evaluating your candidacy in relation to the vacancy posted or other vacancies which we may decide to engage in the future.

5. use of your personal data

5.1 candidates

Your personal data may be used in connection with:

- your actual or possible work placement;
- checking your work rights status with any government department or body (or their agents);
- where legally permitted, to undertake directly or through agents a criminal reference check with relevant government agencies, background checks or credit checks;
- payment for work completed on a temporary/contract assignment;
- to follow up with you to offer you work or ascertain your availability for work;

- your performance appraisals;
- our assessment of your ongoing performance and prospects;
- any test or assessment (including medical tests and assessments) that you might be required to undergo;
- · our identification of your training needs;
- any workplace rehabilitation;
- our management of any complaint, investigation or inquiry in which you are involved;
- any insurance claim or proposal that requires disclosure of your personal data;
- to tell you about the other services that we may provide; and
- ensuring our internal business processes are running smoothly which may include quality
 assurance audits, quality and services evaluations, fulfilling legal requirements and conducting
 confidential systems maintenance and testing.

5.2 clients

Personal data that we collect, hold, use and disclose about clients is typically used for:

- client and business relationship management;
- recruitment functions;
- marketing services to you;
- statistical purposes and statutory compliance requirements; and
- risk management.

5.3 referees

Personal data that we collect, hold, use and disclose about referees is typically used for:

- to confirm identity and authority to provide references;
- candidate suitability assessment; and
- recruitment functions.

5.4 participants

Your personal data may be used in connection with (as relevant):

- to communicate with and provide information requested by you;
- outplacement or redeployment;
- provision of career management programs and associated services;
- provision of services in connection with change programs; and
- executive coaching and associated services.

6. disclosure of your information

6.1 candidates

Your personal data may be disclosed to:

- potential and actual employers and clients of Randstad;
- referees:
- other members of Randstad, clients and third party service providers and suppliers located in Randstad's worldwide locations. A list of these locations is available at: www.randstad.com/find-randstad-in-your-country;
- a professional association or registration body that has a proper interest in the disclosure of your personal data;
- our insurers;
- any government department or body (or their agents) to verify your work rights status;
- a designated, registered training provider in relation to training and personal development opportunities;
- any person with a lawful entitlement to obtain the information; and
- select third parties including suppliers and sub-contractors for the performance of any contract we enter into with them; and
- (where permitted by law) third party providers of criminal, background or credit checking services.

We will advise you of our intentions and gain consent before we refer your personal data to our clients for possible work opportunities.

6.2 participants

Your personal data may be disclosed for the purpose for which it is collected. That is, generally, we will only disclose your personal data for a purpose related to the provision of career transition services, career management service, coaching, change programs or other services. This may include disclosing your personal data to clients who may be your potential or actual employer. We may also disclose your personal data to the parties listed in section 6.1.

6.3 related purpose disclosures (relevant for candidates, clients, referee and participants) We outsource a number of services to contracted service suppliers (CSPs) from time to time. Such CSPs may be located overseas. As part of the outsourcing arrangement with a CSP, they may need access to some of your personal data.

Typically our CSPs would include:

- software solutions providers;
- I.T. contractors and database designers and Internet service suppliers;
- legal and other professional advisors;
- insurance brokers, loss assessors and underwriters;
- · background checking and screening agents; and
- talent marketplace platforms.

We take reasonable steps to ensure that terms of service with our CSPs recognise that we are bound by obligations under the PDPA to protect the privacy of your personal data and that they will not do anything that would cause us to breach those obligations.

Once we establish and maintain an employment, staffing or placement relationship with you, we use the data you provided to us, to comply with laws and regulations, including but not limited to employment law, tax and social security and national and international sanctions regulation compliance. For the purposes mentioned above, Randstad may transfer your personal data to other Randstad entities that provide services on behalf of Randstad.

7. personal data of referees (relevant to candidates)

The submission of references is essential to the recruitment process as we give critical consideration to any input provided to us by your referees.

In submitting your application, you shall be required to submit the names and other personal data of referees you wish us to contact. Before you give us any personal data about your referees, you must notify each referee with the purpose of Randstad's use of their personal data and obtain their permission to disclose to us their data for the purposes of evaluating your candidacy for current or future vacancies that we may engage with you from time to time.

8. if you do not give us the information we seek

You can refuse to provide us with your personal data. However if you do not give us this information, we may not be able to provide our services to you. For example, if you are a candidate we may be limited in our ability to locate suitable work for you.

9. direct marketing

We may sometimes use personal data for marketing purposes but only in the following ways:

- we will contact candidates and participants (where relevant) while they are registered us with updates in relation to employment opportunities, market information and promotions from time to time;
- we will send subscribers to our website news and job alerts to which they have subscribed; and
- we will contact clients with whom we have a relationship with market information and promotions from time to time.

When sending direct marketing material we will give you the option as to whether or not you wish to receive further marketing communications. We usually use email, phone and/or SMS. If you wish to change your preferences for contacts, please go to www.randstad.com.sg/my-randstad.

10. how does Randstad protect the security of your information

We take all reasonable steps to protect your personal data from misuse, loss, unauthorised access, modification and disclosure.

We have a number of safety measures in place to protect your information. For example, your personal data is stored in secured offices and in computerised databases which require a log in and password to gain access. Access to the database is only available to those who require such access. All staff are bound by a confidentiality agreement regarding company and customer information. Visitors to our premises are always accompanied by a member of staff for the duration of the visit.

As our information technology storage facilities and servers may be located in other jurisdictions, your personal data may be transferred to, stored, used and processed in a jurisdiction other than Singapore. You understand and consent to the transfer of your Personal Data out of Singapore as described herein and under sections 6.1 and 6.3.

Where we transfer your personal data to a country outside of Singapore, we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

11. accuracy of personal data

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 Data Protection Officer in writing or via email at the contact details provided below.

12. your rights – withdrawing your consent

You are entitled to withdraw your consent for the collection, use and disclosure of your personal data by giving Randstad reasonable notice by sending a written request to our Data Protection Officer at the contact details provided below.

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 implications of such withdrawal.

We may also ask you to verify your identity and for more information about your request. In general (and provided you have given us sufficient information for us to process your request), we shall seek to respond/process your request within ten (10) business days of receiving it.

Please note that withdrawing your consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is required/permitted under applicable laws.

13. your rights - correcting information you have provided

13.1 general

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 or via email to our Data Protection Officer at the contact details provided below.

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.

We will respond to your request as soon as reasonably possible. If we are unable to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) 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).

13.2 candidates

If you are a candidate, information provided by referees or from clients about you is often given on a confidential basis. Accordingly, disclosing the opinions given by a referee or client may have an unreasonable impact on the privacy of those individuals. If referees or clients provide information about you on a confidential basis, you may not access this information, and we will not be able to share it with you without the consent of the referee or client (as applicable).

14. retention of personal data

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

15. using our website

As with most websites, when you visit our website, we may record anonymous information such as IP address (where not used to identify a specific individual), time, date, referring URL, pages accessed and documents downloaded, type of browser and operating system.

We also use "cookies" and other tracking tools. A cookie is a small file that stays on your computer until, depending on whether it is a sessional or persistent cookie, you turn your computer off or it expires. Cookies may collect and store your personal data. You may adjust your internet browser to disable cookies. If cookies are disabled you may still use our website, but may be limited in the use of some of the features. For more information about the cookies on our website, please check the cookie statement at www.randstad.com/cookies.

16. external sites

Our website or communications may contain links to or from other websites. External sites that are linked to or from the Randstad web site are not under our control and you are advised to review their privacy statement. Users should note there are inherent risks associated with the transmission of information via the Internet and you should therefore make your own assessment of the potential risk to the security of your information.

17. changes to this privacy statement

Our Privacy Statement is reviewed and updated regularly, and the updated details will always be available on our web site.

18. how to contact us about this privacy statement

If you wish to contact us about any concerns or queries in relation to your personal data or this Privacy Statement, please contact:

Randstad Singapore Data Privacy Officer

email: privacy@randstad.com.sg

address: Randstad Pte Ltd, 50 Raffles Place, #17-02 Singapore Land Tower, Singapore, 048623