1. INTRODUCTION

1.1 This Data Protection Policy (“Policy”) sets out the basis upon which JobTech Pte Ltd (“we”, “us” or “our”) may collect, use, disclose or otherwise process personal data of our platform users in accordance with the Personal Data Protection Act (“PDPA”).

1.2 This Policy 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 process personal data on behalf of.

1.3 Our appointed Data Protection Officer contact details are as follows:

Michael Li, michael@jobtech.sg

2. APPLICATION OF THIS POLICY

2.1 This Policy applies to all persons engaged in a contract of service with us (whether on a part-time, temporary or full-time basis) and interns and trainees working at or attached to us (collectively referred to as “employees”) as well as persons using our platform Talented (collectively referred to as “users”) whether directly with us or on behalf of our business partners’ organizations.

3. PERSONAL DATA

3.1 As used in this Policy, “personal data” means data, whether true or not, about a user 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.

3.2 As a platform user, personal data which we may collect includes, without limitation, your:

   a. name or alias, gender, date of birth, NRIC, nationality, and country and city of birth; telephone numbers, email address;
   b. resume, educational qualifications, professional qualifications and certifications and employment references, employment and training history;
   c. photo or avatar picture;
   d. user interactions on our platform;
   e. IP address, browser type, operating system, cookie identifiers

4. COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4.1 Generally, we collect Personal Data in the following ways
a. when you submit any form, including but not limited to application, registration, declaration or other forms;
b. when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our products and services;
c. when you interact with our staff, including customer service officers, for example, via telephone calls (which may be recorded), letters, face-to-face meetings, social media platforms and emails;
d. when you interact with us via our platform or use services on our platform;
e. when you request that we contact you or request that you be included in an email or other mailing list;
f. when you respond to our promotions, initiatives or to any request for additional Personal Data;
g. when we seek information about you and receive your Personal Data in connection with your relationship with us, including for our products and services or job applications, for example, from business partners, public agencies
h. when you submit your Personal Data to us for any other reason.

4.2 We collect and use your Personal Data specifically for these purposes

a) Verifying your identity
b) Managing administrative and business operations, complying with our internal policies and procedures
c) Conducting statistical research to better the design of our product, understand user behaviour on our platform, and improve the quality of our services.
d) Detect, prevent or investigate malicious behaviour
e) Maintain the security of our platform and maintaining compliance with applicable rules and regulations regarding audit checks, due diligence and investigations.
f) With our business partners (where applicable)
   a) Share your profile information with employers with job openings
   b) Send information to you regarding your profile, potential relevant job openings, microlearning media and community news and forums.

4.3 JobTech takes all reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed below (where applicable):

a) To our business partners who has commissioned us to create your user account on our platform, in order to better serve your needs and interests
b) To relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority
c) To any other party to whom you authorise us to disclose your Personal Data to
5. WITHDRAWING CONSENT

5.1 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 using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

   Michael Li, michael@jobtech.sg

5.2 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 and if applicable our business partner that commissioned our system for 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 30 days of receiving it.

6. ACCESS TO AND CORRECTION OF PERSONAL DATA

6.1 If you wish to make 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 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 Data Protection Officer.

6.2 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.

6.3 We will respond to your access request as soon as reasonably possible. Should we not be able to respond to your access request within thirty (30) days after receiving your access 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).

6.4 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 organisation has on record, if the record of your personal data forms a negligible part of the document.

7. PROTECTION OF PERSONAL DATA
7.1 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, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

7.2 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 are constantly reviewing and enhancing our information security measures.

8. ACCURACY OF PERSONAL DATA

8.1 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.