



Titanium's Safety & Security Personal Data Protection Policy

Updated as of 5 June 2023

1. POLICY OVERVIEW

- 1.1. Titanium Safety & Security Pte Ltd (“**TITANIUM**”) is a corporation registered in the Republic of Singapore with the Company’s UEN number 201222175W and a registered office in No 6. Tagore Lane Singapore 787470. This Personal Data Protection Policy outlines TITANIUM’s procedures and policies on the 1protection of personal data of individuals under the Company’s custody. It sets out important information on how and why TITANIUM collects, uses, and discloses personal data of individuals in a manner that recognises both the right of individuals to protect their personal data and the need of organizations to collect, use or disclose personal data for purposes that a reasonable person would consider appropriate in the circumstances. The Personal Data Protection Act 2012 (“**PDPA**”) and all applicable PDPA advisory guidelines are taken into consideration for the formulation of this policy.
- 1.2. For the purposes of any other applicable data protection laws, we are the data controller. For matters pertaining to personal data protection, our data protection officer can be contacted at controller@titaniumss.com.sg.

2. PERSONAL DATA

- 2.1. Personal Data is defined in the PDPA as “data, whether true or not, about an individual who can be identified –
 - 2.2.1. from that data; or
 - 2.2.2. from that data and other information to which the organization has or is likely to have access”.
- 2.2. Such data includes but is not limited to:
 - Personal particulars (such as NRIC/FIN, Gender, Date of Birth, Images)
 - Personal contact information (such as address, phone number or email address)
 - Personal financial information (such as credit or debit card details, card number, name of cardholder and expiry date)
 - Educational and professional information
 - Health information (such as medical records)
 - Technical information (such as IP address)
 - Others (such as vehicle number)



- 2.3. Aligned with the Personal Data Protection Act (PDPA), TITANIUM will be adopting the Data Protection Management Programme (DMDP). The DMDP is a systematic framework that helps organizations to establish a robust data protection infrastructure. It covers management policies and processes for the handling of personal data as well as defines roles and responsibilities of the people in the organization in relation to personal data protection.

3. PURPOSE, COLLECTION & USAGE OF DATA

- 3.1. TITANIUM collects information directly from you or through your authorized representatives. We collect information when you approach us to request for a quotation, explore partnership or even apply for a position in the organization. Information will be collected through the various channels.
- a. when filling up and submitting the form (physically or digitally) to request for quotation for our products or services;
 - b. when interacting with our recruitment team, business development team or operations team;
 - c. when providing information by filling up the form (physically or digitally) during the recruitment process or before an interview;
 - d. when requesting that we contact you or be included in an email or other mailing list;
 - e. when responding to surveys conducted by the organization;
 - f. when submitting a job application either through our website, career fairs or walk-in interviews; and
 - g. when submitting your Personal Data to us for any other reasons.
- 3.2. TITANIUM will make sure that you are notified on the purpose for the collection of your data. The organization will also notify how the data will be used, disclosed, processed or/and stored. We will obtain your consent for the above unless an exception under the law permits us to conduct the above without your consent.

3.2.1. Clients

These are the purposes for which we may collect, use and disclose clients' personal data which include, but are not limited to any of the following:

- a. to verify the client's identity
- b. to evaluate enquiries on our products and services;
- c. to process personal data as part of access control duties on the behalf of our clients during the provision of our security services;
- d. to collect payment or charges for the products or services rendered;
- e. to process credit notes or any refunds;
- f. to provide supporting document for any audit purposes;
- g. to respond to any emergencies at our client's premises and/or assisting governing authorities with the investigation;



- h. to respond to any product/service-related complaints or to resolve any disputes; and/or
- i. to provide to relevant regulatory authorities (such as but not limited to the Police Licensing Regulatory Department, Ministry of Manpower, Singapore Civil Defence Force and/or Land Transport Authority) for any other purpose that is required or permitted by any governing laws, regulations, code of practices and guidelines.

3.2.2. Employees

These are the purposes for which we may collect, use and disclose employees' (including potential employees') personal data which include, but are not limited to any of the following:

- a. to maintain employees' personal records (such as but not limited to medical, child's birth certificate, NRIC, bank account, contact, next-of-kin contact, address, personal contact or email);
- b. to ensure employees or potential employees aged 60 and above to be certified fit for employment;
- c. to conduct performance appraisal and review;
- d. to assist the governmental bodies and relevant authorities for references and information;
- e. to credit salary, claims and/or reimbursements, other remuneration, benefits by various mode of payments (cheque and bank transfers);
- f. to access candidates' employability and suitability during recruitment activities. This includes pre-employment checks and screening with relevant authorities or recruitment agencies;
- g. to conduct training, learning & development;
- h. to upload data into the Company's Human Resource Management System (HRMS);
- i. to use for any marketing activities, postings on TITANIUM'S various communication platforms; and/or
- j. other purpose as may be required by any laws, regulations and guidelines.

4. DISCLOSURE OF DATA

- 4.1. TITANIUM shall ensure compliance to the terms of this Personal Data Privacy Policy. TITANIUM will also ensure that employees, clients or third parties involved in the collection, processing and disclosure of Personal Data comply with the terms of this Policy.
- 4.2. In some cases, TITANIUM holds the rights to disclose your Personal Data to third parties without your consent, including, but not limited to:
 - a. any disclosure is required or authorised based on the applicable laws and/or regulations;
 - b. disclosure is necessary during an emergency or responding to an emergency that threatens the life, health or safety of yourself or individual;



- c. disclosure is required for any legal proceedings or investigations;
- d. disclosure to any officer of a law enforcement agency or government bodies, upon confirming in writing that the Personal Data collected is for the purposes of the functions or duties of the officer;
- e. disclosure to the public agency whereby such disclosure is necessary in the public interest; and/or;
- f. any disclosure without your or individual consent is permitted by the PDPA or applicable law.

5. ACCURACY OF DATA

- 5.1. TITANIUM will ensure that your Personal Data is up to date, accurate and complete. Individual must keep the Organization updated of any change(s) in his/her Personal Data. Inaccurate or incomplete Personal Data may result in the Organization's inability to provide you with the requested products, services or even employment.
- 5.2. In some cases, whereby you may be required to provide information or another party (e.g. referrer), TITANIUM will seek your help on the following:
 - a. inform the individual that you are providing personal information to use;
 - b. consent given to you for the provision of information to us; and/or
 - c. where to locate a copy of this Personal Data Privacy.
- 5.3. By providing such information to us, you acknowledge that you are representing us and have obtained the consent of the party to provide us with their Personal Data for the respective purposes.

6. STORAGE OF DATA

- 6.1. TITANIUM will ensure that all data collected are safely and securely stored. The Organization will not keep Personal Data for longer than is necessary and will take reasonable steps destroy and/or anonymise the information.
- 6.2. TITANIUM has appointed Data Protection Officers to oversee the management of your Personal Data in accordance with this Personal Data Privacy Policy and applicable laws. We ensure that our employees are trained with the knowledge to handle your Personal Data and respect the confidentiality, failing which they may be subjected to non-performance action.
- 6.3. TITANIUM will also take necessary steps to ensure compliance with the confidentiality requirements. (e.g. signing of Non-Disclosure Agreement) on our clients, partners, consultants, professional advisors and even employees.



7. TRANSFER OF PERSONAL DATA OUTSIDE OF SINGAPORE

- 7.1. In the event should any Personal Data required to be transferred outside of Singapore, TITANIUM will ensure that any transfers will be in accordance with the PDPA.

8. UPDATES TO PERSONAL DATA PRIVACY

- 8.1. TITANIUM reserve the rights to review or make amendments to this Personal Data Privacy Policy from time to time, to take into account new laws, technological changes, practices, industry trends and/or changes to our business operations.
- 8.2. Subject to your rights at law, you agree to be bound by the prevailing terms of our Personal Data Protection Policy as updated on websites. Please check back regularly for the most updated version of our information on our policy.

9. REACH OUT TO US

- 9.1. Please feel free to contact us at the information below should you have any queries or feedback on our Personal Data Privacy Policy, obtain access and make corrections on your records or withdraw your consent to any use of your Personal Data.

Write to: **Data Protection Officer (DPO)**

Contact: 6570 6161

Email: controller@titaniumss.com.sg