

Personal Data Policy

AETOS respects your privacy.

The security of your personal data is important to us. AETOS has put in place measures and safeguards to protect your personal data stored with us. This policy sets out the types of personal data we collect, how we use that data and to whom we share it with.

In this policy, “AETOS”, “we”, “us” or “our” means AETOS Holdings and its subsidiaries.

A) Types of Personal Data Collected

“Personal Data” means data that can identify an individual.

The types of personal data we collect include (but not limited to):

- Name
- NRIC number / FIN / Passport number
- Residential address
- Mobile number / Home number
- Bank details
- Vehicle number
- Personal email address
- Thumb print / Finger print
- Photographs / Video and CCTV footage
- Specimen signature
- Employment details

B) How We Use the Personal Data

The purposes for which we use the personal data include (but not limited to) any of the following:

If you are a customer

- Providing services to you in relation to your business transactions with us. In particular, we collect personal data on your behalf, such as taking down particulars of visitors to your premises, and you acknowledge and agree that we act as a data intermediary for you in accordance to the Personal Data Protection Act;
- Enabling the use of our products and services, including where necessary, contacting you by SMS, email or otherwise;
- Dealing with enquiries made;

- Providing warranty and maintenance services with regards to your business transactions with us;
- Maintaining and updating the personal data;
- Providing statistical analysis;
- Providing administrative and/or operational services;
- Processing credit notes and refunds;
- Facilitating security clearance into our premises;
- Collecting fees, charges and expenses for services and products provided; and/or
- Facilitating attendance for events and functions organized by us.

If you are a vendor

- Conducting background checks in accordance to our internal policies and practices;
- Facilitating security clearance into our premises;
- Facilitating attendance for events and functions organized by us;
- Evaluating your products and services for the purpose of our business needs;
- Collecting fees, charges and expenses for services and products provided by us; and/or
- Facilitating the making and paying of claims, including payments by cheque, bank transfers or other means.

If you are our employee

- Administering and maintaining personnel records;
- Paying and reviewing salary and other remuneration and benefits;
- Providing and administering benefits (including any applicable insurance and/or employee share option plan);
- Undertaking performance appraisals and reviews;
- Maintaining records for sickness, holiday and other absence, including maternity, child care or infant care leave;
- Making decisions about your fitness for work;
- Providing references and information to future employers, and if necessary, governmental and quasi-governmental bodies, including, the Inland Revenue and the Central Provident Fund Board;
- Providing information to current and/or future partners and/or purchasers of the Company and/or its business and/or any company within the Group or any of their respective businesses;
- Maintaining medical and dental records, including information about your physical and mental health or condition;
- Disciplinary and grievance matters;
- Recruitment activities;
- Opening, maintaining and operating bank accounts and the carrying out of treasury operations;
- Arranging key installation visits and work-related travel, including the arrangement of flights, accommodation and visas, when necessary;
- Facilitating the making and payment of claims and/or reimbursements, including payments by cheque, bank transfers or other means;
- Carrying out billing, accounting, auditing and the maintenance of proper book-keeping to explain the Company's operations and business;
- Tax filing purposes;
- Preparing of financial reports and disclosure of the relevant books, documents, records and information (in hard or soft copy) to the auditors, where necessary; and
- Assigning you to work in other companies within the Group in another country, to comply with local legislation, including but not limited to local employment legislation and to apply for visas/work permits.

Others

- Reviewing online job applications submitted by you;
- Reviewing, responding or processing any queries (including queries relating to courses or services) submitted by you;
- Enabling you to access or use a service on the Website;
- Administering or carrying out our obligations in relation to any agreement we have with you; and/or
- Complying with such court order or legal obligation, in response to a law enforcement agency's request, or when it is necessary to disclose your personal data to identify, contact or bring legal action against someone who may be infringing our rights or causing damage to our property.

C) Whom We Share, Disclose and Transfer the Personal Data

We do not sell personal data to any third parties. We may from time to time, share, disclose and transfer personal data to the following parties for the following purposes:

- To Government and non-Government authorities and agencies as required under the law or under directions from the Government and non-Government authorities and agencies.
- To our business partners for the purposes of providing our products and services to our customers, including:
 1. Professional, financial, tax and legal advisors, insurers and insurance brokers and auditors;
 2. Service providers who provide outsourcing services such as electronic mail services, deployment of manpower operations and data storage.
- To financial institutions for the purposes of payments and transactions related to our provision of products and services as well as any employment with us; and/or
- To event organisers or service providers to facilitate the planning of events / functions that we organised.

In addition, we would disclose personal data in the following circumstances:

- We are required to do so under the law;
- We are responding to a request from law enforcement authorities or other Government officials;

D) Data Quality and Security

We take reasonable steps to make sure that the personal data we collect, use or disclose is accurate, complete and up to date. In addition, reasonable measures are in place to protect the personal data we hold from misuse and loss and from unauthorized access, modification or disclosure. We will not keep personal data for longer than is necessary and will take reasonable steps to destroy or permanently de-identify personal data if it is no longer needed.

In addition, we expect our valued clients and vendors to comply with the Personal Data Protection Act by taking reasonable steps, such as getting our clients and vendors to commit to a letter of undertaking for compliance.

E) Access and Correction

As a general rule, we will, upon the request of an individual, provide him as soon as reasonably possible with personal data about the individual that is in our possession and information about the ways in which the personal data has been or may have been used or disclosed within a year before the date of the request.

We will also, where an individual has requested that it corrects an error or omission in the personal data about the individual that is kept with us, correct such data as soon as practicable and send the corrected personal data to every organisation to which the personal data was sent before it had been corrected, unless that organisation does not need the corrected personal data for any legal or business purpose.

We may however choose not to provide individuals with access to or correct such information, in accordance with the exceptions under the Personal Data Protection Act. This would include cases where:

- We are satisfied on reasonable grounds that the correction should not be made;
- The request for access is frivolous or vexatious or the information requested is trivial;
- The personal data is related to a prosecution and all the proceedings related to the prosecution have not been completed;
- The personal data, if disclosed, would reveal confidential commercial information that could, in the opinion of a reasonable person, harm the competitive position of AETOS; and/or
- The personal data was collected, used or disclosed for the purposes of an investigation and associated proceedings and appeals have not been completed.

We may decide to impose a nominal charge upon the individual to cover the cost of verifying a request for information and locating, retrieving, reviewing and copying any material requested.

F) Transborder Data Flows

If your personal data is transferred to a country or territory outside Singapore, for instance, if some services are sub-delegated to overseas resource centres, we will ensure that the recipients thereof provide a standard of protection to your personal information so transferred that is comparable to that which is provided herein.

G) Cookies

Cookies may be used in this website. If you prefer not to receive cookies, you can configure your Internet browser to disable cookies. Please note that disabling cookies may limit the functionality of the website.

H) Links to other websites

This website may contain links to third party websites whose data protection and personal data policies may differ from ours. We are not responsible for the content and personal data practices of these other websites and you should check and consult the personal data policies/notices of those websites before accessing them and/or providing any personal information to them.

I) General

We have the right to amend, revise or change this policy (or any part thereof) from time to time without prior notice or subsequent notification to you. By accessing this website you agree to be legally bound by any such amended and/or revised policy. It is therefore your responsibility to read this page prior to any future access to and use of the website. If you do not agree to the amended and/or revised policy, kindly stop using the website and exit immediately.

J) Enquiry and Complaints

We have designated the person whose details are set out below as the person (“Data Protection Officer”) who will be responsible for ensuring AETOS’ compliance with applicable data protection laws. If you have any queries or requests or wish to make any applications concerning your personal information or data, please contact the Data Protection Officer at michelle.cheamac@aetos.com.sg