



DATA PROTECTION NOTICE

This Data Protection Notice (“**Notice**”) sets out the basis upon which *Executive Ship Management Pte Ltd* (“**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of employees and job applicants in accordance with the Personal Data Protection Act (“**PDPA**”). This 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 for purposes related to our business.

APPLICATION OF THIS NOTICE

This 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 who have applied for any such position with us (“job applicants”), and all references to “employment” shall apply equally to internships and traineeships (as may be applicable).

PERSONAL DATA

1. As used in this Notice, “**personal data**” means data, whether true or not, about an employee or a job applicant 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.
2. If you are an enquirer, some examples of personal data which we may collect from you include name, contact number and email address.
3. If you are a job applicant, personal data which we may collect includes, without limitation, your:

During Application Stage

- (a) photograph
- (b) name or alias, gender, nationality, residential status in Singapore, race, religion, marital status, height, weight, year of birth and place of birth;
- (c) country of residence, present residential address, telephone numbers, email address and other contact details;
- (d) resume, educational qualifications, professional qualifications and certifications and employment references;
- (e) employment and training history;
- (f) medical history;
- (g) credentials for security check;

During Job Offer Stage

- (h) personal identification number, passport details, date of birth;
 - (i) details of your next-of-kin, spouse and other family members; and
 - (j) pre-employment medical report
4. Upon confirmation of your employment with us, personal data which we may collect in the context of your employment with us includes, without limitation, your:



- (a) photographs and other audio-visual information;
 - (b) name or alias, gender, nationality, residential status in Singapore, race, religion, marital status, height, weight, date of birth and place of birth;
 - (c) country of residence, present residential address, telephone numbers, email address and other contact details;
 - (d) resume, educational qualifications, professional qualifications and certifications and employment references;
 - (e) employment and training history;
 - (f) medical history;
 - (g) credentials for security check;
 - (h) personal identification number, passport details, date of birth;
 - (i) details of your next-of-kin, spouse and other family members; and
 - (j) pre-employment medical report;
 - (k) work-related health issues and disabilities;
 - (l) salary information and bank account details;
 - (m) records on leave of absence from work;
 - (n) performance assessments and disciplinary records; and
 - (o) any additional information provided to us by you as a job applicant (that is, prior to being engaged as an employee).
5. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).
6. If you refuse to provide us with your personal data listed in the above clauses or if you provide us with incomplete personal data, we may not be able to proceed with your enquiry, application or employment, where applicable.

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

7. We collect personal data that
- (a) You knowingly and voluntarily provide in the course of or in connection with your enquiry, employment or job application with us, or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”, which may include your job placement agent), after
 - i. you (or your authorised representative) have been notified of the purposes for which the data is collected, and
 - ii. you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or
 - (b) Collection, use and disclosure of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except to public agencies, courts and law enforcement agencies when required for purposes of investigations or proceedings under the PDPA or other written law).



8. If you are submitting an enquiry, we may collect and use your personal data for any or all of the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:
 - (a) verifying your identity;
 - (b) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you; and
 - (c) any other incidental business purposes related to or in connection with the above.

9. If you are a job applicant, your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:
 - (a) assessing and evaluating your suitability for employment in any current or prospective position within the organisation;
 - (b) verifying your identity and the accuracy of your personal details and other information provided;
 - (c) assessing and evaluating your suitability for employment/appointment or in any position within our organisation;
 - (d) acquiring approval from government authorities for applicable work pass/permit or any other employment-related matters.

10. Upon commencement of your employment with us, your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:
 - (a) performing obligations under or in connection with your contract of employment with us, including payment of remuneration and tax;
 - (b) all administrative and human resources related matters within our organisation, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your insurance and other benefits, processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;
 - (c) managing and terminating our employment relationship with you, including monitoring your internet access and your use of our intranet email to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances;
 - (d) assessing and evaluating your suitability for employment/appointment or continued employment/appointment in any position within our organisation;
 - (e) ensuring business continuity for our organisation in the event that your employment with us is or will be terminated; and
 - (f) facilitating our compliance with any laws, customs and regulations which may be applicable to us.

11. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).



You may provide us with personal data relating to other individuals from time to time. You undertake that the data provided by you is accurate and that you have obtained valid consent from the individuals for the purpose, use and disclosure of their personal data.

WITHDRAWING CONSENT

12. 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 collecting, 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.
13. We shall send you an acknowledgement and notify you of any consequences of your request within two working days upon receipt of your request. Once you acknowledge and/or agree to proceed with the withdrawal in spite the consequences, we will then inform the involved parties, who possess your personal data to complete your request. In general, we shall seek to process and effect your request within ten (10) days of receiving it.
14. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and extent of your request, we may not be in a position to process your job application or enquiry (as the case may be). We shall, in such circumstances, notify you before completing the processing of your request (as outlined above). Should you decide to cancel your withdrawal of consent, please inform us in writing.
15. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent as permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

16. 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, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
17. 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.
18. The request shall generally be acknowledged within 2 working days. In general, our response will be within thirty (30) calendar days. 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).
19. 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. 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.

PROTECTION OF PERSONAL DATA

20. 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, use of privacy filters, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
21. 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.

ACCURACY OF PERSONAL DATA

22. 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.

RETENTION OF PERSONAL DATA

23. We may retain your personal data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.
24. 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 purposes for which the personal data were collected, and are no longer necessary for legal or business purposes.
25. You may contact our Data Protection Officer in writing at the contact details provided below for more details on our retention and disposal policies and procedures.

TRANSFERS OF PERSONAL DATA

26. Your personal data may be transferred / shared to other companies within Executive Group, which are within Singapore or outside of Singapore. With this regard, we will take reasonable 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.

DATA PROTECTION OFFICER

27. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures; or if you wish to make any request, in the following manner:



Contact No. : 63240500
Email Address : pdpa@executiveship.com

EFFECT OF NOTICE AND CHANGES TO NOTICE

28. This Notice applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
29. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services and/or employment and participation in our recruitment process, constitute your acknowledgement and acceptance of such changes.

Last updated : 23/10/2020