



## PRIVACY NOTICE FOR JOB APPLICANTS

Last updated : February 18, 2021

This Privacy Notice for Job Applicants sets out the basis upon which Foris Asia Pte. Ltd. and/or Foris Dax Sg Pte. Ltd. (individually and collectively “**Foris**”, “**Company**” “**we**”, “**us**” or “**our**”), as the case may be, may collect, use, disclose or otherwise process Personal Data of job applicants in accordance with the Personal Data Protection Act 2012 (“**PDPA**”). This Privacy Notice for Job Applicants 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 for our purposes.

In this Privacy Notice for Job Applicants, the words and expressions below have the following meaning:

Word/expression	Meaning
<b>Personal Data</b>	means data, whether true or not, about 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.
<b>Processing</b>	any operation or set of operations, performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction; (“ <b>Personal Data Processing</b> ”).
<b>Controller</b>	the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by European Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law; (“ <b>Data Controller</b> ”).
<b>Electronic document</b>	any content stored in electronic form, in particular text or sound, visual or audiovisual recording.
<b>Supervisory Authority</b>	Personal Data Protection Commissioner.

Other terms used in this Privacy Notice for Job Applicants shall have the meanings given to them in the PDPA (where the context so permits).

## 2.Introduction

### 2.1. Application of this Privacy Notice for Job Applicants

This Privacy Notice for Job Applicants applies to all persons selected or shortlisted to be engaged in a contract of service (“**Employment**”) with us (whether on a part-time, temporary or full-time basis) as well as persons who have applied for any position with us (collectively “**job**”).



**applicants”)** and all references to **“Employment”** shall apply equally to internships and traineeships (as may be applicable).

This Privacy Notice is not a part of Employment contract and does not grant you any contractual rights, nor creates legal obligations for the Company.

### 3. Personal Data

The Personal Data which Company may collect, use, disclose or otherwise process includes:

Personal Data Categories	Examples of Personal Data
<b>Personal Particulars</b>	<ul style="list-style-type: none"><li>▪ Name in English</li><li>▪ Personal Email</li><li>▪ Telephone Numbers</li></ul>
<b>Resume or Curriculum vitae (CV)</b>	<ul style="list-style-type: none"><li>• Name in English</li><li>• Personal Email</li><li>• Telephone Numbers</li></ul>
<b>Other personal data</b>	<ul style="list-style-type: none"><li>▪ any additional information provided to us by you as a job applicant and/or in your job application prior to you being engaged as an employee*</li></ul>

In addition, we may collect, use, disclose or otherwise process any other Personal Data, which you may knowingly and voluntarily choose or have chosen to provide or disclose to us during or in connection with your job application with us, either orally or in written (e.g. – in email).

In case if you have any doubts regarding the Personal Data which the Company processes about you, please do not hesitate to contact the Company’s Talent Acquisition Department or Data Protection Officer at the contact details provided below.

### 4. Collection, Use, Processing and Disclosure of Personal Data

#### 4.1. Collection Personal Data

We generally collect Personal Data that:

- a) you knowingly and voluntarily provide in the course of or in connection with your job application with us, or via a third party who has been duly authorised by you to disclose your Personal Data to us (your **“authorized representative”**, which may include your job placement agent), after you (or your authorised representative) have:
  - (i) been notified of the purposes for which the data is collected; and



(ii) provided written consent to the collection and usage of your Personal Data for those purposes; or

(b) collection and use 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 where permitted or authorised by law).

#### *4.2 Purpose of collection, usage, processing and disclosure as well as the lawful basis*

Your Personal Data will be collected, processed and used by us for the following purposes and basis. We may disclose your Personal Data to third parties where necessary for the following purposes:

<b>Purpose of collection, usage, processing and disclosure of Personal Data</b>
Processing your job application.
Assessing and evaluating your suitability for Employment/appointment in any current or prospective position within our organization.
Verifying your identity and the accuracy of your personal details and other information provided.
Offering and/or entering into an Employment contract.
Ensuring your own security and the security of Company's property and assets.
Establishment, exercise and defence of potential legal claims.
All administrative, talent acquisition and human resources related matters within our organisation, including granting access to our premises and investigating any acts or defaults (or suspected acts or defaults).

The purposes listed above may continue to apply even in situations where your relationship with us has been altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any laws and regulations).

#### *4.3. Consequences in case you do not provide your Personal Data*

Please note that if you do not provide some of the Personal Data listed in section 3 above, the processing of your job application and/or offering of an Employment contract with you would be virtually impossible.

The processing of some of the Personal Data listed in section 3 will be necessary to assessing and evaluating your job application and/or your suitability for Employment/appointment within our organization. If you refuse to provide it, this will hinder the processing of your job application.

In case if you have any doubts regarding the purposes and lawful basis upon which the Company processes Personal Data about you, please do not hesitate to contact the Company's Talent Acquisition Department or Data Protection Officer at the contact details provided below.



## **5. Personal Data sources**

Basically, your Personal Data are obtained directly from you or indirectly, such as from recruitment agencies, and from your authorized representative (e.g. employment references).

In other cases, we may obtain your Personal Data from third parties, for instance – social networks, state and local authorities.

## **6. Recipients of Personal Data**

For the above-mentioned purposes we may share your Personal Data with employees within the Company or with the affiliates, authorized service providers or agents of the Company, complying with the “need to know” principle, or with third parties (only in exceptional cases, e.g. - in order to protect your vital interests) who are legally bound by privacy, confidentiality and protection obligations in safeguarding your Personal Data and observing the provisions of all applicable laws and regulations pertaining to Personal Data.

Furthermore, we share information as may be required by the regulatory authorities in accordance with the law.

In case you have further questions please do not hesitate to contact the Company’s Talent Acquisition Department or Data Protection Officer at the contact details provided below

## **7. Protection of your Personal Data**

The necessary physical, technical and administrative security measures are being introduced, adopted and adhered by the Company with the aim of protecting and safeguarding your Personal Data from loss, misuse, alteration, destruction, damage, unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. Such measures include up-to-date antivirus protection, encryption and disclosing Personal Data both internally and to our authorized third-party service providers and agents only on a need-to-know basis.

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.

You also play a major role in protecting your Personal Data and shall observe to whom you share your Personal Data and how you protect your communications and devices.

## **9. Transfer of Personal Data**

Foris is a global company with many legal entities operating in many countries and territories. As such, we may, to the extent necessary for the purposes set forth above, have caused to transfer your Personal Data from one legal entity to another or from one country to another. If we do transfer, 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.

## **10. Accuracy of Personal Data**



We generally rely on the Personal Data provided by you or your authorized representative. In order to ensure that your Personal Data is current, complete and accurate, please update us if there are any changes to your Personal Data by informing the Talent Acquisition Department in writing or via email.

We will, upon receiving your updates, update our record so as to ensure that your Personal Data is accurate, current, complete and up to date.

Thus, it is important that you keep us informed, from time to time, if your Personal Data changes at any point during your job application with us or when you apply for any of our jobs.

## **11. Your Rights**

### **Right to Access**

You have the right to obtain confirmation from the Company as to how your Personal Data is being used, disclosed or processed by us and, where that is the case, access to that Personal Data.

If you wish to access to a copy of your Personal Data which we hold about you or information about the ways in which we use or disclose your Personal Data, you may send your request to our Talent Acquisition Department or Data Protection Officer in writing or via email at the contact details provided below and request for a copy of the same.

You shall receive one copy, free of charge and via email, of your Personal Data which we hold about you or information about the ways in which we use or disclose your Personal Data. Please note that a reasonable fee may be charged for an access request. In case your requests are manifestly unfounded or excessive, in particular because of their repetitive character, please note that the Company may charge a reasonable fee for an access request. If so, we will inform you of the fee before processing your request.

We will respond to your access request as soon as reasonably possible upon receiving your access request and/or confirmation of agreement to the said reasonable fee for an access request, as the case may be. Should we not be able to respond to your access request within thirty (30) days after receiving your access request or confirmation of agreement to the reasonable fee for such access, 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 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).

This right to access your Personal Data is without prejudice to our right to protect and ensure the integrity and confidentiality of the Personal Data of other persons. You are only entitled to request access to Personal Data that relates to you.

Please note that depending on the request that is being made by you to us, 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 such circumstances, it may be appropriate for us to simply provide you with confirmation of the Personal Data that we have on record, if the record of your Personal Data forms a negligible part of the document.



## **Right to Correct**

You have the right to **request rectification (correction)** of any Personal Data which we may hold about you. This enables you to have any incomplete or inaccurate Personal Data we hold about you corrected and/or updated, though we may first need to verify the accuracy of the new Personal Data that you provide to us.

If you wish to make a rectification or correction request to correct or update any of your Personal Data which we hold, you may send your request to our Talent Acquisition Department in writing or via email at the contact details provided below and request for the rectification or correction to be made to your Personal Data.

## **Right to withdraw consent**

You have the right to withdraw your consent for specific purpose at any time. 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.

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 is permitted or required under applicable laws.

## **Procedure**

You can exercise the above-mentioned rights by writing or email to our Talent Acquisition Department or Data Protection Officer at the contact details provided below and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above.

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 consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us.

In general, the request shall be analyzed and within thirty (30) days of its receipt, you will be provided with information on action taken on the request. If the Company does not act upon your request within the above-mentioned term, you will be informed of the underpinning reasons and on the possibility of lodging a complaint with the Supervisory Authority and seeking a judicial remedy.

## **12. Retention of Personal Data**

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.

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.



### 13. Contact us

Should you have any questions or concerns regarding the collection, use, disclosure or processing of your Personal Data and should you need further information or you wish to exercise any of your rights above, please contact the Company's Talent Acquisition Department or Data Protection Officer in the following manner:

<b>Attention To</b>	<b>:</b>	<b>Talent Acquisition Department</b>
<b>Registered Office Address</b>	<b>:</b>	<b>1 Raffles Quay, #09-06 Singapore 048583</b>
<b>Office Number</b>	<b>:</b>	<b>+65 6978 4632</b>
<b>Business Email Address</b>	<b>:</b>	<b>careers@crypto.com</b>

<b>Attention To</b>	<b>:</b>	<b>APAC Data Privacy Manager</b>
<b>Registered Office Address</b>	<b>:</b>	<b>1 Raffles Quay, #09-06 Singapore 048583</b>
<b>Office Number</b>	<b>:</b>	<b>+65 6978 4632</b>
<b>Business Email Address</b>	<b>:</b>	<b>dpo@crypto.com</b>

### 14. Effect of and Changes to Privacy Notice for Job Applicants

This Privacy Notice for Job Applicants applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use, disclosure and processing of your Personal Data by us.

We may revise this Privacy Notice for Job Applicants 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 Privacy Notice for Job Applicants was last updated. Your continued participation in our recruitment process constitutes your acknowledgement and acceptance of such changes.

### 15. Miscellaneous

By participating in our recruitment process and/or electronically accepting or signing the present document, you acknowledge that you have read and understood how we collect, use, process and disclose your Personal Data and disclose such Personal Data within our organization or to our authorized service providers and relevant third parties, and consent to the collection, use, processing and disclosure of your Personal Data by us in accordance with and/or for the purposes set out in this Privacy Notice for Job Applicants.