

## SG Recruitment Data Protection Notice

### **Scope and Overview**

This Recruitment Data Protection Notice (“**Notice**”) sets out the basis upon which Business Insider Asia Pte. Ltd. (a subsidiary of Insider Inc.) (“**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data (as defined below) of job applicants in accordance with the Personal Data Protection Act 2012 of Singapore (“**PDPA**”).

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 for our purposes. This Notice applies to all persons who have applied for any position with us (“**job applicants**”).

We use Greenhouse, an online applicant tracking system (ATS) application, to assist with our recruitment process. We use Greenhouse to process personal data as a data processor on our behalf. Greenhouse is only entitled to process your personal data in accordance with our instructions.

You are under no obligation to provide any personal data. Note, however, that failure to provide or allow us to collect, use, disclose and/or process your personal data may affect our ability to process your job application (including, but not limited to, conducting the necessary employment verification and background checks, and evaluating fitness for a particular position).

### **Personal Data**

As used in this Notice, “**personal data**” means data, whether true or not, about an individual 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.

Personal data which we may collect includes, without limitation, your:

- information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method;
- name or alias, gender, NRIC/FIN or passport number, date of birth, nationality, and country and city of birth;
- mailing address, telephone numbers, email address and other contact details;
- resume, educational qualifications, professional qualifications and certifications and employment references;
- employment and training history;
- salary information and bank account details;
- details of your next-of-kin, spouse and other family members;
- a record of correspondence if you contact us; and
- a record of your progress through any hiring process that we may conduct.

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

### **Collection, Use and Disclosure of Personal Data**

We generally collect personal data (a) that you knowingly and voluntarily provide in the course of or in connection with your 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 consent to the collection and usage of your personal data for those purposes, or (b) where collection and use of such personal data without consent is authorised or required under the PDPA or applicable law. 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 required or authorised by applicable law).

We may use third-party service providers for various purposes, including, but not limited to, obtaining employment verification and background checks, and data storage or hosting. These third-party service providers may be located outside of the country in which you live or the country where the position you have applied for is located.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to process your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

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:

- assessing and evaluating your suitability for employment in any current or prospective position within the organisation;
- verifying your identity and the accuracy of your personal details and other information provided;
- performing obligations under or in connection with your contract of employment with us, including payment of remuneration and tax;
- assessing and evaluating your suitability for employment/appointment or continued employment/appointment in any position within our organisation; and
- facilitating our compliance with any laws, customs and regulations which may be applicable to us.

We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- To other members of our group of companies (including outside of your home jurisdiction) for the purposes set out in this Notice and as necessary to administer the application and recruitment process.
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.
- To protect the rights and property of Insider.
- During emergency situations or where necessary to protect the safety of persons.
- If a business transfer or change in ownership occurs and the disclosure is necessary to complete the transaction. In these circumstances, we will limit data sharing to what is absolutely necessary, and we will anonymise the data where possible.
- For additional purposes with your consent where such consent is required by law.

We may also process your personal data for legitimate interests, including for the following purposes:

- To prevent fraud
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

#### **Collection and Use of Sensitive Personal Data**

We may collect and process data relating to disability, cultural, genetic or biometric information when you voluntarily provide it, or we receive them from a third party with your consent, when relevant for a particular position to carry out our obligations under employment law, or as applicable law otherwise permits to determine appropriate reasonable adjustments to support you in your role or to evaluate fitness for a particular position. Where we have a legitimate need to process sensitive personal data for purposes not identified above, we will only do so only after providing you with notice and obtaining your prior, express consent.

The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to your employment contract should you be hired) 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 a contract with you).

#### **Withdrawing Consent**

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. As a job applicant, 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 [privacy@insider.com](mailto:privacy@insider.com).

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, we shall seek to process and effect your request within 10 business days of receiving it. Should we require more time, we will inform you of the time frame by which the withdrawal of consent will take effect.

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. 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 in the manner described above.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is authorised or required under applicable laws.

#### **Access to and Correction of Personal Data**

If you wish to make (a) an access request for access to a copy of your personal data that is in our possession or under our control 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 that is in our possession or under our control, you may submit your request in writing or via email to [privacy@insider.com](mailto:privacy@insider.com).

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.

We will respond to your request as soon as reasonably possible. In general, we shall seek to respond to an access request or give effect to a correction request (as the case may be) within 30 days after receiving such request. Should we require more time, we will inform you in writing within 30 days of the time by which we will be able to respond to the access request or correct the personal data (as the case may be).

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.

#### **Protection of Personal Data**

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 disclosing personal data both internally and to our authorised 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.

#### **Accuracy of Personal Data**

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 in writing or via email the contact details provided below.

### **Retention of Personal Data**

We typically hold the personal data collected for 1 year from the date of collection or such longer period as required or permitted by applicable laws and legal or business purposes. We review the personal data we hold on a regular basis to determine if such personal data is still needed.

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.

If you are offered and accepted employment with Business Insider Asia Pte. Ltd., the personal data we collected during the application and recruitment process will become part of your employment record, and we may use it in connection with your employment consistent with our employee personal data policies. If you do not become an employee, or, once you are no longer an employee of Insider, we will retain and securely destroy your personal data in accordance with our data retention period and applicable laws and regulations.

### **Cross-Border Data Transfers**

You give your express consent that we may transfer the personal data we collect about you to other jurisdictions outside Singapore for the purposes set out in this Notice or in order that such data may be stored. We shall take appropriate steps to ensure that the overseas recipient is bound by legally enforceable obligations or specified certifications to provide the transferred personal data a standard of protection that is comparable to that under the PDPA. If you are located in the EU, we have implemented Standard Contractual Clauses adopted by the European Commission to secure the transfer of your personal data to the United States and other jurisdictions.

### **Contact Us**

If you have any questions about our processing of your personal data or would like to make an access or other request, please contact us at [privacy@insider.com](mailto:privacy@insider.com)

### **Effect of Notice and Changes to Notice**

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.

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 employment and participation in our recruitment process constitute your acknowledgement and acceptance of such changes.