



Singapore Amalgamated Services
Co-Operative Organisation Limited
ROCS REGN UEN: S33CS0022K

Data Protection Policy

This Data Protection Policy applies to all personal data collected by the Singapore Amalgamated Services Co-operative Organisation, Limited (referred to herein as the “SASCO”, “us”, “we” or “our”).

This Policy outlines how SASCO manages Personal Data in compliance with the Personal Data Protection Act in Singapore (the “Act”) and applies to all divisions and organisations in the SASCO stable of companies. The Policy sets out:

- a) our policies on how we manage your Personal Data;
- b) the types of Personal Data we collect, use, disclose and/or retain;
- c) how we collect, use, disclose and/ or retain your Personal Data; and
- d) the purpose(s) for which we collect, use, disclose and/ or retain your Personal Data.

By interacting with us, submitting information to us, or signing up for any products and services offered by us, you agree and consent to SASCO, as well as our respective representatives and/or agents collecting, using, disclosing, and sharing amongst themselves your Personal Data, and disclosing such Personal Data to SASCO’s authorised service providers and relevant third parties in the manner set forth in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consent you may have previously provided to SASCO in respect of your Personal Data, and your consent herein are additional to any rights which SASCO may have at law to collect, use, disclose and/or retain your Personal Data.

SASCO may from time to time update this Data Protection Policy to ensure that this Policy is consistent with our future developments, industry trends, and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Data Protection Policy as updated from time to time on our websites, applications, and digital services. Please check back regularly for updated information on the handling of your Personal Data.

This Personal Data Protection Policy forms a part of the terms and conditions governing your relationship with us and should be read in conjunction with such terms and conditions (“Terms and Conditions”). In the event of any inconsistency between the provisions of the Personal Data Protection Policy and the Terms and Conditions, the provisions of the Terms and Conditions shall prevail.



Singapore Amalgamated Services
Co-Operative Organisation Limited
ROCS REGN UEN: S33CS0022K

1. Personal Data

- 1.1 In this Data Protection Policy, “Personal Data” refers to any 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, including data in our records as may be updated from time to time.
- 1.2 Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. Collection of Personal Data

- 2.1 Generally, we collect Personal Data in the following ways:
- (a) when you submit an application form or registration form, or other forms relating to any of our products and services;
 - (b) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services;
 - (c) when you interact with our customer service officers, for example, via telephone calls, letters, face-to-face meetings, social media platforms and emails;
 - (d) when you use our electronic services, or interact with us via any of our websites or use services on any of our websites;
 - (e) when you request that we contact you or request that you be included in an email or other mailing list;
 - (f) when you respond to our promotions, initiatives or to any request for additional Personal Data;



Singapore Amalgamated Services
Co-Operative Organisation Limited
ROCS REGN UEN: S33CS0022K

- (g) when your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events at our premises;
- (h) when you are contacted by, and respond to, our marketing representatives and customer service officers;
- (i) when we receive references from business partners and third parties, for example, where you have been referred by them;
- (j) when you fill up surveys administered by our employees and/or third party surveying service providers;
- (k) when we seek information from third parties about you in connection with the products and services you have applied for; and/or
- (l) when you submit your Personal Data to us for any other reason.

2.2 When you browse our websites, or use our applications and/or digital services, you generally do so anonymously but please see the section below on cookies. We do not, at our websites, applications and digital services, automatically collect Personal Data unless you provide such information or login with your account credentials.

2.3 If you provide us with any Personal Data relating to a third party (e.g., information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent and warrant to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.

2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true, and correct. Failure on your part to do so may result in our inability to provide you with the products and services you have requested.



Singapore Amalgamated Services
Co-Operative Organisation Limited
ROCS REGN UEN: S33CS0022K

3. Purposes for the Collection, Use and Disclosure of Your Personal Data

3.1 Generally, SASCO collects, uses and discloses your Personal Data for the following purposes:

- (a) responding to your queries, feedback, complaints and requests;
- (b) verifying your identity;
- (c) managing the administrative and business operations of SASCO and complying with internal policies and procedures;
- (d) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving SASCO;
- (e) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (f) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to review, develop and improve the quality of our products and services;
- (g) preventing, detecting and investigating crime and analysing and managing commercial risks;
- (h) facilities management (including but not limited to maintaining the security of our premises);
- (i) managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- (j) monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
- (k) in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- (l) conducting investigations relating to disputes, billing or fraud;



Singapore Amalgamated Services
Co-Operative Organisation Limited
ROCS REGN UEN: S33CS0022K

- (m) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on SASCO (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations);
- (n) if you are an existing or prospective participant (including an invited speaker or lecturer) of our courses, events and programmes:
 - (i) assessing and processing any applications or requests made by you for any courses, events and programmes offered by us;
 - (ii) creating and maintaining your profile in our system database for internal records and reference;
 - (iii) providing customer service and support;
 - (iv) administering debt recovery and debt management;
 - (v) facilitating your use of our online portals;
 - (vi) taking photograph(s) and/or video(s) of you for (i) internal dissemination within SASCO and (ii) generating publicity materials for our courses, events and programmes;
 - (vii) facilitating and providing opportunities for business networking between yourself and other existing or prospective (including invited speakers or lecturers) of our courses, events and programmes; and/or
- (o) any other purpose reasonably related to the aforesaid.

3.2 In addition to the purposes listed at paragraph 3.1 above, SASCO collects, uses and discloses your Personal Data for the following purposes:

- (A) If you are an existing or prospective participant (including an invited speaker or lecturer) of our courses, events and programmes:



Singapore Amalgamated Services
Co-Operative Organisation Limited
ROCS REGN UEN: S33CS0022K

- (i) administering and conducting information sessions, courses, events and programmes (including facilitating registration, recording attendance, processing payment for courses, conducting tests and examinations, event budgeting and contacting you for administrative purposes);
 - (ii) facilitating your applications to other educational institutions which you may apply to;
 - (iii) maintaining an alumni network and organising alumni activities such as information sessions and talks;
 - (iv) registering you on member lists;
 - (v) administering continuing professional development points;
 - (vi) publicity, marketing and providing networking opportunities to other registered participants of the same course for which you have registered; and/or
 - (vii) any other purpose reasonably related to the aforesaid.
- (B) If you have submitted any applications to SASCO and/or SASCO's registries:
- (i) conducting research and surveys on behalf of SASCO; and/or
 - (ii) any other purpose reasonably related to the aforesaid.

3.3 Furthermore, where permitted under the Act and/or where you have provided your consent to SASCO separately, SASCO may also collect, use and disclose your Personal Data for the following additional purposes:

- (a) providing or marketing services, products and benefits to you, including but not limited to special events and promotions from SASCO;
- (b) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services by SASCO;



Singapore Amalgamated Services
Co-Operative Organisation Limited
ROCS REGN UEN: S33CS0022K

- (c) administering and organising contests, lucky draws, events, competitions and marketing campaigns, and personalising your experience at SASCO;
- (d) conducting market research, analytics and surveys to enable SASCO to understand and determine customer preferences and demographics for us to offer you products and services as well as special offers and marketing programmes which may be relevant to your preferences and profile; and/or
- (e) any other purpose reasonably related to the aforesaid.

3.4 If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, SASCO may continue to contact you using such Singapore telephone number(s) (including via voice calls, text, fax, or other means) with information about our products and services, unless you have withdrawn your consent.

3.5 In relation to particular products and services or in your interactions with SASCO, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

4. Disclosure of Personal Data

4.1 SASCO will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed by SASCO, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:

- (a) companies providing services relating to medical screening, insurance, marketing and consultancy to SASCO;
- (b) agents, contractors or third party service providers who provide operational services to SASCO, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security, employee recognition or other services to SASCO;



Singapore Amalgamated Services
Co-Operative Organisation Limited
ROCS REGN UEN: S33CS0022K

- (c) agents, contractors or third party service providers (including but not limited to external tutors and lecturers) who provide services in connection with the courses, programmes and events organised, conducted and administered by SASCO;
- (d) our partners or collaborators in our courses, events and programmes
- (e) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving SASCO;
- (f) external banks, credit card companies and their respective service providers;
- (g) our professional advisers such as consultants, auditors and lawyers;
- (h) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority;
- (i) other existing or prospective participants (including invited speakers or lecturers) of our courses, events and programmes; and
- (j) any other party whom you authorise us to disclose your Personal Data to.

5. Use of Cookies

5.1 A cookie is a small piece of information that is placed on your computer when you visit certain websites. The cookies placed by the servers hosting our websites are readable only by us, and cookies cannot access, read or modify any other data on an electric device, nor does it capture any data which allows us to identify you individually. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visitor.

5.2 Should you wish to disable the cookies associated with these browsers, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our websites.



Singapore Amalgamated Services
Co-Operative Organisation Limited
ROCS REGN UEN: S33CS0022K

6. Data Security

- 6.1 SASCO will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that for example no harmful code will enter our websites, applications, and digital services (for example viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with using websites, applications, and digital services.
- 6.2 While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet, when you browse our websites, or use our applications and/or digital services, and the method of electronic storage. We urge you to take every precaution to protect your Personal Data when you are on the Internet, when you browse our websites, or use our applications and/or digital services. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.
- 6.3 If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person, and to inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorised transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorised and/or fraudulent use of your username and password.

7. Contacting Us – Feedback, Withdrawal of Consent, Access, and Correction of your Personal Data

- 7.1 You can contact our Data Protection officer at Pearly.Lim@sasco.sg or call (65) 6273 5183 ext. 721, if you:
- (a) have any questions or feedback relating to your Personal Data or our Data Protection Policy;
 - (b) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or



Singapore Amalgamated Services
Co-Operative Organisation Limited
ROCS REGN UEN: S33CS0022K

(c) would like more information on or access and make corrections to your Personal Data records.

7.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, SASCO may not be in a position to administer any contractual relationship in place, which in turn may also result in the termination of any agreements with SASCO, and your being in breach of your contractual obligations or undertakings. SASCO's legal rights and remedies in such event are expressly reserved.

8. Governing Law

8.1 This Data Protection Policy, your browsing of our websites, and use of our applications and/or digital services shall be governed in all respects by the laws of Singapore.