

# PERSONAL DATA PROTECTION POLICY

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This Personal Data Protection Policy (PDPP) sets out:

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

From time to time, we may update this PDPP to ensure that it is consistent with any regulatory changes. Should any revision(s) be made to this PDPP, updates will be published on our public site <http://galaxyconsultants.com>. Subject to your legal rights in Singapore, the prevailing terms of the PDPP shall apply. You should check the PDPP regularly for changes.

This PDPP 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 PDPP and the Terms and Conditions, the provisions of the Terms and Conditions shall prevail.

## Consent

By using our service or visiting our website, you agree and consent to us, the Company, and our authorised service providers and third parties to collect, use and disclose and/ or retain your Personal Data in the manner set forth in this PDPP.

## Withdrawal of Consent

Please note that if you withdraw your consent to any or all use or disclosure of your Personal Data, depending on the nature of your request, we may no longer be in a position to continue to provide account and other related services to you. Such a withdrawal may therefore result in the termination of any account that you may have with us.

## Your Personal Data

In this PDPP, “Personal Data” as defined by the Personal Data Protection Act (PDPA) refers to any data and/or information about you from which you can be identified by, either (a) from that data; or (b) from that data and other information to which we may have legitimate access to.

Depending on your relationship with us, the type of Personal Data we collect from you may include:

- your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided in any forms you may have submitted to use, or in other forms of interaction with you;
- your photos; your employment history, education background, and income levels;
- Personal Data of your family members, such as next of kin, spouses, and children; information relating to payments, such as your bank account number or credit card information;

- information about your usage of and interaction with our website and/ or services including computer and connection information, device capability, bandwidth, statistics on page views and traffic to and from our website.

## Collection of your Personal Data

Generally, we may collect your Personal Data through the following ways:

- when you sign up an account with us; when you access our websites or perform an online transaction with us;
- when you interact with any of our employees or our authorised third-party service providers;
- when you respond to our request for additional Personal Data;
- when you ask to be included in an email or other mailing list;
- when you request that we contact you; and
- when you submit your Personal Data to us for any other reason.

When you browse our website, you generally do so anonymously, but please see the section on “Use of Cookies”.

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

Generally, we may collect, use, disclose and/ or retain your Personal Data for the following purposes:

- to manage your account;
- to provide you with employment and employability services;
- to assist you with your enquiries;
- to improve customer services, such as resolving complaints and handling requests and enquiries;
- to conduct research, surveys and interviews;
- to keep you updated on our events; and
- to comply with applicable laws and regulations.

## Marketing/ Optional Purposes

From time to time, we may contact you via mail, electronic mail, telephone (call or SMS-Text), facsimile or social medial platforms, to inform you about our activities that we think may be of interest to you.

You can let us know at any time if you no longer wish to receive marketing materials (by informing us through Consent to Marketing Messages) and we will remove your details from our direct marketing database.

Please note that we may still send you non-marketing messages such as surveys, customer-service notices and other service-related notices.

## Disclosure of your Personal Data

We may disclose your Personal Data to the following group of external parties for purposes mentioned above, subject to the requirements of applicable laws:

- external banks, financial institutions, credit card companies and their respective service providers;
- agents, contractors, data intermediaries or third-party service providers who provide services, such as telecommunications, mailing, information technology, payment, payroll, data processing, training, market research, carding, storage and archival, to the Company;
- our professional advisers such as our auditors;
- relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any government authority;
- any other person in connection with the purposes set forth above.

### Use of Cookies

We may collect or analyse anonymised information from which individuals cannot be identified (“Aggregate Information”), such as number of users and their frequency of use, the number of page views (or page impressions) that occur on our websites and common entry and exit points into our websites.

We make use of “cookies” to store and track Aggregate Information about you when you enter our website(s). Such cookies are used to track information such as the number of users and their frequency of use, profiles of users and their online preferences.

Such aggregate Information collected may be used to assist us in analysing the usage of our website(s) so as to improve your online experience with us.

Should you wish to disable the cookies associated with these technologies you may do so by changing the setting on your browser. However, please note that this may affect the functionality of the website(s).

### Third-Party Sites

Our website may contain links to other websites operated by third parties independent of the Company. We are not responsible for the privacy practices of such websites operated by third parties even though it is linked to our website(s).

We encourage you to learn about the privacy policies of such third-party website(s) by checking the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

### Protection of your Personal Data

We maintain appropriate security safeguards and practices to protect your Personal Data from unauthorised access, collection, use, disclosure, copying, modification disposal or similar risks, in accordance with applicable laws.

When we provide Personal Data to a service provider, we will require the service provider to use appropriate measures to protect the confidentiality and security of the Personal Data.

### Accuracy of your Personal Data

We take all reasonable measures to ensure that your Personal Data remains accurate, complete and up-to-date.

You may also keep us informed when there are any updates to your Personal Data by contacting us directly.

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

You may request access to or make corrections to your Personal Data records. There are certain exemptions under the PDPA which may apply to personal data access and correction requests. The Company may request that you as the person requesting access or correction, provide suitable identification and we may charge a reasonable fee for processing your request.

### **Retention of Personal Data**

We take reasonable practicable steps to erase your Personal Data in accordance with our internal policies and procedures and will retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws or other legitimate purpose.

### **Transfer of Personal Data outside of Singapore**

We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will ensure that it is within the specified circumstances as set out in the PDPA and 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.

### **Contact Us**

If you have any questions or complaints relating to the use or disclosure of your Personal Data, or if you wish to know more about our data protection policies and practices, please contact our Data Protection Officer, Mr Sean Hoh via email at [sean@galaxyconsultants.com](mailto:sean@galaxyconsultants.com).