



DATA PROTECTION & PRIVACY POLICY (“POLICY”)

This Policy sets out the manner in which Astrum Partners Pte Ltd (“**Astrum Partners**”) collects, uses, manages and protects Personal Data (as defined below) in compliance with the Personal Data Protection Act 2012 (“**PDPA**”) and General Data Protection Regulation (“**GDPR**”).

Astrum Partners is committed to protecting your privacy and applicable data protection legislation including Personal Data. This Policy applies to all Individuals (as defined below) who provide Astrum Partners with Personal Data or whose Personal Data is otherwise collected, used and/or disclosed by Astrum Partners in connection with and/or for the purposes of its business operations.

This Policy supplements but does not supersede or replace any previous consent which an Individual may have provided to Astrum Partners, nor does it affect any rights that Astrum Partners may have at law in connection with the collection, use and/or disclosure of any data.

Astrum Partners may from time to time update this Policy to ensure it is consistent with its business purposes or to accommodate future changes to applicable legal or regulatory requirements. All updates to this Policy will be published at www.astrumpartners.com.sg (“**Astrum Partners Website**”) and appropriate notifications of any material revisions will be published on the Astrum Partners Website and may be issued separately to relevant persons such as may be determined by Astrum Partners. Subject to an Individual's rights at law, the prevailing terms of the Policy from time to time shall apply. By continuing their relationship with Astrum Partners after any amendments have been introduced and published on the Astrum Partners Website, Individuals shall be deemed to have accepted the Policy as amended.

1. Definitions:

For purposes of this Policy:

“**Individual**” means a natural person, whether living or deceased and “**Individuals**” shall be construed accordingly;

“**Personal Data**” means data that is capable of identifying an Individual, whether on its own or in conjunction with other data accessible to Astrum Partners;

“**Personnel**” means any Individual engaged under a contract of service with Astrum Partners, permanent or temporary employees as well as trainees and interns engaged by Astrum Partners from time to time; and

“**Sensitive Personal Data**” includes data relating to race or ethnic origin, political opinions, religions or similar, trade union membership, physical or mental health, sexual life or criminal record.

2. Personal Data collected by Astrum Partners

Astrum Partners will only collect, use or disclose Personal Data about an Individual which it reasonably considers necessary for the relevant purposes underlying such collection, use or disclosure. It is not our policy to seek Sensitive Personal Data, but if an Individual provides us with their Sensitive Personal Data for any reason, by doing so, they indicate their willingness for it to be used as described in this Policy unless otherwise directed at the time of disclosure. Depending on the specific nature of an Individual's interaction with Astrum Partners, Personal Data which Astrum Partners collects, uses or discloses concerning an Individual may variously include but is not limited to the following:



- a. the Individual's name, gender and contact particulars, including telephone number(s), residential/ mailing address(es) and email address;
- b. details of the Individual's identification documents (such as, NRIC or passport numbers), and applicable visa or permits (such as employment pass, work permit, permanent residency status);
- c. details of the Individual's employment history and academic qualifications;
- d. the name and contact particulars of the Individual's next-of-kin;
- e. the Individual's network usage data and other information gathered automatically by our computer systems, including the Individual's computer IP address, links visited and other activities conducted online or using our computer systems;
- f. photographs and video or CCTV recordings of the Individual; and
- g. other information which the Individual may provide to Astrum Partners, from time to time, in the course of such Individual's interaction with Astrum Partners.

3. How Astrum Partners collects Personal Data

Astrum Partners is an executive search firm providing search, due diligence and consulting services. We collect Personal Data for the purpose of carrying out such services on behalf of our clients worldwide where we have a legitimate interest or other legal interest for processing such information.

Generally, Astrum Partners may collect Personal Data from an Individual in one or more of the following ways or circumstances:

- a. when the Individual interacts with Astrum Partners' Personnel via telephone calls, emails, other correspondence and/or face-to-face meetings;
- b. when the Individual visits Astrum Partners' premises;
- c. when the Individual specifically requests that Astrum Partners contact him or her or requests to be included in an email or any mailing list maintained by Astrum Partners;
- d. when the Individual responds to any request by Astrum Partners for the provision of Personal Data;
- e. when Astrum Partners receives references or referrals from its business partners or other third parties;
- f. when the Individual attends or participates in any event organised by Astrum Partners;
- g. when the Individual submits his or her Personal Data to Astrum Partners as a potential candidate for hire or in connection with current or potential future executive search or recruitment projects;
- h. when the Individual subscribes to Astrum Partners' publication(s); and/or
- i. when the Individual submits his or her Personal Data to Astrum Partners for any other reason related to Astrum Partners' ordinary course of business operations.

Astrum Partners may also compile data from searches of an Individual's professional information publicly available via social media platforms such as LinkedIn, Google, Twitter, company websites, the press or other publications as part of our research and assessment.

4. Purposes of collection, use and disclosure of Personal Data

Generally, Astrum Partners collects, uses and/or discloses Personal Data from Individuals for one or more of the following purposes:

A. Provision of services

- a. administering and managing the Individual's relationship with Astrum Partners;
- b. providing the Individual with information about Astrum Partners' services and/or the services of any external vendor that is providing services or products in partnership or collaboration with Astrum Partners;
- c. providing the Individual with information about Astrum Partners' search related, recruitment or other business opportunities;
- d. responding to the Individual's complaints, queries and/or requests;
- e. facilitating and/or organising meetings, interviews or events; and
- f. informing the Individual of changes and/or updates to Astrum Partners' policies, terms and conditions and/or other administrative information.

B. Security measures

- a. verifying the Individual's identity or monitoring the Individual's activities, including without limitation via CCTV observation and/or recording; and
- b. preventing, detecting and investigating fraud, misconduct, any unlawful action, omission or dispute, and whether or not there is any suspicion of the aforementioned.

C. General business operations of Astrum Partners

- a. staff training, quality assurance and performance evaluation;
- b. record-keeping;
- c. executive search, recruitment, and due diligence review of Individuals;
- d. research and consulting;
- e. administering and managing Astrum Partners' relationship with potential clients and/or candidates including post-placement integration support;
- f. evaluating the suitability and eligibility of potential candidates to be engaged by Astrum Partners or by our clients; and
- g. meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines which are binding on Astrum Partners (including but not limited to responding to regulatory complaints, disclosure to regulatory bodies and conducting audit checks, due diligence and investigations).

D. Managing Personnel

- a. administering, managing and/or terminating Astrum Partners' relationship with Personnel;



- b. evaluating the performance of Personnel;
- c. undertaking staff training and quality assurance activities; and
- d. providing Personnel with services, facilities and/or other benefits being offered or made available by Astrum Partners to such Personnel as well as information about such services, facilities and benefits.

E. Marketing

- a. where Astrum Partners circulates Astrum Partners' publications or marketing information to an Individual or which may be disseminated to an Individual relating to services offered by Astrum Partners (whether by Astrum Partners or Astrum Partners' business partners) which Astrum Partners thinks is or may be of benefit or interest to him/her via postal mail, electronic transmission to his or her or any email address(es), and/or voice call or phone call and/or fax to his or her or any telephone number(s).

F. Others

- a. for transfer to third party data intermediaries to facilitate any of the aforesaid purposes;
- b. for any purposes reasonably related to any of the above purposes; and
- c. for any other purposes in relation to which Astrum Partners has specifically obtained the Individual's consent.

5. Consent

Unless otherwise authorised under the PDPA or any other applicable law, Astrum Partners will not collect, use or disclose an Individual's Personal Data without his or her explicit consent.

Astrum Partners will take reasonable steps to highlight the purposes relevant to an Individual, by appropriate means, at the point or time of collection of the Personal Data from such Individual, including:

- a. a via express provisions in contracts, application forms and/or registration forms to be signed with or submitted to Astrum Partners;
- b. via notifications on Astrum Partners's websites; and
- c. in the course of verbal communications.

Where feasible, Astrum Partners will inform the Individual of purposes that are intrinsic to the relationship between Astrum Partners or to the provision of services to such Individual, as well as purposes that are optional.

In so far as any purpose(s) are intrinsic to the relationship or provision of services, Astrum Partners reserves the right to decline to engage in the relevant relationship or to provide the relevant services to the Individual if he or she does not consent to Astrum Partners's collection, use or disclosure of his or her Personal Data for such purpose.



Individuals who:

- a. voluntarily provide their Personal Data to Astrum Partners for the specified purposes;
- b. use or access Astrum Partners's website(s) or computer network;
- c. enter Astrum Partners's premises or use any of the facilities thereon; and/or
- d. attend or participate in meetings, events or programmes organised by Astrum Partners

will be deemed to agree and consent to Astrum Partners collecting, using and/or disclosing their Personal Data in the manner and for the purposes set forth in this Privacy Policy.

An Individual who provides Astrum Partners with Personal Data relating to a third party for any particular purpose, represents to Astrum Partners that he/she has obtained the consent of the relevant third party to Astrum Partners collecting, using or disclosing such Personal Data for the relevant purpose.

In so far as Astrum Partners collects Personal Data of an Individual from any third party(ies), Astrum Partners will take reasonable steps to inform the relevant third party(ies) of Astrum Partners's purposes for collecting the Personal Data and to verify that consent from the Individual has been obtained by the relevant third party(ies) to such disclosure for the intended purpose.

6. Disclosure of Personal Data

In carrying out one or more of the above Purposes, Astrum Partners may need to disclose Individuals' Personal Data to the following third parties for one or more of the above Purposes:

- a. Astrum Partners's clients. We will only disclose what is necessary for providing our services and will obtain permission from an Individual before disclosing Personal Data in detail as part of an executive search process;
- b. third party service providers or agents or external vendors that are providing services or products in partnership or collaboration with Astrum Partners;
- c. Astrum Partners's auditors and professional advisors;
- d. any person to whom disclosure is permitted or required by any statutory provision or law;
- e. any permitted assigns;
- f. any local or foreign regulatory body, government agency, statutory board, ministry, department or other government body and/or its officials; and/or
- g. other parties with the Individual's consent or at their direction.

7. Withdrawal of Consent

Any Individual who wishes to withdraw his or her consent to any use or disclosure of his or her Personal Data by Astrum Partners as set out in this Policy may do so by contacting Astrum Partners' Data Protection Officer at ws@astrumpartners.com.sg.

Depending on the extent to which an Individual withdraws consent to the use or disclosure of his or her Personal Data by Astrum Partners, such withdrawal of consent may result in Astrum Partners' inability to provide services to the Individual and may be considered as a termination by the Individual of any agreement



between Astrum Partners and the Individual. Astrum Partners' legal rights and remedies are expressly reserved in such event.

In so far as an Individual's data is being collected by cookies, the Individual may disable the use of cookies on his or her internet browser when accessing Astrum Partners's website. However, this may result in the loss of functionality, restrict the Individual's use of the website and/or delay or affect the way in which Astrum Partners' website operates.

8. Verification of Personal Data & Notification of Changes

Where feasible, Astrum Partners will take reasonable steps to verify the accuracy of Personal Data received at the point of collection but Individuals remain primarily responsible and liable to ensure that all Personal Data submitted by them to Astrum Partners is complete and accurate. Information voluntarily provided by an Individual to Astrum Partners shall prima facie be deemed complete and accurate.

Astrum Partners will also take reasonable steps to periodically verify Personal Data in its possession, taking into account the exigencies of its operations, but Individuals are nonetheless responsible for notifying Astrum Partners, from time to time, of any applicable changes to such Personal Data.

Astrum Partners shall not be held liable for any inability on its part to provide services to an Individual who fails to ensure that his or her Personal Data submitted to Astrum Partners is complete and accurate or who fails to notify Astrum Partners of any relevant changes to such Personal Data.

9. Protection of Personal Data

Astrum Partners makes reasonable physical and technical security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to Personal Data in its possession and ensure staff have training to support this.

If Astrum Partners transfers Personal Data outside Singapore, Astrum Partners takes reasonable steps to ensure that such Personal Data transferred receives a standard of protection comparable to the protection received under the PDPA and GDPR and such transfer shall be subject to this Policy. Astrum Partners will do their reasonable best to ensure that third parties who receive Personal Data from Astrum Partners protect such Personal Data in a manner consistent with this Policy and not use such Personal Data for any purposes other than those specified by Astrum Partners, by incorporating appropriate contractual terms in its written agreements with these third parties. Astrum Partners is not responsible in any way for the security and/or management of Personal Data shared by Individuals with third party websites accessible via links on Astrum Partners's website.

10. Contacting Astrum Partners-Access and Correction of Personal Data

Any Individual who:

- a. has questions or feedback relating to this Policy; and/or
- b. would like to obtain access to his or her Personal Data held by Astrum Partners; and/or
- c. would like to obtain information about the ways in which his or her Personal Data held by Astrum Partners has been or may have been used or disclosed by Astrum Partners in the year preceding the request; and/or



- d. would like to update or make corrections to his or her Personal Data held by Astrum Partners; and/or
- e. would like to exercise other rights he or she has under applicable legislation, such as the right to restrict/block, object, erase, move, copy or transfer his or her Personal Data held by Astrum Partners; and/or
- f. would like to revoke consent to any applicable aspect of this Policy,

should contact Astrum Partners's Data Protection Officer at privacy@astrumpartners.com.sg.

Individuals should note that Astrum Partners is not required, under the PDPA, to provide access and correction to Personal Data in certain exempted situations as set out in the PDPA.

The PDPA allows and Astrum Partners reserves the right to charge a reasonable fee for the handling and/or processing of access requests by an Individual pursuant to paragraphs (b) or (c) above.

11. Governing Law

This Policy shall be governed by and construed in accordance with the laws of Singapore. Any dispute arising out of or in connection with this Policy including any question regarding its existence, validity or termination, shall be referred to and finally resolved by the Courts of Singapore.