



Privacy Policy

This statement sets out the Privacy Policy and practices of POLWEL Co-Operative Society Limited (“POLWEL”) that will be followed with respect to the collection, use and/or disclosure of your personal data. This statement is provided in accordance with the Personal Data Protection Act (Act 26 of 2012) (the “PDPA”).

Please note that this Privacy Policy complements, and does not limit or replace, the purposes for which you provide POLWEL with your personal data which may be expressly stated in any form for submission of personal data to POLWEL. POLWEL reserves the right to update this Privacy Policy from time to time to ensure that it reflects our current practices and remains consistent with the requirements imposed by law. This Privacy Policy was last updated on 21 September 2016.

1. Personal Data

In providing POLWEL with your personal data (either directly or through a third party), you hereby agree that POLWEL may collect, store, process, disclose, access, review and/or use personal data (including sensitive personal data) about you, whether obtained from you or from other sources (such as our Approved Training Organisations), for the purposes set out below and/or any other administrative or operational purposes and/or the purpose of managing your relationship with POLWEL:

- (i) providing services to you in relation to your transactions with POLWEL;
- (ii) verification and identification purposes, including verifying your identity when you attend the assessments conducted by POLWEL;
- (iii) enabling the Police Licensing Regulatory Department to carry out the necessary licensing for the private security industry;
- (iv) assisting you with your job placement and security clearances when you engage our Business & Employment Services Division;
- (v) processing your request for a loan or fixed deposit when you approach our Financial Services Division;
- (vi) enabling your use of the services which POLWEL provides, including, where necessary, contacting you (whether by SMS, email or otherwise);
- (vii) evaluative purposes, including processing your job application pursuant to POLWEL’s recruitment activities;
- (viii) dealing with enquiries made by you;
- (ix) maintenance and updating of the data;
- (x) administrative or operational purposes;
- (xi) tax filing preparation;



- (xii) processing credit notes and processing refunds;
- (xiii) collection of fees, charges and expenses for services provided;
- (xiv) facilitating the making and payment of claims, including payments by cheque, bank transfers or other means;
- (xv) carrying out billing, accounting, auditing and the maintenance of proper book-keeping to explain POLWEL's operations and business;
- (xvi) the disclosure of the relevant books, documents, records and information (in hard or soft copy) to the auditors for the preparation of financial reports; and/or
- (xvii) the disclosure of the relevant books, documents, records and information (in hard or soft copy) to the relevant government authorities pursuant to any written law.

You further agree to be bound by the prevailing terms of this Privacy Policy as updated from time to time.

2. Use of Cookies

Cookies are simple text files which are stored on your computer or mobile device by our website's server. Only POLWEL's server will be able to retrieve or read the contents of these cookies. Polwel uses cookies on its website in order to enable certain features and functionality, to ensure a smooth and optimized user experience, and to improve user security. In order to do so, Polwel uses cookies in the following ways:

- (i) To store a user's session for the log-in duration;
- (ii) To determine the authenticity of a user;
- (iii) To identify a user's session on the server;
- (iv) To detect other cookies in use;
- (v) To store information about what a user is putting in his or her cart; and
- (vi) To store a user's information in order to identify his or her cart data in the database.

POLWEL's use of cookies is in accordance with the terms of this Privacy Policy. By continuing to visit this site, you hereby agree to POLWEL's use of these cookies. If you do not agree to POLWEL's use of cookies, you are free to control or disable these cookies under your browser settings. However, due to the afore-mentioned functions of these cookies, disabling certain cookies may result in a lessened user experience. Please also note that the Polwel website may not work properly without cookies.



3. Consent

a. Consent Required

POLWEL will not collect, use or disclose your personal data unless:

- (i) you give, or are deemed to give, consent to the collection, use or disclosure of your personal data; or
- (ii) the collection, use or disclosure of your personal data without your consent is required or authorized under the PDPA or other written law.

If you disclose the personal data of third parties to POLWEL, you represent that you have obtained the consent of the relevant third parties to have their personal data collected, used and/or disclosed by POLWEL for the applicable purposes listed in clause 1.

b. Provision of Consent

POLWEL will not obtain or attempt to obtain your consent for collecting, using or disclosing personal data by providing false or misleading information with respect to the collection, use or disclosure of your personal data.

c. Withdrawal of Consent

- (i) You may at any time withdraw your consent for any of the purposes which you have previously consented to by providing us with notice through a request submitted to the Designated Person whose contact details are made available at the bottom of this Privacy Policy.
- (ii) Please be aware that once we receive confirmation that you wish to withdraw your consent, it may take up to thirty (30) working days for your withdrawal to be reflected in our systems. During this period of time, your personal data will continue to be collected, used and/or disclosed pursuant to the purposes set out at clause 1 above.
- (iii) On receipt of such notice, POLWEL will inform you of the likely consequences of withdrawing your consent and we may no longer be in a position to continue to provide our services to you. Such a withdrawal may therefore result in the termination of any relationship that you may have with us.

4. Data Quality

POLWEL will take reasonable steps to make sure that the personal data it collects, uses or discloses is accurate, complete and up to date.

5. Data Security

POLWEL will take reasonable steps to protect the personal data it holds from misuse and loss and from unauthorized access, modification or disclosure.



POLWEL will not keep personal data for longer than is necessary and will take reasonable steps to destroy or permanently de-identify personal data if it is no longer needed.

6. Access and Correction

You are entitled to have access to the personal data about you that is in the possession or under the control of the organization and information about the ways in which the personal data has been or may have been used or disclosed within a year before the date of the request. This can be done by you making a written application to the Designated Person (as defined below) requesting for any such information. POLWEL reserves the right to charge a fee (representing its costs in administering your request) for supplying such information and to refuse requests which, in its opinion, occur with unreasonable frequency.

POLWEL will also, where you have requested that it correct an error or omission in the personal data about you that is kept with POLWEL, correct such data as soon as practicable and send the corrected personal data to every organisation to which the personal data was sent before it had been corrected, if applicable, unless that organisation does not need the corrected personal data for any legal or business purpose.

POLWEL may however choose not to provide you with access to or correct such information, in accordance with the exceptions under the PDPA. This would include cases where:

- (i) POLWEL is satisfied on reasonable grounds that the correction should not be made;
- (ii) The request for access is frivolous or vexatious or the information requested is trivial;
- (iii) The personal data is related to a prosecution and all the proceedings related to the prosecution have not been completed;
- (iv) The personal data, if disclosed, would reveal confidential commercial information that could, in the opinion of a reasonable person, harm the competitive position of the organisation; and
- (v) The personal data was collected, used or disclosed for the purposes of an investigation and associated proceedings and appeals have not been completed.

7. Transborder Data Flows

If your personal data is transferred to a country or territory outside Singapore, for instance, if your personal data is required to be transferred for administrative or operational purposes by POLWEL, we will ensure that the recipients thereof provide a



standard of protection to your personal data so transferred that is comparable to that which is provided herein.

8. Enquiries and Complaints

POLWEL has designated the person whose details are set out below as the person (“**Designated Person**”) who will be responsible for ensuring POLWEL’s compliance with applicable data protection laws. If you have any queries or requests or wish to make any applications concerning your personal information or data, please contact the Designated Person:

Contact Person: Data Protection Officer

Email: admin@polwel.org.sg

Address: 175A Bencoolen Street, Burlington Square #12-08, Singapore 189650