

# DATA PROTECTION NOTICE FOR TRAINEES

This Data Protection Notice ("Notice") sets out the basis upon which NTUC LearningHub Pte Ltd ("NTUC LHub", "we", "us", or "our") may collect, use, disclose or otherwise process personal data of contractors in accordance with the Personal Data Protection Act 2012 ("PDPA"). This Notice 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 registered for and/or attends courses, seminars, training or exam organised by us or conducted at our premises ("trainees"). Terms used in this Notice shall have the meanings given to them in the PDPA.

## Collection, Use and Disclosure

1. We generally collect personal data that has been provided to us voluntarily by you or via a third party who has been duly authorised by you to disclose your personal data to us (your "authorised representative"), 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 written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. 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 permitted or authorised by law).
2. 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:
  - a. providing the products and services listed on our website;
  - b. verifying your identity and the accuracy of your personal details and other information provided;
  - c. communicating with you regarding the status of your registration;
  - d. assessment of suitability for job matching;
  - e. sending of marketing-related messages;
  - f. monitoring of classroom activities;
  - g. monitoring of examination conduct; and
  - h. any administrative related matters concerning your registration.
3. We may disclose your personal data:

- a. with your consent, where such disclosure is required in connection with the purposes listed above;
  - b. to comply with any applicable laws, regulations, codes of practice, guidelines or rules (e.g. in an emergency or when we receive a subpoena to disclose your personal data); or
  - c. with your consent, to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in Paragraph 2 above for us. Any third parties engaged by us will be contractually bound to keep all personal data confidential.
4. You have the right of choice regarding the collection, usage and disclosure of your personal data. If you choose not to provide us with any of your personal data requested in this form, you may do so by indicating in the relevant field or via email at the contact details provided below. Whilst we respect your decision, please note that depending on the nature and extent of your request, we may not be in a position to process your application and/or continue your relationship with us (as the case may be). We shall, in such circumstances, notify you before continuing to process your access card request. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to carry out your request, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

### **Withdrawing Your Consent**

5. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. You may withdraw your consent and request us to stop 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 our Data Protection Officer at the contact details provided below.
6. Depending on the complexity of the request and its impact to our relationship with you, we will cease (and instruct any of our data intermediaries and agents to cease) collecting, using or disclosing the personal data within thirty (30) days of our receipt of your request, unless required or authorised under applicable laws.
7. 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 application and/or continue your relationship with us (as the case may be) if the withdrawal is proceeded with. We shall, in such circumstances, notify you before completing the processing of your request (as outlined above).

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

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

9. If you wish to request (a) for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) to correct or update any of your personal data which we hold, you may submit your request in writing or via email to our respective Course Consultant at the contact details provided below.
10. 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.
11. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your access request within thirty (30) days after receiving your access request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

### **Protection of Personal Data**

12. 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 the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to authorised third parties and agents only on a need-to-know basis.
13. However, 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 personal data and are constantly reviewing and enhancing our information security measures.

### **Accuracy of Personal Data**

14. 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 by informing our respective Course Consultant in writing or via email at the contact details provided below.

### **Retention of Personal Data**

15. We may retain your personal data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.

16. 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.

### **Cross-border Transfers of Personal Data**

17. We generally do not transfer your personal data to other jurisdictions. However, if we do so, we will obtain your consent for the transfer to be made and we 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 applicable personal data protection laws and regulations.

### **Course Consultant and Data Protection Officer Contact Information**

18. You may contact our respective Course Consultant or Data Protection Officer (DPU@ntuclearninghub.com), or write in to us at *NTUC Trade Union House, 73 Bras Basah Road, #02-01, Singapore 189556* if you have any enquiry, feedback or complaint regarding our personal data protection policies and procedures, if you wish to make any request, or if you believe that information we hold about you is incorrect or outdated.

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

19. 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.
20. 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 participation in our services constitutes your acknowledgement and acceptance of such changes.

*Latest updated on 01 Nov 2023*