



GALAXY LOGISTICS PTE LTD

Tel: (65) 6558 7942, (65) 8799 4779 | REGISTRATION NO: 199802446Z
124 Pioneer Road, Singapore 639584

DATA PROTECTION POLICY FOR EMPLOYEES

This Data Protection Policy (“Policy”) sets out the basis upon which Galaxy Logistics Pte Ltd (“we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data of employees and job applicants in accordance with the Personal Data Protection Act (“PDPA”). This Policy applies to personal data in our possession or under our control, including personal data in the possession of organizations which we have engaged to collect, use, disclose or process personal data for our purposes.

This Policy applies to all persons engaged in contract of service with us (whether on a part-time, temporary or full-time basis) and interns and trainees working at or attached to us (collectively referred to as “employees”) and all references to “employment” shall apply equally to internships and traineeships (as may be applicable).

DEFINITION

1. “Employee” (“you”) means an individual who is under the payroll of “Galaxy Logistics Pte Ltd”
2. “Personal data” means data, whether true or not, about an employee 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.
3. Personal data which we may collect in the context of your employment with us includes, without limitation, your:
 - a) Full name,
 - b) NRIC Number or FIN (Foreign Identification Number) or WP (Work Pass)
 - c) Passport number
 - d) Personal mobile number
 - e) Residential Address
 - f) Facial image of an individual (e.g. in a photograph or video recording)
 - g) Voice of an individual (e.g. in a voice recording/WhatsApp audio)
 - h) Fingerprint
 - i) Financial data
 - j) Username and password
 - k) Signature
4. “PDPA” means the Personal Data Protection Act 2012
5. “Agreement” means Data Protection Policy for Employees

HANDLING AND PROTECTION PERSONAL DATA

1. We shall comply with all its obligations under PDPA.
2. We shall only collect, use, or disclose personal data:
 - a. Strictly for the purposes of fulfilling our obligations and providing the services required under this Agreement
 - b. With your prior written consent
 - c. When required by law or an order of court, but shall notify you as soon as practicable before complying
3. We shall NOT transfer your personal data to a place outside Singapore without your prior written consent. We shall ensure that your personal data transferred outside Singapore will be protected at a standard that is comparable to that under the PDPA. If we transfer your personal data to any third party overseas, we shall procure a written undertaking from such third party stating clearly the same level of data protection standard.



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4. We shall protect your personal data in our control or possession by making reasonable security arrangements (including, where appropriate, physical administrative procedural and information and communications technology measures) to prevent unauthorized or accidental access, collection, use, disclosure, copying, modification, disposal, or destruction or other similar risks.
5. We shall only permit authorized personnel to access employees' personal data on a need to know basis
6. We shall provide you with access to your personal data that we have in our possession or control, as soon as practicable upon your written request.
7. Where you provide personal data to us, you shall make reasonable effort to ensure that the personal data is accurate and complete before providing the same to us. We shall put in place adequate measures to ensure that the personal data in your possession or control remain or is otherwise accurate and complete. In any case, we shall take steps to correct any errors in the personal data, as soon as practicable upon your written request.
8. We shall NOT retain your personal data (or any documents or records containing your personal data, electronic or otherwise) for any period of time longer than is necessary to serve the purposes of this Agreement.
9. We shall, upon your request:
 - a. Limit or restrict the use of your personal data for certain reasons;
 - b. Return to you all personal data;
 - c. Delete all personal data in our possession;
10. After returning or deleting all personal data provide you with written confirmation that we no longer possess any of your personal data. Where applicable, we shall also instruct all third parties to whom we have disclosed your personal data for the purposes of this Agreement to return to us or delete such personal data
11. We shall immediately notify you when a breach of any of its obligations in clauses (1 to 9) surfaces.
12. You shall indemnify us and our officers, employees, and agents, against all actions, claims, demands, losses, damages, statutory penalties, expenses and cost (including legal costs on indemnity basis) in respect of:
 - a. Your breach of clauses (1 to 9)
 - b. Any act, omission, or negligence of you that causes or results with us being in the breach of PDPA
13. You have the right to exercise the following:
 - a. Access to the personal data that we hold about you;
 - b. Update details of your personal data;
 - c. Withdraw consent for use of personal data for certain purposes;
 - d. Request that any incomplete or inaccurate data that we hold or control be corrected or removed;
 - e. Request access for a copy of the personal data we have;
14. If you wish to exercise your rights, you may contact us by sending a written request to Data Protection Officer via email at dpo@virgogroup.com.sg and our **HR Department** via email at julie@virgogroup.com.sg
15. We may require that you submit form 1.4A (Request for Access, Correction, Consent, and Withdrawal) or provide certain information to process your request. We will need to verify your identity before carrying out certain requests. Where permitted by law, we may charge you a fee to process your request.



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16. We may be permitted under applicable laws to refuse your request to exercise your rights, for example, we may refuse (a) a request for erasure where the personal data is required for in connection with claims; or (b) an objection request and continue processing your personal data based on compelling legitimate grounds for the processing.
17. On such instances your request for access or correction was rejected or refused, you may raise objections or clarification to DPO via email.

CONSENT

You acknowledge that you have read and understood Galaxy Logistics' Data Protection Policy for Employees (the "Policy"), and consent to the collection, use and disclosure of your personal data by Galaxy Logistics for the purposes set out in the Policy. You may withdraw consent for such collection, use and disclosure, and make an access or correction request in respect of your personal data, in accordance with the Policy.

Name: _____

Signature & Date: _____