

The Works Partnership Pte Ltd

Personal Data Privacy Policy

1. Personal Data Privacy Policy

1.1. **The Works Partnership Pte Ltd** (referred to as “us”, “we”, “our”, or “TWP”) is committed to protecting your personal data collected, used and disclosed by us. TWP is a company incorporated in Singapore, collectively with our associated companies, **The Works Partnership Holdings Pte Ltd** (“TWPH”), **Asiaworks Training (S) Pte Ltd** (“AWS”) and **The Coach Partnership Pte Ltd** and (“TCP”), referred as **The Works Partnership Group** (“TWPG”)

1.2. *Application*

TWP has different channels for collecting personal data. However, we are committed to complying with this Policy in its collection, use and disclosure to ensure accountability and uniformity in protecting your personal data.

1.3. *Compliance With This Policy*

This Policy applies to all personal data you provide or that we may collect about you. Please do not provide us with any personal data if you do not accept this Policy.

We may also require you to accept this Policy when you contact, interact with, transact with, or deal with us or access and use our websites, applications, or services. If you notify us that you do not accept this Policy, we may not be able to establish a relationship with you or service your requests.

1.4. *Concerns And Contact Us*

Suppose you have any feedback or issues concerning your personal data or about this Policy or wish to complain to us. In that case, you may contact our **Data Protection Officer**, whose details are below.

Data Protection Officer

Email address: roy.ng@alac.sg

1.5. *Amendment To This Policy*

We may amend this Policy occasionally without notice to comply with applicable laws or as we update our data usage and handling processes. The revised Policy will supersede earlier versions and apply to personal data provided to us previously. The amended Policy will take effect when made available at <https://www.theworkspartnership.com>

2. Personal Data

2.1. *What Personal Data Do We Collect?*

The personal information collected is contingent upon the specific purposes we require and the details you opt to furnish. This may encompass details such as your name, address, contact particulars (such as telephone number and email address), identification number, photograph, video image, and any additional information that can serve to identify you or is personal.

2.2 ***How Do We Collect Personal Data?***

We collect personal data relevant to our relationship with you. We may collect your personal data directly or indirectly through various channels, including when:

- you use our services or enter into transactions with us (or express interest in doing so)
- your organisation enrolled you to attend our training courses
- you apply to be a member of any of our loyalty programs, respond to our promotions, or subscribe to our mailing lists;
- you visit our websites, download or use our mobile applications;
- you register an account with us through our websites or applications;
- you transact with us, contact us or request that we contact you through various communication channels, for example, through social media platforms, messenger platforms, face-to-face meetings, telephone calls, emails, faxes and letters;
- your images, captured via CCTV, photographs or videos taken by us or our representatives when you are within our premises or attend events organised by us;
- you participate in events and programs, competitions, contests or games organised by us;
- we seek information about you and receive your personal data in connection with your relationship with us, for example, if you are a customer, investor or shareholder, seeking employment or adjunct trainer, or
- You can submit your personal data to us for any other reason.

Depending on your relationship with us, we may also collect your personal data from third parties, including:

- from our associated companies, **The Works Partnership Holdings Pte Ltd** (“TWPH”), **Asiaworks Training (S) Pte Ltd** (“AWS”) and **The Coach Partnership Pte Ltd** and (“TCP”), collectively referred to as **The Works Partnership Group** (“TWPG”);
- from your family members or friends who may provide your personal data to us on your behalf;
- from public agencies or other public sources and,

Our website and applications may utilise specific technologies designed to automate data collection, including personal information. These technologies encompass cookies, web beacons, and web analytics. Suppose you prefer to avoid having your data collected through these technologies. In that case, you can turn off their operation on your devices (if feasible) or choose not to use our websites and applications.

2.3 ***Voluntary Provision Of Personal Data***

Your provision of personal data to us is voluntary, and you have the right to withdraw your consent for us to use your personal data at any time by contacting us and submitting a request to us. Your withdrawal will take effect after your request is processed. However, Suppose you do not provide us with the necessary personal data. In that case, We may be unable to fulfil the purposes for which the personal data is required, including providing the products and services you need.

2.4 ***Providing Personal Data Belonging To Others***

In certain circumstances, you may also provide the personal data of persons other than yourself. If you do so, you are responsible for informing the party of the purposes for which we require

the party's personal data and warrant that you are validly acting on behalf of the party to consent to our collection, use and disclosure of the personal data.

2.5 ***Accuracy And Completeness Of Personal Data***

You must ensure that all personal data you provide is true, accurate and complete and promptly inform us of any changes to the personal data.

2.6 ***Minor***

If you are a child, minor or not of legal age, please inform and seek the consent of your parent or guardian before you provide your personal data to us. If you are a parent or guardian and have reason to believe your child or ward has provided us with their personal data without your consent, please us and contact us to request the eraser of their personal data.

3. **Purposes**

3.1 We collect, use and disclose your personal data where:

- you have given us consent;
- necessary to comply with our legal or regulatory obligations;
- necessary for our legitimate business interests, provided that this does not override your interests or rights and
- necessary to perform a contract or transaction you have entered into with us or provide a service you requested or require from us.

3.2 ***General Purposes***

Generally, we collect, use and disclose your personal data for purposes connected or relevant to our business, including:

- processing your transactions for products and services to you, including, without limitation, to apply or obtain funding from relevant funding agencies;
- managing your relationship with us;
- facilitating your use of our platforms and services;
- assisting you with your requests, enquiries and feedback;
- administrative purposes, such as accounting, risk management and record keeping, business research, data, planning and statistical analysis, and staff training;
- security and safety purposes, such as monitoring and protecting our platforms from unauthorised access and usage for security threats, including images captured by security cameras;
- carrying out research, data and statistical analysis;
- compliance with laws and regulations, internal policies and procedures, e.g. audit, accounting, risk management and record keeping;
- enforcing legal obligations owed to us or responding to complaints, litigation or investigations concerning us;
- managing and engaging third parties or data processors that provide services to us, such as IT services, data analytics, marketing, and other professional services;
- processing your application for employment purposes or matters relating to or leading to employment;
- engaging you as an associate trainer or issues relating to training;
- such purposes that may be informed to you when your personal data is collected;

- carrying out our legitimate business interests (listed below) and
- any other reasonable purposes related to the aforesaid

3.3 **Marketing Purposes**

Where you give us consent, we collect, use and disclose your personal data for purposes of:

- Managing and administering your request to receive news (including events and product launches), promotions and marketing information from us (and our affiliates or related entities) and on our group products;
- Analysing and profiling your purchases, transactions and likes or dislikes to be better able to send you relevant or targeted news (including events and product launches), promotion and marketing information from us (and our affiliates or related entities) and on our group products; and
- Sending you news (including events and product launches) and promotions from us (and our affiliates or related entities) as well as marketing information from us (and our affiliates or related entities) and on our group products.

3.4 **Legitimate Business**

Our legitimate business interests include:

- managing our business and relationship with you, and providing services to our users and customers;
- protecting our rights and interests and those of our users and customers;
- preventing and investigating possible misuse of our websites, applications and services;
- understanding and responding to inquiries and feedback;
- understanding how our users use our websites, applications and services;
- identifying what our users want and improving our websites, applications, services and offerings;
- enforcing obligations owed to us, or protecting ourselves from legal liability; and
- sharing data in connection with acquisitions and transfers of our business.

3.5 **Purposes involving The Works Partnership Group**

Without prejudice to the generality of other provisions in this Policy, for administrative efficiencies and to allow us to serve your needs better, your personal data may be collected, used and disclosed to the Works Partnership Group and associates for the following purposes:

- to facilitate the provision of centralised administrative and management services;
- enabling the use of centralised resources such as shared information technology resources and systems;
- enable the conduct of internal audits, reporting and management of our operations and
- facilitating the conduct of centralised business activities and functions such as data analytics.

3.6 **Permitted Under Applicable Laws**

We may also collect, use, disclose and process your personal data for other purposes without your knowledge or consent, where law requires or permits.

3.7 **Contacting You**

When using your personal data for the above purposes, we may contact you via mail, email, SMS, telephone, pop-up notifications (when you are using our applications), or any other means.

We will refrain from contacting you for marketing purposes unless we have obtained your consent or are exempted by relevant laws from requiring consent. When reaching out for marketing, we will not use your telephone number unless you have expressly permitted such communication. If you prefer not to receive any communication or information from us or want to specify the methods through which we contact you or send information, please feel free to contact us with your preferences.

4. Disclosure of Personal Data

4.1 **Disclosure To The Works Partnership Group.**

We may disclose or share your personal data with our associated companies of TWPG for the purposes described in paragraphs 3.2, 3.3, 3.4 and 3.5.

4.2 **Other Disclosures**

We may also disclose or share your personal data in connection with the purposes described in paragraphs 3.2, 3.3 and 3.4 above, including to the following parties:

- third parties who are appointed to provide services to us, e.g. associate trainers, IT vendors, marketing companies and event organisers;
- third parties that we conduct joint marketing and cross promotions with, and
- business partners, and
- regulatory authorities and public agencies.

When disclosing personal data to third parties, we will (where appropriate and required by applicable law) enter into contracts with these third parties to protect your personal data in a manner consistent with applicable laws and ensure that they only process your personal data per our instructions.

5. Cross Jurisdiction Transfers of Personal Data

5.1 **Safeguards**

We may transfer your personal data from Singapore for the purposes in paragraph 3. When transferring personal data outside Singapore, we will require recipients of the personal data to protect personal data at a standard comparable to that under the laws of Singapore. For example, we may enter into legally enforceable agreements with the recipients to ensure that they protect your personal data. You may obtain details of these safeguards by contacting us.

6. Protection of Personal Data

6.1 **Period of retention**

We keep your personal data only for so long as we need it to fulfil the purposes we collected and to satisfy our business and legal purposes, including audit, accounting, or reporting requirements. How long we keep your personal data depends on the nature of the data, e.g. we hold personal data for at least the duration of the limitation period for bringing claims if the personal data may be required to commence or defend legal proceedings. We may retain certain

information for extended periods, such as where we are required to do so by law or to maintain a record of the certification you have obtained with us. Our data retention period is typically six years upwards, depending on the limitation period.

6.2 **Anonymised Data**

In some circumstances, we may anonymise your personal data so that it no longer identifies you; in this case, we are entitled to retain and use such anonymised data without restriction, including for data analytics.

6.3 **Unauthorised access and vulnerabilities**

While we take reasonable precautions to safeguard your personal data in our possession or under our control, we cannot be held responsible for unauthorised or unintended access beyond our control, including hacking or cybercrimes. We also do not guarantee that our websites and applications are invulnerable to security breaches or that your use of our websites and applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities.

7. Your Rights

7.1 You enjoy certain legal rights concerning your personal data that we hold or control. These rights include:

- **Withdrawal of consent:**

You may withdraw consent for our use of your personal data.

- **Correction:**

You may request that any incomplete or inaccurate data we hold or control be corrected.

- **Access:**

You may ask if we hold or control your personal data, and if we do, you can request access or a copy of such data. (administrative fee may apply).

7.2 **Exercising your rights**

You may contact us to exercise your rights (see paragraph 1.4 above for contact details). We may require that you submit certain forms or provide certain information to process your request. Upon receipt of your written request, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of our acceding to the same, including any legal consequences which may affect your rights and liabilities to us. We will seek to process and effect your request within 30 days of receipt. Where law permits, we may charge you a fee to process your request. We may also be permitted under applicable laws to refuse a request.

7.3 **Limitations**

We may be permitted under applicable laws to refuse your request to exercise your rights; for example, we may deny,

- (a) a request for erasure where the personal data in connection with claims is required or
- (b) an objection request and continue processing your personal data based on compelling legitimate grounds for the processing.

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