

Privacy Policy

Introduction

This Personal Data Protection Policy (“Policy”) of Astro Pacific group of companies (“Company”) sets out the controls and procedures to ensure we comply with the provisions of the Personal Data Protection Act 2012 of Singapore (‘PDPA’) namely;

- how we collect, use, disclose and retain your personal data,
- the types of personal data we collect, use, disclose and retain,
- the purpose for which we collect, use, disclose and retain your personal data, and
- how we manage your personal data

This Policy applies to visitors, and job seekers engaging with the Company and it shall be read in conjunction with the Personal Data Protection Act 2012 (“PDPA”) and all PDPA Advisory guidelines issued by the Personal Data Protection Commission (“PDPC”).

The scope of the Personal Data Protection Management Policy shall include all entities under the Astro Pacific group of companies listed below:

1. ASTRO PACIFIC PTE LTD
2. CATHAY SHIPPING & FREIGHT SERVICES PTE LTD
3. MANTRO MARINE SERVICES PTE LTD

Astro Pacific Group of companies (“Astro Pacific”, “we”, us or “our”) takes the privacy of your (“You, Your, Website, office and port visitor, member of the public”) information seriously.

Depending on who you are, we may handle your data as a data controller. Therefore, if you are:

- A person who visits our office premises, we may collect your personal data, such as CCTV surveillance footage.
- A person who have applied for any such position with us as job seekers, we may collect your personal data such as
 - name or alias
 - residential address, telephone numbers, email address and other contact details;
 - educational qualifications
 - employment/work experience;

- referee's personal data, such as name, email address and mobile number

Note that at the recruitment stage, we will dispose of any unsolicited personal data (like NRIC/ Passport number) that has been transmitted to us. Therefore, do not send us personal data that has not been requested in the list above.

You have choices regarding our collection, use or disclosure of your personal data. You have the right to object to the processing of your personal data and withdraw your consent in a manner described in the withdrawing clause below (under **Withdrawing Your Consent**). However, please note that we may not be able to continue with our services to you or to allow you to our office premises, or attend our , where you have withdrawn your consent for our collection, use or disclosure of your personal data.

We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law such as during the following situations:

- To respond to an emergency that threatens your life, health and safety or of another individual;
- Necessary in the national interest, for any investigation or proceedings.

Personal Data

"Personal data" means data, whether true or not, about a person 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.

Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, mailing address, email address, telephone number, audio-video recordings (including CCTV surveillance footages) and still images, gender and details of your emergency contact person (such as name, relationship and mobile number).

Other terms used in this Notice shall have the meanings given to them in the Personal Data Protection Act 2012 (PDPA) (where the context so permits).

Information Collection

- We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly 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).

- We may collect and use your personal data for any or all of the following purposes:
 - verifying your identity; security purposes
 - recruitment purposes
 - responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - managing your relationship with us;
 - complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - any other purposes for which you have provided the information;
 - transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
 - any other incidental business purposes related to or in connection with the above;
- We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law such as during the following situations:
 - To respond to an emergency that threatens your life, health and safety or of another individual;
 - Necessary in the national interest, for any investigation or proceedings.
- You have choices regarding our collection, use or disclosure of your personal data. You have the right to object to the processing of your personal data and withdraw your consent in a manner described in withdrawing clause below. However, please note that we shall not be able to continue with your job application and/or, access to our office in the absence of required information.

Disclosure of Personal Data

We may disclose your personal data:

- to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above-mentioned purposes.

Security of Personal Data

We strive to maintain the safety of your Personal Information. We use a reasonable physical and digital security system to store your personal information.

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 minimised collection of personal data, authentication and access controls (such as good password practices, need-to-basis for

data disclosure, etc.), encryption of data, up-to-date antivirus protection, regular patching of operating system and other software, securely erase storage media in devices before disposal, web security measures against risks, usage of one-time password (OTP)/2 factor authentication (2fa) to secure access, and security review and testing performed regularly.

The implementation of this system is to protect your information from unauthorized access, use, disclosure, or destruction. The information you provide to us may be stored on the secure servers of our trusted service providers, which is located in Singapore and elsewhere.

However, no internet-based service is completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. Therefore, by visiting our website, you acknowledge the potential for unauthorized access and agree to assume the risk.

In the case of a breach that affects your personal information, you will be notified within a reasonable timeframe of such breach and measures we took to rectify the breach. Note that, you may request at any time to access and delete your information with us.

Withdrawing Your Consent

The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, 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.

Upon receipt of your written request to withdraw your consent, 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 us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described above.

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

Access To And Correction Of Personal Data

If you wish to make (a) an access request 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) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

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.

We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) business days after receiving your request, we will inform you in writing within thirty (30) business 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).

Retention time

Astro Pacific group retains your personal information for as long as is necessary to fulfil the purpose for which it was collected and whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Astro Pacific group may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, 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 purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

Accuracy of Personal Data

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 Data Protection Officer in writing or via email at the contact details provided below.

Transfers of Personal Data Outside of Singapore

We generally do not transfer your personal data to countries outside of Singapore, except where the transfer is necessary to fulfil our performance of a contract or where the transfer is necessary for the use or disclosure where exceptions to consent for use or disclosure apply under the PDPA. Where such transfers are made, 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 PDPA.

Links to Other Websites

Our Website may contain links to other websites. This Privacy Policy only applies to this website so when you link to other websites you should read their own privacy policies.

Singapore Personal Data Protection Act 2012 (“PDPA”)

In this Privacy Statement, “Personal Data” refers to any data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access.

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal data, please contact dpo@astro-pacific.com who will review your feedback and respond within 10 business days of receiving it.

Changes to this Privacy Policy

Astro Pacific group reserves the right to make changes to this privacy policy at any time. Astro Pacific group encourages you to periodically review this Privacy Policy to be informed of how Astro Pacific group is protecting your information.

Contact US

Astro Pacific group welcomes your comments regarding this Privacy Policy. If you believe that Astro Pacific group has not adhered to this Privacy Policy, please contact us at +65 6661 6800 or email: dpo@astro-pacific.com

Ver: 3.0/ dated: 1 MAY 2024