

## **Data Protection Policy**

We at Air Liquide Singapore Private Limited (ALSg) and our Singapore subsidiaries take our responsibilities under Singapore's Personal Data Protection Act 2012 (the "PDPA") seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the "DPO") at:

[sg-dpo@airliquide.com](mailto:sg-dpo@airliquide.com)

### **1 INTRODUCTION**

- 1.1 "Personal Data" is defined under the PDPA to mean 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. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video images.
- 1.2 We will collect your personal data in accordance with the PDPA. We will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to collect and process your personal data without your consent.
- 1.3 We will collect your personal data on the basis of how you have disclosed them to us and we will not assume any responsibilities for verification of your personal data and we shall not be liable for the accuracy thereof in any manner.

### **2 PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA**

- 2.1 The personal data which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data, including:
  - (a) Recruitment, assessment of the candidate's suitability, appraisal performance, promotion, training, career development, remuneration, health and safety, discipline, review of human resource policies and / or statistical purposes
  - (b) Provisioning & administration of services that you have requested from us

- (c) Marketing, advertising and promotional information that you requested to receive from us
- (d) Security and risk management
- (e) Legal & regulatory requirements
- (f) any other purposes which we notify you of at the time of obtaining your consent.

(collectively, the “**Purposes**”)

As the purposes for which we may/will collect, use, disclose or process your personal data depend upon the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent for such other purpose is permitted by the PDPA or by law.

- 2.2 In order to conduct our business operations more efficiently, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, and/or other third parties whether situated in or outside of Singapore, for one or more of the above-stated Purposes. Such third party service providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes.
- 2.3 When you view one of our Web sites, we may store some data on your computer in the form of a “cookie” to automatically recognize your PC next time you visit. Cookies can help us to tailor-make a Website to suit your interests or to store your password to save you having to re-enter it each time. If you do not wish to receive cookies, please configure your internet browser to erase all cookies from your computer’s hard drive, block all cookies or to receive a warning before a cookie is stored.

### **3 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

- 3.1 We respect the confidentiality of the personal data you have provided to us.
- 3.2 In that regard, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following :
- (a) cases in which the disclosure is required or authorized based on the applicable laws and/or regulations, including PDPA;
  - (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
  - (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;

- (d) cases in which the disclosure is necessary for any investigation or proceedings;
- (e) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
- (f) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest.

3.3 The instances listed above at paragraph [3.2] are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

3.4 Where we disclose your personal data to third parties with your consent, we will employ our best efforts to require such third parties to protect your personal data.

#### **4 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA**

4.1 You may request to access the personal data currently in our possession or control by submitting a written request to the DPO at [sg-dpo@airliquide.com](mailto:sg-dpo@airliquide.com). Please provide the last four digits/alphanumeric number of your identity document (e.g. NRIC or passport) for security and identification verification purposes, and specifying the data which you wish to access, including any account or reference numbers where applicable. We may request for further documentation or information as necessary in order to process your request accordingly.

4.2 For a request to access personal data, we will seek to provide you with the relevant personal data within 30 days from the time we have sufficient information from you to deal with such request. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested. Note that the PDPA exempts certain types of personal data from being subject to your access request.

4.3 You may correct inaccuracies in your personal data within our records by sending a written request to the DPO at [sg-dpo@airliquide.com](mailto:sg-dpo@airliquide.com) with your last four digits/alphanumeric number of your identity document (e.g. NRIC or passport) for security and identification verification purposes and specifying the personal data which is incorrect and submitting the correct particulars which it should be replaced with. Once we have sufficient information from you to deal with the request, we will :

- (a) correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request; and

- (b) subject to paragraph [4.4], we will send the corrected personal data to every other organisation to which the personal data was disclosed by ALSg within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.
- 4.4 Notwithstanding paragraph [4.3(b)], we may, if you consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.
- 4.5 We will also be charging you a reasonable fee for the handling and processing of your requests to access your personal data. We will provide you with a written estimate of the fee we will be charging before the commencement of work. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

## **5 REQUEST TO WITHDRAW CONSENT**

- 5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control at any point of time by submitting your request at the email address: [sg-dpo@airliquide.com](mailto:sg-dpo@airliquide.com) with your last four digits/alphanumeric number of your identity of your identity document (e.g. NRIC or passport) for security and identification verification purposes.
- 5.2 We will process your request within 30 days from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.
- 5.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we may not be able to continue with your existing relationship with us.

## **6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA**

- 6.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by ALSg to make a decision that affects you, or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had initially provided us with.
- 6.2 We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are attributable to factors beyond our control.

- 6.3 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.
- 6.4 Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the PDPA. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

## **7 COMPLAINT PROCESS**

- 7.1 Please contact us if you have a complaint or grievance regarding our handling of your personal data or our complying with the PDPA by sending us an email or mail to “The Data Protection Officer” at:

(a) Email : [sg-dpo@airliquide.com](mailto:sg-dpo@airliquide.com).

(b) Office Address : No 2 Venture Drive, #22-28, Vision Exchange, Singapore 608526

- 7.2 We will certainly strive to deal with any such legitimate complaint or grievance that we receive, speedily and fairly.

## **8 UPDATES ON DATA PROTECTION POLICY**

- 8.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
- 8.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our website and can be viewed at <http://www.sg.airliquide.com>.
- 8.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.