

# **PRIVACY POLICY**

1. Deluge Corporation Pte Ltd (DCPL)
2. Deluge Fire Protection (SEA) Pte Ltd (DFP)

## **POLICY STATEMENT: Personal Data Protection Policy**

This is the Personal Data Protection Policy of Deluge Corporation Pte Ltd (DCPL) and Deluge Fire Protection (SEA) Pte Ltd on how we collect, use, and disclose or otherwise process your personal data in accordance with the Personal Data Protection Act (No. 26 of 2012) (“the Act”).

Please take a few minutes to read this Privacy Policy Statement so that you are aware of and understand the purposes for which we collect, use your Personal Data, and to whom such data may be disclosed and how data access requests can be addressed.

## **OUR COMMITMENT UNDER PDPA**

Deluge Corporation Pte Ltd (DCPL) and Deluge Fire Protection (SEA) Pte Ltd (DFP) are committed to protecting the personal data of our employees, clients and stakeholders. We will comply with the Personal Data Protection Act and ensure that personal data is processed fairly, transparently, and securely.

## **WHAT WE COLLECT**

By “Personal Data” we refer to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which the organisation has or is likely to have access.

The personal data that we may request directly or indirectly or online or in print includes but is not limited to:

- **personal identification information:** including name, identification and passport numbers, gender, date of birth, photographs, videos and voice recordings

- **contact information:** home address, postal address, email address, phone number, medical health, hobbies and interests;
- **academic qualifications and work experience:** certificates/degrees, previous occupation/employers and past job details, professional references;
- **other information:** which we may require from time to time;

The personal data you provide helps us to understand your needs and to maintain our relationship with you. From time to time, we may use your information to contact you - by email or phone to gather site information, work progress and feedback or to update your personal data.

We may also use and disclose your Personal Data to Deluge Group of companies, 3rd parties such as government agencies, statutory board, business partners, and builders, in order to fulfil the expressed purposes, including making application for work passes, security passes, security vetting, training courses, etc.

All third parties are prohibited from using your Personal Data except to provide their services to us, and they are required to maintain the confidentiality of your Personal Data, except:

- a. for any police investigation on criminal cases and fraud;
- b. for establishing, exercising or defending our legal rights, or obtaining legal services;
- c. for responding to an emergency that threatens the life, health or safety of an individual;

## HOW WE COLLECT, USE AND DISCLOSURE OF PERSONAL DATA

Personal data collected is protected by appropriate safeguards and made available only to authorised persons.

## **CONSENT**

Your express consent will be sought when collecting your Personal Data. There will also be instances where your consent for the collection or use of your Personal Data will necessarily be implied, for example in job application form, visiting our website, requesting for quotation or in the course of signing up for, or accepting, any of our Services or activities you have requested.

In the case of job applicants, you are deemed to have given your consent for collection of your personal data.

The purpose for the collection are:

- To process your job application;
- To provide or to obtain references for background screening;
- To collect information about your suitability for the position;
- To assess your performance;
- To administer benefits and payroll processes
- To develop training and staff development programs;
- To communicate with you as required to ensure compliance with our policies and processes.

## **USE**

We may collect, use and disclose your personal data for managing your employment and/or relationship with us;

- Verifying your identity;
- Responding to, handling, and processing queries, requests, applications, complaints, and feedback;

- Processing payment or claims transactions;
- To handle any disputes and conduct any necessary investigations.

## **DISCLOSURE**

For the purposes listed above, we may disclose your personal data to where such disclosure is required for performing obligations in connection with your employment or products and services:

- To our Deluge Group of companies - affiliated or related business units, including regional and overseas offices;
- To processing your transactions with us or to provide products and services to you;
- To our professional advisors (including our auditors and lawyers);
- To banks, credit card companies and their respective service providers;
- To government agencies, agents and 3rd party service providers, who have engaged us for our services or functions;
- To any government, statutory or regulatory authority or law enforcement agency as required by laws or rules and regulations;
- To any other party to whom you authorise us to disclose your personal data;
- Any other reasonable purpose related to the aforesaid.

## **WHAT ARE YOUR RIGHTS TO PERSONAL DATA COLLECTED**

- **Request correction of the Personal Data that we hold about you.** In the event that we have any incomplete or inaccurate Personal Data, you have the right to request the data to be corrected or to be deleted or to be removed.

- **Withdraw consent.** Whilst you are entitled to withdraw the consent to the collection, use or disclosure of the personal data, please give us reasonable notice so long as there are no legal or contractual restrictions preventing you from doing so. Depending on the nature and scope of your withdraw request, we may not be in a position to continue providing our services or contractual obligations to you. 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 by law.
- **Make a complaint and seek a remedy.** You may submit a complaint to us via the DPO Contact (see below) in relation to this Privacy Policy.

## ACCESS

### *You have the right to request access to Your Personal Data held by DCPL/DFP*

- put your request in writing via email to our DPO – [dpo@deluge.com.sg](mailto:dpo@deluge.com.sg)
- provide us with sufficient information, for us to verify your identity and
- to ensure that Personal Data is not disclosed to any person who has no right under applicable laws to receive it;

We will endeavour to respond to your request within thirty (30) days unless your request is particularly complex or you have made multiple requests. In this regard, to meet our costs for responding to your multiple access requests, we reserve the right to charge a reasonable administrative fee for this service and/or deny your request for access to your Personal Data.

## ACCURACY OF PERSONAL DATA

### *You have the right to request for correction of any of your personal data which is incorrect.*

Generally, we rely on personal data provided by you as accurate, true and complete. 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 via email provided at the DPO contact details.

If you believe that any Personal Data we are holding on you is incorrect or incomplete, please write to or email our Data Protection Officer.

## **RETENTION OF PERSONAL DATA**

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

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

## **PROTECTION OF YOUR PERSONAL DATA**

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,

## **CONTACTING US**

If you:

- Have any questions or feedback relating to your Personal Data or our Privacy Policy
- Would like to withdraw your consent to any use of your Personal Data;
- Would like to obtain access and make corrections to your Personal Data

Please email us at the address provided below referencing 'Privacy Policy'.

Kindly provide us your name, company name, email address and contact number. We will require you to verify your identity before we can respond substantially to your request.

### **Data Protection Officer**

Deluge Fire Protection (SEA) Pte Ltd

Email : [dpo@deluge.com.sg](mailto:dpo@deluge.com.sg)



## GOVERNING LAW

This Data Protection Policy and your use of our website shall be governed by and construed in accordance with the laws of the Republic of Singapore.

## Updating of Personal Data

1. We reserve the right to update this Policy from time to time. You should periodically visit this website page to review the current terms of this Policy so that you are aware of any updated terms to which you are bound.
2. We will post the changes to this Policy on the website and update the “Last Updated” date at the bottom page of this Policy as the effective date of change. However, any changes will not apply retrospectively.
3. By using this DP Policy Site, you are deemed to have consented to our collection, use and disclosure of your Personal Data in accordance with this Policy.

## USE OF COOKIES

By browsing or using our websites, you consent to our use of cookies to collect information on your website usage data and improve your online experience when browsing or transacting using our websites.

You can choose to accept or decline cookies when a website. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. However, this may prevent you from taking full advantage of our websites.

Attachments:

Form 1 – Withdrawal Consent Form to the use of my Personal Data

Form 2 – Request Access Form to my Personal Data

Form 3 – Request Correction Form to my Personal Data

Approved by:

Name: Freddie Quek

Title: Deputy Managing Director

Effective date: [1<sup>st</sup> April 2025 ]

Last updated: [                      ]

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