

PERSONAL DATA PROTECTION

Refulgence is the trading name of Refulgence Inc Pte Ltd. with company registration number: [200404210Z] ("Refulgence").

This policy sets out how Refulgence collects, uses and discloses your personal information that we collect (i) from you and/or (ii) from our clients when we act as data intermediary (as defined in the Singapore Personal Data Protection Act 2012, as the same may be amended from time to time ("PDPA")) for our clients in the performance of our services for our clients; as well as the security measures we take to protect your personal information. This policy is drawn up to meet the requirements of Singapore's personal data protection laws. Please be advised that from time to time, we may update this policy specially to reflect any changes in the laws and hence if you wish to be informed of how we are protecting your personal information at any particular point in time, please review this policy at that time.

HOW WE COLLECT YOUR PERSONAL INFORMATION?

All the personal information we collect about you comes from you and/or from our clients when they place an order with us for the purchase of our services. We may also collect personal data of employees and/or candidates of our customers ONLY if our customers require us to receive the personal data from the relevant employee and/or candidate direct.

WHAT IS PERSONAL INFORMATION?

Personal information is any information that can identify an individual or information about an identifiable individual, such as his/her telephone number, email address, NRIC number, home address, employment details, educational qualifications and transaction activity in relation to the purchase of services from us. A client may also furnish us with their bank account details and/or corporate credit card details to process a payment.

For the purpose of this policy, "personal information" shall mean data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and any other information to which Refulgence has or is likely to have access.

WHAT PERSONAL INFORMATION DO WE COLLECT?

We may need to collect personal information about you when you register with us and/or place an order with us for the purchase of our services. If you wish to register with us and/or place an order for the purchase of services, regretfully, we would not be able to proceed with your registration or process your order without you furnishing to us the personal information required.

If you voluntarily complete surveys, provide feedback, participate in any competitions run by Refulgence, participate in promotional events which Refulgence is participating in or organizing, we may also collect personal information about you with your consent for the purposes made known to you at the time of collecting that personal information from you.

USE OF YOUR PERSONAL INFORMATION

We may collect your personal information to verify your order, to deliver the reports or other materials as result of the services you have bought from us and to manage your account with us. With your consent, we may also contact you by voice call, SMS/MMS and/or email about offers or other information relating to existing and/or new services which may be of interest to you, to conduct research about your opinion of our services, to conduct surveys, to invite you for promotional events which Refulgence is participating in or organizing.

Refulgence does not rent, lease or sell to any third party its client list or any personal information it receives as a result of any service contracts it enters into with its clients.

Refulgence and they are required by contract to maintain the confidentiality and security of your personal information.

SECURITY OF YOUR PERSONAL INFORMATION

Refulgence uses reasonable precautions to protect your personal information and store it securely including restricting access to your personal information. You should be aware however, that Refulgence cannot guarantee security as no method of transmission over the internet or method of electronic storage is completely secure. The third-party service providers that Refulgence engages by contract as our data processors will also be contractually required to maintain the confidentiality and security of your personal data in line with the requirements of the Singapore personal data protections laws. Refulgence will not share your personal information with third parties other than those mentioned above except if required by law or a court order to do so.

DO NOT CALL PROVISIONS

Refulgence will not send you any telemarketing messages or make any marketing calls to you if you have registered your Singapore telephone number with the respective DNC registers unless you have furnished us with your express consent to do so and/or unless it is business number.

OTHER WEBSITES

The Refulgence website may contain hyperlinks to other websites from time to time and the personal data protection and privacy practices and policies of these website may differ from those of Refulgence. Refulgence does not accept any responsibility or liability for such other practices and policies and recommends that you consult the privacy notices of those websites before you submit any personal information to any of those websites.

DATA BREACH MANAGEMENT

1. Identify and Contain: Quickly identify the source and scope of the breach. Isolate affected systems to prevent further unauthorized access.

2. **Notify Internal Teams:** Inform your IT, security, and management teams immediately to assess the situation and coordinate a response.
3. **Assess Impact:** Determine the type and sensitivity of data compromised, and assess potential impacts on customers and your organization.
4. **Report to Authorities:** Depending on your jurisdiction and the nature of the data, report the breach to relevant authorities and comply with legal requirements.
5. **Notify Affected Parties:** Inform customers, partners, and other stakeholders about the breach, outlining what data was affected and the steps being taken. Will be notified to stakeholders as soon as we get the information (Roughly 2 hours).
6. **Secure Systems:** Strengthen security measures, apply patches, and enhance monitoring to prevent further breaches.
7. **Conduct a Forensic Investigation:** Engage experts to investigate the breach, identify vulnerabilities, and gather evidence.
8. **Review and Update Policies:** Review security policies and procedures, and update them based on lessons learned from the incident.
9. **Provide Training:** Educate employees on data security best practices and the importance of adhering to security protocols.
10. **Communicate Transparently:** Maintain transparent communication with stakeholders throughout the process to build trust and credibility.

ADMIN - DATA - PROTECTION POLICY

1. **Data Encryption:** All sensitive data, both in transit and at rest, is encrypted using strong encryption standards to ensure unauthorized parties cannot access it.
2. **Access Control:** Implement strict access controls to ensure that only authorized personnel can access sensitive data based on their roles and responsibilities.
3. **Regular Audits:** Conduct regular audits and assessments to identify vulnerabilities, ensure compliance with data protection policies, and take corrective actions as needed.
4. **Employee Training:** Provide regular training to employees on data protection best practices and the importance of safeguarding customer data.
5. **Incident Response Plan:** Have a robust incident response plan in place to quickly address and mitigate any data breaches, minimizing potential harm to customers and the company.

DATA RETENTION AND DATA DISPOSAL POLICY

1. **Data Retention Period:** Define and document specific time frames for retaining different types of data, ensuring compliance with legal, regulatory, and business requirements. After the retention period expires, data should be securely disposed of. Once client gives instruction to delete and dispose the data, a time frame will be informed to the client, depending on the size of the data and data will be disposed accordingly
2. **Secure Disposal Methods:** Implement secure methods for data disposal, such as data wiping, shredding physical media, or using certified disposal services, to ensure data cannot be recovered.
3. **Access Control During Retention:** Maintain strict access controls during the retention period to prevent unauthorized access or data breaches.

PERSONAL DATA QUERIES & COMPLAINTS

1. **Data Access and Correction:** Ensure individuals can request access to their personal data and correct any inaccuracies and there will be an approval process for either retrieval or correction as specified by the client
2. **Complaint Handling:** Establish a clear process for individuals to submit complaints about data handling, with designated personnel to address them.
3. **Response Time:** Set a specific timeframe within which queries and complaints will be acknowledged and resolved.
4. **Data Security Measures:** Implement security measures to protect personal data from unauthorized access, disclosure, or loss.
5. **Employee Training:** Conduct regular training for employees on data protection policies and procedures to ensure compliance and awareness.

CONTACT US

Please contact us if you have any questions about this privacy policy or about information, we hold about you.

As indicated above, the handling of certain personal information may be necessary to maintain your registration with us and/or for processing transactions relating to the purchase of services from us.

Except for personal information that Refulgence received consequent upon the relevant contracts with our clients to provide screening services, in which case the data subject must

contact the relevant client direct to amend any earlier consent the data subject has given, to check and/or to correct his/her personal data:

1. you may at any time contact us to withdraw consents given for the collection, use and/or disclosure of your personal data and we may advise you of the consequences of such withdrawal of consent(s), if any; and
2. you may contact us if you wish to inform us of any changes to your personal information, check on the accuracy of the personal information we hold about you and request that corrections be made to such information – at no cost to you.

You may contact our Data Protection Officer for any of the reasons stated above at Tel: [+65-97310477] or at Email: [sri@refulgenceinc.com].