



DATA PROTECTION POLICY

(Revised on 27th March 2020)

This data protection policy applies to **Rubicon Int'l Talent Exchange Pte Ltd** ("RUBICON" and including her business division of Cornerstone Singapore), a firm established in Singapore. This policy governs the collection, use, disclosure and retention of personal data submitted to RUBICON and explains how we collect and handle personal data of individuals and comply with the requirements of the Personal Data Protection Act 2012 of Singapore and its regulation(s) ("PDPA"). In this policy, "personal data" shall have the meaning ascribed to it in the PDPA.

This document covers data protection policies in the areas of:

- i. Main data protection policy
- ii. Recruitment data protection policy
- iii. Marketing data protection policy.

MAIN DATA PROTECTION POLICY

Summary

We will collect, use or disclose personal data for reasonable business purposes only if there is consent or deemed consent from the individual and information on such purposes have been notified. We may also collect, use or disclose personal data if it is required or authorised under applicable laws.

Collection of Personal Data

We collect personal data from clients, customers, candidates, business contacts, partners, personnel, contractors and other individuals. Such personal data may be provided to us in forms filled out by individuals, face-to-face meetings, email messages, telephone conversations, through our websites or provided by third parties. If you contact us, we may keep a record of that contact.

We collect these personal data when it is necessary for business purposes or to meet the purposes for which you have submitted the information.

We will only collect, hold, process, use, communicate and/or disclose such personal data, in accordance with this policy.

Use of Personal Data

We use personal data for the following purposes:

- to provide our services
- to respond to the individual's request or for the purposes for which it was provided to us as stated at the time of the collection (or as is obvious from the context of collection)
- to maintain contact with clients, candidates and other contacts
- to keep clients, candidates and other contacts informed of the services we offer that may be of interest to them
- for general management and reporting purposes, such as invoicing and account management
- for recruitment purposes
- for purposes related to the employment of our personnel and providing internal services to our personnel
- all other purposes related to our business

You may choose to unsubscribe from mailing lists, registrations, or elect not to receive further marketing information from us by contacting our Data Protection Officer at singapore@cornerstone-group.com or, if we have contacted you by email, you may use that email to notify us that you would like to unsubscribe. Please allow 28 days for your request to be processed.

Disclosure of Personal Data to Third Parties

We do not disclose personal data to third parties except when required by law, when we have your consent or deemed consent.

We may disclose personal data to other member firms in the RUBICON / Cornerstone network of firms where necessary:

- i. to meet the purpose for which you have submitted the information; or
- ii. to enable you to be provided with information at a later date which may be of relevance and interest to you based on the nature and purpose of your voluntary requests.

Access to and Correction of Personal Data

Upon request, we will provide the individual with access to their submitted personal data or other appropriate information on their personal data in accordance with the requirements of the PDPA.

Upon request, we will correct an error or omission in the individual's personal data that is in our possession or control in accordance with the requirements of the PDPA.

Withdrawal of Consent

Upon reasonable notice being given by an individual of his withdrawal of any consent given or deemed to have been given in respect of our collection, use or disclosure of his personal data, the individual is deemed to be aware of the likely consequences of withdrawing his consent. We will cease collecting, using or disclosing the personal data unless it is required or authorised under applicable laws.

Accuracy of Personal Data

We will make a reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.

After collection of the personal data by us or on our behalf, do inform us of any change by contacting our Data Protection Officer at singapore@cornerstone-group.com

Security and Protection of Personal Data

We have implemented generally accepted standards of technology and operational security to protect the personal data in our possession or under our control and to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. Only authorised RUBICON personnel are provided access to personally identifiable information and these personnel have agreed to ensure confidentiality of this information.

Retention of Personal Data

We will cease to retain personal data as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.

Transfer of Personal Data outside of Singapore

We will endeavour to ensure that any transfers of personal data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

Privacy on Our Web Sites

This Policy also applies to any personal data we collect via our websites. Cookies may be used on some pages of our websites. "Cookies" are small text files placed on your hard drive that assist us in providing a more customised website experience. Cookies are now used as a standard by many websites to improve users' navigational experience. If you are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, a visitor may refuse a cookie and still fully navigate our websites; however other functionality in the site may be impaired. After termination of the visit to our site, you can always delete the cookie from your system if you wish.

Data Protection Officer

If you believe that information we hold about you is incorrect or out of date, or if you have concerns or further queries about how we are handling your personal data, or any problem or complaint about such matters, please contact our Data Protection Officer at singapore@cornerstone-group.com

Modifications

We reserve the right to modify or amend this Policy at any time. The effective date will be displayed at the beginning of this Policy.

MARKETING DATA PROTECTION POLICY – For Clients, existing and potential

The privacy of information you provide is important to us. The following privacy statement governs the collection, use, disclosure and retention of personal data submitted to RUBICON. RUBICON's information handling practices are in accordance with current privacy and data protection legislation in Singapore.

For more general information about the privacy practices of RUBICON, please refer to our main Data Protection Policy.

Why do we collect personal data and how do we use it?

The personal data submitted will be used by RUBICON for the purposes of any relevant promotional activities organised by RUBICON; such as, but not limited to, seminars, events and alerts on publications. We may also send you communications from time to time, for example, to advise you of technical updates or ask you to participate in surveys which may be of interest to you. By submitting the information, you acknowledge that you have consented to our processing data in accordance with the privacy statement for the purposes described.

Retention of Personal Data

Personal data that is kept by us will be destroyed after a reasonable period from the time when it becomes outdated or is no longer required for the purpose for which it was collected or when we receive your request to delete it.

How is this personal data secured?

The personal data submitted to us is stored in our contacts database or similar system and is available to only authorised partners and staff, and contractors.

Access to your Personal Data

If you wish to delete or correct your personal data provided to us or if you have any concerns about how we handle information about you, please send your request to our Data Protection Officer at singapore@cornerstone-group.com

Disclosure of Data to Third Parties

Personal data collected may be transferred and shared internationally between the member firms of the RUBICON / Cornerstone network in order to meet the purpose for which you have submitted the information and activities directly related to it. By submitting personal data, you are providing explicit consent to trans-border transmission of such data as described above.

The personal data submitted will not be disclosed to third parties except when required by law, when we have your explicit consent or in cases where the third party is a contractor or supplier whom we have engaged specifically to assist with RUBICON's activities.

RECRUITMENT DATA PROTECTION POLICY – For Candidates

RUBICON believes that privacy is an important individual right and this policy provides information regarding our use and disclosure of personal data collected from individuals including via our websites for recruitment purposes. RUBICON's information handling practices are in accordance with current privacy and data protection legislation in Singapore.

For more general information about the privacy practices of RUBICON, please refer to our main Data Protection Policy.

Why do we collect personal data?

As part of our business process and services* – including recruitment - we collect necessary personal data about you to consider them for employment with RUBICON or our clients' firms. During the course of the recruitment and selection process, we may request further information about you to assess your suitability for positions with RUBICON or our clients' firms. In doing so, we only collect personal data that is necessary for recruitment decisions. The procedures used by RUBICON to gather further information about you might include:

- Selection interviews;
- Assessment centres;
- Written skills tests;
- Referee reports;
- Security vetting; and,
- Necessary pre-employment activities.

Formal references from your current or former employer(s) or other sources will be obtained with your consent. In some cases, pre-employment checking may be necessary. Any checking is "tailor-made" and the extent and nature of information sought is no more than is justified by the particular position being filled. Failure to provide requested information may influence the processing and outcome of your placement with RUBICON or our clients' firms.

*Our business also encompasses services for coaching, leadership development, career counselling and other related fields for which this collection of personal data applies.

How do we use personal data?

We use the personal data for the primary purpose of considering your respective suitability for positions with us or our clients. Only that information which is relevant to the purpose of assessing your suitability is collected and use. We will not collect or use personal data in ways other than as described in this policy unless we have obtained your consent. In some cases we may specifically request a consent form to be signed. In other cases consent may be implied (for instance, you give us information after being fully advised of how it will be used).

Disclosure of personal data

Your personal data will be used only by partners and staff directly involved in the recruitment process. Information will not be disclosed to third parties except when required by law, when we have your explicit consent or in cases where the third party is a contractor or supplier whom we have engaged specifically to assist with RUBICON's activities.

Transfer of Data to Other Countries

Personal data collected by RUBICON may be transferred internationally to other RUBICON / Cornerstone and or other entities world-wide where it is necessary to meet the recruitment purposes. By submitting personal data to RUBICON, whether through our websites or otherwise, you are providing explicit consent to trans-border transmission of such data collected by RUBICON, whether through our websites or otherwise, for the fulfilment of recruitment applications or placement with our clients.

How is this information secured?

We keep your personal data secure and make it accessible to partners and staff on a need to know basis. The information you provide in your online application is stored into our recruitment database. RUBICON has implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, alteration or destruction. Only authorised RUBICON personnel are provided access to personal data and these employees are bound by company policy to ensure confidentiality of this information.

How long is information kept?

We retain recruitment information only as long as it is reasonable to assume that the purpose for collection of such personal data is served by such retention, and such retention for legal or business purposes. To request us to delete your personal data submitted to RUBICON whether through our websites or otherwise, please send request to singapore@cornerstone-group.com

Correction and Concerns

If you believe that information we hold about you is incorrect, or you have concerns about how we are handling your personal data, or if you changed your mind about our usage of your data, please email our Data Protection Officer at singapore@cornerstone-group.com and we will try to resolve those concerns.

Changes to RUBICON's Recruitment Data Protection Policy

RUBICON reserves the right to modify or amend this policy at any time and for any reason. However, RUBICON commits to ensure that the privacy rights of individuals are maintained.

In order to keep interested parties informed, RUBICON will ensure that we notify users of changes to our Recruitment Data Protection Policy by stating the effective date of the latest version at the beginning of this policy.

Contact our Privacy Office

We welcome enquiries or comments about our Recruitment Data Protection Policy by writing to our Data Protection Officer at singapore@cornerstone-group.com.