

DOCUMENT: Job Applicant Data Protection Policy	CODE: HRAPAC-
DATE OF EFFECTIVITY: July 1, 2022	SUPERSEDES: Any similar policy issued before.
ISSUED TO: Hitachi Solutions Asia Pacific Pte. Ltd. Job Applicants.	

I. OBJECTIVE

To outline the basis upon which Hitachi Solutions Asia Pacific (“the Company”, “we”, “us” or “our”) may collect, use, disclose or otherwise process personal data of job applicants in accordance with the Singapore’s Personal Data Protection Act of 2012 (“PDPA”). This Policy applies to personal data in our possession or under our control, including personal data in the possession of organizations which we have engaged to collect, use, disclose or process personal data for our purposes.

II. SCOPE:

This Policy applies to all persons who have applied for any position with us (whether on a part- time, temporary or full-time basis and whether under internship or traineeship) (collectively referred to as “job applicants”), and all references to “employment” shall apply equally to internships and traineeships (as may be applicable).

Contact Information:

HR Team: Email HR team at SingHR@hitachisolutions.com

III. GUIDELINES

Personal Data:

1. As used in this Policy, “personal data” means data, whether true or not, about a job applicant 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.
2. Personal data of job applicants which we may collect includes, without limitation, your:
 - (a) Name or alias, gender, NRIC/FIN and/or passport number (if contained in any of the documents listed in this clause or collected during advance stages of our recruitment processes), re-entry permit date, date of birth, nationality, and country and city of birth;
 - (b) Mailing address, telephone numbers, email address and other contact details;
 - (c) Resume, educational qualifications, professional qualifications and certifications, language/dialect proficiency level and employment references;
 - (d) Employment history and salary information;

- (e) Training and other work-related skills history and proficiency level;
 - (f) National service status, where applicable;
 - (g) Work-related health issues and disabilities;
 - (h) Photographs;
 - (i) Details of your next-of-kin, spouse, and other family members; and
 - (j) Work-related health issues and disabilities;
3. Other terms used in this Policy shall have the meanings given to them in the PDPA (where the context so permits).

Collection, Use and Disclosure of Personal Data

1. We collect personal data that
 - (a) You knowingly and voluntarily provide in the course of or in connection with your job application with us, or via a third party who has been duly authorized by you to disclose your personal data to us (your “authorized representative”, which may include your job placement agent and character referees), after (i) you (or your authorized representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorized 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.
2. 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 authorized by law).
3. Your personal data will be collected and used by us, and we may disclose your personal data to third parties where necessary for the following purposes:
 - (a) Assessing and evaluating your suitability for employment in any current or prospective position within the organization; and
 - (b) Verifying your identity and the accuracy of your personal details and other information provided.
4. The purposes listed in the above clauses may continue to apply even in situations where your engagement with us has ended or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to re-assessing and re-evaluating your suitability for employment in any current or prospective position).

Withdrawing Collection, Use and Disclosure of Personal Data

1. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all the purposes listed above by submitting your request in writing to our Human Capital Group at the contact details provided below.
2. 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 engagement 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.
3. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and extent of your request, we may not be able to process your job application (as the case may be).

We shall, in such circumstances, notify you before completing the processing of your request (as outlined above). Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 1 above.

4. 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 under applicable laws.

Access to and Correction of Personal Data

1. 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, you may submit your request in writing to our Human Capital Group at the contact details provided below.
2. 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.
3. We will respond to your access request as soon as reasonably possible. Should we not be able to respond to your access request within thirty (30) days after receiving your access request, we will inform you in writing within thirty (30) 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 inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).
4. Please note that depending on the request made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organization has on record, if the record of your personal data forms a negligible part of the document.

Protection of Personal Data

1. To safeguard your personal data from unauthorized 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, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorized third party service providers and agents only on a need-to-know basis.
2. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

Accuracy of Personal Data

1. We rely on personal data provided by you (or your authorized representative). 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 Human Capital Group in writing at the contact details provided below.

Retention of Personal Data

1. We may retain your personal data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.
2. We will cease to retain your personal data or remove how the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data were collected, and are no longer necessary for legal or business purposes.

Transfer of Personal Data Outside of Singapore

1. Your personal data may be transferred to countries outside of Singapore to other members of the Hitachi group or to other third parties, where necessary or appropriate for human resources administration, compensation-related activities and compensation analysis, data management and consolidated and recruitment purposes. 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.

Company's Contact Details

1. You may contact our HR (who would in turn, communicate with our Data Protection Officer) if you have any enquiries or feedback on our personal data protection policies and procedures; or if you wish to make any request, in the following manner:

Contact person: Glaiza Ann Divino

Email address: gdivino@hitachisolutions.com & singhr@hitachisolutions.com

Effect of Policy and Changes to Policy

1. This Policy applies in conjunction with any other policies, notices, contractual clauses, and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
2. We may revise this Policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued participation in our recruitment process constitutes your acknowledgement and acceptance of such changes.

This Policy is subject to modification or revision in part or in its entirety to reflect changes in conditions