

This privacy policy is for the website “www.singaporehcs Summit.com” and served by the Human Capital Leadership Institute and governs the privacy of its users who choose to use it.

The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore the way this website processes, stores and protects user data and information will also be detailed within this policy.

## **PRIVACY STATEMENT**

This website (www.singaporehcs Summit.com) is a Human Capital Leadership Institute (HCLI) website. Thank you for examining our privacy statement.

## USE OF COOKIES

This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device.

Cookies are small files saved to the user's computers hard drive that track, save and store information about the user's interactions and usage of the website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.

This website uses cookies to track visitor usage to better understand how they use it. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

## PERSONAL DATA

If you choose to submit a webform or send an e-mail that contains personally identifiable data, for us to process an application or to render you a service, we may share relevant data within HCLI, or if necessary, with other Government agencies or partners, so as to serve you efficiently and effectively, unless such sharing is prohibited by legislation. We may also need to disclose personal data as required by law or a court order. We will NOT share your personal data with private organisations, except where such entities have been authorised to carry out specific services in partnership with HCLI.

## EXTERNAL LINKS

This site may contain links to other independently-managed websites whose data protection and privacy practices may be different from ours. We are not responsible for the content and privacy practices of these other websites and encourage you to examine the privacy notices of those sites.

If you wish to read HCLI's Personal Data Statement, click [here](#)

Contact details of HCLI's Data Protection Officer:

[connect@hcli.org](mailto:connect@hcli.org)

## **HCLI PERSONAL DATA PROTECTION STATEMENT**

HCLI respects the privacy of individuals and recognizes the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect, process and disclose your personal data. We are also committed to adhering to the provisions and principles of the Personal Data Protection Act 2012. As such, this Personal Data Protection Statement is to assist you in understanding how we collect, use and/or disclose your personal data.

We will collect, use and disclose your personal data in accordance with the Personal Data Protection Act 2012 (“Act”). The Act establishes a data protection law that comprises various rules governing the collection, use, disclosure and care of personal data. It recognises both the rights of individuals to protect their personal data, including rights of access and correction, and the needs of organisations to collect, use or disclose personal data for legitimate and reasonable purposes.

The Act takes into account the following concepts:

- Consent – Organisations may collect, use or disclose personal data only with the individual’s knowledge and consent (with some exceptions);
- Purpose – Organisations may collect, use or disclose personal data in an appropriate manner for the circumstances, and only if they have informed the individual of purposes for the collection, use or disclosure; and
- Reasonableness – Organisations may collect, use or disclose personal data only for purposes that would be considered appropriate to a reasonable person in the given circumstances.

In projecting the three main concepts above, the Act contains nine main obligations which organisations are expected to comply with if they undertake activities related to the collection, use and/or disclosure of personal data:-

- (1) The Consent Obligation
- (2) The Purpose Limiting Obligation
- (3) The Notification Obligation
- (4) The Access and Correction Obligation
- (5) The Accuracy Obligation
- (6) The Protection Obligation
- (7) The Retention Limitation Obligation
- (8) The Transfer Limitation Obligation
- (9) The Openness Obligation

While we will not be going into the details of these Obligations in this Personal Data Protection Statement, you can be rest assured that we are constantly mindful of them in our collection, use and disclosure of personal data. Should you wish to know more about these obligations, an excellent summary can be found in the Advisory Guidelines of the Personal Data Protection Commission at: [www.pdpc.gov.sg/docs/default-source/advisory-guidelines/overview-of-the-data-protection-provisions-\(chapter-10\).pdf?sfvrsn=0](http://www.pdpc.gov.sg/docs/default-source/advisory-guidelines/overview-of-the-data-protection-provisions-(chapter-10).pdf?sfvrsn=0)

### **1. Purpose for the Collection, Use & Disclosure of Personal Data**

In general, subject to applicable exceptions permitted in the Act, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used and/or disclosed, as well as obtain consent for the collection, use and/or disclosure of your personal data for the intended purpose.

Depending on your relationship with us, the personal data which we collect from you may be used and/or disclosed for the following purpose:

#### **For Programme Participants Generally**

Most programme participants will have consented to HCLI using your personal data in the manner set out in the application/registration form used when you registered for the programme; or when alumni are notified by the HCLI administration of new rules and policies applicable to the alumni and are deemed to have consented to the same.

#### **2. Disclosure of Personal Data to Third Parties**

We will not disclose your personal data to any third parties without first obtaining your consent permitting us to do so or unless any such disclosure is permitted under any of the statutory exemptions under the Act. In this respect, please note that we may disclose your personal data to third parties in certain circumstances without first seeking your consent, if such disclosure is either required or permitted under the Act, including without limitation, if the disclosure is required by law and/or regulations or if there is an emergency.

#### **3. Request for Access, Correction and/or Withdrawal of Personal Data**

Subject to certain exceptions in the Act, you may request to access and/or correct the personal data currently in our possession or withdraw your consent for the collection, use and disclosure of your personal data in our possession at any time by submitting your request here.

For a request to access personal data, we will provide you with the relevant personal data within a reasonable time from such request being made.

For a request to correct personal data, we will process your request, including undertaking necessary verification activities, as soon as practicable after the request has been made.

For a request to withdraw consent, we will process your request within a reasonable time from such a request for withdrawal of consent being made. In some cases, requests for withdrawal of consent may adversely impact your relationship with HCLI as it may hinder HCLI's ability to continue to interact with you. We will notify you in advance of such impact, if any.

#### **4. Administration and Management of Personal Data**

We will take appropriate measures to keep your personal data accurate, complete and updated. We will also take reasonable efforts to take appropriate precautions and preventive measures 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.

We will also take reasonable efforts to ensure that the personal data in our possession or under our control is destroyed 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.

Our websites may contain links to other websites not maintained by HCLI. Such third party websites are subject to their own data protection and privacy practices and you are encouraged to examine the data protection policies of those websites.

## **5. Responsibility of Employees and Other Stakeholders**

The Act also imposes certain responsibilities on all those who process personal data at HCLI, whether you are a member of staff holding, using and sharing personal data in your professional capacity, or a programme participant with access to personal data in your programme or other activities. These obligations include holding and using data in a secure manner, making sure that data is handled in line with what individuals have been told, having appropriate arrangements in place for the access to (and sharing of) data, and making sure that individuals' data is accurate and retained for a suitable period. If a data breach occurs (e.g. personal data held by HCLI is lost, stolen, inadvertently disclosed to an external party, or accidentally published), this should be reported immediately to your seniors and the Data Protection Officer so that we may review the circumstances and liaise as necessary with colleagues internally and the relevant external authorities.

Contact details of Data Protection Officer:

[connect@hcli.org](mailto:connect@hcli.org)