

NTU Personal Data Privacy Statement And Consent For Employees

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NTU Personal Data Protection ACT (PDPA)

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NTU Personal Data Protection ACT (PDPA)

PERSONAL DATA PROTECTION ACT – CONSENT FOR THE COLLECTION, USE AND DISCLOSURE OF EMPLOYEE PERSONAL DATA

The Personal Data Protection Act 2012 (PDPA) 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. It takes effect on 2 July 2014.

Throughout the course of your employment with the University, the University will collect, use, disclose and/or process your personal data for the purpose of managing or terminating your employment. In line with the provisions of the PDPA, the University has prepared a NTU Personal Data Privacy Statement and Consent for Employees which explains the type of personal data collected, the purposes for which the data is collected, how the data will be used and managed by the University.

NTU PERSONAL DATA PRIVACY STATEMENT AND CONSENT FOR EMPLOYEES

PART 1

COLLECTION, USE AND DISCLOSURE OF EMPLOYEE PERSONAL DATA

1. Protection of your personal data is important to us. Please read this document carefully as it contains important information about how we will/may collect, use, disclose and process personal data that you provide or that we possess about you. In this document, the term “**personal data**” means data, whether true or not, about you where you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access.
2. In this document, the words “we”, “our”, “us” and “NTU” refer to Nanyang Technological University and its successors and assigns.
3. To process, administer and/or manage your employment relationship with us, we will necessarily need to collect, use, disclose and/or process your personal data. Such personal data includes information about you set out in the NTU’s various forms and documents and any other personal information provided by you, possessed by us, obtained by us, or which was or is collected in the course of your employment, whether now or in the future. Some examples are your name, identification number, home address, personal contact details, appraisal, medical records, etc.
4. Your failure to supply certain personal data to us (or if we are not permitted by you to process your personal data), may/would result in us being unable to process, administer and/or manage your employment relationship with us. Depending on the extent by which you do not permit us to process your personal data or the extent of personal data which you do not provide to us, it may mean that we will not be able to continue the employment relationship with you, as we will be unable to administer the relationship.
5. We will/may collect, use, disclose and/or process your personal data for one or more of the following purposes :

NTU Personal Data Protection ACT (PDPA)

- a) facilitating, processing, dealing with, administering, managing, maintaining and/or terminating your employment relationship with us, including but not limited to secondments with or transfer to affiliates, related corporations or associated companies, secondments with third party organisations who are/may be our business partners, suppliers or counterparts, dealing with and/or recording your achievements or progress, dealing with your application for loans or any benefits or schemes that may be provided by us (whether now or in the future) and thereafter administering and managing the same, determining your suitability for promotion, awards or any other benefits that may be provided by us, training programmes (whether conducted by us or by third parties) including determining your suitability for the same and which may require us to disclose your personal data to the providers of such training programmes, dealing with insurance checks, benefits and/or claims (whether for yourself or for your family members depending on what we provide), dealing with medical checks, benefits and/or claims (whether for yourself or for your family members depending on what we provide), payroll administration, performance appraisal, personal and career development; monitoring, analyzing and/or managing your performance, performance targets and/or transactions carried out for NTU, dealing with training and development including administering programs and plans with respect thereto, job assessment, compensation, planning and organisation, dealing with applications for security clearance at sites where such clearances are needed, including sites where NTU conducts its business or sites where NTU is to perform a contract for a third party;
- b) marketing your capabilities and services to potential students of NTU;
- c) dealing with and/or administering employment benefits;
- d) dealing with conflict of interests;
- e) supporting, dealing with and/or administering your health needs, medical needs, safety and welfare requirements (all of which may or may not be provided by us at our absolute discretion);
- f) facilitating, administering, processing, dealing with and/or managing your application for and/or involvement in any events, seminars, and/or your interest or participation in any events, seminars, and/or other opportunities that we may (at our discretion) make available to employees;
- g) facilitating, administering, processing, dealing with and/or managing your application(s) for scholarships (if provided by us), financial aid or bursaries (if any), whether for yourself or for your family member(s) and if successful, administering and/or managing such scholarships (including bonds related thereto), financial aid grants or bursaries;
- h) dealing with, monitoring, administering and/or managing your use of infrastructure, equipment or facilities that may be provided by us including but not limited to provision of IT (information technology) equipment and services, recreation facilities and benefits, that may (at our discretion) be provided by us or any third party whom we may engage in that regard. Without prejudice to the generality of the aforesaid, this includes monitoring your emails and contents thereof (whether personal or business related) that are sent or received through our infrastructure, equipment or facilities as well as your Internet usage/browsing;
- i) carrying out your instructions (which we reserve our rights as to whether to act upon or not) or responding to any enquiry given by (or purported to be given by) you or on your behalf;

NTU Personal Data Protection ACT (PDPA)

- j) contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering and/or managing your employment relationship with us such as but not limited to communicating with you for administrative matters, sending you correspondence (including but not limited to mailing you a cheque for salary that may be due to you post termination of your employment). You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages;
- k) facilitating communication with you or your nominated contacts in an emergency, such as but not limited to medical emergency, flood, etc.;
- l) managing, facilitating and dealing with NTU's infrastructure and/or business operations needs, including disclosure and processing necessary for the University to conduct its business, such as but not limited to application for and/or administering corporate loans, responding to third party requests for your personal data pursuant to contractual requirement, AML (anti money laundering checks), IT outsourcing. In this regard and for the avoidance of doubt, we will/may disclose your personal data to third parties for such purposes set out in this sub-paragraph. Without limiting the generality of the foregoing, an example would be where you are a cheque signatory for NTU with respect to banking facilities with a bank and we would need to disclose your personal data to the bank to facilitate such facilities;
- m) carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or our risk management procedures that may be required by law or that may have been put in place by us;
- n) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether relating to your employment relationship or any other matter arising from, dealing with or related to your employment relationship with us, and whether or not there is any suspicion of the aforementioned; and/or investigating any alleged or actual fraud, misconduct or unlawful conduct within NTU and/or the NTU group of companies;
- o) complying with or as required by any applicable law, governmental or regulatory requirements of any relevant jurisdiction, as well as rules, guidelines or notices issued by applicable regulatory authorities, including meeting the requirements to make disclosure under the requirements of any law binding on us and for the purposes of any guidelines issued by regulatory or other authorities, whether in Singapore or elsewhere, with which we are expected to comply, and/or complying with NTU's internal policies;
- p) facilitating and/or administering tax related requirements, claims, deductions or matters such as but not limited to disclosure of your personal data to the Inland Revenue Authority of Singapore;
- q) complying with or as required by any request or direction of any governmental authority; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (including but not limited to the Ministry of Manpower, Ministry of Defence, Ministry of Home Affairs, Ministry of Education, Immigration and Checkpoints Authority and Ministry of Health);
- r) dealing with immigration related matters and/or employment pass/permit/licence matters. In this regard, this includes but is not limited to disclosing to the relevant government

NTU Personal Data Protection ACT (PDPA)

authorities (including Singapore government authorities or foreign government authorities) details about your status for immigration related and/or employment pass/permit/licence matters. Without limiting the generality of the aforesaid, in the case where you are a foreigner coming to Singapore or in the case where you are being sent to work overseas, we may/will need to collect, use and disclose your personal data from/for dealing with/to such government authorities;

- s) dealing with, handling and/or conducting disciplinary, security and/or quality assurance processes, matters and/or arrangements. Without prejudice to the generality of the aforesaid, we wish to bring to your attention that there are surveillance cameras installed throughout the premises of our offices for security reasons and you acknowledge that your personal data will be collected by such cameras and processed by us consequently;
- t) dealing with and/or investigating complaints and discipline related matters;
- u) performing internal administrative, operational and technology tasks to facilitate, administer or manage your employment relationship with us;
- v) facilitating, administering, managing and/or dealing with Employee Welfare activities. Without prejudice to the generality of the aforesaid, do note that photography and/or videography could be carried out during such activities and your image captured for the purpose of recording your participation in such activities and used, disclosed, processed and published in our corporate videos, materials such as newsletters or other publication created or issued by us, any materials/books recording your participation in such activities, whether for marketing purpose or otherwise, and you agree to the same. **“Employee Welfare”** refers to activities, events, products and/or services (such as but not limited to excursions, CSR (corporate social responsibility) activities, engaging consultants to speak on medical topics, staff dinner & dance, staff welfare or incentive tours/trips, etc.) which are intended to enhance or enrich your life as an employee with us, to foster community spirit and a positive culture within NTU. For the avoidance of doubt, although NTU has the intention of, it is not under any obligation to provide Employee Welfare to you and efforts in this regard by us is at our absolute discretion.
- w) dealing with and/or administering CSR (corporate social responsibility) activities such as recycling, care for the environment, community involvement including visits to old folks homes or participating in events held by charities;
- x) conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our infrastructure, welfare, benefits and facilities in order to enhance your employment relationship with us or for your benefit, or for benchmarking or assessing the competitiveness of your remuneration package;
- y) responding to and/or dealing with legal process, pursuing legal rights and remedies, defending litigation or claims and managing any complaints or claims;
- z) record-keeping purposes and producing statistics and research for internal and/or statutory reporting and/or record-keeping requirements;
- aa) NTU group reporting purposes including but not limited to reporting on salary, performance reviews and achievements;
- bb) storage, hosting, back-up and/or disaster recovery, of your personal data;

NTU Personal Data Protection ACT (PDPA)

- cc) carrying out and/or performing NTU's obligations in its contracts with current / potential project partners and/or corporate counterparts, and/or pitching for contracts/projects with potential project partners and/or corporate counterparts, including that it may require provision of your personal information to such current or potential project partners and/or corporate counterparts;
- dd) processing, facilitating, dealing with and/or making arrangements for your business travels including but not limited to travel visa applications for such travels;
- ee) dealing with references or reference checks (or opinions) pertaining to you. In this regard, you agree that we may obtain personal data, references or opinions or reference checks, about you, from various sources or third parties without any need for your further consent, to determine your suitability for employment, promotion or continued employment. You also agree that should any other organisation (including its agents such as a recruitment company) in future seek from us information, personal data, a reference, opinion or reference check, about you, and/or details relating to your work performance, with a view to considering hiring you, employing you or engaging your services, that we may disclose your personal data and such requested information, personal data, reference, opinion, or reference check about you to them without any need for your further consent;
- ff) publicity and promotion with a view to marketing the business of NTU and/or to acquiring corporate counterparts and/or students. In this regard, your personal data will be processed by us for the purpose of conducting publicity and/or the development of promotional materials for use by us, showcasing or marketing your achievements, expertise, skills or qualifications, such as but not limited to publication of your image and personal data on public media platforms such as the newspaper, the Internet, our in-house notice boards, at marketing exhibitions, the radio, etc. **You hereby** authorize NTU to videotape and photograph you and you grant NTU a license to use your name, photograph, video images, personal data, and likeness in NTU's promotional materials (which includes all media platforms including corporate videos). You hereby waive all claims for payment for such use;
- gg) dealing with and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves NTU as a participant or involves only a related corporation or affiliated company of NTU as a participant or involves NTU and/or any one or more of NTU's related corporations or affiliated companies as participant(s), and there may be other third party organisations who are participants in such transaction. **"business asset transaction"** means the purchase, sale, lease, merger or amalgamation or any other acquisition, disposal or financing of an organisation or a portion of an organisation or of any of the business or assets of an organisation;
- hh) facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business(es), transactions, processes, policies, practices and/or systems of NTU;
- ii) dealing with and/or facilitating Trade Union related matters of which you may be a member of or involved in, or which NTU is impacted by or involved in. Without limiting the generality of the aforesaid, in this regard, we may need to disclose your personal data to such Trade Union for the purpose of the activities or business of such Trade Union.

(collectively, the **"Purposes"**).

6. Your personal data may be held or stored locally, regionally or globally, whether in Singapore or out of Singapore.

NTU Personal Data Protection ACT (PDPA)

7. We may need to disclose your personal data to third parties, whether located within or outside Singapore, for one or more of the above Purposes, as such third parties, would be processing your personal data for one or more of the above Purposes. In this regard, you hereby acknowledge, agree and consent that we may/are permitted to disclose your personal data to such third parties (whether located within or outside Singapore) for one or more of the above Purposes and for the said third parties to subsequently collect, use, disclose and/or process your personal data for one or more of the above Purposes. Without limiting the generality of the foregoing or of paragraph [5], such third parties include :
- (a) our associated or affiliated organisations or related corporations;
 - (b) any of our agents, contractors or third party service providers who process your personal data on our behalf including but not limited to medical clinic(s)/centre(s), those which provide administrative or other services to us such as mailing houses, telecommunication companies, manufacturers/suppliers, travel agencies, insurance companies and information technology companies, data storage or hosting companies, data centres, disaster recovery service providers, banks, benefits administrators;
 - (c) NTU (or NTU's associated corporations' or related corporations') professional advisors or service providers;
 - (d) legal process participants and their advisors;
 - (e) public and governmental / regulatory authorities (including the Central Provident Fund Board), statutory boards, industry associations;
 - (f) courts and other alternative dispute forums;
 - (g) any third party in connection with any proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposition or all or any portion of NTU's business, assets or stock (including in connection with any bankruptcy or similar proceedings); and/or
 - (h) third parties which are receiving your personal data for one or more of the Purposes.
8. In addition, it is our policy to retain certain personal data of employees when they cease to be employed by us, so long as such personal data is still relevant for the purpose(s) for which it was collected and/or we have a legal or business purpose to keep the same. Without limiting the foregoing, such personal data may be required for any post employment related activities in relation to a former employee including but not limited to provision of references, processing applications for re-employment, matters relating to retirement benefits and allowing us to fulfil contractual or statutory obligations.
9. NTU may require you to provide from time to time, the personal data of other individuals such as your next of kin or dependents, for administering and/or managing your employment relationship with us, such as but not limited to contacting such individuals for emergency purposes, declaration of conflict of interest, processing/administering any corporate group insurance scheme or any other benefit scheme (if any) which we may provide you and/or your family member(s) with. You hereby represent and warrant that where you provide the personal data of such individuals to the organisation that you have each of their authority to provide their personal data to us and that you are validly acting on each of their behalf and have obtained their consent to disclose their personal data to us for the purposes for which we are collecting, using, disclosing and processing their personal data.

NTU Personal Data Protection ACT (PDPA)

10. Please ensure that you provide complete and accurate personal data to us and keep us updated on any changes to your personal data. Kindly note that if you do not provide complete and accurate personal information to us as and when it is required, it may have adverse consequences for you as we would be relying on such personal data to make decisions about you such as ascertaining promotion, administering benefits.
11. To the extent that the applicable law allows, you may request access to, and the correction of, your personal data in our possession or control. If we allow access, we may charge you a reasonable fee.
12. You may withdraw your consent by giving us reasonable notice, whether in part or as a whole. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your employment relationship with us. Should you wish to withdraw your consent in part or whole, please send an email to our Data Protection Officer at dpo@ntu.edu.sg and provide details of your withdrawal.
13. For the avoidance of doubt, in the event that Singapore personal data protection law or other Singapore law permits an organisation such as NTU to collect, use or disclose your personal data without your consent, such permission granted by the law shall continue to apply. This will be the case notwithstanding that you may have withdrawn your consent or notwithstanding that you have not given us consent to the same.
14. If you have any questions relating to our collection, use and disclosure of your personal data or the matters set out in this document, you may contact our Data Protection Officer at dpo@ntu.edu.sg.

NTU Personal Data Protection ACT (PDPA)

PART 2

NOTIFICATION ON MANAGING OR TERMINATING AN EMPLOYMENT RELATIONSHIP

1. Throughout the course of your employment with Nanyang Technological University (“**NTU**”), NTU may/will collect, use, disclose and/or process your personal data for the purpose of managing or terminating your employment relationship with NTU (the “**M&T Purpose**”).
2. Without limiting the generality of the foregoing, purposes/sub-purposes or activities that fall within the M&T Purpose where NTU would be collecting, using, disclosing and/or processing your personal data include but are not limited to :
 - (a) Using your bank account details to issue salaries. Without prejudice to the generality of the aforesaid, this could mean that NTU may/will disclose your personal data to banks which you have indicated to us to remit your salaries to, as well as to NTU collecting and/or using your personal data that we obtain from such banks to deal with such salary remittances.
 - (b) Monitoring how you use NTU's computer network resources. This would include but is not limited to monitoring of :
 - (i) your records on access history of the office premises (e.g. your use of access cards, PIN access, bio-metric) throughout the day;
 - (ii) your use of NTU's issued devices and equipment and records related thereto (e.g. mobile devices, GPS records (e.g. for drivers), laptops & computers);
 - (iii) your use of emails and access to websites.
 - (c) Posting your photographs, name and other business related contact details on the staff directory page on the NTU's intranet.
 - (d) Managing staff benefit schemes like training or educational subsidies. Without prejudice to the generality of the foregoing, this could mean that NTU may/will process your personal data :
 - (i) to manage group/corporate insurance benefits that may be available to you;
 - (ii) to deal with training programmes/events/seminars for you.
3. NTU may/will need to disclose your personal data to third parties, whether located within or outside Singapore, for one or more of the said foregoing purposes as such third parties would be processing your personal data for one or more of the said foregoing purposes. Such third parties include :
 - (a) NTU's associated or affiliated organisations or related corporations;
 - (b) any of NTU's agents, contractors or third party service providers who process your personal data on our behalf;
 - (c) NTU (or NTU's associated corporations' or related corporations') professional advisors or service providers;
 - (d) legal process participants and their advisors;

NTU Personal Data Protection ACT (PDPA)

- (e) public and governmental / regulatory authorities (including the Central Provident Fund Board), statutory boards, industry associations;
 - (f) courts and other alternative dispute forums;
 - (g) any third party in connection with any proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposition or all or any portion of NTU business, assets or stock (including in connection with any bankruptcy or similar proceedings); and/or
 - (h) third parties which are receiving your personal data for one or more of the said foregoing purposes.
4. For any clarification, please contact the Office of Human Resources.