



DG Packaging Data Protection & Confidentiality Policy

Policy Statement

DG Packaging is committed to safeguarding the personal and confidential information of employees, customers, suppliers, and stakeholders. This policy outlines our approach to collecting, using, storing, and protecting data in compliance with Singapore's Personal Data Protection Act (PDPA) and internal governance standards.

1. Purpose

To establish clear standards for the handling of personal and confidential information and ensure regulatory compliance.

2. Scope

Applies to all personnel and external parties who handle or provide data to DG Packaging.

3. Definitions

- **Personal Data:** Identifiable information about individuals
- **Confidential Information:** Sensitive operational, financial, or proprietary data
- **Data Subject:** Individual whose data is processed
- **Data Breach:** Unauthorized access, disclosure, loss, or misuse of data

4. Data Collection & Usage

DG Packaging collects data for:

- HR administration and onboarding
- Payroll and benefits processing
- Regulatory and tax compliance
- Client servicing and operational needs

All data collection is consent-based, specific to stated purposes, and documented during onboarding or service engagement.

5. Data Storage & Security

- Personal data is stored securely on password-protected systems accessible by authorized managers only
- Physical records (if any) are kept in locked storage
- Access rights are reviewed quarterly and revoked upon exit
- Regular data backups are conducted and monitored for suspicious activity
- System credentials are removed within 24 hours of employee departure, in accordance with the Exit & Offboarding Policy

Effective Date: 01 Aug 2025



6. Confidentiality Obligations

All employees must:

- Sign a Confidentiality Agreement upon joining
- Avoid storing sensitive files on personal or unsecured devices
- Refrain from unauthorized sharing of internal or client data
- Use password protection and encryption when emailing confidential documents
- Immediately report suspected breaches or misuse to HR

7. Disclosure of Personal Compensation

- Employees are expected to treat their own and others' compensation details—including salary, bonuses, and increments—as confidential. Disclosure of such information to colleagues or external parties without prior authorization may be considered a breach of this policy.
- This includes verbal, written, or digital sharing of remuneration details that could disrupt workplace harmony or compromise internal governance.
- Violations may result in disciplinary action as outlined in Section 14.

8. Third-Party Data Handling

External parties who access company data must:

- Sign a Data Protection Agreement
- Follow DG Packaging's handling, transmission, and retention protocols
- Notify HR and IT of any data incidents related to their services

9. Data Subject Rights

Individuals may request:

- Access to their own data
- Correction or deletion of inaccurate data
- Withdrawal of data consent (subject to operational/legal needs)

Requests must be submitted in writing to the HR Department and may take up to 10 working days to process.

10. Data Breach Protocol

- HR and IT will initiate an investigation within 24 hours of notification
- Impacted individuals will be informed with corrective recommendations
- PDPC will be notified if required by regulatory thresholds

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- Affected systems will be isolated, and recovery actions implemented
 - Root-cause analysis and future prevention actions will be documented

11. Data Retention & Disposal

- Employee personal records (e.g. payroll, leave, performance) will be retained for five (5) years post-employment
- Data will be disposed via secure deletion protocols or physical shredding
- Retention schedules for client or supplier data will align with contract requirements and audit needs

12. Remote Work Guidelines

Employees working remotely must:

- Use company-approved devices or secure VPN connections
- Avoid printing confidential documents unless authorized
- Ensure workspaces are not accessible to non-staff individuals

13. Internal Audits

DG Packaging conducts random and scheduled audits of data handling practices, led by HR or Governance, to ensure ongoing policy adherence.

14. Disciplinary Consequences

Violation of this policy may result in:

- Written warnings
- Suspension or dismissal
- Legal action where data misuse or breach causes material harm

15. Cross-Policy References

This policy complements:

- Section 9 of the Exit & Offboarding Policy
- Clause 10.1 of the Employment Agreement (Non-Disclosure and Post-Employment Restrictions)

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