This Privacy Notice (“**Notice**”) sets out the basis which ACES Care Ltd (“**ACL**”, “**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of individuals in accordance with the Personal Data Protection Act (“**PDPA**”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

**APPLICATION OF THIS NOTICE**

1. In order for us to provide our services and for the operation of our business, provide services of recruiting and placing individuals for potential job opportunities (and related services) with our clients and/or directly at ACL, act as employer or hirer of record for individuals employed or engaged by ACL, or provide human resources related services to our clients, we must collect certain personal data from and about individuals who are candidates, job applicants, contractors, and former employees.
2. In the event we are unable to collect the required personal data from such individuals, we may not be able to proceed with the above mentioned services, including providing potential job placements, for such individuals.

**PERSONAL DATA**

1. As used in this Notice, “**personal data**” means data, whether true or not, about an individual who can be identified:
	1. from that data; or
	2. from that data and other information to which we have or are likely to have access.
2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include:
	1. full name or alias;
	2. gender;
	3. date of birth;
	4. nationality, and country and city of birth;
	5. residential address, telephone numbers, email address and other contact details;
	6. details of your next-of-kin, spouse and other family members;
	7. marital status;
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

**COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

1. We generally collect personal data that:
	1. you knowingly and voluntarily provide in the course of or in connection with your employment or job application with us, or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”, which may include your job placement agent), after
		1. you (or your authorised representative) have been notified of the purposes for which the data is collected, and
		2. you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes,
	2. collection, use and disclosure of personal data without consent is permitted or required by the PDPA or other laws. 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 authorised by law).
2. **Your personal data will be used by us for the following purposes, and we may disclose your personal data to third parties where necessary for the following purposes:**
	1. performing obligations in the course of or in connection with our provision of services requested by you;
	2. verifying your identity and the accuracy of your personal details and other information provided;
	3. performing obligations under or in connection with the provision of our services to our clients.
	4. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
	5. managing your relationship with us;
	6. complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
	7. storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
	8. carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations applicable to us (whether in Singapore or overseas), the requirements or guidelines of governmental authorities which we determine are applicable to us (whether in Singapore or overseas), and/or our risk management procedures that may be required by law (whether in Singapore or overseas) or that may have been put in place by us
	9. transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the above mentioned purposes;
	10. crime prevention and safety when entering our office premises;
3. If you do not provide us with your consent, we may not be able to fulfil the purposes listed in clause 7 of the Notice.
4. The purposes listed in Clause 7 may continue to apply even in situations where your relationship with us (for example, pursuant to your employment contract should you be hired) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).
5. If you provide us with personal data of another person (for instance, a potential employee/referral), you are responsible for ensuring that such person is made aware of the data contained in this Notice and that the person has given you his/her consent for sharing the data with us.
6. In the case where we receive unsolicited personal data via email or any other communication channels that do not serve any legal or business purpose, the unsolicited personal data will not be retained and will be securely disposed of as soon as practicable.

**DEEMED CONSENT BY NOTIFICATION**

1. We may collect or use your personal data, or disclose existing personal data for secondary purposes that differ from the primary purpose which it had originally collected for pursuant to Clauses 6 and 7. If we intend to rely on deemed consent by notification for such secondary purposes, we will notify you of the proposed collection, use or disclosure of his personal data through appropriate mode(s) of communication.
2. Before relying on deemed consent by notification, we will assess and determine that the collection, use and disclosure of the personal data will not likely have an adverse effect on you.
3. You will be given a reasonable period to inform us if you wish to opt-out of the collection, use and disclosure of your personal data for such purposes.
4. After the lapse of the opt-out period, you may notify us that you no longer wish to consent to the purposes for which your consent was deemed by notification by withdrawing your consent for the collection, use or disclosure of your personal data in relation to those purposes.

**RELIANCE ON LEGITIMATE INTEREST EXCEPTION**

1. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for the legitimate interests of us or another person. In relying on the legitimate interests exception of the PDPA, we will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.
2. In line with the legitimate interests’ exception, we will collect, use or disclose your personal data for the following purposes:
	1. Fraud detection and crime prevention;
	2. Detection and prevention of misuse of services
3. The purposes listed in Clause 14 may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter.

**WITHDRAWING YOUR CONSENT**

1. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. As an individual, you may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer 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 relationship 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.
	1. For Job applicants: we may not be able to make a decision on your suitability for recruitment and employment, or comply with the law and therefore, we may not be able to make an offer of employment with our clients or us.
	2. For visitors to our office: we may not be able to allow you to enter the office premises
3. In general, we shall seek to process and effect your request within **fourteen (14)** calendar days of receiving it.
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 disclosure without consent is permitted or required under applicable laws.**

 **You may submit a request to withdraw your consent here:** **contact@acescare.sg**

**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 or via email to our Data Protection Officer 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 request as soon as reasonably possible. In general, our response will be within **thirty (30)** calendar days. Should we not be able to respond to your access request within **thirty (30)** calendar days after receiving your access request, we will inform you in writing within **thirty (30)** calendar 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 generally 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 that is being 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 we have on record, if the record of your personal data forms a negligible part of the document.

 **You may submit a request to access your personal data here:**

 **contact@acescare.sg**

**You may submit a request to correct your personal data here:**

 **contact@acescare.sg**

**PROTECTION OF PERSONAL DATA**

1. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as minimised collection of personal data, authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), encryption of data, data anonymisation, up-to-date antivirus protection, regular patching of operating system and other software, securely erase storage media in devices before disposal, web security measures against risks, usage of one time password(otp)/2 factor authentication (2fa)/multi-factor authentication (mfa) to secure access, and security review and testing performed regularly.
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 generally rely on personal data provided by you (or your authorised representative). In order 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 Data Protection Officer in writing or via email 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 the means by which 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.

**TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

1. We may need to disclose your personal data to third parties, whether located within or outside Singapore, as such third parties would be processing your personal data for one or more of the purposes stated in Clause 7.
2. 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 purposes stated in Clause 7 and for the said third parties to subsequently collect, use, disclose and/or process your personal data for one or more of the purposes stated in Clause 7. Such third parties include any of our agents, contractors or third-party service providers that process or will be processing your personal data on our behalf including but not limited to those which provide administrative or other services to us such as mailing houses, telecommunication companies, information technology companies and data centres.
3. Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the PDPA. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

**DATA PROTECTION OFFICER**

1. You may contact 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:

**Email Address: contact@acescare.sg**

Any query or complaint should include, at least, the following details:

1. Your full name and contact information and;
2. Brief description of your query or complaint.

We treat such queries and feedback seriously and will deal with them confidentially and within reasonable time.

**EFFECT OF NOTICE AND CHANGES TO NOTICE**

1. This Notice 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 Notice 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 employment and participation in our recruitment process constitute your acknowledgement and acceptance of such changes.

Effective date : 05/05/2025

Last updated : 05/05/2025