

PRIVACY POLICY NOTICE – PERSONAL DATA PROTECTION ACT, 2012**1. Introduction**

- 1.1. This privacy policy sets out how we comply with the provisions of the Personal Data Protection Act 2012 of Singapore, (“PDPA”), the Singapore Copyright Act, 2021, the European Data Protection Regulation (EU 2016/679 GDPR – General Data Protection Regulation) and the local laws applicable where we operate, as follows:
 - a) our policies on how we manage your Personal Data;
 - b) the types of Personal Data we collect, use, disclose and/ or retain;
 - c) how we collect, use, disclose and/ or retain your Personal Data; and
 - d) the purpose(s) for which we collect, use, disclose and/ or retain your Personal Data.
- 1.2. We will collect, use or disclose Personal Data for reasonable business purposes only if there is consent or deemed consent from the individual and information on such purposes have been notified.
- 1.3. We may also collect, use or disclose Personal Data if it is required or authorised under applicable laws.
- 1.4. You agree and consent to us, our authorised service providers and third parties to collect, use and disclose and/ or retain your Personal Data in accordance with this privacy policy.
- 1.5. This privacy policy supplements but does not supersede nor replace any other consent which you may have previously provided to us nor does it affect any right that we may have at law in connection with the collection, use, disclosure and/ or retention of your Personal Data.
- 1.6. From time to time, we may update this privacy policy to ensure that our policy is consistent with any regulatory changes, however, subject to your legal rights in Singapore, the prevailing terms of the privacy policy shall apply.

2. Personal Data

- 2.1. In this privacy policy, “Personal Data” refers to any data and/or information about you from which you can be identified by, either from that data; or from that data and other information to which we may have legitimate access to.
- 2.2. Examples of such Personal Data include but are not limited to:

- a) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided in any forms you may have submitted to use, or in other forms of interaction with you;
- b) your photos;
- c) your employment history, education background, and income levels;
- d) Personal Data of your family members, such as next of kin, spouses, and children; and
- e) information about your usage of and interaction with our website and/or services.

3. Collection of Personal Data

- 3.1. We collect Personal Data from you, through your interactions with us, our partners, and through your access to various professional network websites, your publicly available data on the world wide web and from clients, customers, business contacts, partners, personnel, contractors and other individuals.
- 3.2. Such Personal Data may be provided to us in forms filled out by individuals, face to face meetings, search queries online, profiles on professional networking platforms, email messages, telephone conversations, through our websites or provided by third parties.
- 3.3. If any individuals contact us, we may keep a record of that contact.
- 3.4. We rely on a variety of legal reasons and permissions (sometimes called “computational data analysis / legal basis / permitted use / fair use”) to analyse data, process data, including with your consent, a balancing of legitimate interests, necessity to enter into and perform contracts, and compliance with legal obligations.
- 3.5. We collect these Personal Data when it is necessary for business purposes or to meet the purposes for which the individuals have submitted the information.
- 3.6. We will only collect, hold, process, use, communicate and/or disclose such Personal Data, in accordance with this privacy policy.
- 3.7. If any party is acting as an intermediary or otherwise on behalf of a third party individual or supplying us with information regarding a third party individual (such as a friend, a colleague, an employee etc), such intermediary party undertakes that you are an authorised representative or agent of such third party individual and that you have

- obtained all necessary consents from such third party individual to the collection, processing, use and disclosure by us of their Personal Data.
- 3.8. As we are collecting the third-party individual's data from you, you undertake to make the third party individual aware of all matters listed in this privacy policy preferably by distributing a copy of this privacy policy to them or by referring them to our website.
- 3.9. We also obtain data from third parties. We protect data obtained from third parties according to the practices described in this policy, plus any additional restrictions imposed by the source of the data. These third-party sources vary over time and include:
- a) Data brokers from which we purchase demographic data to supplement the data we collect.
 - b) Services that make user-generated content from their service available to others, such as local business reviews or public professional network posts.
 - c) Communication services, including email providers and social networks, when you give us permission to access your data on such third-party services or networks.
 - d) Service providers that help us determine your device's location.
 - e) Partners with which we offer co-branded services or engage in joint marketing activities.
 - f) Developers who create experiences through or for Scout products.
 - g) Third parties that deliver experiences through Scout products and services.
 - h) Publicly -available sources, such as open public sector, academic, and commercial data sets and other data sources.
- 3.10. You have choices when it comes to the technology you use and the data you share. When you are asked to provide personal data, you can decline. Many of our products and services require some personal data to operate and provide you with a service. If you choose not to provide data required to operate and provide you with a product or feature, you may not be able to use that product or feature.
- 3.11. Likewise, where we need to collect personal data by law or to enter into or carry out a contract with you, and you do not provide the data, we will not be able to enter into the contract; or if this relates to an existing product you're using, we may have to suspend or cancel it. We will notify you if this is the case at the time.
- 3.12. The data we collect depends on the context of your interactions with Scout, various professional network sites and the choices you make (including your privacy settings), the products and features you use, your location, and applicable law.

4. Use of Personal Data

4.1. In general, we may use your Personal Data for the following purposes:

- a) to provide our services and to provide you with the best job offers / vacancies available in the market. For example, we may contact you by phone or email or other means to inform you when a business has an opening suitable for you;
- b) to respond to the individual's request or for the purposes for which it was provided to us as stated at the time of the collection (or as is obvious from the context of collection);
- c) to maintain contact with clients, contractors and other contacts;
- d) for general management and reporting purposes;
- e) for recruitment purposes;
- f) Scout uses data to provide you with relevant and valuable information regarding our products and services. We analyse data from a variety of sources to predict the information that will be most interesting and relevant to you and deliver such information to you in a variety of ways. For example, we may predict which organisation would be best suited for your future prospects and communicate with you about new job offers you may like.
- g) for purposes related to the employment of our personnel and providing internal services to our personnel;
- h) all other purposes related to our business;
- i) to troubleshoot and diagnose product problems and provide other customer care and support services, including to help us provide, improve, and secure the quality of our products, services, and training, and to investigate security incidents; and
- j) to comply with applicable laws and regulations.

4.2. For these purposes, we combine data we collect from different contexts (for example, from your profile uploaded on professional network portals and your profile given to registered recruiting agencies).

4.3. Scout uses this information to make personalised recommendations.

4.4. Our processing of personal data for these purposes includes both automated and manual (human) methods of processing. Our automated methods often are related to and supported by our manual methods. For example, our automated methods include artificial intelligence (AI), which we think of as a set of technologies that enable

computers to perceive, learn, reason, and assist in decision-making to solve problems in ways that are similar to what people do.

- 4.5. To build, train, and improve the accuracy of our automated methods of processing (including AI), we manually review some of the predictions and inferences produced by the automated methods against the underlying data from which the predictions and inferences were made. This manual review may be conducted by Scout employees or vendors who are working on Scout's behalf.
- 4.6. When we process personal data about you, we do so with your consent and/or as required to provide the products you use, operate our business, meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfil other legitimate interests of Scout as described in this policy.

5. **Disclosure of Personal Data**

- 5.1. We do not disclose Personal Data to third parties except when required by law, when we have the individual's consent or deemed consent or in cases where we have engaged third parties such as data intermediaries or subcontractors specifically to assist with our company's activities.
- 5.2. We may also disclose your Personal Data to the following group of external organisations, subject to the requirements of applicable laws:
 - a) our affiliated companies;
 - b) agents, contractors, data intermediaries or third-party service providers who provide services, such as telecommunications, mailing, information technology, payment, payroll, data processing, storage and archival, to us;
 - c) external banks, financial institutions and their respective service providers;
 - d) our professional advisers;
 - e) relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any government authority; and
 - f) any other person in connection with the purposes set forth above.

6. **Third-Party Sites**

- 6.1. Our website may contain links to other websites operated by third parties independent of us, but we are not responsible for the privacy practices of such websites operated by third parties even though it is linked to our website(s).
- 6.2. Our services may contain data from other websites operated by third parties independent of us, but we are not responsible for the privacy practices of such websites operated by third parties.
- 6.3. We encourage you to learn about the privacy policies of such third-party website(s) by checking the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

7. **Protection of your Personal Data**

- 7.1. We maintain appropriate security safeguards and practices to protect your Personal Data unauthorised access, collection, use, disclosure, copying, modification disposal or similar risks, in accordance with applicable laws.

8. **Access and Correction of your Personal Data**

- 8.1. We take all reasonable measures to ensure that your Personal Data remains accurate, complete and up-to-date.
- 8.2. You may also keep us informed when there are any updates to your Personal Data by contacting us directly.
- 8.3. You may request access to or make corrections to your Personal Data records, but we have the right to charge a reasonable fee for processing your request.
- 8.4. Please submit your request to us by writing to our Data Protection Office at dpo@hackertrail.com.

9. **Withdrawal of Consent**

- 9.1. If you wish to withdraw your consent to any use or disclosure of your Personal Data as set out in this Personal Data Protection Policy, you may contact our Data Protection Office at dpo@hackertrail.com.

10. **Contacting Us**

- 10.1. If you have any questions or complaints relating to the use or disclosure of your Personal Data, or if you wish to know more about our data protection policies and practices, please contact our Data Protection Office via email at dpo@hackertrail.com.