

## MK CONSULTING DATA PROTECTION POLICY

### POLICY STATEMENT

1.1 Everyone has rights to know how their Personal Data will be handled. During the course of our activities, we will collect, use and disclose (as reasonably necessary) your personal data for the purposes of internal recruitment or to carry out services such as temporary staffing, permanent placement, career transition and talent development services, outsourcing and consulting services ("**Services**"). MK Consulting prioritizes the need to treat your Personal Data in compliance with the applicable data protection laws and/or regulations.

### STATUS OF & COMPLIANCE WITH THE POLICY

2.1 This data protection policy ("**Policy**") has been approved by the Head of Legal of MK Consulting. It sets out MK Consulting internal regulations and standards on data protection including any legal requirements that must be satisfied in relation to the collection, use and disclosure of Personal Data.

2.2 The Data Protection Officers are responsible for ensuring compliance with this Policy and the applicable data protection laws and regulations of their respective country ("**Data Protection Laws**"). Any questions or concerns about this Policy should be addressed to MK Consulting Data Protection Officer.

### DEFINITION OF PERSONAL DATA & PROCESSING

3.1 Personal data means data relating to an individual who can be identified from that data (or from the combination of that data and other information in our possession) ("**Personal Data**"). Personal Data includes without limitation the following:

- a) name
- b) address
- c) contact details
- d) nationality
- e) photograph
- f) identification card number
- g) educational and professional background
- h) health records
- i) interests
- j) religion
- k) languages

3.2 "**Processing**" means the carrying out of any operation or set of operations in relation to Personal Data and includes any of the following:

- a) recording
- b) holding
- c) organisation adaptation or alteration
- d) retrieval
- e) combination
- f) transmission
- g) erasure or destruction

### CONSENT OBLIGATION

4.1 All collection, use or disclosure of Personal Data shall be subject to your prior consent.

4.2 MK Consulting seeks consent prior to the collection, use and disclosure of Personal Data. Unless otherwise permitted by the applicable Data Protection Laws, the granting of this consent will be a pre-condition for the collection, use or disclosure of your Personal Data in relation to the provision of the Services. You are entitled to withdraw your consent at any time by giving prior notice to the MK Consulting Data Protection Officer. Such withdrawal shall apply prospectively and only affect MK Consulting future use or disclosure of your Personal Data.

#### PURPOSE LIMITATION OBLIGATION

5.1 Personal Data may only be processed for the purposes notified to you when the Personal Data was first collected or for any other purposes specifically permitted under the applicable Data Protection Laws. This means that Personal Data will not be collected for one purpose and then used for another purpose. If it becomes necessary to process the Personal Data for a new purpose, MK Consulting will inform you of the new purpose and seek your consent before processing the Personal Data for any new purpose.

5.2 MK Consulting will only collect Personal Data that is necessary for our internal recruitment or for the performance of the Services (as the case may be).

5.3 MK Consulting will use the collected Personal Data in accordance with the purpose which you have consented to. To the extent applicable, it includes the following ("**Purpose**");

- a) introducing and recommending you (including sending your resume and Personal Data) to MK Consulting clients, MK Consulting affiliated companies, agents or sub-contractors that are engaged in the same or similar recruitment business as MK Consulting for recruitment purposes or recruitment collaborative purposes;
- b) pre-employment and related background checks (whether conducted internally by MK Consulting or through our vendors);
- c) sending you directly or via MK Consulting clients, MK Consulting affiliated companies, agents or sub-contractors for reasoning test, psychometric test, personality test, career aptitude test or any tests to determine your skills and suitability for the job(s);
- d) assessing and evaluating your profile to determine eligibility or suitability for a job application;
- e) discussing with your past employer(s), educational institution(s) to establish your employment history, reference checks or educational history;
- f) calling you to make arrangements for interviews;
- g) sending you internal MK Consulting newsletters periodically;
- h) calling you (including leaving voice messages) or short message services (SMS), WhatsApp or sending you text or other communication (text or image) applications for mobile device or via any electronic means (including electronic mailing) and facsimile or send invitations to you on job alerts, recruitment events, seminars, networking events, campus attraction activities;
- i) sending you market research surveys and/or service satisfaction surveys;
- j) meet any legal or regulatory obligations or requests issued by any court, legal or any regulatory bodies (including the agents of the regulatory bodies) to conduct audit checks, surveillance and investigation;
- k) meeting or complying with MK Consulting internal policies and procedures;
- l) storage and processing of your Personal Data; and
- m) any other purposes which are reasonably related to the aforesaid.

#### NOTIFICATION OBLIGATION

6.1 MK Consulting will inform you of the purposes for which your Personal Data will be collected, used and disclosed in order to ensure you are able to provide informed consent.

#### ACCURACY OBLIGATION

7.1 MK Consulting will make a reasonable effort to ensure that the Personal Data collected fulfil any Purposes or Services and the same is accurate and complete. Inaccurate or out of date Personal Data will be destroyed.

7.2 MK Consulting will also require your assistance to provide accurate and complete Personal Data at the time of our collection of Personal Data from you. If you wish to correct or update your Personal Data, you may contact the MK Consulting Data Protection Officer.

#### RETENTION LIMITATION OBLIGATION

8.1 MK Consulting will cease retention of any Personal Data after seven (7) years from the date of collection or for as long as required for any relevant Purposes or Service(s) and under the applicable Data Protection Laws.

## ACCESS, CORRECTION & DELETION RIGHTS

9.1 You are entitled to request access and to correct or delete the Personal Data collected by MK Consulting. Such request to correct or delete data will generally be complied with, unless MK Consulting sees no reasonable reasons for the correction (e.g. the Personal Data is scheduled for deletion).

9.2 MK Consulting will take reasonable efforts to destroy/delete all Personal Data. All hard copy records will be shredded and securely destroyed and all electronic data will be erased completely.

## PROTECTION OBLIGATION

10.1 MK Consulting will put in place reasonable procedures to maintain the security of all Personal Data from the point of collection to the point of destruction.

10.2 MK Consulting has implemented administrative and technical measures to protect all Personal Data that we have collected.

Security procedures include, but are not limited to, the following:

- a) entry controls;
- b) secure lockable desks and cupboards;
- c) methods of disposal: paper documents should be shredded; CD-ROMS or disks should be physically destroyed when no longer required;
- d) equipment: data users should ensure that individual monitor do not show confidential information to passer-by and that they log off from the PCs when it is left unattended;
- e) personal laptops will not connect to the MK Consulting' network;
- f) firewall, DMZ, antivirus are in place to filter off incoming network traffic;
- g) off-boarding process of all staff, to ensure all access to IT system is revoked and all confidential documents are returned to MK Consulting and
- h) Personal Data will be destroyed according to legal or industry standard, whichever is stricter.

## TRANSFER LIMINATION OBLIGATION

11.1 MK Consulting may also transfer your Personal Data to MK Consulting' employees, officers, directors, clients (and its agents) – if applicable, suppliers (including but not limited to IT providers, financial and legal advisors), authorities (and its agents), and to other MK Consulting affiliates, based locally or abroad, in order to reasonably achieve the Purpose (as applicable).

11.2 Transfers to third parties will be strictly on a need to know basis, in order to comply with contractual or legal obligations and provided that such third parties have data protection standards comparable to MK Consulting or the requirement under the applicable Data Protection Laws.

## OPENNESS OBLIGATION

12.1 This Policy has been prepared by MK Consulting to set out our legal obligations in respect of compliance with the applicable Data Protection Laws and Artemis internal regulations, as well as, to inform of our commitment to ensure the protection of Personal Data. Further information regarding this Policy or any complaints about any failure to protect the Personal Data in accordance with this Policy can be directed to the MK Consulting Data Protection Officer.

## COOKIES

13.1 We use Cookies to enable our website to interact with your browser so as to provide you with better service and a more effective website.

13.2 “**Cookies**” are small pieces of information stored by your browser on the hard drive of your computer. Cookies are used to maintain session information between your browser and our website and are required for our website to operate. Our website can later retrieve those cookies if you visit it again.

13.3 We allocate a cookie to each internet browser that visits our website. This cookie does not allow us to collect your Personal Data. Our website uses Cookies for the following purposes:

- a) to allocate a unique identification number to your internet;
- b) to identify pages that you have accessed on our website; and
- c) to determine if you have previously visited our website.

If you wish to make full use of our website, you should configure your browser to accept the Cookies.

#### REVIEW OF THE POLICY

14.1 MK Consulting will continue to review the applicability and effectiveness of this Policy on an annual basis – or more frequently in light of any potential developments - to ensure it is achieving its objectives.

#### MISCELLANEOUS

15.1 This Policy shall be read in conjunction with any local Data Protection Laws. In the event of any conflict or inconsistencies between the provisions of this Policy and those in the local Data Protection Laws, the more restrictive provision for MK Consulting shall prevail.

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