

**ASIA-PACIFIC ECONOMIC COOPERATION SECRETARIAT (“APEC SECRETARIAT”)
Personal Data Protection Policy**

Document Reference: APECSEC-DPMP-0001-01

Document Owner: Data Protection Officer

Version No.	Change Description	Date Approved	Amended By	Approved By
1.0	Initial Release	18 Nov 2021	P2D Solution Pte Ltd	APEC Secretariat Core Management Group
2.0	Updated Appendix A with the addition of point 8 on Social Media	30 June 2022	P2D Solution Pte Ltd	APEC Secretariat Core Management Group
2.1	Revised Appendix A, point 8 on Social Media	22 July 2022	P2D Solution Pte Ltd	APEC Secretariat Core Management Group

(A) **Purpose and Overview**

1. Introduction

All employees of **ASIA-PACIFIC ECONOMIC COOPERATION SECRETARIAT** (“**APEC SECRETARIAT**” or “**Organization**”) and all other users of personal data and data within APEC Secretariat or on behalf of APEC Secretariat (“**Users**”) undertake to abide by and comply with this Organization’s Personal Data Protection Policy (the “**Policy**”) as may be amended from time to time by APEC Secretariat at its sole and absolute discretion.

APEC Secretariat may from time to time and for its business and operational purposes hold, collect, obtain, store, process or otherwise use personal data or information of its employees, customers or other third parties.

APEC Secretariat is committed to the safeguarding and proper usage and/or storage of personal data and information in accordance with Singapore’s Personal Data Protection Act 2012 (“**PDPA**”).

For the purposes of this Policy, “**Personal Data**” means data, whether true or not, about an individual who can be identified from that data or from that data and other information to which APEC Secretariat has or is likely to have access.

2. Why this Policy exists

The Policy sets out the obligations of every user of Personal Data within or on behalf of APEC Secretariat and is intended to ensure that APEC Secretariat is in compliance with the PDPA and shall apply to any Personal Data held, collected, obtained, stored, transmitted, recorded, processed or otherwise handled by APEC Secretariat.

APEC Secretariat will:

- (a) comply with the PDPA and follow good practices on data protection;
- (b) demonstrate accountability in Personal Data; and
- (c) protect the rights of employees, interns, consultants, business contacts and other individuals APEC Secretariat has relationships with or may need to contact.

3. The Personal Data Protection Act 2012

The PDPA governs the collection, use, and disclosure of Personal Data by private organizations, in a way that recognizes both the needs of individuals and organizations. The data protection obligations of PDPA apply regardless of whether data is stored electronically, on paper or on other materials.

The PDPA is underpinned by the following eleven data protection obligations:

Data Protection Obligation	Description
Accountability	<p>Accountability refers to a risk-based approach to identify, monitor and respond to data risks through the data life cycle. Organisation must ensure and demonstrate the compliance with the PDPA. In addition, organisations are to make information about its Personal Data protection policies and practices available to individuals and appoints a data protection officer (“DPO”) who is responsible for ensuring the organisation comply with the PDPA.</p> <p>Accountability towards data protection also refers to moving away from viewing PDPA as a “checkbox” compliance, where organisations should undertake and demonstrate responsibility for the data they have collected (to not only safeguard the Personal Data but also to use, innovate and maximize its value), to build public trust in order to thrive in the evolving landscape.</p>
Consent	<p>Any Personal Data collected, used, stored or otherwise disclosed shall only be collected, used, stored or otherwise disclosed with the consent of the individual from whom Personal Data is collected. The individual shall be made aware of the purpose for which his or her Personal Data is collated, used, stored or otherwise disclosed. Where reasonable or practicable, written consent from the individual shall be obtained. Where consent is subsequently withdrawn by the individual, employees of APEC Secretariat and/or the User must as soon as practicable cease any such collection, use storage or disclosure of the Personal Data of that individual.</p>
Purpose Limitation	<p>Any Personal Data collected, used, stored or otherwise disclosed must be for purposes that would be considered reasonable and appropriate in the circumstances and for which that individual has given consent.</p>
Notification	<p>An individual should be notified of the purposes for which an employee of APEC Secretariat or the User on behalf of APEC Secretariat is intending to collect, use, store or disclosure his or her Personal Data on or prior to the collection, use, storage or disclosure of his or her Personal Data. Where reasonable or practicable, the notification should be made in written form to the individual.</p>
Access and Correction	<p>An individual has the right to request access to his or her Personal Data and the purposes for which and the ways his or</p>

	<p>her Personal Data has been collected, used, stored or otherwise disclosed in the past one year.</p> <p>Employees of APEC Secretariat and Users on its behalf should also correct any Personal Data that may be inaccurate when requested by the individual.</p>
Accuracy	All reasonable efforts and endeavours should be used to ensure that any Personal Data collected, used, stored or otherwise disclosed is accurate and complete, as the Personal Data is likely to be used to make a decision affecting the individual, or if the Personal Data is likely to be disclosed to another organisation.
Protection	All security procedures and policies that an organisation has implemented must be complied with, to prevent any unauthorised access, collection, use, disclosure, copying, modification, disposal or other risks to the Personal Data the organisation has in its possession or control.
Retention Limitation	Retention and storage of Personal Data should cease as soon as it is reasonable to assume that the purpose for which the Personal Data was collected is no longer being served by the retention of that Personal Data and retention is no longer necessary or required for an organisation’s legal, business and operational purposes.
Transfer Limitation	No Personal Data shall be transferred to any territory outside of Singapore, except in accordance with the provisions or a separate arrangement or contractual agreement mutually agreed upon by both economies, and the standards contained in the PDPA to ensure that the receiving organizations provide a standard of protection to the transferred Personal Data that is equivalent or comparable to the protection afforded by PDPA.
Data Breach Notification	An organisation that suffered a data breach must, within thirty (30) days of becoming aware of the breach, assess whether the breach is notifiable to the Singapore’s Personal Data Protection Commission (“PDPC”) and/or the individuals whose Personal Data is involved in the breach. If the breach is assessed to be notifiable because it is likely to result in significant harm to the individuals, and/or are of significant scale, the Organisation must notify PDPC and/or individuals within seventy-two (72) hours after assessing the breach to be notifiable.

Data Portability ¹ (not yet in effect)	An Organisation must, upon request, transmit an individual's Personal Data in the organisation's possession or under the organisation's control to another organisation specified by the individual in a commonly used machine-readable format.
--	---

Detailed information on PDPA can be found at: <https://www.pdpc.gov.sg/Overview-of-PDPA/The-Legislation/Personal-Data-Protection-Act>

(B) **Scope, Risk and Responsibilities**

1. **Policy Scope**

This Policy applies to all employees, interns of, and consultants to, the APEC Secretariat

It applies to all Personal Data in APEC Secretariat's possession or control, and can include:

- (a) Full name
- (b) NRIC, FIN or passport number
- (c) Gender
- (d) Photograph or video image of an individual
- (e) Mobile telephone number
- (f) Personal email address
- (g) Name & residential address
- (h) Name & residential telephone number
- (i) Salary and Bank Account details;
- (j) Work related health issues and disabilities;
- (k) Employment and training history;
- (l) Performance assessments and disciplinary records;
- (m) Next-of-kin details (e.g., spouse and other family members);
- (n) Doctor's certification;
- (o) ... plus, any other information that on its own, or when combined with other information, can uniquely identify individuals

A **[Data Inventory Map]** is established to document how Personal Data is collected, used and disclosed by APEC Secretariat. The **[Data Inventory Map]** is to be kept updated and reviewed regularly (at least once every 3 years).

2. **Data Protection Risks**

This Policy helps to protect APEC Secretariat from data protection risks, which may result in a breach of PDPA, including:

¹ PDPC has disclosed this eleventh obligation but has yet to decide when this obligation will come into effect. This obligation will only take effect when the regulations on Data Portability are issued.

- (a) Breaches of confidentiality. For instance, information not disclosed appropriately or subjected to unauthorised access, use, loss, modification, disclosure or deletion.
- (b) Failure to offer choice. For instance, all individuals should be free to decide how APEC Secretariat uses data relating to them.
- (c) Not transparent in how Personal Data is processed. For instance, not providing information to individuals on how their Personal Data will be collected, used or disclosed by APEC Secretariat.

Breach of PDPA will likely result in reputational damage, regulatory fines, or sanctions.

The DPO will make **annual attestation** on the state of APEC Secretariat's compliance of PDPA in the past one year and report to the Core Management Group.

3. Responsibilities

- (a) Every employee, intern and consultant who works for APEC Secretariat has the responsibility to ensure Personal Data is collected, stored and handled appropriately and in accordance with this Policy. This includes making an undertaking to safeguard Personal Data by signing the **[Data Protection Agreement]**.

In addition, the following persons will have specific responsibilities on Personal Data:

- (i) The DPO and APEC Secretariat's Core Management Group ("CMG") is ultimately accountable to ensure APEC Secretariat complies with the obligations of PDPA Data Protection Team. Their roles and responsibilities will include:
 - (1) Executing APEC Secretariat's **[Personal Data Protection Management Program]** ("DPMP"), including the communication of this Policy;
 - (2) Keeping the APEC Secretariat CMG/Leadership updated on data protection responsibilities, risks, and issues;
 - (3) Performing periodic review of all data protection procedures and related policies to ensure continuing compliance with PDPA;
 - (4) Handling data protection enquiries or complaints from employees and other individuals;
 - (5) Responding to requests from individuals to access and/or correct the Personal Data APEC Secretariat has about them (also known as 'subject access/correction requests');
 - (6) Handling any PDPA regulatory changes/updates and assess the associated impact to APEC Secretariat;
 - (7) Ensuring third party vendors sign an undertaking to handle Personal Data received from APEC Secretariat according to PDPA requirements; and
 - (8) Working with internal/external parties to:
 - (A) ensure adequate data protection training and communication is provided to APEC Secretariat's employees and interns; and

(B) ensure there is reasonable data security measures taken to protect APEC Secretariat's Personal Data from unauthorised access, use, loss, modification, disclosure or deletion.

(9) Notifying APEC Secretariat of any potential or actual non-compliance with the PDPA and where necessary, liaise and/or seek guidance from PDPC.

(b) The DPO shall be adequately trained for his/her role and shall be registered with PDPC.

(B) Data Collection – Consent and Notification

1. Personal Data must only be collected directly or indirectly from individuals under the following conditions:
 - (a) the individual concerned has consented to the collection, use and disclosure (or where a third party has consented to the individual disclosing Personal Data on his/her behalf);
 - (b) APEC Secretariat needs to carry out such processing (i) to perform, or take steps with view to enter into, a contract with the individual concerned, (ii) to provide products or services to individuals, (iii) to comply with legal obligation of APEC Secretariat or (iv) to protect the vital interests of the individual concerned in a 'life or death' situation;² or
 - (c) Any other situations as permitted under PDPA and any applicable laws.
2. APEC Secretariat shall:
 - (a) not collect excessive Personal Data; and
 - (b) ensure the Personal Data collected are adequate and relevant for the intended purposes, accurate and up to date.
3. When collecting Personal Data from an individual, the individual shall be notified on the purposes on the collection, use or disclosure of his/her Personal Data. This will be done via the following ways:
 - (a) APEC Secretariat's Data Protection Notice made available to the individual [**Appendix A – External Data Protection Notice**];
 - (b) APEC Secretariat's Employee Data Protection Notice made available to the employee [**Appendix B – Employee Data Protection Notice**]; and
 - (c) As notified to the individual on any hardcopy/electronic notices at the point of collection.
4. NRIC and/or identification documents shall only be collected when permitted by PDPA. These identification documents (e.g., NRICs of employees) must be promptly destroyed when they are no longer required for business or legal purposes.
5. Please refer to [**Appendix C – Consent Language Template**] for the consent language to be used on forms (whether on electronic and non-electronic media) used to collect Personal Data.

² For more details, please refer to **Appendix A – External Data Protection Notice** and **Appendix B – Employee Data Protection Notice**].

6. In addition, please refer to **[Appendix D – CCTV Notice]** for wordings to be prominently displayed to notify individuals of CCTV recording on APEC Secretariat’s premises for safety and security purposes.
7. Please refer to **[Appendix E – Photography and Videography Notification]** for wordings to be prominently displayed to notify individuals that APEC Secretariat may be taking pictures and videos during an event.

(C) Data Use

1. APEC Secretariat shall process Personal Data only:
 - (a) for the purposes made known to the individual concerned (in the form of a data protection notice); or
 - (b) where permitted by PDPA or other applicable laws.
2. Whenever APEC Secretariat intends to use the Personal Data it has already collected for a new purpose, it must first notify and seek fresh consent from the individual for the new purpose.

(D) Data Storage and Disposal

1. The following guidance describes how to securely store and dispose Personal Data:
 - (a) When Personal Data is **stored on paper**:
 - (i) the paper should be kept in a secure place where it cannot be accessed by unauthorized persons;
 - (ii) the paper should not be left unattended where it can be seen by unauthorized persons, for example, on a printer; and
 - (iii) the paper should be destroyed using ‘Din-3’ shredders and disposed of securely when it is no longer required.
 - (b) When Personal Data is **stored electronically**, the storage should be done according to the **[ICT Security Policy]** and associate information security-related policies.

(E) Data Security

1. Personal Data is of no value to APEC Secretariat unless the Personal Data has commercial application. APEC Secretariat shall maintain organizational, physical and technical security arrangements in relation to all of the Personal Data it holds. These measures are defined in the **[ICT Security Policy]** and associate information security-related policies.

Examples of security measures include but not limited to:

- (a) Personal Data should be protected and access granted through valid user accounts assigned to all users, including employees and interns, on an as-needed basis and these

accounts should be password protected. In addition, only authorized persons should be allowed to access specific personal data and only if they need it to carry out their work.

- (b) Users, including consultants, must ensure their computer screens are locked with password protected screensavers which activate after a short period of inactivity. Individual computers/workstations should be protected with passwords, password protected screensavers, and security software, such as anti-virus, anti-spyware and personal firewall software.
 - (c) Portable devices such as thumb drives, tablets, memory cards should be secured when not in use by keeping them under lock and key, hand-carrying them and not leaving them unattended.
 - (d) Personal Data should not be shared informally, e.g., Personal Data must not be sent via email without the additional security measures described below; and
 - (e) Personal Data must be encrypted before transfer to another party, e.g., when using email to transfer Personal Data, a user must save the file containing Personal Data with password, before sending the file to the recipient.
 - (f) Patches to any software and hardware involved in personal data should be applied as soon as they are available to remove potential security holes. For APEC Secretariat servers, IT will be responsible for installing the patches. For individual laptops and workstations, the individual employees will be responsible.
 - (g) Encryption should be considered when confidential or sensitive data are stored in APEC Secretariat's database.
 - (h) Network security should be managed using appropriate security equipment such as firewalls.
 - (i) No unnecessary files containing Personal Data should be made available on APEC Secretariat's public-facing websites.
2. Employees are advised not to save copies of Personal Data in their own computers but to do so from a central data storage.

(F) Data Accuracy

- 1. APEC Secretariat is to notify individuals that it is their responsibility to provide APEC Secretariat with accurate Personal Data, and to timely update the same when there are changes, for APEC Secretariat to accurately process their Personal Data.
- 2. It is the responsibility of all employees, interns and consultants who work with Personal Data to take reasonable steps to ensure the Personal Data is kept as accurate and up to date as possible.
 - (a) Employees should **take every opportunity to ensure their Personal Data are updated**. For instance, HR should verify that an employee's identity number is accurately keyed in HRMS system by checking it with the source document (i.e., the ID document).
 - (b) APEC Secretariat will make **provisions for individuals to update their Personal Data** that APEC Secretariat holds about them through the **[Correction/Update of Personal Data Request Form]** and handled according to the 'Access to Personal Data' and 'Correction of Personal Data' processes in the **[PDPA Request Handling Process]**.

- (c) Personal data should be **updated as soon as inaccuracies are discovered**. For instance, if a bank informs that an employee's salary crediting account has been terminated, APEC Secretariat HR should immediately follow up by requesting the employee provide an updated salary crediting account and update the latest information into HRMS.
3. Where third-party organization(s) to whom the Personal Data was disclosed (e.g., overseas APEC Secretariat member economies, data intermediaries, service providers, agents) and after disclosure APEC Secretariat becomes aware of the Personal Data it shared was inaccurate, incomplete or out-of-date, APEC Secretariat must inform the third-party organization(s) on the inaccuracy as soon as reasonably possible. APEC Secretariat will then follow up by sending the correct data to the affected third-party organisation(s) via email or by updating the relevant system(s).
4. Where a third-party organisation to whom Personal Data was disclosed (e.g., data intermediaries, service providers, agents) becomes aware of the Personal Data which it received was inaccurate, incomplete or out-of-date, the third-party organization shall immediately notify APEC Secretariat of the inaccuracy. APEC Secretariat will take immediate action to correct the data and send the updated data to the third-party organisation via email or by updating the relevant system(s).

(G) Subject Access Requests

1. All individuals, under PDPA, are entitled to:
 - (a) ask APEC Secretariat for information about the Personal Data that APEC Secretariat holds about him/her and the reasons for having those Personal Data and the processing that has been done on the Personal Data in the past one year;
 - (b) access the Personal Data held by APEC Secretariat; and
 - (c) correct any inaccuracies in the Personal Data APEC Secretariat holds about him/her.
2. Any requests to APEC Secretariat requesting access and/or correction of Personal Data must be made using the **[Access to Personal Data Request Form]** and handled according to the 'Access to Personal Data' and 'Correction of Personal Data' processes in the **[PDPA Request Handling Process]**.
3. Any request to access CCTV footages shall be handled in the same way as 'Access to Personal Data' process.

(H) Withdrawal of Consent

1. According to the PDPA, an individual can request to withdraw consent on the collection, use and disclosure of his/her Personal Data. APEC Secretariat shall review the request and reply to the individual on the consequence of withdrawing consent, e.g., APEC Secretariat may not be able to continue to provide the products and services without access to the Personal Data.

2. Any requests to APEC Secretariat to withdraw consent must be requested using the **[Withdrawal of Consent Request Form]** and handled according to the 'Withdrawal of Consent' process in the **[PDPA Request Handling Process]**.

(I) Retention of Data

1. APEC Secretariat will maintain retention policies and procedures so that Personal Data is deleted after a reasonable period of time, once the purpose for which the Personal Data are collected/held are fulfilled, unless a separate legislation requires the Personal Data to be kept for a certain period of time.
2. When APEC Secretariat no longer needs to keep Personal Data for the purposes for which they are held, it will destroy them as soon as practicable. APEC Secretariat shall destroy all unsolicited Personal Data it comes across or come into its possession during the course of business. All individuals (including employees) can ask the DPO for the reasons and the duration APEC Secretariat holds their Personal Data.

(J) Transfer of Data

1. APEC Secretariat shall not transfer Personal Data to entities outside its organisation in other economies for further processing unless the parties receiving the Personal Data agree to enter into contractual arrangements to adopt data protection standards comparable to the PDPA when processing the APEC Secretariat's Personal Data, or when the transfer is permitted under Singapore law or when the individual whose Personal Data is processed gives the consent.
2. APEC Secretariat has established the third-party vendor/service provider/partner due diligence process to ensure that any third-party having access and/or process Personal Data on behalf of APEC Secretariat shall accord adequate and appropriate data protection measures, through contractual agreements and/or relevant due diligence checks. The due diligence process will include the following:
 - (a) **[Checklist for Tenders, Vendors and Service Providers (who have access to or process APEC Secretariat's Personal Data)];**
 - (b) **[IT Checklist for Tenders, Vendors and Service Providers who provide IT solutions to APEC Secretariat; and/or**
 - (c) **[Standard Operating Procedure (SOP) for Third Parties].**

(K) Disclosing Data for Other Reasons

1. In certain circumstances, PDPA allows disclosure of Personal Data to law enforcement agencies without the consent of the affected individual.
2. Under these circumstances, APEC Secretariat will disclose the requested Personal Data but before doing so, DPO shall ensure the request is legitimate by seeking assistance from the Core Management Group and/or legal advisers, where necessary.

(L) Data Breach Notification

In the event of a data breach, APEC Secretariat will refer to the **[Data Breach Management Plan]** for the steps to mitigate the impact of the breach and assess whether breach is notifiable under PDPA, by carrying out an assessment whether the breach is likely to result in significant harm to the individuals and/or on a significant scale. If the breach is assessed to be notifiable, APEC Secretariat has 72 hours from the time it makes its assessment to notify.

(M) Data Portability [Not Yet in Effect]³

APEC Secretariat has established a protocol to respond to any requests from individuals whose Personal Data is possessed by APEC Secretariat or APEC Secretariat has control, to another organisation specified by the individual in a commonly used machine-readable format.

(N) Accountability

APEC Secretariat has established clear policies and procedures in complying with PDPA. Any queries and complaints relating to APEC Secretariat's data protection policies and procedures shall be handled according to the **[PDPA-related Feedback and Complaints Process]**.

(M) Data Protection Impact Assessment

APEC Secretariat shall perform Data Protection Impact Assessment (DPIA) on significant new/ updates to existing technological, business, or operational systems and processes that affect the Personal Data of an individual. The DPIA is to be completed using the **[Data Protection Impact Assessment Template]**.

(O) Communication to Staff

1. APEC Secretariat shall inform all employees, interns and consultants, of the Policy and their roles in safeguarding Personal Data. They shall be informed that:
 - (a) compliance with PDPA is the responsibility of every employee, intern and consultant;
 - (b) breaching the PDPA provisions without valid reasons is a serious misconduct that may result in appropriate action being taken, including dismissal/termination; and
 - (c) deliberate breach can lead to criminal prosecution.

(P) Review

This Policy shall be reviewed at intervals of not more than **three (3)** years, or when there is an update to the PDPA, whichever is earlier, to ensure the Policy remains up to date and compliant with PDPA.

³ PDPC has disclosed this eleventh obligation but has yet to decide when this obligation will come into effect.

Appendix A – External Data Protection Notice (for external stakeholders)

**ASIA-PACIFIC ECONOMIC COOPERATION SECRETARIAT (“APEC SECRETARIAT”)
Data Protection Notice (the “Notice”)**

Updated as at 22 Jul 2021

1. Overview and Scope

In this Notice, “we”, “us”, “our”, “Company” or “APEC Secretariat” means **ASIA-PACIFIC ECONOMIC COOPERATION SECRETARIAT**, “you”, “your” or “yours” means the persons to whom this Notice applies. “Personal Data” has the same meaning as that defined in the Personal Data Protection Act 2012 (the “PDPA”).

Your personal data privacy is important to us and we are highly committed in protecting and managing your Personal Data in a responsible manner in line with this Notice.

This Notice sets out the collection, use and disclosure of your Personal Data. "Personal Data" means any data or information, whether true or not, about an individual who can be identified either (a) from that data; or (b) from that data and other information to which APEC Secretariat is likely to have access to.

Personal Data excludes Business Contact Information which means an individual's name, position name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about the individual, not provided by the individual solely for his personal purposes.

2. When and what kind of Personal Data do we collect?

We may collect, use and disclose the following data about you:

1. When you register and participate in our events, including APEC project events implemented by member economies, subscribe to our services and publications or access our websites and use our online services;
2. When you submit concept notes, project proposals, or any request for project funding;
3. When you submit documents and application forms to register participation of our events, or for a job, or for project funding;
4. If and when you contact APEC Secretariat (i.e., phone, email, face to face meetings, networking, interviews, SMS, fax, mail or electronic mail, internet messaging services, etc.) which we may keep a record of that correspondence;
5. If and when you respond to any of APEC Secretariat’s newsletters and other communication materials, or when you respond to our queries or request for us to contact you;
6. When you submit requests for changes or updates of your existing personal data;

7. When you submit personal data to us to participate in our surveys, event, competition organised by APEC Secretariat or its partners;
8. When you request a third party to contact and/or make enquiries from APEC Secretariat with your personal data;

When you apply to join APEC Secretariat as an employee or intern; We may collect the following kinds of Personal Data through the different channels mentioned above:

1. Full name;
2. Business and/or residential addresses;
3. Business and/or personal email addresses;
4. Mobile and business telephone numbers;
5. Bank account details, if necessary;
6. Passport information, if necessary;
7. Work permit information, if necessary;
8. Travel VISA information, if necessary;
9. Voice, photos and CCTV images/videos, if applicable;
10. Salary and Bank Account details;
11. Work related health issues and disabilities;
12. Employment and training history;
13. Performance assessments and disciplinary records;
14. Next-of-kin details (e.g., spouse and other family members);
15. Doctor's certification;

3. What purposes does APEC Secretariat Collect, Use and Disclose Personal Data?

We may use the information we collect from you for any of the following purposes:

1. To perform or carry out APEC Secretariat's legal obligations arising from any contracts entered into by APEC Secretariat;
2. To enable APEC Secretariat's subcontractors, third-party agents, partners and service providers, to fulfil obligations/services as stipulated in contracts entered into by APEC Secretariat;
3. Evaluating your suitability for participation in APEC projects, events, collaborations in our projects and/or employment;
4. To administer and evaluate APEC projects implemented by any member economy;
5. Responding to your requests or queries including requests and queries from your authorised representatives and individuals purporting to be you;
6. For payment administration, including assessing, processing, settling, authenticating and investigating claims for reimbursements;
7. To administer and update your records in our databases; monitoring and maintaining a copy of a record of your past transactions;

8. Providing ad-hoc or regular information about your relationship with APEC Secretariat;
9. Verifying your identity and any information you provide to us;
10. Promoting our events and projects;
11. Participating and administering contests, events and competitions;
12. Providing, managing, operating, processing and administering our services to you;
13. Meeting requirements for APEC Secretariat's operations;
14. To communicate with you to update you on APEC Secretariat's mission, work or future changes;
15. For statistical and surveys;
16. For data matching and administrative purposes;
17. For professional training purposes;
18. To facilitate data analysis and business planning purposes;
19. To process your enquiries and any and all other ancillary administration;
20. For vendor management and communications purposes;
21. For government, compliance, audit and other regulatory reporting purposes, including meeting requirements imposed by any law, rules, regulations, agreements imposed by the Singapore Government, project partners, third parties service providers, industry bodies, etc;
22. For security, safety surveillance and monitoring purposes;
23. For internal reporting and/or accounting purposes; and
24. Purposes incidental to each or all of the above.

We may also contact you by any communication means which you have given us your contact details, including but not limited to via phone, email, face to face meetings, networking, interviews, SMS, fax, mail or electronic mail, internet messaging services, etc., for the purpose of getting your feedback or for providing you with information which we believe could be of interest to you or your organisation.

We do not knowingly solicit or collect personal data from children below the age of 18. If we discover that we have accidentally collected personal data from a child below the age of 18, we will remove that child's personal data from our records as soon as reasonably possible. However, we may collect personal data about children below the age of 18 years if authorized by the parent or legal guardian responsible over for the child.

By your submission of your Personal Data to us, you consent to the onward disclosure of your Personal Data to the overseas APEC members economies, agents or service providers (as set out in no. 3 of "*What purposes does APEC Secretariat collect, use and disclose Personal Data?*") and the processing of your Personal Data by these agents and/or service providers.

We only collect, process, use or disclose such Personal Data, in accordance with this Notice. If you are acting as an intermediary, or otherwise on behalf of a third party, or supply us with information regarding a third party, you undertake that you are an authorised representative or agent of such third party and that you have obtained consent from such third party to our collection, processing, use and disclosure of his/her Personal Data. Because we are collecting the third party's data from you, you undertake to make the third party aware of all matters listed in this Notice by referring the third party to our website.

4. Consent for the collection and use of your Personal Data

You consent to the collection, use and disclosure of your Personal Data for the above-mentioned purposes and agree to be bound by the obligations it imposes on you, when you accept this Notice. You accept this Notice when you continue to browse on APEC Secretariat's website or continuing to engage with APEC Secretariat.

When you consent to us collecting and/or processing your Personal Data, it is on you to ensure that all Personal Data submitted to us is complete, accurate, true and correct at the time of submission. **You are also requested to inform us should there be any changes to the Personal Data that you had submitted to us.** Failure to do so may result in our inability to provide you with products and services you have requested.

Please note that if you do not consent to any of the above business purposes, APEC Secretariat may not be able to satisfy the purposes for which the information was collected.

5. Does APEC Secretariat disclose Personal Data to third parties (including overseas APEC member economies)?

On occasion, we may use third party agents and service providers to assist us in the use of your Personal Data as outlined under "*What purposes does APEC Secretariat Collect, Use and Disclose Personal Data?*" You consent to such use of your Personal Data by continuing to browse on APEC Secretariat's website or continuing to engage with APEC Secretariat.

APEC Secretariat will not transfer Personal Data within or outside Singapore unless we have assurance the Personal Data will be accorded a level of protection which is comparable to those of PDPA or when the individual whose Personal Data is processed gives the consent.

6. For how long does APEC Secretariat retain your Personal Data?

We will cease retaining your Personal Data, as soon as it is reasonable to assume that the purpose for collecting/processing your Personal Data has been fulfilled, and there is no other legal or business purposes to continue retaining your Personal Data.

7. How does APEC Secretariat protect your Personal Data?

The Personal Data that we hold about you may be stored on cloud provided by Microsoft. APEC Secretariat will ensure that there is a variety of reasonable security measures to maintain the safety of your Personal Data. All electronic storage and transmission of Personal Data is secured and stored on managed servers with controlled access and appropriate security technologies.

Although every reasonable effort has been made to ensure that all Personal Data will be so protected, APEC Secretariat cannot be responsible for any unauthorised use or misuse of such information and from risks which are inherent in all internet communications.

Your Personal Data will only be disclosed for the express purpose of delivering the product or service requested and shall not be sold or disclosed to any other company for any other reason whatsoever without your consent.

8. Social Media

You may visit our micro-sites on various social media platforms, and as such, may choose to provide us with personal data through these social media platforms, such as through forms, account portals, interfaces, and interactions with other customer support portals/channels. By doing so, you consent to the use of this personal data in accordance with this Privacy Policy.

APEC Secretariat may receive information related or connected to an account with a third-party service that you use to sign up or log in, or when you associate that account. For instance, when you associate your account, we may receive your public profile, your friends list, your contacts, and your email address.

If you delete your profile from a third-party service, such as Google or Facebook, information that has been shared with APEC Secretariat from that service may still be retained by APEC Secretariat. If you wish us to delete such information, please contact APEC Secretariat's Data Protection Officer ("DPO") at dpo@apec.org.

9. Access and Correction of Personal Data

Please contact us should you wish to have access to or seek to update, correct or withdraw the consent to collect and use your Personal Data. Your email should identify yourself and state which Personal Data and information about its use and/or disclosure is requested.

We will respond to your request as soon as reasonably possible. In the event we are not able to respond to your request within thirty (30) days after receiving your request, we will inform you before the deadline. If we are unable to provide you with any Personal Data or to make a correction you have requested, we shall inform you of the reasons unless where we are not required to do so under PDPA.

10. Further Information and contact

If you are concerned about the handling of your Personal Data, wish to be removed from our email subscription or contact lists, or if you have any complaints or queries related to your Personal Data or our Notice, please contact APEC Secretariat's DPO at dpo@apec.org. Please clearly identify yourself and the purpose of your query.

11. Amendments and updates of this Notice

APEC Secretariat reserves the right to change this Notice with or without notice from time to time and will make the updated statement available on our website.

Appendix B – Employee Data Protection Notice (for employees/interns)

**ASIA-PACIFIC ECONOMIC COOPERATION SECRETARIAT (“APEC SECRETARIAT”)
Personnel Data Protection Notice (the “Notice”)**

Updated as at 22 Jul 2021

1. Collection and Use of Personal Data

1.1 In this Notice, “we”, “us”, “our” or “APEC Secretariat” means ASIA-PACIFIC ECONOMIC COOPERATION SECRETARIAT, “you”, “your” or “yours” means the persons to whom this Notice applies. “Personal Data” has the same meaning as that defined in the Personal Data Protection Act 2012 (the “PDPA”).

1.2 This Notice provides information on the way APEC Secretariat obtains, uses, holds, transfers and otherwise processes your Personal Data as full time, part time and temporary employees, contract workers of APEC Secretariat, and such other persons engaged by APEC Secretariat to perform duties or functions for APEC Secretariat (collectively “Personnel”). Collection, use and disclosure of Personal Data is conducted by lawful and fair means, and consistent with requirements under PDPA. It is also intended to notify Personnel the rules on the protection of Personal Data and the Personnel’s rights in relation to their Personal Data processed by APEC Secretariat. In addition, the Notice provides information on the circumstances in which one entity of APEC Secretariat processes Personal Data on behalf of another entity of APEC Secretariat.

1.3 APEC Secretariat processes Personal Data about individuals such as its Personnel (past and present), job applicants, business partners and suppliers. APEC Secretariat may process either directly or through third party vendors and service providers, such Personal Data for a number of business purposes, including:

- (a) Recruitment, including evaluation and reference checks of an individual for suitability of employment;
- (b) Schedule work activities and projects undertaken by APEC Secretariat’s departments and teams;
- (c) Reviewing and/or renewing your contracts;
- (d) Employee performance management and professional development;
- (e) Payroll, claims reimbursements, accounting or tax purposes, including assessing, processing, settling, authenticating and investigating claims for reimbursements;
- (f) Administering records of leave applications and consumption of employment benefits;
- (g) Applying for work permits at the Ministry of Manpower, if needed;
- (h) Administer business travel (i.e., booking airfare, hotels and applying for visa etc.) and other corporate events (i.e., annual general meetings, extraordinary general meetings);
- (i) Facilitating corporate insurance coverage;
- (j) Knowledge management and training for staff;
- (k) Government and other regulatory reporting;
- (l) Business and market development;

- (m) Publicity, external and internal marketing purposes;
- (n) For security and access controls, safety surveillance and monitoring and reporting purposes, especially in emergency situations;
- (o) For internal reporting and/or accounting or audit purposes;
- (p) Registrations and submissions with relevant governmental or regulatory authorities, and financial institutions (e.g., bank signatories), as necessary;
- (q) To provide service support to the APEC Secretariat's employees; and
- (r) Other purposes required by law or regulation;

1.4 Please note that if you do not consent to any of the above business purposes, it may affect APEC Secretariat's ability to continue on the employer/employee relationship and/or other engagements with you.

2. APEC Secretariat's Duties

2.1 APEC Secretariat will process your Personal Data in accordance with PDPA. In particular, APEC Secretariat will not process Personal Data unless one of the following conditions is met:

- (a) the individual concerned has consented to such processing;
- (b) APEC Secretariat needs to carry out such processing (i) to perform, or take steps with view to enter into, a contract with the individual concerned, (ii) to comply with legal obligation of APEC Secretariat or (iii) to protect the vital interests of the individual concerned in a 'life or death' situation; or (iv) as permitted by "other exemptions" under PDPA (as specified in Second, Third, Fourth, Fifth and Sixth Schedule of PDPA)

2.2 When you provide APEC Secretariat with your (or those of any third parties) Personal Data, APEC Secretariat will process the Personal Data according to PDPA.

2.3 APEC Secretariat will make sure you are informed if the existing Personal Data about you is to be used in a new way, or for different purposes.

2.4 APEC Secretariat will not collect or use or disclose your Personal Data unless: (a) you consent to such collection, or (b) APEC Secretariat needs to do so to meet its obligations or exercise its rights under employment law or other applicable laws and regulations, or (c) in exceptional circumstances such as where the processing is necessary to protect the vital interests of the individual concerned, or (d) in circumstances permitted by PDPA.

2.5 APEC Secretariat may in exceptional circumstances, rely on consent given on behalf of the individual, for example, by a company employee on behalf of a family member.

2.6 APEC Secretariat shall:

- (a) not collect Personal Data more than what is reasonably required for the intended purpose;
- (b) ensure the Personal Data collected are adequate and relevant for the intended purposes, accurate and up to date;

- (c) process Personal Data only for the purposes specified in this Notice or in information provided to the individual concerned; and
- (d) ensure one of the conditions in Section 2.1 is met if it processes Personal Data for new or different purposes.

2.7 APEC Secretariat will maintain retention policies and procedures so that Personal Data is deleted after a reasonable time, given the purposes for which the Personal Data are held, except where, given those purposes, another law requires the data to be kept for a certain period of time. When APEC Secretariat no longer needs to keep Personal Data for the purposes for which they are held, it will destroy them as soon as practicable. APEC Secretariat will destroy all unsolicited Personal Data immediately which it comes into contact or possess during the course of business activity. All Personnel can contact the Data Protection Officer (the "DPO") about the duration and the purposes for which their Personal Data is retained by APEC Secretariat.

2.8 APEC Secretariat will maintain appropriate organizational, physical and technical security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal of Personal Data in its possession.

2.9 On occasion, we may use third party agents and service providers to assist us in the use of your Personal Data as outlined under "Collection and Use of Personal Data". APEC Secretariat will not transfer Personal Data to entities outside APEC Secretariat in other economies for further processing unless such entities agree to abide by a data protection standard at least as high as this Notice, or enter into a contractual arrangement requiring the same. The only exceptions are where the transfer is necessary to

- (a) protect the vital interests of the individual concerned in a 'life or death' situation, or
- (b) enter into or perform a contract with (or for the benefit of) that individual.

2.10 APEC Secretariat has procedures to deal with any suspected breaches of data security arrangements, unauthorized access or disclosure, or loss of Personal Data.

3. An Individual's Rights

3.1 Right of Access and Correction, Withdrawal of Consent Requests

- (a) Your Right of Access and Correction shall be as set out in PDPA. You may contact the DPO if you wish to request access and/or make correction to your Personal Data.
- (b) You may also contact the DPO to withdraw consent on the collection, use and disclosure of your Personal Data. All withdrawal of consent requests shall be done via email request and write in to DPO directly. If more time is needed, the DPO will inform you in writing. After successful withdrawal of consent, DPO shall inform all third parties or data intermediaries to cease, to collect, use or disclose the Personal Data of the individual (If applicable).

4. Accurate and Complete Records

4.1 APEC Secretariat take reasonable actions to verify any Personal Data from third parties' source are accurate and complete by:

- (a) Ensuring third parties source provide the latest and completed data as per date of handover by the third parties.
- (b) Performing system verification to ensure mandatory information (e.g., name, IC number, contact number, address, etc.) is provided.

4.2 APEC Secretariat takes reasonable actions where possible to verify the accuracy and completeness of Personal Data before use or disclosure:

- (a) Reviewing the current data
- (b) Ensuring the data are the latest and most accurate to date
- (c) Verifying the data with individual (if necessary)

4.3 Please note that it is your responsibility to ensure that all Personal Data (including those that are providing on behalf of another individual) submitted to APEC Secretariat is complete, accurate, true and correct at the time of submission. You are also requested to inform us should there be any changes to the Personal Data that you had submitted to us.

4.4 APEC Secretariat will amend any of the Personal Data when informed by Personnel. APEC Secretariat will maintain the amendment details (e.g. changes, date, time, etc). All third parties who have obtained the particular data from APEC Secretariat will also be provided with the latest Personal Data where necessary.

5. Company Compliance with this Notice

5.1 APEC Secretariat will maintain internal and external arrangements to:

- (a) facilitate compliance with this Notice;
- (b) allow effective exercise of individuals' rights guaranteed in the Notice; and
- (c) consider and respond to complaints from individuals that APEC Secretariat may not have complied with this Notice.

You may rely upon these procedures and/or exercise your rights provided as informed in this Notice by contacting the DPO. The email address of the DPO is dpo@apcc.org.

5.2 APEC Secretariat may update this Notice any time. All personnel are reminded they can refer to the latest version on APEC Secretariat's intranet.

Appendix C – Consent Language Template

1. Language if no Third-Party Personal Data is Collected

By submitting this form to **ASIA-PACIFIC ECONOMIC COOPERATION SECRETARIAT** ("APEC Secretariat"), I hereby warrant that all the information I am submitting in this Form is true and accurate to the best of my knowledge. I further understand that any personal data which I have provided in this form may be processed by APEC Secretariat or any overseas APEC member economies, vendors and/or subcontractors ("**APEC Secretariat's connected entities**") both locally and overseas and I expressly consent to such processing for the purposes as set out in APEC Secretariat' Privacy Notice available at <https://www.apec.org/PrivacyPolicy>.

I understand that any personal data disclosed by me herein will be retained by APEC Secretariat and its connected entities as long as any of the purposes set out in APEC Secretariat's Privacy Notice remain valid.

2. Language if Third Party Personal Data is Collected

By submitting this form to **ASIA-PACIFIC ECONOMIC COOPERATION SECRETARIAT** ("APEC Secretariat"), I hereby warrant that all the information I am submitting in this Form is true and accurate to the best of my knowledge. I further understand that any personal data which I have provided in this form may be processed by APEC Secretariat or any overseas APEC member economies, vendors and/or subcontractors ("**APEC Secretariat's connected entities**") both locally and overseas and I expressly consent to such processing for the purposes as set out in APEC Secretariat' Privacy Notice available at <https://www.apec.org/PrivacyPolicy>.

I also warrant that I have obtained all necessary consents from any third parties for APEC Secretariat to disclose any personal data belonging to such third parties as well as for the onward disclosure or processing of such third party's personal data by APEC Secretariat.

I understand that any personal data disclosed by me herein will be retained by APEC Secretariat and its connected entities as long as any of the purposes set out in APEC Secretariat's Privacy Notice remain valid.

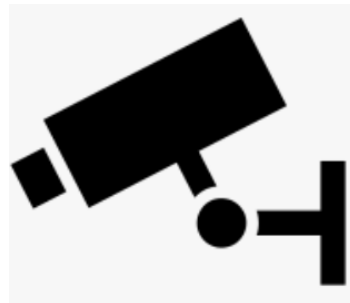
Appendix D – CCTV Notice

These premises are under

CCTV SURVEILLANCE

For safety and surveillance purposes.

All activities will be recorded.



Note: Notice should be prominently displayed prior to and during the collection, use and disclosure of personal data (i.e., at all major entry and exit points of the premises under CCTV surveillance).

Appendix E - Photography and Videography Notification

ASIA-PACIFIC ECONOMIC COOPERATION SECRETARIAT (“APEC SECRETARIAT”)

Photography and Videography Notification

We would like to inform all participants that photographs, and videos taken at this event may be used for **ASIA-PACIFIC ECONOMIC COOPERATION SECRETARIAT (“APEC SECRETARIAT”)** marketing, documentation, audit and publicity purposes on print or electronic media or social media and for post event initiatives.

Should you require further assistance or have any queries, kindly approach one of APEC Secretariat’s staff for further assistance. Thank you.

Note: Notice should be prominently displayed prior to and during the collection, use and disclosure of personal data (i.e., at the registration desks, and all major entry and exit points where the event is being held).