

HREASILY PRIVACY POLICY (FOR INDIVIDUALS) – HONG KONG

This privacy policy (“**Policy**”) outlines how HReasily collects, maintains, stores and discloses personal information and data we hold about individuals (“**Personal Data**”). This Policy forms part of the Terms and Conditions of Use for all products, software and services provided by HReasily.

For the purposes of this Policy, please note that:

- a) “HReasily” refers to HR Easily Pte Ltd, its Hong Kong subsidiary Hreasily Limited and related corporations
- b) “We / Our / Ours / Us” refers to HReasily and its respective officers, servants or agents
- c) “Services” refers to the HReasily products and services you or your employer have applied for or are using, including but not limited to payroll and staffing services, software, products and support provided by HReasily

Personal Data in this Policy includes any data about an individual who can be identified from that data such as the individual’s name, identity card, passport or other identification number, their contact details, work experience, qualifications, aptitude test results, salary and payroll details, incidents at the workplace, and other information obtained or received by us in connection with the Services.

How we use your Personal Data

1. We may collect, use and disclose Personal Data for one or more of the following purposes:
 - a. to establish your identity and background
 - b. processing an application for any products or services offered or distributed by us (including but not limited to third party products)
 - c. providing products and services requested by you
 - d. generating marketing, regulatory, management, statistical or other related reports and performing analytics
 - e. meeting or complying with our (or our affiliated third party organisation’s) internal policies and procedures and any applicable laws or court orders
 - f. legal purposes
 - g. handling complaints or feedback
 - h. facilitating proposed or actual assignment, transfer, participation or sub-participation in an of our rights or obligations in respect of your relationship with us
 - i. for any insurance claim or proposal that requires disclosure of your personal information
 - j. for our direct marketing and business development to you (including but not limited to third party products)
 - k. for career guidance and management
 - l. for other internal business purposes to allow us to improve our services to you
 - m. conducting market research, surveys and data analysis relating to any service or product provided by us (whether or not conducted jointly with another party) which may be relevant to you
 - n. other purposes which are reasonably related to the purposes above.
2. Personal Data of Individuals is kept confidential. However to carry out the purposes listed above, HReasily may share such Personal Data with its related or affiliated corporations, entities and contractors whether in Hong Kong or elsewhere. When doing so, we require them to ensure that the Personal Data disclosed is kept confidential and secure. Please note that technical or customer support involving access to personal data may be provided by HReasily representatives located outside Hong Kong.
3. Where you or your employer applies for or holds a product or service which is jointly offered by HReasily and a co-brand partner, HReasily may also collect, use and disclose your Personal Data for the purpose of sharing it with the co-brand partner for offering, marketing and promoting to you any products, services, offers or events which the co-brand partner thinks may be of interest to you.

Disclosure of your Personal Data

4. We may disclose your Personal Data to:
 - a. Your employer, co-branded partners of HReasily and related or trusted third parties
 - b. Our insurers
 - c. A professional association or body that has a legitimate interest in the disclosure of your Personal Data
 - d. Mandatory Provident Fund Schemes Authority
 - e. External education or training providers to you
 - f. Employees, officers and agents of HReasily located within and outside Hong Kong to assist us in providing the Services

5. We will otherwise treat your Personal Data as private and confidential and apart from the parties stated above, we will not disclose your data to any other party except:
 - a. where you have given permission
 - b. where we are required or permitted to do so by law
 - c. where required or authorised by any court order
 - d. where we are required to meet our obligations to any relevant regulatory authority

Security of Personal Data

6. HReasily takes breaches of privacy very seriously. Our employees and contractors are trained to handle the personal data securely and with utmost respect and confidentiality, failing which they may be subject to disciplinary action. Employees and contractors of HReasily located outside Hong Kong are contractually obligated to keep secure any personal data they may handle.
7. We store Personal Data in secure computer storage facilities and paper-based files and other records and take reasonable steps in the circumstances to protect the personal information we hold from misuse, interference and loss, unauthorised access, modification or disclosure. We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will delete all details that identify you and/or destroy all records of your Personal Data.
8. We have appointed a Data Protection Officer to ensure that your Personal Data is managed in accordance with this Policy, with the Personal Data (Privacy) Ordinance and other similar legislation in the countries in which we operate.
9. All Personal Data provided by individuals within Hong Kong is stored on and transferred to servers located within Hong Kong and other locations permitted and approved under the Personal Data (Privacy) Ordinance.

Accuracy of Personal Data

10. We take reasonable steps to ensure that all Personal Data is up-to-date and accurate and recognise that contact details and other data may change frequently. Please keep us advised of any changes in your information.
11. If you wish to delete your Personal Data held with us, please contact our Data Protection Officer. HReasily may retain certain information about you where required to do so by law.

Rights to access and correct Personal Data

12. We can assist you to access and correct your Personal Data held by us.
13. To make a request to access your Personal Data, or where you are of the opinion that such Personal Data held by us is inaccurate, incomplete or misleading, you will need to complete an application form which sets out what Personal Data you require and verifying your identity. Please contact our Data Protection Officer for the application form or further information about how to access your Personal Data.
14. We will respond to your request within 30 days of receiving a duly completed written request and provide you with access to your Personal Data. If we cannot comply with your request within this timeframe, we will respond and let you know when we can. You should anticipate that it may take some time to process your application as there may be a need to retrieve information from storage and review it. There may also be a small but reasonable fee for the access request. Please discuss this with our Data Protection Officer.
15. Please note that we may have to withhold access to your Personal Data in certain situations, for example when we are unable to confirm your identity.
16. You may request that we correct the Personal Data we hold about you if you deem it to be inaccurate, incomplete, out-of-date, irrelevant or misleading. We will take reasonable steps to correct the information as soon as practicable and send the corrected personal information to other organisations in accordance with the Personal Data (Privacy) Ordinance

Consent

17. If you do not agree with this Policy, please DO NOT continue to use or access the Services.
18. By disclosing Personal Data to us or continuing to utilise the Services you are deemed to:
 - a. agree with this Policy and consent to the purposes above for which we collect and use your Personal Data; and

- b. have provided your clear and unambiguous consent to being contacted by us or our affiliates on your telephone number in relation to marketing or other purposes, notwithstanding any listing on the Do Not Call Registry.

19. You may withdraw your consent at any time by providing us with a notice in writing.

Website cookies

20. We use cookies on our website. Cookies are files we put on your computer which record information about your visit and use of the website in order to enhance your viewing experience.
21. We use cookies for the following purposes:
 - a. to improve the user experience on the website;
 - b. to assist us in monitoring the performance of the website;
 - c. to remember your preferences;
 - d. to monitor traffic on the website;
 - e. to assist the website in functioning properly.
22. You can disable or enable cookies through your web browser settings. If you disable or block the cookies on our website, you may not be able to access the entire scope of functions ordinarily performed by our website.
23. Personal Data that we collect from you through our cookies may be passed onto third party service providers (whether within or outside Hong Kong), for managing or improving our website, for data hosting or backup or for one or more of the purposes set out in paragraph 21 above.
24. Your use of our website constitutes consent to the use of cookies by us as governed by this Policy.

Enquiries, requests and complaints

For enquiries, requests and complaints regarding Personal Data, please contact our Data Protection Officer at theo@hreasily.com. Alternatively, you may telephone us on any of the contact numbers listed on our website or send mail to 138 Robinson Rd, #14-01/02 Oxley Tower, Singapore 068906.