

Privacy Policy — HR SaaS with Cross-Border Transfer to US and EU Cloud Providers

Sample document — not legal advice. This document was drafted by the LawCrew AI agent team and is published at lawcrew.ai/samples as a showcase of how our pipeline approaches a common Singapore Privacy Policy scenario. This run completed automated drafting, self-critique, adversarial review and deterministic gates, then routed to lawyer review (Self-critique flagged 2 high issue(s); adversarial flagged 4 high concern(s)). **It is not legal advice and is not tailored to any specific transaction.**

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Sample Privacy Policy #04 · Agent-drafted; routed to lawyer review · Published 2026-05-26

Privacy Policy

Last updated: 2026-07-01

1. Who We Are

TalentBridge Systems Pte. Ltd. operates <https://talentbridge.sg> and related services. This Privacy Policy explains how we collect, use, disclose, retain, protect, and transfer personal data in Singapore.

2. Personal Data We Collect

We may collect contact details, identification information, employment information, financial information from employees and job applicants of corporate subscriber organisations; HR administrators and payroll staff of subscriber organisations. We collect this personal data only for purposes that a reasonable person would consider appropriate in the circumstances and where consent or another permitted basis applies.

3. Purposes and Consent

We collect, use, and disclose personal data for: Operating the HRIS platform for subscriber organisations; storing and processing employee records including payroll, leave, and performance data; facilitating recruitment and applicant tracking; generating statutory payroll reports and CPF submission files; technical support and platform security; compliance with Singapore Employment Act, CPF Act, Income Tax Act, and other applicable legislation.

Our primary basis is compliance with legal obligations. Individuals may withdraw consent by contacting our Data Protection Officer, subject to legal or contractual consequences that we explain at the time of withdrawal.

4. Disclosure to Third Parties

We may disclose personal data to the following recipients for the stated purposes:

Recipient	Purpose	Country
Amazon Web Services EMEA SARL (Ireland Region)	Cloud infrastructure hosting for EU-based subscriber organisations and disaster recovery replication. Employee data for Singapore-based subscribers is primarily hosted in the Singapore AWS region.	IE
Microsoft Corporation (Azure US West)	AI-powered performance analytics and talent-matching features. Processed data is anonymised before transmission where technically feasible.	US
Workato Pte. Ltd.	Integration automation for connecting the HRIS with subscriber payroll and accounting systems. Processes only the data fields necessary for the specific integration configured by the subscriber.	SG

5. Cross-Border Transfers

We may transfer personal data to IE, US using written contractual clauses requiring comparable protection. We take steps to ensure transferred personal data receives a standard of protection comparable to Singapore data-protection law.

6. Protection and Accuracy

We apply reasonable security arrangements to protect personal data against unauthorised access, collection, use, disclosure, copying, modification, disposal, and similar risks. We also take reasonable steps to keep personal data accurate and complete where it is likely to be used to make a decision about an individual or disclosed to another organisation.

7. Retention

Employee records are retained for the duration of the subscriber's active agreement plus 7 years following termination of the agreement, to comply with Employment Act record-keeping obligations and potential employment dispute resolution periods. CPF and payroll records are retained for a

minimum of 5 years as required by the CPF Act and Income Tax Act. Recruitment and applicant data for unsuccessful candidates is retained for 2 years from the date of application. Upon expiry of the retention period or at the subscriber's written request, employee data is securely deleted or returned to the subscriber. We stop retaining personal data, or remove the means by which it can be associated with an individual, when retention is no longer necessary for legal or business purposes.

8. Access, Correction, and Questions

Individuals may request access to, or correction of, their personal data by contacting our Data Protection Officer:

Field	Details
Name	Mr. Rajesh Subramaniam
Email	dpo@talentbridge.sg
Address	TalentBridge Systems Pte. Ltd., 79 Robinson Road, #14-03 CPF Building, Singapore 068897
Phone	+65 6345 6789

9. Marketing

Individuals may opt out of marketing communications by contacting marketing-opt-out@talentbridge.sg.

10. Cookies

The service uses essential cookies for login, security, and service delivery. We use only session authentication and CSRF-protection cookies strictly necessary for secure login and session management within the HRIS platform. No advertising or third-party analytics cookies are placed on the platform interface.

11. Complaints and Updates

Individuals may contact our Data Protection Officer with privacy questions or complaints. If we are unable to resolve a complaint to the individual's satisfaction, the individual may refer the matter to the Personal Data Protection Commission (PDPC) at www.pdpc.gov.sg. We may update this Privacy Policy from time to time and will publish the updated version with a new last-updated date.