

Policy Document

External Personal Data Protection Policy

July 2021

Document Control

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Revision History

Revision Date	Revised by	Previous Version	Description of Revision
31 Aug 2018	Leah Tan		Changed item 8 - policy review from bi-yearly to yearly
7 Nov 2018	Leah Tan		1.To include telephone no for withdrawal, correction and access rights. 2. 3.2 – add ' may ' collect name and contact when visit to NHCS office ' for security reasons '.
13 July 2021	Jeff		- Changed "Openness" to "Accountability" - Added Data Breach Notification Obligation

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Contributors

The following individuals/groups contributed to the contents of this document:

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1. Introduction

1.1. Purpose of policy

New Hope Community Services (**NHCS**) is committed to safeguarding the personal data entrusted to it by the individuals. This Policy sets out how **NHCS** uses, collects and disclose personal data about you so that we can serve you better. It also sets out how you can update us or request to be unsubscribed from our records.

1.2. Definitions

Personal data

Personal data generally refers to data about an individual who can be identified from that data, in whatever form. It includes information such as individual's name, identification number, address, mobile phone number, email addresses and photos and video images of the person (including CCTV images). Employee data of **NHCS** such as salaries, medical records and educational records is also recognized as personal data and is subject to all the obligations of the PDPA.

2. Policy Statement

NHCS will:

- i. comply with regulatory requirements as stated in the PDPA 2012;
- ii. respect individual rights;
- iii. be transparent and honest to the individuals whose data are held by us;
- iv. provides training and support for staff and volunteers who handle personal data, so that they may confidently comply with this policy
- v. properly documented and protected by appropriate security and keep with trusted and authorized parties;
- vi. kept for no longer than necessary.

3. Data Collection, usage and disclosure

3.1 Purpose for Information Collection

Personal data collected by **NHCS** is mainly to help us understand your needs so as to enable us to serve you better.

These purposes include the following:

- i. To provide services such as transition shelters, food ration, life skills training, job training, HOPE programmes and social service;
- ii. To notify members, volunteers and donors of our events and programmes;
- iii. To assess our clients for administer grants, subsidy, referral programmes and services;
- iv. To comply with legal process or legal requirements of any government agencies;

- v. To solicit donations from business owners, corporations, executives and existing donors;
- vi. Any other purpose relevant to **NHCS** objectives of which you will be notified and we will ask for your consent.

3.2 How do we acquire your personal data

Personal data is to be collected by fair, transparent and lawful means, without misleading or deceiving individuals as to the purposes for collection of personal data about them. NHCS may collect personal data from a number of channels, but are not limited to:

- i. Application form (s) submitted by clients to **NHCS** for purpose of applying for NHCS services;
- ii. Job application form (s) apply for a job position in **NHCS**;
- iii. Where an individual makes a donation to **NHCS**;
- iv. E-forms from website for volunteer registration, donations and enquiries;
- v. Images and videos taken by representatives during **NHCS** events or from our CCTV cameras within our premises;
- vi. Where an individual submits his personal data for the purpose of volunteering;
- vii. We may collect information such as your name, email address, telephone number when you visit our **NHCS** office, for security purposes.

3.3. Consent

NHCS shall always seek consent from individual to collect, use or disclose the individual's personal data, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law.

NHCS may not be able to fulfill certain services if individuals are unwilling to provide consent to the collection, use or disclosure of certain personal data.

3.4. Deemed Consent

NHCS may assume individual has consented to collection, usage and disclosure of their personal data in situations where the individual provided information for **obvious** purposes.

NHCS may deem individual's consent was obtained for personal data collected prior to 2nd July 2014 for the purpose of which the personal data was collected. The consent may include for **NHCS** usage and where applicable include disclosure.

NHCS need not seek consent from staff (including volunteers and part-time workers) for purposes related to the staff's work in **NHCS**. However, staff's consent shall be obtained if such purpose is unrelated to their work. Staff shall be informed that their personal data may be disclosed to public and arrangements may be made to limit such disclosure with mutual agreement.

3.5 Consent withdrawal

Any individual may withdraw their consent to the use and disclosure of their personal data at any time, unless such personal data is necessary for **NHCS** to fulfill its legal obligations. **NHCS** shall comply with the withdrawal request, and inform the individual if such withdrawal will affect the services and arrangements between the individual and **NHCS**. **NHCS** may cease such services or arrangements as a result of the withdrawal.

3.6. Notification obligation

NHCS shall collect this personal data directly from the individuals. However, **NHCS** may also collect individual's personal data from third parties i.e. referral agencies such as Family Service Centre provided the consent was obtained from the individual or required by law.

Prior or during collecting personal data, **NHCS** shall make known to the individual the purpose for which the personal data was collected, except when such personal data is provided by an individual for an obvious purpose (E.g. individual provided personal data to register for an event, as such the purpose is for that event participation).

3.7. Accuracy obligation

NHCS shall make every reasonable effort to ensure that individuals' information it keeps are accurate and complete. **NHCS** relies on individuals' self-notification of any changes to their personal data that is relevant to **NHCS**.

3.8. Data disclosure and Transfer of personal data in and outside Singapore

NHCS may disclose individual personal data to internal/external/overseas organizations for necessary and appropriate purposes. Such transfer shall be done in a manner that is secure and appropriate align with PDPA requirements.

4. Security and storage

4.1. Protection of Personal data

All personal data held must be secured and protected against unauthorized access and theft.

NHCS shall ensure that:

- i. Restriction of personal data access within the organization;
- ii. Provide physical security to personal data records and files;
- iii. Personal computers and other computing devices that may access to personal data are password protected. Passwords are managed in accordance with industry best practices;
- iv. Personnel and other files that contain sensitive or confidential personal data are secured and only made available to staff with authorized access.

4.2. Storage of Personal Data

NHCS shall take reasonable and appropriate security measures to protect the storage of personal data such as:

- i. Making confidential on documents with personal records clearly and prominently;
- ii. Storing hardcopies of documents with personal records in locked file cabinet systems;
- iii. Storing electronic files that contain personal data in secured folders.

4.3. Retention Limitation Obligation

NHCS shall retain individual's personal data only for as long as it is reasonable to fulfil the purposes for which the information was collected for or as required by law.

5. Access and correction of personal data

We can provide and help you access your own personal data:

- i. Request for personal copy – A nominal administrative fee will be charged;
- ii. For update or correction.

Request for personal data access or correction by individuals, including any enquires and complaints shall be submitted to NHCS in writing to the Data Protection Officer at the following address and contact information:

Attention: Data Protection Officer

New Hope Community Services

Blk 148 Yishun Street 11, #01-123, Singapore 760148

Email: pdpa@newhopecs.org.sg

Telephone: 63059620

We may refute your access in cases if and when such related personal data is under legal proceeding, no proper identification or request is carried out with suspected fraudulent intent.

6. Accountability Obligation

NHCS shall develop and publish data protection policy statements to inform staff, including part-time staff and volunteers, declaring the manner that their personal data are collected, used and disclosed. The data protection policy statements are made available to staff and the public in our website.

7. CCTV, video recording and photography

CCTV, video footage and photos may constitute personal data if an identifiable individual is captured.

- i. Appropriate notices shall be put up to inform that the premises are covered by CCTV video surveillance
- ii. Notices shall be put up to inform visitors and volunteers that photographs and videos taken may be used by NHCS for communication and publicity purposes in print or electronic media.

8. Data Breach Notification Obligation

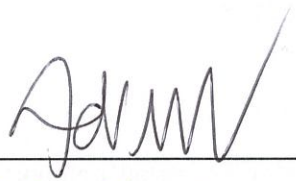
Even with reasonable protection measures in place, there may be a possibility of a data breach. In the event the data breach is assessed to be notifiable, NHCS will notify the affected individuals as soon as practicable, at the same time or after notifying the Commission. If the breach warrants notification to the Commission, NHCS will make notification as soon as practicable but no later than three (3) calendar days.

9. Policy review

The Personal Data Protection Policy shall be maintained and updated by the Data Protection Officer, reviewed and approved by the Management in a timely manner but shall review at least yearly.

Approval and Effective Date: July 2021

Approved by: _____



Date: _____

21 JUL 2021

Pastor Andrew Khoo Chiat Jin
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