



General Conference Women's Society of Christian Service

Personal Data Protection Policy

1 July 2017 – Version 2

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1. INTRODUCTION

1.1 Policy Information

Document Owner
This policy was prepared by General Conference Women's Society of Christian Service.
Organisation and Scope of Policy
This policy applies to all the staff, including volunteers and contractors of General Conference Women's Society of Christian Service. A copy of this policy shall be made available to any individual upon request.
Policy operational date
1 July 2017
Date approved by GC WSCS Executive Committee
1 July 2017

1.2 Purpose of Policy

General Conference Women's Society of Christian Service ("GC WSCS" or "organization" or "us") is committed to safeguarding the personal data entrusted to it by the Individuals.

GC WSCS manages the Individuals' personal data in accordance with Singapore Personal Data Protection Act 2012 (No. 26 of 2012) ("PDPA 2012" or the "Act") and other applicable written laws. The purpose of the Personal Data Protection Policy (the "Policy") outlines the principles and practices adopted by GC WSCS in protecting personal data.

1.3 Definitions

Personal Data

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 the organisation has or is likely to have access.

Individual

Individual means a natural person, whether living or deceased.

For GC WSCS, individuals include, but not limited, to the following:-

- Staff (either paid or not paid. Unpaid staff include volunteers, persons holding offices or represent GC WSCS in any way.);
- Members;
- Donors;
- Students;
- Beneficiaries;
- Prospects;
- Customers;
- Researchers; and
- Visitors

Purpose

The term "purpose" refers to objectives or reasons that the organization have in relation to the collection, use and disclosure of personal data.

2. POLICY STATEMENT

GC WSCS will:-

- comply with regulatory requirements as stated in the PDPA 2012;
- respect individuals' rights;
- be open and honest to the individuals whose data are held by us; and
- provide training and support for staff and volunteers who handle personal data, so that they may confidently comply with this Policy.

GC WSCS recognizes that our primary commitment with reference to the Personal Data Protection Act is to ensure individuals' personal data are not misused and may result in harmful consequences. We strive to achieve this by ensuring personal data are: -

- obtained fairly and lawfully and shall not be processed unless certain conditions are met;
- obtained for specified and lawful purposes and not further processed in a manner incompatible with that purpose;
- adequate, relevant and not excessive;
- accurate and up to date;
- kept for no longer than necessary; and
- protected by appropriate security and kept with trusted and authorized parties.

GC WSCS is also committed to being open and transparent and will respond to any legitimate enquiries from individuals regarding usage, storage and accuracy of their personal data in a timely manner.

3. RESPONSIBILITIES

3.1 General Conference Women's Society of Christian Service Executive Committee (GC WSCS ExCo) Responsibilities

The General Conference Women's Society of Christian Service Executive Committee (GC WSCS ExCo) is the responsible authority for ensuring that GC WSCS complies with the following legal obligations: -

- Develop and implement its data protection policies and practices;
- Appoint a Data Protection Officer ("DPO");
- Develop process to receive and respond to complaints that may arise with respect to the application of PDPA 2012;
- Communicate information about its data protection policies and practices to its staff; and
- Make information available on request about its data protection policies and practices and its process to receive and respond to complaints;

Each committee and department which manages personal data is responsible for formulating their respective operational procedures in compliance to this Policy (including induction and

training) to ensure that good data protection practices are established and implemented.

3.2 GC WSCS Staff, Volunteers and Vendors' Responsibilities

All GC WSCS staff, paid and unpaid, including office bearers, shall comply with this Policy.

All staff shall read, understand and acknowledge Policy procedures that relate to the personal data that they may manage in GC WSCS.

Staff shall seek approval from the DPO when there is a need to consider using personal data in a manner not consistent with this Policy, or an official disclosure request is received. The considerations, approval and disclosures shall be documented and filed.

Significant breaches of this Policy shall be referred to the DPO and the GC WSCS Administrative Committee for appropriate action.

4. DATA COLLECTION, USAGE AND DISCLOSURE

4.1 Personal Data

The type of personal data that GC WSCS may collect from individuals will depend upon the Individual category (Staff, Member, Visitor, Donor, etc). Normally the personal data collected by GCWSCS may include an individual's:

- name, telephone number(s), mailing address, email address and any other information relating to the individual which he or she has provided in any form he or she may have submitted to use, or in other forms of interaction with him or her;
- personal identification and/or passport number;
- title, date of birth/age, sex, marital status, nationality and occupation;
- Christian background (church, baptism, theological studies, missions, etc);
- credit card/bank account information;
- camera or video footage that identifies individuals;
- or any other personal information that an individual may offer voluntarily.

4.2 Purpose Limitation

GC WSCS collects, uses and discloses personal data for the following purposes:-

- Human resource administration;
- Education and training;
- Event organisation and management;

- Missions organisation and management;
- Fundraising, donations and activities for charitable causes;
- Tenancy management;
- Service intermediation (insurance and banking);
- Members services;
- Queries and requests handling;
- Meet regulatory requirements (Charity portal declaration); and
- Advertising and communication.

GC WSCS shall only collect personal data relevant to the purpose of the collection or if it is mandatory in order to accomplish the purpose. Individuals shall be informed of the purpose of collecting optional data (e.g. to improve services rendered).

4.3 Collection of Information

Personal data is to be collected by fair and lawful means, without misleading or deceiving individuals as to the purposes for collection of personal data about them. The avenues by which GC WSCS may collect personal data include, but are not limited to:

- Application form(s) submitted by an individual to GC WSCS, such as volunteer application forms or other forms relevant to events or activities organised or managed by GC WSCS;
- Where an individual attends at the GC WSCS Office for the purpose of making enquiries or to make requests relating to any event, activity, course or program organised, conducted or managed by GC WSCS;
- Where an individual makes a donation to GC WSCS;
- Where an individual makes a request to GC WSCS to contact that individual for any purpose;
- Where an individual submits that individual's personal data for the purpose of employment;
- Where an individual submits that individual's personal data for the purpose of volunteering at GC WSCS events, activities, programs or courses.

4.4 Consent

GC WSCS shall 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 under this Act or required by any other written law.

Consent may be collected through written documentations (e.g. consent form, written note) or electronically (email consent, electronic forms). In situations that consent cannot be

conveniently obtained in written form or electronically, GC WSCS may opt to obtain verbal consent and such process shall be approved by DPO.

GC WSCS 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.

4.5 Deemed Consent

GC WSCS may deem the individual has consented to collection, usage and disclosure of his or her personal data in situations where the individual provided information for obvious purposes.

GC WSCS 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, unless consent for such use is withdrawn. The consent may include for GC WSCS' usage and where applicable include disclosure.

GC WSCS need not seek consent from staff (including volunteers and part-time workers) for purposes related to the staff's work in GC WSCS. However, the 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 the public and arrangements may be made to limit such disclosure with mutual agreement.

4.6 Consent Withdrawal

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

4.7 Notification Obligation

GC WSCS shall collect this personal data directly from the Individuals. However, GC WSCS may also collect the individual's personal data from third parties provided the consent was obtained from the individual or required by law.

Prior to or during the collection of personal data, GC WSCS 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).

4.8 Accuracy Obligation

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

4.9 Data Disclosure and Transfer of Personal Data in and outside Singapore

GC WSCS may disclose the individual's personal data to the following group of external organisations for appropriate purposes and subjected to compliance of applicable written laws:-

1. agents, contractors, data intermediaries or third party service providers who provide services, such as telecommunications, mailing, information technology, payment, payroll, insurance, training, storage and archival, to the organisation;
2. banks and financial institutions;
3. GC WSCS' professional services providers such as auditors;
4. relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by relevant government;
5. charity organisations; and
6. any relevant person related to achieving the intended purposes.

GC WSCS will transfer personal data to a country or territory outside Singapore when required for business purposes. Such transfer shall be done in a manner that is secure and appropriately aligned with PDPA 2012 requirements.

5. SECURITY AND STORAGE

5.1 Protection Obligation

GC WSCS shall adopt security arrangements that are reasonable and appropriate to the circumstances, while taking into consideration the nature of the personal data, the form in which the personal data is collected (physical or electronic) and the possible impact to the individual concerned if an unauthorized person were to obtain, modify or dispose the personal data. Each department shall determine such arrangement appropriate for its operating unit. The DPO shall review and examine such arrangements and provide necessary recommendations.

5.1.1 Storage of personal data

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

- Marking confidential on documents with personal records clearly and prominently;
- Storing hardcopies of documents with personal records in locked file cabinet systems;
- Storing electronic files that contains personal data in secured folders; and
- Archived paper records and data backup files may be stored in off-site facilities or service providers provided such facilities are secured.

5.1.2 Protection of personal data

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

GC WSCS shall ensure that:-

- Network drives, personal computers and other computing devices that may access to personal data are password protected. Passwords are managed in accordance with industry best practices;
- Personnel and other files that contain sensitive or confidential personal data are secured and only made available to staff with authorized access.

In the event of a security breach, the DPO shall be notified. The DPO shall investigate if such breach is a malicious act and shall take appropriate action after consultation with GC WSCS Executive Committee.

5.2 Retention Limitation Obligation

GC WSCS shall retain the individual's personal data only for as long as it is reasonable to fulfill the purposes for which the information was collected for or as required by any written law.

GC WSCS shall establish a personal data retention schedule and ensure that personal data managed are processed regularly. GC WSCS may anonymise collected personal data or destroy records containing personal data according to the retention schedule.

GC WSCS shall ensure the disposal of personal data is performed appropriately with little possibility to recover the information from disposal process. Such method may include shredding paper records and permanently deleting the electronic records.

6. ACCESS AND CORRECTION OF PERSONAL DATA

6.1 Access to Personal Data

Individuals whose personal data are kept by GC WSCS shall be allowed to access to their personal data. GC WSCS shall disclose such information, including the usage and disclosure history of the personal data that has occurred within a year of the date of request. Individuals

may make request to GC WSCS for such disclosure and correction by writing to GC WSCS in accordance to clause 6.3.

6.2 Correction of Personal Data

GC WSCS is committed to ensure that all personal data provided are kept accurate and up-to-date. To achieve this, GC WSCS recognizes that the individuals' participation in informing GC WSCS of any changes, error or omission in their personal data is essential. GC WSCS shall provide facilities and processes to allow individuals to submit corrections to their personal data.

GC WSCS shall notify all other organisations of such corrections, if the individual's personal data was disclosed by GC WSCS to that organization one year prior to this correction. Such notification shall take place except if GC WSCS deems the personal data is no longer relevant or needed by the organization for the purpose that GC WSCS' disclosure was made earlier.

6.3 Access and Correction Process

The DPO will have oversight of all personal data access or correction requests and ensure that they are processed in accordance with this Policy.

Request for personal data access or correction by individuals, including any enquires and complaints shall be submitted to GC WSCS in writing to the DPO at the following address and contact information: -

70 Barker Road #06-05
Methodist Centre
Singapore 309936
Tel: 6478 4760
Email: wscs@methodist.org.sg

All GC WSCS staff shall forward any personal data access or correction request to the DPO in a timely manner.

GC WSCS may request for additional information from the requestor to aid in the investigation. The DPO shall verify the identity of the individual before responding to the request for access or correction. GC WSCS may respond to the requestor via telephone call, written note or electronic mail. In any case, the DPO shall make a record of such requests and responses for future reference and verification.

6.4 Openness Obligation

GC WSCS 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. Such statement shall be made available to staff upon request, or may be published in an appropriate manner that GC WSCS deems fit.

GC WSCS shall also publish a data protection policy statement for other parties (non-staff) and such statement shall be published on GC WSCS website.

7. VIDEO RECORDING AND PHOTOGRAPHY

Video footage and photographs may constitute personal data if an identifiable individual is captured.

- Notices shall be put up to inform volunteers and participants that photographs and videos taken may be used by GC WSCS for communication and publicity purposes in print or electronic media.
- For special event, it should be stated in the invitation that photographs or attendees will be taken at the function for communication and publicity in print and electronic media.
- If photographs and videos are taken out of the context of the above, GC WSCS must obtain the individual's consent before using them.

Only authorized staff of GC WSCS are allowed to access these personal data. When in doubt, seek the advice of the DPO.

8. POLICY REVIEW

This Policy shall be maintained and updated by the DPO, and reviewed and approved by the GC WSCS ExCo biennially.