

# **Personal Data Protection Policy**

*TELOK AYER CHINESE METHODIST CHURCH*

The Methodist Church in Singapore

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## 1. Policy information

<b>Document Owner</b>
This policy was prepared by TELOK AYER CHINESE METHODIST CHURCH (TACMC)
<b>Organisation and Scope of policy</b>
This policy applies to all the staff (including volunteers and part-timers, clergy, and lay as well as contractors of TELOK AYER CHINESE METHODIST CHURCH. A copy of this policy shall be made available to any individual upon request.
<b>Policy operational date</b>
1 <sup>st</sup> December, 2014
<b>Date approved by {Name of Church} Executive Committee</b>
30 <sup>th</sup> November, 2014 by TACMC LOCAL CHURCH EXECUTIVE COMMITTEE
<b>Policy review date</b>
BI-YEARLY 31 <sup>st</sup> May, 2015

# 1. Introduction

## 2.1. Purpose of policy

The TELOK AYER CHINESE METHODIST CHURCH (TACMC) is committed to safeguarding the personal data entrusted to it by the Individuals.

TACMC manages Individual's personal data in accordance with Singapore Personal Data Protection Act 2012 (No. 26 of 2012) and other applicable laws. This policy outlines the principles and practices adopted by TACMC in protecting personal data.

## 2.2. 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 organization has or is likely to have access.

### Individual

Individual means a natural person, whether living or deceased.

For the TACMC, individuals include, but not limited, to the followings;

- Staff (either paid or not paid. Unpaid staff includes volunteers, lay person holding office or represents TACMC in anyway.
- Members
- Donors
- Students
- Beneficiaries
- Prospects
- Customers
- Researchers
- Visitors / Guests
- Missionaries
- Parents & Students

### Purpose

The term "purpose" refers to objectives or reasons the organisation relating to personal data.

## 2. Policy statement

TACMC 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,
- provide training and support for staffs and volunteers who handle personal data, so that they may confidently comply with this policy.

TACMC recognises that our primary commitment with reference to the 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;
- protected by appropriate security and keep with trusted and authorized parties.

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

## 3. Responsibilities

### 3.1. TACMC Local Church Executive Committee responsibilities

TACMC Local Church Executive Committee is the responsible authority for ensuring TACMC complies with the following legal obligations:

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

Each committee *Chairman* 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. TACMC staffs, lays' and vendors' responsibilities

All TACMC staffs, paid and unpaid, including lay and clergy office bearers, shall comply with this Personal Data Protection policy.

All staff shall read, understand and acknowledge any policies and procedures that relate to the personal data that they may manage in TACMC.

Staff shall seek approval from the **Data Officer** in the occasion that 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 processes of the disclosures shall be documented and filed.

Significant breaches of this policy shall be referred to according to TACMC disciplinary procedures.

## 4. Data collection, usage and disclosure

### 4.1. Personal data

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

*Personal data:*

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

### 4.2. Purpose limitation

TACMC 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),
- Advertising and communication.
- Church Activities
- Baptism
- Confirmation & Membership

*Other Churches purposes:*

- Planning, organising and holding church services, events, activities, courses and programs;*
- Administration and management of TACMC's operations, functions or other internal matters as the case may be including record keeping;*
- Pastoral care of TACMC members or other individuals where applicable;*
- To communicate with an individual in respect of:*
  - *any of the matters described in this clause;*
  - *the individual's membership with TACMC;*
  - *responding to a request or query by the individual;*
  - *responding to and resolving any complaints;*
  - *any matters by reason of which the individual is reasonably associated with, affiliated with or connected to TACMC; or*
  - *any other matters in respect of which it is reasonably necessary for TACMC to communicate with the individual;**whereby such communication may take the form of voice calls, SMS, other messages receivable on a mobile phone (e.g. WhatsApp, Tango, Line, WeChat, Skype messages etc.), email, fax or post;*
- Providing services to one or more individuals, a community or the general public;*
- Internal and external communications and publications;*
- For the purposes of the TACMC Pastoral Care Ministry, which include without limitation the following carried out by members of the Pastoral Care Ministry:*
  - *Addressing an individual at TACMC events or activities to welcome that individual;*

- *Communicating with an individual in the manner described at sub- clause (b) of this clause;*
  - *Visitations at an address provided by the individual, including but not limited to the individual's home, place of work, a hospital or dormitory etc.;*
  - *Meeting with the individual, including to have a meal with the individual, for counseling, to communicate personal experiences and to provide spiritual support; and*
  - *Conducting ceremonies, for example house blessings, weddings and funerals; or*
- h. Any other purposes of which TACMC may notify individuals from time to time.*

TACMC shall only collect personal data relevant to the purpose of the collection. Each data shall indicate 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 TACMC may collect personal data include, but are not limited to:

#### *Our policy of personal data:*

- Application form(s) submitted by an individual to TACMC, such as membership application forms or other forms relevant to events and activities organised or managed by TACMC;
- Where an individual contacts staff or representatives of TACMC to make enquiries or in relation to pastoral care, whether such contact is by email, voice calls, or otherwise;
- Where an individual attends at the Church Office for the purpose of making enquiries or to make requests relating to pastoral care or any events, activities, courses or programs organised, conducted or managed by TACMC;
- Where an individual makes a donation to TACMC;
- Where an individual makes a request to TACMC 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 TACMC events, activities, programs or courses.

### **4.4. Consent**

TACMC 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 or required by 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, TACMC may opt to obtain verbal consent and such process shall be approved by Data Officer.

TACMC 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**

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

TACMC may deem individual's consent was obtained for personal data collected prior to 2<sup>nd</sup> July, 2014 for the purpose of which the personal data was collected. The consent may include for TACMC's usage and where applicable include disclosure.

TACMC need not seek consent from staff (including volunteers and part time workers) for purposes related to the staff's work in TACMC and MCS. 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.

#### **4.6. 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 TACMC to fulfill its legal obligations. TACMC shall comply with the withdrawal request, and inform the individual if such withdrawal will affect the services and arrangements between the individual and TACMC. TACMC may cease such services or arrangements as a result of the withdrawal.

#### **4.7. Notification obligation**

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

Prior or during collecting personal data, TACMC 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**

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

#### **4.9. Data disclosure and Transfer of personal data in and outside Singapore**

TACMC may disclose Individuals Personal Data to the following group of internal/external organisations for appropriate purposes and subjected to compliance of applicable laws:

1. *TACMC, ensures that the purpose of disclosing personal data to AC and GC is explained in 4.2*
2. 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;
3. banks and financial institutions;
4. TACMC's professional services providers such as auditors;
5. 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;
6. charity organisations; and
7. any relevant person related to achieving the intended purposes.

TACMC 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 appropriate align with PDPA requirements.



## **5. Security and storage**

### **5.1. Protection Obligation**

TACMC 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 of the personal data. Each department shall determine such arrangement appropriate for their operating unit. The Data Officer shall review and examine such arrangements and provide necessary recommendations.

#### **5.1.1. Storage of Personal Data**

TACMC 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 contain personal data in secured folders.
- 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 unauthorised access and theft.

TACMC shall ensure that:

- TACMC IT networks that host personal data are secured and protected against unauthorised access.
- 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 authorised access.
- Ensure that IT service providers' services or provisions complies with security standards in line with industry practices.

In the event of a security breach, the Data Officer shall be notified. The Data Officer shall investigate if such breach is a malicious act and shall take appropriate action after consulting with TACMC's management, FAC Chairperson, GCEC Chairperson and GC Secretary.

### **5.2. Retention Limitation Obligation**

TACMC shall retain 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 law.

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

TACMC 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 permanent delete and wiping of electronic records.

## **6. Access and correction of personal data**

### **6.1. Access to personal data**

Individuals whose personal data are kept by TACMC shall be allowed to access to their personal data. TACMC 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 from TACMC for such disclosure and correction by writing to TACMC in accordance to clause 6.3.

### **6.2. Correction of Personal data**

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

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

### **6.3. Access and correction process**

The Data Protection Officer will have oversight of all personal data access or correction requests and ensures that they are processed in accordance with this policy.

Request for Personal data access or correction by individuals, including any enquires and complains shall be submitted to TACMC in writing to the Data Officer GOH YAT TECK at the following address and contact information;

235 TELOK AYER STREET, SINGAPORE 068656  
Telephone Number: 63244001, 62781323  
Email address: admin@tacmc.org.sg

All TACMC staffs shall forward any personal data access or correction request to the Data Protection Officer in a timely manner.

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

### **6.4. Openness obligation**

TACMC 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 TACMC deems fit.

TACMC shall also publish a data protection policy statement for other parties (non-staff) and such statement shall be published on TACMC or MCS's web site.

## **7. Solicitation – Do not call registry**

(This section is intentionally left blank.)

## **8. CCTV, video recording and photography**

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

- Appropriate notices are put up at the gate, church entrance, to clearly state the use and purpose of CCTV video surveillance.
- Notices are put up at church entrance, Notice Board to inform visitors and volunteers that photographs and videos taken may be used by TACMC for communication purpose in print or electronic media.
- For special event, it should be stated in the invitation that photographs of attendees will be taken at the function for publicity on print and electronic media. Appropriate notice should also be put up at the reception or entrance to inform the attendees on the event day.
- If photos and videos are taken out of the context of the above, TACMC must obtain individual's consent before using them.

Only authorized staff of TACMC, are allowed to access these personal data. Where in doubt, seek the advice of the Data Protection Officer.

## **9. Using our website {Optional}**

As with most websites, when you visit TACMC website or use an application on TACMC website, TACMC may record anonymous information such as IP address (where not used to identify a specific individual), time, date, referring URL, pages accessed and documents downloaded, type of browser and operating system.

TACMC websites may contain links to or from other websites. TACMC is not responsible for the privacy practices of other websites. This privacy policy applies only to TACMC. We encourage you to read the privacy policies of other websites you link to from TACMC's website.

## **10. Policy review**

This Personal Data Protection Policy shall be maintained and updated by the Data protection officer, reviewed and approved by TACMC Local Church Executive Committee in a timely manner but shall review at least bi-yearly.  
GC