

PRESBYTERIAN COMMUNITY SERVICES POLICY ON PERSONAL DATA PROTECTION

I. Policy

I.1. This Privacy Policy applies to personal data collected, stored, disclosed and/or processed by Presbyterian Community Services hereinafter referred to as “PCS”.

I.2. This Policy is based on the Singapore Personal Data Protection Act 2012 (“PDPA”) and all the associated regulations and guidelines as may from time to time be issued by the Personal Data Protection Commission (“PDPC”) of Singapore.

I.3. PCS will share the personal data that it collects from the individuals with other Government authorities and agencies including Voluntary Welfare Organizations and other organizations that has the right of access to the personal data that PCS collected. When personal data is acquired by PCS from other organization, it will be treated according to the provisions set forth in this Policy

I.4. This policy takes effect on 30 June 2014.

II. Obtaining consent when collecting, using or disclosing personal data

II.1 A valid consent must be obtained from the individual, for a purpose that has been clearly notified to the individual, for the collection, use and disclosure of personal data of the individual, unless exceptions apply.

II.2. An individual is deemed to consent to the collection, use and disclosure of his personal data for a purpose if the individual voluntarily provides the personal data to PCS for that purpose and it is reasonable that the individual would do so.

II.3. When it is unclear whether consent may be deemed, PCS should obtain consent from the individual to collect, use or disclose his personal data (as the case may be) for the relevant purpose in order to avoid any dispute over whether consent was given.

II.4. Exceptions to consent include where the collection, use or disclosure of personal data is necessary for evaluative purposes (such as in relation to the grant of financial or social assistance, or the delivery of appropriate health services, under any scheme administered by a public agency).

For completeness, “evaluative purpose” is defined under the PDPA to mean –

- (a) for the purpose of determining the suitability, eligibility or qualifications of the individual to whom the data relates – (i) for employment or for appointment to office; (ii) for promotion in employment or office or for continuance in employment or office; (iii) for removal from employment or office; (iv) for admission to an education institution or eldercare related services; (v) for the awarding of contracts, awards, bursaries, scholarships, honours or other similar benefits; (vi) for selection for an athletic or artistic purposes; or (vii) for grant of financial or social assistance, or the delivery of appropriate health services, under any scheme administered by a public agency;
- (b) for the purpose of determining whether any contract, award, bursary, scholarship, honour or other similar benefit should be continued, modified or cancelled;
- (c) for the purpose of deciding whether to insure any individual or property or to continue or renew the insurance of any individual or property; or
- (d) for such other similar purposes as may be prescribed by the Minister.
- No other such purposes have been prescribed to date.

III. Collection of Personal Data

III.1 As part of our program's objective, we collect information that includes personal data. As used in this Policy, "personal data" means data, whether true or not, about an individual who can be identified: (a) from that data; or (b) from that data and other information to which PCS has or is likely to have access. While some data may necessarily relate to an individual, other data may not, on its own, relate to an individual. Such data would not constitute personal data unless it is associated with, or made to relate to a particular individual.

III.2. Personal data obtained from other sources shall be similarly protected as if the information is collected directly from the individual by PCS so that it is in compliance with the PDPA.

IV. Protection of Personal Data

IV.1. As PCS sets out to protect personal data in its possession or under its control, only authorized person should be allowed access, collection, use, disclose, copying, modification and disposal.

V. Uses of Information Collected

V.1. Main purposes for which PCS collects, uses and disposes client's personal data.

V.1a PCS collects, use or disclose a client's personal data including full name, NRIC number, contact details, financial and family situation, medical history, etc. for purposes such as employment, enrolment in an education institution, pre-school centres, eldercare drop-in centres and/or related services, fund raising activities and appeals, emergency relief schemes and for all other social services and programmes.

V.2. For any other purpose not prohibited by applicable law.

V.2a. To verify client's identity;

V.2.b. To provide and administer the necessary assistance or services.

V.2.c. For the purpose of compiling data and conducting statistical or demographic analysis.

V.2.d. To process and respond to inquiries.

VI. Sharing of Information

VI.1 PCS may share personal data with Government Agencies and Ministries and other Voluntary Welfare Organization: (1) as set forth in this Policy; (2) to verify client's identity; (3) to protect and defend the rights or property of PCS (4) to comply with a court order or other legal process or other legal requirements of any governmental agencies and (5) PCS in its discretion, in exceptional circumstances, such as a national emergency, security concern, or other situation, may disclose personal data to other relevant agencies in which PCS deems such disclosure is necessary.

VI.2. In addition, PCS may share personal data with certain trusted third parties to help improve PCS's social services extended to clients. Consent would be required for such disclosures unless exceptions apply, such as when the disclosure is necessary for any purpose which is clearly in the interests of the individual.

VI.3. In situations in which a third party under contract with PCS collects personal data about PCS's clients, PCS will require the third party to exercise reasonable care in protecting such information so that it is in compliance with the PDPA.

VII. Security

VII.1. PCS should use reasonable precautions to protect personal data and store it securely.

VII.2. Any unauthorized access, collection, use or disclosure of personal data by PCS staff shall be dealt with according to the provisions of applicable law and in the absence of which, according to the provision set forth in the Staff Handbook.

VIII. Retention/Disposal of personal data

VIII.1 PCS will cease to retain personal data or remove the means by which the personal data can be associated with particular individuals, as soon as the purpose for which the personal data was collected is no longer being served by retention of the personal and the retention is no longer necessary for legal or business purposes.

VIII.2. The Data Protection Officer together with assigned staff in PCS should conduct a regular review of the personal data to determine if that personal data is still needed for the purpose of collection or other legal or business purposes. The frequency of review shall be determined by DPO and other appointed staff of PCS.

IX. Do Not Call Provisions

IX.1 This provisions apply to a specified message (in the form of voice calls, text messages or faxes) addressed to a Singapore telephone number, if the sender of the specified message is present in Singapore when the specified message is sent or the recipient of the specified message is present in Singapore when the specified message is accessed.

IX.2 Specified messages are messages with a purpose to offer to supply, advertise or promote goods or services, land or an interest in land, or a business or investment opportunity, or a supplier of such goods, services, land or opportunity.

X. Obligation to check the Do Not Call Registers

X.1. PCS through its authorized staff must check the Do Not Call Registers when sending specified messages, unless:

- a) The user or subscriber of the Singapore telephone number has given clear and unambiguous consent in written or other accessible form to the sending of the specified message to that number; or
- b) There is an established “ongoing relationship” between PCS and the recipient of a specified message.

XI. Contact Details

XI.1. Data protection officer shall be appointed and should be contacted at info@pcs.org.sg