

# **Personal Data Protection Policy**

1 September 2019

Version 1.0

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## 1. Overview

This is the Personal Data Protection Policy (the “Policy”) of Harvester Community Church Limited (“we”, “our” or the “Church”), which sets out the Church’s policy with respect to the collection, use, disclosure and/or retention of individuals’ personal data. This Policy is formulated in compliance with the Personal Data Protection Act 2012 (the “PDPA”) and guidelines issued by the Personal Data Protection Commission (the “PDPC”).

### **Terms & Definitions**

- a) An “individual” means a natural person, whether living or deceased. For the purposes of this Policy, an “individual” includes (but is not limited to) members of the Church, visitors to the Church who may not be members of the Church, and donors of the Church.
  
- b) “Personal data” means data, whether true or not, about an individual who can be identified: (i) from that data; or (ii) from that data and other information to which the Church has or is likely to have access. Some examples of “personal data” include (but is not limited to) the following:
  - i) Name
  - ii) Contact information including residential address, email address, telephone number and emergency contact information
  - iii) NRIC/FIN and passport numbers (see 2.2 below)
  - iv) Nationality
  - v) Gender
  - vi) Date of birth
  - vii) Martial status and other family details
  - viii) Medical history
  - ix) Employment / education details
  - x) Photographs and other audio-visual data, including video footage taken during events of the Church or CCTV footage taken at the Church’s premises
  - xi) Financial information, including bank account details and details of tithes , offerings and other forms of donations
  - xii) Details of involvement in Church events, including Church services, Christian education classes, ministry events, ministry training sessions, camps and retreats

## 2. Data Collection, Consent, Usage, Disclosure & Archival

### 2.1 Collection of Personal Data

We generally collect your personal data when:

- a) it is provided to us voluntarily by you after: (i) you have been notified of the purposes for which the data is collected, and (ii) you have provided written consent to the collection and usage of your personal data for those purposes, or
- b) collection and use of personal data without consent is permitted or required by the PDPA or other laws.

Generally (and without limitation), we collect personal data through the following ways:

- a) when you sign up with us for membership with the Church;
- b) when you fill in a registration or application form (whether physical or electronic) for any event organized or service provided by the Church;
- c) when you register as a guest or visitor of the Church;
- d) when you pay any tithe, offering or donation to the Church and when you provide us with details of such tithe, offering or donation, whether using a tithing envelope or otherwise;
- e) when you ask to be included in an email or other mailing list;
- f) when you request that we contact you for any other reason;
- g) when you submit your personal data to us for any other reason.

### 2.2 NRIC and other National Identification Numbers

In compliance with the PDPC Advisory Guidelines on the Personal Data Protection Act for NRIC and other National Identification Numbers published on 31 August 2018, we will not collect, use or disclose the NRIC/passport number or photocopy the NRIC/passport of an individual, save where such collection, use or disclose is:

- required under the law (or an exception under the PDPA applies)
- necessary to accurately establish or verify the identity of an individual to a high degree of fidelity.

The Church collects NRIC/passport numbers for the following purposes:

- a) church membership
- b) holy matrimony forms

- c) activities which involve travelling out of Singapore, therefore requiring passport details for purposes of booking accommodation, flights and other transportation, and other logistical arrangements

If there is any need to collect NRIC/passport numbers which does not fall within the above list, the prior express approval of the Data Protection Officer must be obtained.

### 2.3 Purposes for collection, use and disclosure

The personal data collected by the Church is generally used and/or disclosed for the following purposes:

- a) General administration of the Church, including human resource and finance;
- b) Administration and planning of cell groups;
- c) Planning and organizing events of the Church which include without limitation, Church services, Christian education classes, ministry events, ministry training sessions, camps and retreats;
- d) Fundraising, donations and activities for charitable causes;
- e) Membership services including administration, birthdays and baptisms;
- f) Responding to, handling and processing queries, requests, applications, complaints and feedback;
- g) Development, marketing and/or implementation of present and future events organised and/or supported by the Church;
- h) Pastoral care such as counselling of an individual who seeks support and/or guidance, hospital visitation, home visitation, funeral wake services, house dedications and marriages;
- i) Data analysis and/or reporting of statistics to members of the Church, donors and supporters;
- j) Complying with any applicable laws, regulations, codes of practice, guidelines or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- k) Any other purposes for which you have provided the personal data;
- l) Any other incidental purposes related or in connection with the above.

### 2.4 Personal data collected before 2 July 2014

The Church will continue to use personal data collected before 2 July 2014 for the purposes for which the personal data was collected, unless the individual has withdrawn consent.

## 2.5 Disclosure of personal data

We may disclose your personal data:

- a) where such disclosure is required for, or in connection with, the provision of any services requested by you and/or the fulfilment of any of the purposes listed in clause 2.3 above;
- b) to third party service providers, agents and other parties in fulfilment of any of the purposes listed in clause 2.3 above;
- c) to non-employees of the Church including lay ministry leaders of the Church and other ministry volunteers in fulfilment of any of the purposes listed in clause 2.3 above;
- d) insofar as photographs and other audio-visual data are concerned, in publications and all other marketing materials distributed to the general public or to any specific audience;
- e) to the Assemblies of God of Singapore, on a need-to-know basis;
- f) to comply with any applicable laws, regulations, codes of practice, guidelines, rules or requests by public agencies, or to assist in law enforcement and investigations; and
- g) any other party to whom you authorised us to disclose your personal data to, or where necessary to undertake any action requested by you.

## 2.6 Consent Withdrawal

2.6.1 The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you or your authorised representative in writing. You or your authorised representative may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request via email or otherwise in writing to our Data Protection Officer at the contact details provided below. If you are unable to submit your request in writing or if you require any assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.

2.6.2 Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may

affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

2.6.3 Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in the manner described in clause 2.6.1 above.

2.6.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

## 2.7 Access to and Correction of Personal Data

2.7.1 If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request via email or otherwise in writing, to our Data Protection Officer at the contact details provided below. If you require assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.

2.7.2 Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

2.7.3 We will respond to your request as soon as reasonably possible. In general, our response will be within seven (7) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

## 2.8 Protection of Personal Data

2.8.1 To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

2.8.2 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

## 2.9 Accuracy of Personal Data

2.9.1 We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer at the contact details provided below.

## 2.10 Storage and Retention of Data

2.10.1 We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

2.10.2 We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

### 2.11 Transfer of Personal Data Outside Singapore

We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

### 2.12 Data Protection Officer

You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Name of Data Protection Officer: Oh Chwee Fang

Contact No.: 6494 2780

Email Address: berniceoh@harvester.org.sg

Address: 165 Sims Ave #04-01 Harvest Care Centre Singapore 387606

## 3. CCTV and Auto-Visual Data

The Church captures events in the form of auto-visual data, including videos and photographs. For security reasons, we also install CCTVs on the premises at 165 Sims Avenue Singapore 387606, and data is stored in the form of CCTV surveillance footage. We are committed to protect personal data in these forms through the following measures:

- a) Notices are put up at appropriate places in our premises to inform of the taking of CCTV surveillance footage.
- b) Notices are put up to inform all who are in our premises that photographs and videos will be taken for corporate communication, publicity, ministry use and other purposes as appropriate.
- c) Access to CCTV surveillance footage are only by authorized personnel, including Church staff and the building management committee.
- d) The photographs and videos will be retained in a central repository which can only be accessed by Church staff and authorized personnel in the Church's multimedia ministry.

## 4. Effect of Policy and Changes to Policy

This policy applies in conjunction with any other policy, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

We may revise this Policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Policy was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.