

All Saints' Church (English)

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PDPA-2019-001 – Personal Data Protection Policy	00	23 August 2019	
Policy Owner:		Approved by:	
Data Protection Officer for All Saints' Church (English)		ECC	
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1. Objective

- 1.1. To provide guidelines for the procedures and systems in place in All Saints Church English Congregation (ASE or the Church) to comply with the Singapore Personal Data Protection Act (2012) (the Act or PDPA), with respect to how the Church collects, uses and/or discloses any personal data.

2. Background

- 2.1. ASE recognises the importance of safeguarding personal data when dealing with information relating to its members, worshippers at its services, attendees of its programs, visitors and staff, and therefore is committed to fully implementing and complying with the provisions of the Act.

3. Definitions

- 3.1. **Individuals** → Refers to a natural person, whether living or deceased. Individuals include, but not limited, to the following:

- Staff (either paid or not paid. Unpaid staff include volunteers, lay person holding office or represents ASE in anyway.);
- Members;
- Donors;
- Students;
- Beneficiaries;
- Prospects;
- Customers;
- Researchers; and
- Visitors

- 3.2. **Personal Data** → Refers to any data, whether true or not, about an individual who is identifiable from the provided data or information to which we have or are likely to have access to. This includes:

- Personal details, such as name, age, religion, gender
- Personal identification details such as NRIC, FIN or passport number, and applicable via or permits, such as employment pass, work permit etc.
- Personal contact details such as telephone numbers or email addresses
- Sacramental records, such as baptism, confirmation, marriage
- Information relating to employment application such as employment history and academic qualifications
- Information relating to pastoral care needs
- Photographs and video recordings

4. Key Consideration

- 4.1. This Policy may be updated from time to time to take account of changes in policy, technology, and/or to ensure compliance with any legislative changes. The latest version of this policy statement may be found at our website at www.ase.org.sg.

5. Purposes for the Collection, Use and Disclosure of Personal Data

- 5.1. ASE receives or collects the personal data of its members, worshippers at its services, attendees of its activities and programs, visitors and staff for purposes reasonably required by it as a place of worship with its attendant activities and programs.
- 5.2. These purposes include the following, whether within or outside Singapore:-
- 5.2.1. Operational planning and implementation of activities and programs such as bible teaching, family life ministry, fellowship and discipleship;
 - 5.2.2. Communication of activities, programs and other church-related information including church bulletin and other publications;
 - 5.2.3. Maintenance of records such as membership, participants of activities and programs, baptism, marriage, birth, death and financial pledges and giving;
 - 5.2.4. Management and administration of employment relationships with staff such as work-related dealings, evaluation of performance, crediting salaries, administering staff benefit schemes and conducting audits on finance claims;
 - 5.2.4. Reporting and sharing of information within the Diocese of Singapore including amongst her parishes in furtherance of her religious objectives; and
 - 5.2.5. Such other purposes as may reasonably be appropriate in the circumstances of the collection of personal data.
- 5.3. ASE will not collect personal data from the individuals unless written consent is first obtained.
- 5.4. ASE will not use the personal data for any purpose other than that for which it was collected. Should ASE require any personal data in its possession to be used for a purpose other than those for which consent was originally given, fresh consent will be sought in order to use the data for that new purpose.
- 5.5. In the course of processing personal data for the above purposes, ASE may disclose such personal data to third parties within or outside Singapore. These third parties include:-
- 5.5.1. Governmental organizations or authorities to whom ASE is required by law to disclose the data;
 - 5.5.2. Individuals who are legally entitled to the data;
 - 5.5.3. Third parties who require the data in order to process and operate programs in which an individual intends to participate;
 - 5.5.4. Third parties who provide ASE with data processing, administration, health, insurance or legal services, or other professional or management services; and
 - 5.5.5. Such other persons as may reasonably be appropriate in the circumstances of the collection of personal data.

- 5.5. Disclosure to third parties outside Singapore shall only be to organizations that are required or undertake to process the data with a comparable level of data protection as that required under Singapore law.

6. **NRIC Numbers and other National Identification Numbers**

- 6.1. Under the Identification Guidelines of PDPA 2014 (effective 1 September 2019), organizations will generally not be allowed to collect, use or disclose NRIC and other National Identification Numbers, unless:

- 6.1.1. It is required under the law (or an exception under the PDPA applies); or
- 6.1.2. It is necessary to accurately establish or verify the identities of the individuals to a high degree of fidelity (such as where a failure to do so may pose a significant safety or security risk or harm to the individual or the organization).
- 6.1.3. In the case of ASE, NRIC and other National Identification Numbers of authorized individuals may only be collected, used or disclosed for authorized financial and banking transactions, as required by the bank.
- 6.1.4. ASE will maintain employment records of employees covered by the Singapore Employment Act, which includes their NRIC number or foreign identification number.

- 6.2. Church activities may not readily or easily satisfy the above high requirements of the Identification Guidelines for collection and use of NRICs and other National Identification Numbers. Yet, some form of identifier in addition to the individual's name may be useful or needful, as in the case of Baptism and Confirmation certificates. For such situations, ASE shall comply with the Diocese of Singapore's recommended alternatives. The recommended alternatives are as follows:

- 6.2.1. Partial NRIC and other National Identification Numbers - the last 3 numerical digits and the first and last alphabet of the identification number (e.g SXXXX567A from the full NRIC number of S1234567A)
- 6.2.2. Email address
- 6.2.3. Mobile phone number

7. **Minors below 14 years of age**

- 7.1. ASE shall not collect, use or disclose personal data of persons below the age of fourteen (14) for any purpose unless written parental or guardian consent has been given for such purpose.

8. **Withdrawal of consent**

- 8.1. Should you wish to withdraw or limit your consent to ASE's collection, use and disclosure of your personal data, please write in with full particulars to our Data Protection Officer (DPO) using the contact details provided in paragraph 17 below.

9. Confidentiality

- 9.1. Any personal data collected by ASE shall be accessible by employee(s) of ASE to serve the purpose for which the data was collected. Such employee(s) shall observe strict confidentiality at all times.
- 9.2. In the event personal data is disclosed to third parties, such third parties will be required to sign an agreement requiring them to observe confidentiality at all times and to use the personal data only for the purpose for which it was disclosed to them.

10. Data Protection Officer

- 10.1. ASE has designated a DPO to deal with day-to-day data protection matters and complaints, encourage good data handling practices and ensure that ASE complies with the Act and implements the Policy. If you have any questions, complaints or concerns, please contact the DPO using the contact details provided in paragraph 17 below.

11. Accuracy

- 11.1. ASE endeavours to take all reasonable steps to ensure that personal data in its possession or under its control is accurate, up-to-date, and complete. If there is any error or omission in the personal data you have provided to ASE, please write in to our DPO with the necessary details for correction of your data. If any personal data you have provided to ASE becomes inaccurate, please contact our DPO to update your data.

12. Access

- 12.1. Should you wish to access any personal data collected by ASE or understand how such data has been used or disclosed, please write in to our DPO with your request. The DPO will provide you with the requested information within a reasonable time, after verification of your identity.

13. Retention

- 13.1. ASE will retain personal data for as long as it is necessary to serve the purpose for which it has been collected. Once the data in ASE's possession is no longer necessary to serve the purpose for which it was collected, the data will be destroyed or anonymized in a secure manner.

14. Protection

- 14.1. ASE endeavours to maintain all personal data in its possession or under its control securely. To this effect, ASE has put in place measures to ensure the protection of data in its possession against unauthorized access, collection, use, disclosure, copying, modification, disposal or other risks.

15. Transfer

- 15.1. ASE shall not transfer any personal data in its possession to any parties outside Singapore except as specified in this Policy. Any outside party to which ASE intends to transfer data in its possession must have protections equivalent to those provided for in the Act.

16. Complaints

- 16.1. If an individual feels that his data has been erroneously or improperly handled by ASE, he may lodge a complaint in writing by post with the DPO. Once a complaint has been received, the DPO will acknowledge receipt of the same in writing by post, and will contact the relevant departments to investigate the complaint.
- 16.2. The outcome of the investigation will be communicated by the DPO to the complainant in writing by post, notifying him of the outcome.

17. Enquiries

- 17.1. ASE is committed to protecting the privacy and personal data of its members, worshippers at its services, attendees of its programs, visitors and staff. For enquiries about ASE's Policy, please write to the DPO at the following address:-

All Saints' Church (English)
600 Upper Changi Road
Singapore 487012
(Inside Anglican High School)
Tel: 62419767
Email: ase@asc.org.sg