

Personal Data Protection Policy

Ang Mo Kio Chinese Methodist Church

FY2015 - Version 1.0

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1 Introduction

1.1 Policy information

Document Owner	
This policy was prepared by the Data Protection Officer (“DPO”) of Ang Mo Kio Chinese Methodist Church. The policy has been approved by the Local Church Executive Committee (LCEC) in FY2015.	
Organisation and Scope of policy	
This policy applies to all the staff, including clergy and lay, volunteers as well as contractors in Ang Mo Kio Chinese Methodist Church. A copy of this policy shall be made available to any individual upon request.	
Policy operational date	
01/08/2014	
Version and Date approved by the Local Church Executive Committee	
Version 1.0	01/05/2015
Document Change History	
0.1 Initial draft 0.2 Aligned contents with GC template 0.3 Updated for LCEC review 0.4 Reviewed and approved by LCEC 1.0 Adopted and enforced since FY2015	

1.2 Purpose of Policy

The Ang Mo Kio Chinese Methodist Church (“AMKCMC” or “organization” or “us”) is committed to safeguarding the personal data entrusted to it by the Individuals.

AMKCMC manages Individual’s personal data in accordance with Singapore Personal Data Protection Act 2012 (No. 26 of 2012) (“PDPA” 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 AMKCMC 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 organization has or is likely to have access.

Individual

Individual means a natural person, whether living or deceased.

For the AMKCMC, Individuals include, but not limited, to the following: -

- Staff (either paid or not paid. Unpaid staff includes volunteers, lay person holding office or represents AMKCMC in anyway.);
- Members;
- Worshippers;
- Donors;
- Students;
- Beneficiaries; and
- Visitors.

Purpose

The term “purpose” refers to objectives or reasons the organization relating to the collection, use and disclosure of personal data.

2 Policy Statement

AMKCMC will: -

- comply with regulatory requirements as stated in the PDPA;
- 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.

AMKCMC recognizes 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; and
- protected by appropriate security and keep with trusted and authorized parties.

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

3 Responsibilities

3.1 Local Church Executive Committee’s (LCEC) Responsibilities

The Local Church Executive Committee (LCEC) is the responsible authority for ensuring AMKCMC complies with the following legal obligations: -

- Develop and implement its data protection policies and practices;
- Appoint a Data Protection Officer (“DPO”);
- Develop processes to receive and respond to complaints that may arise with respect to the application of PDPA;
- 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 department, ministry or sub-unit of AMKCMC 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.

Significant breaches of this Policy shall be dealt according to AMKCMC's disciplinary procedures.

3.2 AMKCMC Staff, Lays', Clergys' and Volunteers' Responsibilities

All AMKCMC staff, paid and unpaid, including lay and clergy office bearers as well as volunteers shall comply with this Policy.

All staff shall familiarize themselves with the Policy procedures that relate to the personal data that they may manage in AMKCMC.

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.

4 Data Collection, Usage and Disclosure

4.1 Purpose Limitation

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

- Human resource administration;
- Education and training;
- Event organization and management;
- Missions organization 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.

AMKCMC 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).

4.2 Consent

AMKCMC shall seek consent from the 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 documentation (e.g. consent form, written note) or electronically (email consent, electronic form). In situations when consent cannot be conveniently obtained in written form or electronically, AMKCMC may opt to obtain verbal consent and such process shall be approved by DPO.

AMKCMC 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.

4.3 Deemed Consent

AMKCMC may deem the Individual has consented to collection, usage and disclosure of their personal data in situations where the Individual provided information for obvious purposes.

AMKCMC may deem the Individual's consent were 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 AMKCMC's usage and where applicable include disclosure.

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

4.4 Consent Withdrawal

Any Individual may withdraw or limit their consent to the use and disclosure of their personal data at any time, unless such personal data is necessary for AMKCMC to fulfil its legal obligations. AMKCMC shall comply with the withdrawal request and inform the Individual if such withdrawal will affect the services and arrangements between the Individual and AMKCMC. AMKCMC may cease such services or arrangements as a result of the withdrawal.

4.5 Notification Obligation

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

Prior or during collecting personal data, AMKCMC shall made 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).

4.6 Accuracy Obligation

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

4.7 Data Disclosure and Transfer of Personal Data to External Parties

AMKCMC may disclose Individual's personal data to the following group of external organizations for appropriate purposes and subjected to compliance of applicable written laws: -

- 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 organization;
- banks and financial institutions;
- AMKCMC's professional services providers such as auditors;
- 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;
- charity organizations; and
- any relevant person related to achieving the intended purposes.

AMKCMC 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

AMKCMC shall adopts 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 DPO shall review and examine such arrangements and provide necessary recommendations.

5.1.1 Storage of personal data

AMKCMC 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.

AMKCMC shall ensure that: -

- The Church IT networks that host personal data are secured and protected against unauthorized 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 contains sensitive or confidential personal data are secured and only made available to staff with authorized access; and
- Ensure that the IT service provider complies with security standards in line with industry practices.

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 consulting with AMKCMC's management, LCEC Chairperson and Governance Chairperson.

5.2 Retention Limitation Obligation

AMKCMC shall retains 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.

AMKCMC shall establish a personal data retention schedule and ensures that personal data managed are processed regularly. AMKCMC may anonymize collected personal data or destroy records containing personal data according to the retention schedule.

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

6 Access and Correction of Personal Data

6.1 Access to Personal Data

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

6.2 Correction of Personal Data

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

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

6.3 Access and correction process

The DPO 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 AMKCMC in writing to the DPO at the following address and contact information:

1 Ang Mo Kio St. 21 Singapore 569383
(65) 6705 6150
dpo@amkmc-cac.org.sg

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

AMKCMC 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. AMKCMC 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

AMKCMC 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 AMKCMC deems fit.

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

7 Policy Review

This Policy shall be maintained and updated by the DPO and reviewed by the LCEC Chairperson and Governance Chairperson at least bi-yearly. DPO shall submit its recommendation to LCEC and LCEC shall be the approving authority to adopt the proposed revised Policy.

END OF POLICY DOCUMENT