



HOLLAND VILLAGE METHODIST CHURCH

The Methodist Church in Singapore

Personal Data Protection Policy

Contents

1.	<u>POLICY INFORMATION</u>	3
2.	<u>INTRODUCTION</u>	4
2.1.	PURPOSE OF POLICY	4
2.2.	DEFINITIONS	4
3.	<u>POLICY STATEMENT</u>	4
4.	<u>RESPONSIBILITIES</u>	5
4.1.	THE LOCAL CHURCH EXECUTIVE COMMITTEE RESPONSIBILITIES	5
4.2.	CHURCH STAFF, LAYS' AND VENDORS' RESPONSIBILITIES	5
5.	<u>DATA COLLECTION, USAGE AND DISCLOSURE</u>	5
5.1.	PERSONAL DATA	5
5.2.	PURPOSE LIMITATION	5
5.3.	COLLECTION OF INFORMATION MEANS	6
5.4.	CONSENT	6
5.5.	DEEMED CONSENT	6
5.6.	CONSENT WITHDRAWAL	7
5.7.	NOTIFICATION OBLIGATION	7
5.8.	ACCURACY OBLIGATION	7
5.9.	DATA DISCLOSURE AND TRANSFER OF PERSONAL DATA IN AND OUTSIDE SINGAPORE	7
6.	<u>SECURITY AND STORAGE</u>	7
6.1.	PROTECTION OBLIGATION	7
6.1.1.	STORAGE OF PERSONAL DATA	7
6.1.2.	PROTECTION OF PERSONAL DATA	7
6.2.	RETENTION LIMITATION OBLIGATION	8
7.	<u>ACCESS AND CORRECTION OF PERSONAL DATA</u>	8
7.1.	ACCESS TO PERSONAL DATA	8
7.2.	CORRECTION OF PERSONAL DATA	8
7.3.	ACCESS AND CORRECTION PROCESS	8
7.4.	OPENNESS OBLIGATION	9
8.	<u>CCTV, VIDEO RECORDING AND PHOTOGRAPHY</u>	9
9.	<u>POLICY REVIEW</u>	9

1. Policy information

Document Owner
This policy was prepared by Holland Village Methodist Church.
Organisation and Scope of policy
This policy applies to all the staff, including clergy and lay as well as contractors of Holland Village Methodist Church. A copy of this policy shall be made available to any individual upon request.
Policy operational date
{01/09/2015}
Date approved by Local Church Executive Committee
{19/08/2015}
Policy review date
{18/08/2016}

2. Introduction

2.1. Purpose of policy

The Holland Village Methodist Church (“Church” or “organization” or “us”) is committed to safeguarding the personal data entrusted to it by the Individuals.

Holland Village Methodist Church 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 Holland Village Methodist Church 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 Holland Village Methodist Church, individuals include, but not limited, to the followings;

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

Purpose

The term “purpose” refers to objectives or reasons the organization relating to personal data.

3. Policy statement

The Church will:

- comply with regulatory requirements as stated in the PDPA 2012,
- respect individuals’ rights,
- be open and honest to the individual whose data are held by us,
- provide training and support for staff and volunteers who handle personal data, so that they may confidently comply with this policy.

The Church recognizes that our primary commitment with reference to the Data Protection Act is to ensure individuals’ personal data are not misused. 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.

The Church 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.

4. Responsibilities

4.1. The Local Church Executive Committee responsibilities

The Local Church Executive Committee is the responsible authority for ensuring compliance 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 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.

4.2. Church staff, lays' and vendors' responsibilities

All staff, 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.

Staff shall seek approval from the Data Protection 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 the Data Protection Officer and Data Protection Committee for appropriate action.

5. Data collection, usage and disclosure

5.1. Personal data

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

- 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 us, 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);
- or any other personal information that an individual may offer voluntarily.

5.2. Purpose limitation

The Church collects, uses and discloses personal data for the following purposes;

- a. Planning, organising and holding church services, events, activities, courses and programs;
- b. Administration and management of Church's operations, functions or other internal matters as the case may be including record keeping;
- c. Pastoral care of the Church members or other individuals in various ways, including but not limited to the following examples:
 - Addressing an individual at Church events or activities to welcome that individual;
 - 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 counselling, to communicate personal experiences and to provide spiritual support; and
 - Conducting ceremonies, for example house blessings, weddings and funerals; or
- d. To communicate with an individual in respect of:
- any of the matters described in this clause;
 - the individual's membership ;
 - 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 the Church or
 - any other matters in respect of which it is reasonably necessary for the Church 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, Line, WeChat, Skype messages etc.), email, fax or post;
- e. Providing services to one or more individuals, a community or the general public;
- f. Internal and external communications and publications;
- g. Any other purposes of which the Church may notify individuals from time to time.

The Church 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).

5.3. 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 the Church may collect personal data include, but are not limited to:

- Application form(s) submitted by an individual to the Church, such as membership application forms or other forms relevant to events and activities organised or managed by the Church;
- Where an individual contacts staff or representatives of the Church 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 the Church;
- Where an individual makes a donation to the Church;
- Where an individual makes a request to the Church 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 the Church events, activities, programs or courses.

5.4. Consent

The Church 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 obtain in written form or electronically, the Church may opt to obtain verbal consent and such process shall be approved by Data Protection Officer.

The Church 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.

5.5. Deemed Consent

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

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

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

5.6. 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 the Church to fulfil its legal obligations. The Church shall comply with the withdrawal request, and inform the individual if such withdrawal will affect the services and arrangements between the individual and The Church. The Church may cease such services or arrangements as a result of the withdrawal.

5.7. Notification obligation

The Church shall collect this personal data directly from the Individuals. However, The Church 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, the Church 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).

5.8. Accuracy obligation

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

5.9. Data disclosure and Transfer of personal data in and outside Singapore

The Church may disclose Individuals Personal Data to the following group of internal/external organisations for appropriate purposes. Such transfer shall be done in a manner that is secure and appropriate align with PDPA requirements.

6. Security and storage

6.1. Protection Obligation

The Church 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 Protection Officer shall review and examine such arrangements and provide necessary recommendations.

6.1.1. Storage of Personal Data

The Church 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.

6.1.2. Protection of Personal Data

All personal data held must be secured and protected against unauthorised access and theft.

The Church shall ensure that:

- 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 Protection Officer shall be notified. The Data Protection Officer shall investigate if such breach is a malicious act and shall take appropriate action after consulting with Church's management, the Church Governance Committee and Local Church Executive committee.

6.2. Retention Limitation Obligation

The Church 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 law.

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

The Church shall ensures the disposal of personal data are performed appropriately with little possibility to recover the information from disposal process.

7. Access and correction of personal data

7.1. Access to personal data

Individuals whose personal data are kept by the Church shall be allowed to access to their personal data. The Church 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 the Church for such disclosure and correction by writing to the Church in accordance to clause 7.3.

7.2. Correction of Personal data

The Church is committed to ensure that all personal data kept are accurate and up-to-date. To achieve this, the Church recognizes individual's participation in informing the Church of any changes, error or omission in their personal data.

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

7.3. 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 the Church in writing to the Data Protection Officer at the following address and contact information;

Holland Village Methodist Church
 61 Jalan Hitam Manis
 Singapore 278475
 Tel: 6476 7795
 Email: dpo@hvmc.sg

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

The Church 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. The Church may respond to the requestor via telephone call, written note or electronic mail. In any case, the Data Protection Officer shall make a record of such requests and responds for future reference and verification.

7.4. Openness obligation

The Church 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 the Church deems fit.

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

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 shall be put up to inform visitors and volunteers that photographs and videos taken may be used by the Church for communication and publicity purposes 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 communication and publicity in print and electronic media.
- If photos and videos are taken out of the context of the above, the Church must obtain individual's consent before using them.

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

9. Policy review

This Personal Data Protection Policy shall be maintained and updated by the Data Protection Officer, reviewed and approved by the Executive Council in a timely manner but shall review at least bi-yearly.