

# Personal Data Protection Policy

The Trinity Annual Conference  
of The Methodist Church in Singapore

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## 1. Policy information

<b>Document Owner</b>
Policy prepared by Trinity Annual Conference Executive Board
<b>TRAC and Scope of policy</b>
This policy applies to all staff of Trinity Annual Conference of The Methodist Church in Singapore (TRAC), as well as its sub-contractors, if any.  A copy of this policy shall be provided to any Individual upon request.
<b>Policy operational date</b>
01 Aug 2015
<b>Date approved by the TRAC Executive Board</b>
12 Mar 2015
<b>Policy review date</b>
01 Aug 2016

## 2. Introduction

### 2.1. Purpose of policy

- 2.1.1. The Trinity Annual Conference of The Methodist Church in Singapore (“TRAC”) is committed to safeguarding the personal data entrusted to it by Individuals.
- 2.1.2. TRAC manages Individuals’ personal data in accordance with Singapore Personal Data Protection Act 2012 (No. 26 of 2012) (PDPA) and other applicable laws.
- 2.1.3. This policy outlines the principles and practices TRAC follows in protecting personal data.

### 2.2. Definitions

#### 2.2.1. 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 TRAC has or is likely to have access.

#### 2.2.2. Individual

- 2.2.2.1. Individual means a natural person, whether living or deceased.
- 2.2.2.2. For TRAC, Individuals can be categorized as follow:
  - 2.2.2.2.1. Staff (paid or not paid, including volunteers);
  - 2.2.2.2.2. TRAC churches’ staff and members.

### 2.2.3. Purpose

The term “purpose” refers to objectives or reasons that TRAC has collected the personal data for.

## 3. Policy Statement

- 3.1. TRAC will:
  - 3.1.1. comply with both the law and good practice;
  - 3.1.2. respect Individuals’ rights;
  - 3.1.3. be open and honest with Individuals whose data is held;
  - 3.1.4. provide training and support for staff and volunteers who handle personal data, so that they can act confidently and consistently.
- 3.2. TRAC recognizes that its first priority under the Data Protection Act is to avoid causing harm to Individuals, viz:
  - 3.2.1. keeping information securely in the right hands;
  - 3.2.2. holding good quality information, and
  - 3.2.3. destroying information as soon as retention is no longer necessary for legal or business purpose.
- 3.3. Secondly, the Act aims to ensure that the legitimate concerns of Individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, TRAC will seek to give Individuals as much choice as is possible and reasonable information over what data is held and how it is used.

## 4. Responsibilities

### 4.1. TRAC Executive Board Responsibilities

- 4.1.1. TRAC Executive Board recognizes its overall responsibility for ensuring that TRAC complies with its following legal obligations:
  - 4.1.1.1. Develop and implement its data protection policies and practices;
  - 4.1.1.2. Nominate a Data Protection Officer (DPO);
  - 4.1.1.3. Develop process to receive and respond to complaints that may arise with respect to the application of PDPA;
  - 4.1.1.4. Communicate to its staff information about its data protection policies and practices;
  - 4.1.1.5. Make information available on request about its data protection policies and practices and its process to receive an respond to complaints;
- 4.1.2. Each team where personal data is handled is responsible for drawing up its own operational procedures (including induction and training) to ensure that good Data Protection practice is established and followed.

### 4.2. TRAC Staff and Third-Party Responsibilities

- 4.2.1. All TRAC staff and third-parties (sub-contractors, vendors, suppliers, etc) are responsible for complying with the approved PDPA policy and supporting guidance.
- 4.2.2. All staff are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work with TRAC.
- 4.2.3. Where anyone within TRAC feels that it would be appropriate to disclose information in a way contrary to the PDPA policy, or where an official disclosure request is received, this will only be done with the authorisation of the DPO.
- 4.2.4. All such disclosures will be documented.

## 5. Data Collection, Usage and Disclosure

### 5.1. Purpose Limitation

- 5.1.1. TRAC collects, uses and discloses personal data for the purposes in connection with the services it provides to an Individual:
  - 5.1.1.1. Staff Administration;
  - 5.1.1.2. Event organisation and management;
  - 5.1.1.3. Queries and requests handling;
  - 5.1.1.4. Meeting regulatory requirements;
  - 5.1.1.5. Advertising and communication.
- 5.1.2. Whenever data is collected, the number of mandatory fields will be limited to only those information relevant to the purpose, and Individuals will be informed which fields are mandatory and why.

### 5.2. Consent

- 5.2.1. TRAC will ask for consent to collect, use or disclose an Individual's personal data, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law.
- 5.2.2. In situations where TRAC cannot conveniently obtain consent from an Individual in writing by signing a consent form, by checking a box on a form, or electronically by clicking a button), TRAC may choose to obtain verbal consent only (in person, by telephone).
- 5.2.3. TRAC may not be able to provide certain services if Individuals are unwilling to provide consent to the collection, use or disclosure of certain personal data.

### 5.3. Deemed Consent

- 5.3.1. TRAC may assume Individuals have given consent in cases where they volunteer information for an obvious purpose.
- 5.3.2. TRAC may continue to use personal data collected before 2nd July 2014 for the purpose which it was collected, unless consent has been withdrawn by the Individual.
- 5.3.3. Consent will normally not be sought for most processing of information about employees (staff and volunteers), with the following exceptions:
  - 5.3.3.1. Staff (including volunteers) details will only be disclosed for purposes unrelated to their work for TRAC with their consent;
  - 5.3.3.2. Staff (including volunteers) working from home, will be given the choice over which contact details are to be made public.
- 5.3.4. In case of information provided by local churches on their staff and members to TRAC, TRAC may assume that the church has fully explained to these Individuals that their personal information has been provided to TRAC, the items of the information collected, purposes of the information collection, process and use, and should obtain their written consent.

### 5.4. Consent Withdrawal

- 5.4.1. An Individual may withdraw consent to the use and disclosure of personal data at any time, unless the personal data is necessary for TRAC to fulfil its legal obligations.
- 5.4.2. TRAC will respect his decision, but may not be able to provide him with certain products and/or services if it does not have the necessary personal data.

## 5.5. Notification Obligation

- 5.5.1. TRAC normally collect information on personal data directly from the Individual.
- 5.5.2. TRAC may collect Individuals' information from other persons/organisations with their consent or as authorized by law.
- 5.5.3. TRAC informs Individuals, before or at the time of collecting personal data, of the purposes for which the information is collected.
- 5.5.4. TRAC does not provide this notification when an Individual volunteers information for an obvious purpose. (Example: when completing a registration form to participate to a retreat-If data is not used for another purpose than managing and organizing the event)

## 5.6. Accuracy Obligation

- 5.6.1. TRAC makes every reasonable effort to ensure that the Individuals' information it keeps is accurate and complete.
- 5.6.2. Information voluntarily submitted by an Individual to TRAC shall prima facie be deemed complete and accurate.
- 5.6.3. Individuals remain primarily responsible and liable to ensure that all personal data submitted to TRAC is complete and accurate. They are to notify TRAC of any change to their personal data that may affect their relationship with TRAC.

## 5.7. Data Disclosure and Transfer of Personal Data Outside Singapore

- 5.7.1. TRAC may disclose Individuals Personal Data to the following group of external organisations for purposes mentioned above, subject to the requirements of applicable laws:
  - 5.7.1.1. agents, contractors, data intermediaries or third party service providers who provide services, such as telecommunications, mailing, information technology, payment, payroll, training, storage and archival, to TRAC;
  - 5.7.1.2. banks and financial institutions;
  - 5.7.1.3. Professional advisers such as auditors;
  - 5.7.1.4. relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any government authority;
  - 5.7.1.5. Charity organisations;
  - 5.7.1.6. any other person in connection with the purposes set forth above.
- 5.7.2. TRAC may transfer personal data to a country or territory outside Singapore, when required for business purposes, using a secured mode of transfer, which is aligned with PDPA requirements.

# 6. Security and storage

## 6.1. Protection Obligation

The TRAC has adopted security arrangements that are reasonable and appropriate to the circumstances, 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 obtained, modified or disposed of the personal data.

### 6.1.1. Storage of Personal Data

TRAC is implementing reasonable and appropriate security measures to protect the storage of personal data such as:

- 6.1.1.1. Marking confidential documents clearly and prominently;
- 6.1.1.2. Storing hardcopies of confidential documents in locked file cabinet systems;

- 6.1.1.3. Storing soft copies of confidential documents in secured folders;
- 6.1.1.4. Archived paper records and data backup files may be stored securely off-site.

### **6.1.2. Protection of Personal Data**

- 6.1.2.1. All personal and sensitive personal data held must be secured against unauthorised access and theft.
- 6.1.2.2. TRAC needs to ensure that:
  - a) TRAC IT network is as secure as possible from unauthorised access including access through the website;
  - b) Individual PC's are password protected;
  - c) Personnel and other files holding sensitive or confidential personal data are secured and only made available to staff with authorised access;
  - d) Ensuring that IT service providers are able to provide the requisite standard of IT security;
  - e) TRAC will notify the PDPC, without delay, of a security breach affecting personal data if it creates a real risk of significant harm to Individuals.

## **6.2. Retention Limitation Obligation**

- 6.2.1. TRAC retains member's personal data only as long as it is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes.
- 6.2.2. TRAC reviews the personal data that they hold on a regular basis to determine if that personal data is still required.
- 6.2.3. TRAC may anonymize collected personal data, or destroy records containing personal data once the information is no longer needed.
- 6.2.4. TRAC uses appropriate security measures when destroying personal data, including shredding paper records and permanently deleting electronic records.

## **7. Access and correction of personal data**

### **7.1. Access to Personal Data**

Under the Act, an Individual has the right of access to his personal data in TRAC or under TRAC's control or information which may have been used or disclosed by TRAC, within a year before the date of his request.

### **7.2. Correction of Personal Data**

- 7.2.1. Keeping an Individual's personal data accurate and updated is very important to TRAC. Individuals can help TRAC keep accurate records by informing TRAC of any changes, errors or omissions in their personal data.
- 7.2.2. TRAC will implement correction of the personal data as soon as practicable; and send the corrected personal data to all other external organisations to which the personal data was disclosed by TRAC within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose with TRAC.

### **7.3. Access and Correction Process**

- 7.3.1. The DPO will oversee the handling of any requests for personal data access or correction.
- 7.3.2. All TRAC staff is required to pass on any personal data access or correction requests to the DPO, as soon as possible.
- 7.3.3. Request for personal data access or correction must be submitted to TRAC in writing.

- 7.3.4. Those making a personal data access or correction request may be asked by TRAC to provide additional information which will help to process the request.
- 7.3.5. The DPO shall verify the identity of the Individual before responding to the request for access or correction.
- 7.3.6. In the case of access request to personal data, response will be provided in TRAC specified format or method.
- 7.3.7. TRAC's contact with regard to any inquiries, complaints, access/correction of personal data, is TRAC's DPO with the following contact information:
  - TRAC DPO
  - Tel 6478-4742
  - dpo@trac-mcs.org.sg

#### **7.4. Openness Obligation**

TRAC Personal Data Protection Policy is available on request and published on the web site.

### **8. Policy Review**

- 8.1. The Personal Data Protection Policy shall be maintained and updated by DPO, and approved by the TRAC Executive Board.
- 8.2. This review and approval shall take place annually.