



# **Personal Data Protection Policy**

22 June 2019

Version 1.0

Your privacy is important to us. This Harvest Care Centre Personal Data Protection Policy sets out how Harvest Care Centre (“we”, “us” or “our”) complies with the provisions of the Personal Data Protection Act 2012 of Singapore (“PDPA”)

We also want you to understand the way in which we collect, use, disclose and/ or retain your Personal Data. This Personal Data Protection Policy sets out:

- 1) our policies on how we manage your Personal Data;
- 2) the types of Personal Data we collect, use, disclose and/ or retain;
- 3) how we collect, use, disclose and/ or retain your Personal Data; and
- 4) the purpose(s) for which we collect, use, disclose and/ or retain your Personal Data.

You agree and consent to us, Harvest Care Centre to collect, use and disclose and/ or retain your Personal Data in the manner set forth in this Personal Data Protection Policy.

Collection, use, disclosure or otherwise processing of personal data of our service users on behalf of government ministries or statutory boards will be in accordance with guidelines set out in the government’s data management policy. We will comply with the relevant requirements under the government’s data management policy.

## 1. PERSONAL DATA

### 1.1. As used in this Policy:

“personal data” means data, whether true or not, about an individual (whether a prospective service user, service user, service user's authorised representative, donor, volunteer or otherwise) who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

### 1.2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your:

- a) name
- b) identification numbers such as NRIC number
- c) contact information including residential address, email address or telephone number or emergency contact
- d) nationality
- e) gender
- f) date of birth
- g) marital status
- h) medical history
- i) photographs and other audio-visual data
- j) employment / education information,
- k) financial (income) status for purposes of subsidy applications or otherwise

### 1.3. Other terms used in this Policy shall have the meanings given to them in the PDPA (where the context so permits).

## 2. COLLECTION OF PERSONAL DATA

- 2.1. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) 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. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

2.2. Generally, we may collect your personal data through the following ways:

- a. when you sign up with us for Harvest Care Centre membership;
- b. when you access our websites or perform an online transaction;
- c. when you interact with any of our employees and volunteers;
- d. when you submit an application to us for membership services, funding and/or subsidies;
- e. when you respond to our request for additional personal data to be furnished;
- f. when you ask to be included in an email or other mailing list;
- g. when you request that we contact you;
- h. when you submit your personal data to us for any other reason.

### **3. Purposes for the Collection, Use and Disclosure of Your Personal Data**

3.1. We may collect and use your personal data for any or all of the following purposes:

- a. establishing or managing your relationship with us. This includes:
  - i. where you are a prospective service user,
    1. processing and evaluating your application for our services (including but not limited to disclosing your personal data to relevant governmental agencies where the provision of our services is in connection with grants and/or subsidies by such agencies);
  - ii. where you are a service user,
    1. providing the services requested by you; and
    2. monitoring, evaluating and/or auditing of services provided. This may include an assessment of the quality of the services provided and the effects of the services provided (both in the short and long term, and after you have stopped using the services);
  - iii. where you are a service user's authorised representative,
    1. processing and evaluating the service user's application for our services;
  - iv. where you are a donor,
    1. processing your donation(s);
  - v. where you are a volunteer,
    1. processing and evaluating your suitability to volunteer; and
    2. monitoring, evaluating and/or auditing of services you participated in.
- b. providing you with information on our upcoming events or activities;
- c. verifying your identity;
- d. responding to, handling, and processing queries, requests, applications, complaints and feedback from you;
- e. data analysis and/or reporting of statistics to our third-party partners, sponsors, affiliates, donors and supporters;

- f. development, marketing and/or implementation of present and future events organised and/or supported by us;
- g. 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;
- h. any other purposes for which you have provided the information;
- i. transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
- j. any other incidental purposes related to or in connection with the above.

#### **4. Disclosure of your Personal Data**

##### **4.1. We may disclose your personal data:**

- a. where such disclosure is required for, or in connection with, the provision of the services requested by you and/or the fulfilment of any of the purposes listed in clause 3.1 above;
- b. to third party service providers, agents and other parties in fulfilment of any of the purposes listed in clause 3.1 above;
- c. 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;
- d. 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
- e. any other party to whom you authorised us to disclose your personal data to, or where necessary to undertake any action requested by you.

#### **5. WITHDRAWING YOUR CONSENT**

5.1. 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.

5.2. 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.

5.3. 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 goods or 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 5.1 above.

- 5.4. 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.

## **6. ACCESS TO AND CORRECTION OF PERSONAL DATA**

- 6.1. 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.
- 6.2. 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.
- 6.3. 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).

## **7. PROTECTION OF PERSONAL DATA**

- 7.1. 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.
- 7.2. 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.

## **8. ACCURACY OF PERSONAL DATA**

- 8.1. 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.

**9. RETENTION OF PERSONAL DATA**

- 9.1. 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.
- 9.2. 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.

**10. TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

- 10.1. 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.

**11. DATA PROTECTION OFFICER**

- 11.1. 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: admin@harvestcare.org.sg  
Address: 165 Sims Ave #04-02 Harvest Care Centre Singapore 387606

**12. EFFECT OF POLICY AND CHANGES TO POLICY**

- 12.1. This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
- 12.2. 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 and the latest Policy as updated.

Effective date : 22/06/2019  
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