

Ang Mo Kio Methodist Church (TRAC)

Personal Data Protection Policy

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DOCUMENT CONTROL

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A. Management of Personal Data in Ang Mo Kio Methodist Church (TRAC)**A1. Introduction**

- 1.1 In Ang Mo Kio Methodist Church (TRAC), members' and visitors' personal data are collected and used for various Ministries and church activities. With the implementation of the Personal Data Protection Act (PDPA) coming into effect on 2 Jul 14, a data protection regime to govern the collection, use and disclosure of personal data is necessary to comply with the Act as well as to maintain individuals' trust and confidence in the Church that handle these data.

A2. Objective

- 2.1 To ensure that Ang Mo Kio Methodist Church (TRAC) is in compliance with the PDPA in collecting, using, disclosing, maintaining accuracy, handling and security of personal data in a manner that recognises both the right of individuals to protect their personal data and the need of the Church to collect, use and disclose personal data for the purpose of maintaining the membership records and/ or planning of Church/ Ministries activities.
- 2.2 This policy defines the responsibilities of Ang Mo Kio Methodist Church (TRAC) in ensuring compliance to the PDPA by ensuring proper management, security control and supervision in the collection, usage and disclosure of the personal data in Church.

A3. Definition of Personal Data Protection Act

- 3.1 The PDPA establishes a data protection law that comprises various rules governing the collection, use, disclosure and care of personal data. It recognises both the rights of individuals to protect their personal data, including rights of access and correction, and the needs of organisations to collect, store, maintain accuracy, use or disclose personal information for legitimate and reasonable purposes.
- 3.2 Personal data refers to 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 organisation has or is likely to have access. This includes personal particulars, NRIC number, medical records, educational records, financial records etc., whether the data is stored in electronic or non-electronic form.
- 3.3 Personal data in Singapore is protected under the Personal Data Protection Act 2012.

A4. Concept

- 4.1 The PDPA is intended to set the minimum standards that all organisations¹ in Singapore must observe. The PDPA will operate concurrently with other sectoral legislative and regulatory framework. This means that Church will have to comply with the PDPA as well as the common law and other relevant policies stipulated by the Methodist Church in Singapore, when handling personal data in their possession.
- 4.2 The PDPA takes into account the following concepts:
- 4.2.1 Consent – The Church may collect, use or disclose personal data only with the member's knowledge and consent (with some exceptions);
 - 4.2.2 Purpose – The Church may collect, use or disclose personal data in an appropriate manner for the circumstances, and only if they have informed the member of purposes for the collection, use or disclosure;
 - 4.2.3 Reasonableness – The Church may collect, use or disclose personal data only for purposes that would be considered appropriate to a reasonable person in the given circumstances.

A5. Data Protection Officer

- 5.1 The appointed Data Protection Officer is accountable to the Pastor-In-Charge and be responsible for ensuring that the Church complies with the PDPA. The appointed staff(s) is/ are responsible to review the Church's personal data policies and oversee the compliance of the PDPA. His or her responsibilities may include the followings:
- 5.1.1 Develop processes for handling personal data in electronic and/ or manual form, that suit the Church's needs and comply with the PDPA;
 - 5.1.2 Communicate Church's internal personal data protection policies and processes to staff and members;
 - 5.1.3 Handle queries or complaints about personal data from staff, members and visitors;
 - 5.1.4 Alert Pastor-In-Charge and LCEC Chairman to any risks that might arise with personal data;

¹ The PDPA applies to all organisations which includes any individual, company, association or body of persons, corporate or unincorporated as well as charities, Institutions of a Public Character (IPC).

- 5.1.5 Liaise with General Conference (GC) and/ or the Personal Data Protection Commission (PDPC), when required.

A6. Consent, Purpose Limitation and Notification Obligations

6.1 Collection of Personal Data

- 6.1.1 Registration forms – All registration forms are to provide a clause or separate notice (refer to Annex A) to clearly state and seek consent for the following:

- The purpose for the collection of data collected.
- The usage of the data collected.
- The ways the personal data may be disclosed.

- 6.1.2 Identity Document (ID) – The Church would not retain the physical ID but may collect and use the NRIC/ Foreign Identification/ Birth Certificate/ Work Permit / Passport numbers or make copies of these IDs when it is necessary to precisely verify an individual's identity to a high degree of fidelity. This may include the following purposes, but this list is not exhaustive, within the Church operations:

- Pledge
- Baptism
- Membership
- Mission/ Church Camp
- Marriage solemnisation
- Primary 1 registration
- Pre-employment application/ employee appointment
- Volunteer for high-risk beneficiaries, such as children and seniors

6.2 Deemed Consent

- 6.2.1 The Church may deem that the individual's consent for the disclosure of their personal data has been obtained prior to 2nd July 2014 for the purpose for which such personal data was collected, unless the individual notifies the Church of their disagreement.

- 6.2.2 The Church may deem that the individual's consent is obtained for the collection, usage and disclosure of their personal data when the individual signed up for specific activities organised by the Church such as membership application, ministry events/ courses or voluntarily provided personal data for the purpose(s) listed in clause A6.1.2.

- 6.2.3 The Church need not seek consent from their employees (including volunteers and part-time workers) for purposes related to their work in Ang Mo Kio Methodist Church (TRAC). However, employee's consent shall be obtained if such purpose is unrelated to their work. Employees shall be informed that their personal data may be disclosed, and arrangements may be made to limit such disclosure with mutual agreement.

6.3 Withdrawal of Consent

- 6.3.1 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 Ang Mo Kio Methodist Church (TRAC) to fulfil its legal obligations. The Church shall comply with the withdrawal request and inform the individual if such withdrawal will affect the services or arrangements between the individual and the Church. The Church may cease such services or arrangements as a result of the withdrawal.

A7 **Accuracy Obligation**

- 7.1 Ang Mo Kio Methodist Church (TRAC) shall make every reasonable effort to ensure individuals' information are kept accurately and complete. The Church relies on the individuals to inform the Church office of any changes to their personal data that is relevant to their participation in the Ministries and activities.
- 7.2 Ang Mo Kio Methodist Church (TRAC) will ensure that personal data is updated and amended upon written request from the individual.

A8 **Protection Obligation**

8.1 Confidentiality

- 8.1.1 Ang Mo Kio Methodist Church (TRAC) will ensure that all personal data is kept confidential and accessible only by the Data Protection Officers or authorised personnel for the purposes for which that information was sought.

8.2 Church Office

- 8.2.1 All staff working areas must be secured including work stations, meeting/discussion areas, filing cabinets, printers and fax machines. Access to work areas must be limited by appropriate security measures.

8.2.2 Access to office equipment containing such information must be password protected.

8.3 Databases and registration files/ forms

8.3.1 Soft copy databases must be password protected where applicable and stored by the dedicated Ministries during planning and destroyed when the information is no longer required after the activity.

8.3.2 All staff are not allowed to save any copies of databases in their own computer hard drives or portable storage devices.

8.3.3 Records of members/ visitors must be kept with the Data Protection Officers. He/ She must be informed of the collection, usage and disclosure (or withdrawal) of these records.

8.3.4 Hardcopy registration files/ forms containing personal information must be kept strictly under the Ministries' care during planning and destroyed when the information is no longer required after the activity.

A9. Disclosure to and Collection of data from Third Parties

9.1 Ang Mo Kio Methodist Church (TRAC) will not disclose personal data to third parties without the written consent of the individual.

9.2 Ang Mo Kio Methodist Church (TRAC) may disclose an individual's personal data to third party service providers who provide services such as insurance, training and travel packages. The following information would be registered by the DPO for record purposes:

- The name of organisation and person to whom the individual's personal data was disclosed to.
- Date of disclosure.
- Purpose of disclosure and the type of personal data disclosed.

9.3 Ang Mo Kio Methodist Church (TRAC) shall collect all personal data directly from the individuals. However, Ang Mo Kio Methodist Church (TRAC) may also collect individual's personal data from third parties provided the consent was obtained from the individual or required by the law. Prior or during the collection of the personal data, Ang Mo Kio Methodist Church (TRAC) shall make 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 like registering for an event or course.

A10. Retention Limitation Obligation

10.1 Ang Mo Kio Methodist Church (TRAC) will retain and maintain its personal data records for the following key purposes:

- Membership data maintenance
- Financial pledge management
- Cell Ministry
- Employee payroll
- Volunteer management

10.2 Ang Mo Kio Methodist Church (TRAC) shall establish a personal data retention schedule and ensure that the personal data managed are assessed at least once a year to determine if the retention of the personal data would still be necessary. Ang Mo Kio Methodist Church (TRAC) may anonymise the collected personal data or destroy the records containing the personal data according to the retention schedule.

10.3 The Ang Mo Kio Methodist Church (TRAC) shall ensure that the disposal of personal data is performed appropriately with little possibility of recovering the information from the disposal process. Such method may include shredding paper records and permanently deleting electronic records.

A11. Openness Obligation

11.1 Ang Mo Kio Methodist Church (TRAC) will make information on data protection policies, practices and complaints available on written request to the Data Protection Officers.

11.2 Feedback

11.2.1 All feedbacks must be documented in the Feedback Record and submitted to the Pastor-In-Charge and LCEC Chairperson.

11.2.2 The response to the query must be carried out within 5 working days, upon receiving the feedback.

11.2.3 Follow-up action must be carried out within reasonable time.

A12. Access and Correction Obligation**12.1 Access**

When handling access requests for information, the staff are to verify the identity of the individual making the request before providing the information.

12.1.1 For queries by telephone, staff must perform the following verification checks on the requester before disclosure of personal information:

- Full name as in NRIC
- NRIC/FIN number
- Home Address
- Contact number
- E-mail address

12.1.2 For queries through email or post, staff must follow-up with a telephone call to verify the identity of the requester before disclosure of personal information.

12.2 Correction

12.2.1 The Church is required to correct any error or omission in an individual's personal data upon his/ her request.

12.2.2 The Church should as soon as practical send the amended personal data to the individual and to the Ministries to which the personal data has been sent.

A13. Compliance

13.1 The Data Protection Officer could use the Personal Data Protection Checklist promulgated by the Personal Data Protection Commission as stipulated in Annex B to review and make the necessary enhancements to this policy where applicable.

Annex A**CLAUSES USED FOR BULLETIN, PLEDGE CARD AND REGISTRATION**1. Clause printed in bulletin

In view of the provisions of the Personal Data Protection Act which will take effect from 2 July 2014, Ang Mo Kio Methodist Church (TRAC) is committed to protect your personal data. In the course of the year, the Church will be collecting, using and/ or disclosing your data for the purposes of maintaining the membership records or for the planning of Church related activities/ services for you. We seek your understanding to grant us your consent when the church approaches you for your written consent.

2. Clause printed in Pledge Card

I/ We acknowledge that the Church is collecting my/ our personal data in this pledge card in relation to my/ our membership in the Church or my/ our making my/ our financial pledge to the Church. I/ We hereby consent to the Church collecting, using or disclosing my/ our personal data for the purposes of maintaining and updating the Church's records in respect of my/ our pledge.

I/ We also consent to the Church contacting me/ us by telephone or sending phone or email messages to me/ us in relation to the pledge which I/ we have made to the Church.

3. Clause suggested to be printed in letter/ form for COSC matters

I acknowledge that the Church is collecting my personal data in this [letter/ form] in relation to my participation in the activities of the Church conducted by the Church. I hereby consent to the Church collecting, using or disclosing my personal data to enable the Church to continue to provide services to me.

I also consent to the Church contacting me by telephone or sending phone or email messages to me in relation to (name of activity) conducted by the Church or (type of services) to be provided by the Church.

4. Clause suggested to be printed in letter/ form for children below 21 years old

I/ We acknowledge that the Church is collecting my/ our personal data and the personal data of my/ our child/ ward [insert name & BC/ NRIC] in this [letter/ form] in relation to my/ our child's/ ward's participation in the activities of the Church/ in the [name of activity] conducted by the Church. I/ We hereby consent to the Church collecting, using or disclosing my/ our personal data and that of my/ our child/ ward to enable the Church to continue to provide services to me/us and/ or my/ our child/ ward.

I/ We also consent to the Church contacting me/ us by telephone or sending phone or email messages to me/ us in relation to (name of activity) conducted by the Church or (type of services) to be provided by the Church.

[Signature portion should include full details of the signing parent/ guardian and of the child/ ward]

5. Clause suggested to be printed on registration forms for courses/ activities

By providing my data to Ang Mo Kio Methodist Church, I acknowledge that the Church is collecting my personal data in this form in relation to my participation in the above activity conducted by the Church. I hereby consent to the Church collecting, using or disclosing my personal data to enable the Church to continue to provide services to me.

I also consent to the Church contacting me by telephone or sending phone or email messages to me relating to my interest as indicated above.

6. Clause suggested to be printed on volunteer sign up form

In view of the provisions of the personal Data Protection Act, Ang Mo Kio Methodist Church (TRAC) has a duty to maintain strict confidentiality in relation to the information of individuals and keep safe and secure these information given to its staff and volunteers in the course of their duties.

This applies not only during the course of employment or volunteering but also after termination of employment or volunteering. This confidentiality clause covers all data collected and the staff/ volunteers may not disclose or use such data for another Organisation, purpose or individual benefit.

I understand that any information conferred to me, either verbally or in writing is highly confidential and will not be divulged for any reason to persons not connected with Ang Mo Kio Methodist Church (TRAC)'s current work or event organised. Any written information will be safely and securely stored in a confidential manner.

7. Clause suggested to be printed on notices regarding photography, video and audio recordings

You are entering this Church where photography, video and audio recordings are taken for the purposes of security, media broadcast, publications (printed and online platforms such as the church website and related social media platforms) and archival materials which will remain the property of this Church.

By entering and remaining in this building, you have given the consent to the above. Thank you.

Annex B**PERSONAL DATA PROTECTION CHECKLIST**

This self-assessment checklist designed by the Personal Data Protection Commission is based on the personal data protection obligations underlying the Personal Data Protection Act 2012 (PDPA) and is designed to assist organisation in reviewing its policies and to consider ways in which it can protect the personal data in its custody.

S/n	Checklist	Yes/ No/ Action Plan
I-III Consent, Purpose Limitation and Notification Obligations		
Collection of Personal Data		
1	Do you collect personal data about your employees or members?	
2	Do you have personal data inventory map on: <ul style="list-style-type: none"> • What personal data is collected and why? • Who collects it? • Where it is stored? • Who is disclosed to? 	
3	When collecting personal data, do you clearly inform the individual the purpose(s) for which it will be collected, used or disclosed and obtain his/her consent?	
4	If you collect personal data from third parties, do you ensure that the third party has obtained consent from the individuals to disclose the personal data to you for your intended purposes?	
5	If you are engaging a data intermediary to collect, use or disclose personal data on your organisation's behalf, have you ensured that the data intermediary will take the necessary action to ensure that your organisation will be in compliance with the PDPA?	<i>Not Applicable</i>
6	Is there a formal process for the withdrawal of consent by individuals in respect of the collection, use or disclosure of their personal data?	
7	If you intend to collect the personal data without consent, have you checked the provisions of the PDPA to understand when you may use personal data without consent?	

Use of Personal Data		
8	Do you limit the use of personal data collected to only purposes that you have obtained consent for?	
9	For personal data collected before 2 July 2014, are you using the personal data only for the purposes you have obtained consent for?	
10	If you intend to use the personal data without consent, have you checked the provisions of the PDPA to understand when you may use personal data without consent?	
Disclosure of Personal Data		
11	Do you limit the disclosure of personal data collected to only purposes that you have obtained consent for?	
12	If you intend to disclose the personal data without consent, have you checked the provisions of the PDPA to understand when you may use personal data without consent?	
IV. Access & Correction Obligation		
13	Have you established a formal procedure to handle requests for access to personal data?	
14	Do you have a list of third party organisations to whom personal data was disclosed and for what purposes?	
15	If you are imposing an administrative fee for access requests, have you developed the fee structure?	<i>Not Applicable</i>
16	Have you established a formal procedure to handle correction requests of personal data?	
17	Have you established a formal procedure to send corrected personal data to third party organisations that personal data was disclosed within one year of the correction?	
18	Have you checked S21(3) and the Fifth and Sixth Schedules of the PDPA to understand when you are not required to provide access or correct personal data?	

V. Accuracy Obligation		
19	Do you make reasonable effort to verify that the personal data kept are accurate and complete (i) prior to any use to make a decision that affects the individual or (ii) prior to disclosure?	
VI. Protection Obligation		
20	Have you assessed the personal data protection risks within your organisation and put in place personal data security policies?	
21	Is the personal data that you hold adequately classified?	
22	Is the personal data kept in a secure manner?	
23	Do external parties have easy access to the personal data that you hold?	
24	Are there any remedial measures in place in the event of a breach?	
25	Do you conduct or schedule regular audits on the data protection processes within your organisation?	
26	Are there contractual provisions in place to ensure proper safeguards in respect of personal data disclosed to outsourced parties who will be processing personal data on your behalf?	
VII. Retention Limitation Obligation		
27	Is there regular data housekeeping?	
28	Do you remove personal data no longer needed for business or legal purposes?	
VIII. Transfer Limitation Obligation		
29	Do you put in place the appropriate contractual arrangements or binding corporate rules to govern the transfer of personal data overseas?	<i>Not Applicable</i>
IX. Openness Obligation		
30	Have you designated one or two individuals (who may be referred to as data protection officers) to be responsible for ensuring that the data protection	

	policies and practices of your organisation are in compliance with the PDPA?	
31	Does your data protection officer(s) know his/her roles and responsibilities in ensuring personal data in your organisation's possession or control is well-protected?	
32	Is the business contact information of your designated data protection officer(s) made available to the public?	
33	Have you developed and implemented data protection policies for your organisation to meet its obligations under the PDPA? Are your organisation's data protection policies made available to the public?	
34	Have you developed a process to receive, investigate and respond to complaints that may arise with respect to the application of the PDPA?	
35	Is information on your organisation's complaint process made available on request?	
36	Have you communicated information about your organisation's data protection policies and practices to your employees, in particular, but not limited to, employees who are handling personal data?	
37	Do your employees know who to pass the requests to if it is not their responsibility to respond to such requests?	