

Ang Mo Kio Methodist Church (TRAC)

Personal Data Protection Policy

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DOCUMENT CONTROL

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TABLE OF CONTENTS

	<u>Page</u>
A. Management of Personal Data	4
A1. Introduction	
A2. Objective	
A3. Definition of Personal Data Protection Act	
A4. Concept	
A5. Data Protection Officer	
A6. Consent, Purpose Limitation and Notification Obligations	
A7. Accuracy Obligation	
A8. Protection Obligation	
A9. Disclosure to Third Parties	
A10. Retention Limitation Obligation	
A11. Accountability Obligation	
A12. Access and Correction Obligation	
A13. Data Breach Notification Obligation	
A14. Data Portability Obligation	
A15. Compliance	
Annexes	
Annex A General and Specific Clauses	14
Annex B Personal Data Protection Checklist	17
Annex C Course Registration Workflow	21
Annex D Third Party Register	22
Annex E Feedback Register	23

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 (PDPA)

- 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. Unless it is data that has been assigned uniquely to an individual for the purpose of identifying the individual (e.g. NRIC, passport number or biometric identifiers) there should be at least two data elements in the data set before individual can be identified as not all data that relates to an individual may identify the individual. Personal data 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 (DPO)

- 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;

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).

- 5.1.4 Alert Pastor-In-Charge and LCEC Chairman to any risks that might arise with personal data;
- 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 online registration forms are to provide a generic statement that points to our online PDPA Policy via the URL (<https://www.amkmc.org.sg/personal-data/>) clause, or separate notice for hardcopy registration forms (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
 - Bursaries
 - Pre-employment application/ employee appointment
 - Volunteer for high-risk beneficiaries, such as children and seniors
- 6.1.3 Where personal data collected from the individual differs from the Church membership system, authorised staff shall confirm the right details and seek the approval of the individuals to update the membership records for them. When it is impractical to obtain express consent in writing, the Church shall secure verbal consent and record it as documentary evidence of the fact that an individual had provided his/her verbal consent.

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 Other forms of deemed consent which the Church may use are as follows:

- a. The Church may deem that the individual's consent is obtained for the collection, usage, and disclosure of his/ her 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 as well as birth and bereavement announcements.
- b. The Church may use mass communication channels/ mobile applications/ printed media to send mass notification regarding Church activities/ services and may deem that the individual's consent is obtained through such media, unless **an opt-out notice is received from individuals within ten working days** from which notifications have been sent.

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.

6.2.4 In the event that a Ministry Head/Planning Committee Head would like to request for personal data from another ministry, they are required to consult with the other Ministry Head/Planning Committee Head prior to obtaining the personal data. The Ministry Head/Planning Committee Head which have the personal data reserves the discretion to share or disclose the full/partial personal data requested by the other party. The data protection officer is to be kept informed of all information shared/disclosed.

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 within fourteen (14) working days 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.
- 8.1.2 All department and ministry heads shall establish a workflow (refer to Annex C) to prevent unauthorised access, collection, use or disclosure to ensure personal information security in compliance with the confidentiality obligations under PDPA.

8.2 Church Office

- 8.2.1 All staff working areas must be secured including workstations, 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 should be destroyed when the information is **no longer required after the activity or within six months, whichever is earlier.**
- 8.3.2 All staff are not allowed to save any copies of databases in their personal computer hard drives or portable storage devices.

- 8.3.3 Records of membership and membership withdrawals should only be accessed by authorised staff and not all authorised staff have access rights to make changes on the data.
- 8.3.4 Both hardcopy and softcopy registration files/forms containing personal information must be kept strictly under the Ministries' care during planning should be destroyed when it is **no longer required after the activity or within six months, whichever is earlier.**

A9. Disclosure to and Collection of Data from Third Parties

- 9.1 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.
- 9.2 To control such disclosure, the department and ministry heads shall register the following information in a third-party register form (refer to Annex D) as a security measure to control the sharing of personal information and inform the service providers to destroy the data when the purpose(s) for which the personal data was collected is no longer valid or required, and should be destroyed after the activity or within six months, whichever is earlier.
- 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 to or during the collection of the personal data, the Church shall inform the individual of 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
 - Youth and Children's Ministries
 - 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. Accountability Obligation

- 11.1 Information on data protection and practices is made available on the Church website (<https://www.amkmc.org.sg/personal-data/>). Authorised individuals have been designated to audit the processes and mitigate the risk of reckless use/ disclosure of personal data. On written request to the Data Protection Officer(s), concerns would be reviewed to aid in the compliance efforts.
- 11.2 Feedback
- 11.2.1 All feedback must be documented in the Feedback Record and submitted to the Pastor-In-Charge and LCEC Chairperson. Refer to Annex E.
- 11.2.2 The response to the query must be carried out within 14 working days, upon receiving the feedback.
- 11.2.3 Follow-up action must be carried out within a reasonable time.
- 11.3 When an individual uses/discloses personal data in the possession of or under the control of the Church knowingly/recklessly, resulting in personal gain/loss to another

person, the individual must indemnify the Church of any financial penalty imposed by the Commission for the egregious offence.

A12. Access and Correction Obligation

12.1 Access

12.1.1 When handling access request for personal data, the Church may provide only the personal data or sections of a document containing the personal data belonging to that individual, if it is feasible to do so (e.g. within a year before the date of the individual's request if personal data is under the possession or under the control of the Church).

12.1.2 The Church is not required to provide access if the request interferes with the operations of the Church due to its repetitious nature if request is unreasonable or disproportionate to the individual's interest and if the request reveals personal data about another individual. When an access request is denied, the Church will preserve a complete and accurate copy of the withheld personal data for a period of at least 30 calendar days. In the event the Church receives a Notice of Review Application from the Commission after an individual applies for the Commission to take up the review, the Church must preserve these withheld personal data until the review by the Commission is concluded and any right of the individual to apply for reconsideration and appeal is exhausted.

12.1.3 When an individual makes an access request on behalf of a third party or vice versa, he/she must have proof of consent from the respective individual, for the relevant purpose for which the request is made. For any other purpose, a separate consent must be obtained. Refer to clause A9 for details on third party disclosure and collection of personal data.

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

- Full name as in NRIC
- NRIC/FIN number (last 5 alphanumeric)
- Contact number
- E-mail address

12.1.5 For queries through email or post, staff should follow up with a telephone call to verify the identity of the requester before disclosure of personal information, as in 12.1.4.

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 it is practical to send the amended personal data to the individual and to the Ministries to which the personal data has been sent.

A13. The Data Breach Notification Obligation

13.1 In compliance with the PDPA, when data breach is detected or there is likelihood of a breach of personal data (or classes of personal data), the Church will take reasonable and expeditious steps to assess if it is notifiable to:

- the affected individuals if there is significant harm involved and/ or
- the Commission, if it is of significant scale that involves five hundred or more individuals

When a breach is notifiable and is not the subject of an investigation by law enforcement agency, the Church will notify affected individuals as soon as practicable, to ensure they take steps to protect themselves (e.g. change password and monitor account for malicious activities). Unless there is an investigation by a public agency, the Church will inform the Commission within three calendar days to allow them to remediate the data breach.

13.2 A data intermediary (e.g. financial institution, insurance agency, travel agency) enlisted by Ang Mo Kio Methodist Church (TRAC) to process (i.e. carry out any operation(s) such as recording, holding, transmission etc.) personal data on behalf of the Church pursuant to a contract which is evidenced in writing, is required to notify the Church without undue delay when it has credible grounds to believe that a data breach has occurred. Data intermediaries are subject to the Protection Obligation, the Retention Limitation Obligation, and the Data Breach Notification Obligation of the Data Protection Provisions, to protect the personal data of an individual.

A14. Data Portability Obligation

- 14.1** Organisations are required to, at the request of an individual, transit personal data that is in the organisation's possession or under its control, to another organisation in accordance with any prescribed requirements.

A15. Compliance

- 14.1 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**GENERAL CLAUSE**

The provisions of the Personal Data Protection Act (PDPA) take effect from 2nd July 2014. Ang Mo Kio Methodist Church (TRAC) – hereby known as “the Church” - 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.

** By providing your personal data to the Church, you acknowledge that the Church is collecting, using, or disclosing your personal data to continue to provide activities and/or services to you. You also consent to the Church contacting you by telephone or sending phone or email messages to you.*

*Should you provide us with personal information relating to a third party (eg. your spouse, child, parent, relative, foreign domestic worker, or friend), you represent to us that you had obtained the third party’s consent to provide us with their personal data for the respective purposes.**

The Church respects personal data and privacy and will only share such information with third parties on a required basis. Should you wish to withdraw or limit your consent, please write with full particulars to:

Data Protection Officer

Ang Mo Kio Methodist Church
1 Ang Mo Kio St 21
Singapore 569383

Or email our Data Protection Officer (DPO) at dpo@amkmc.org.sg

To view our Personal Data Protection Policy, visit <https://www.amkmc.org.sg/personal-data/>.

**** Please note that all registrations forms must include the following 2 paragraphs.***

SPECIFIC CLAUSES1. 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.

2. Clause suggested to be printed on notices regarding media recordings

By entering this premises, you consent to such media recording for Ang Mo Kio Methodist Church (TRAC) to reproduce, exhibit, display, broadcast and distribute in any media now known or later developed for promoting, publicising, or explaining Ang Mo Kio Methodist Church (TRAC) and its activities and for administrative, educational, research or archival purposes. Thank you.

3. Clause suggested to be included for vendor's acknowledgement when sending personal data of individuals to thema. *Vendor Acknowledgment in Handling Personal Data on Behalf of the Church*

We consent to "Name of Vendor" collecting, using or disclosing the personal data of our "Staff/Members" to enable "Name of Vendor" to provide services in relation to "Purpose for which personal data is collected for". "The Vendor" agrees to discard/remove all the personal information upon completion of the "Purpose for which personal data is collected for" or when the personal data is no longer needed for the said purpose.

b. To authorise AMKMC (TRAC) to capture and utilise media recordings of the vendor

We hereby grant permission to Ang Mo Kio Methodist Church and its representatives to photograph and video me, and otherwise capture my image, and to make recordings of my voice. we further grant to Ang Mo Kio Methodist Church and its representatives the right to reproduce, use, exhibit, display, broadcast and distribute these images and recordings in any media now known or later developed for promoting, publicising, or explaining Ang Mo Kio Methodist Church and its activities and for administrative, educational, research or archival purposes. Photographs, video images and voice recordings are the property of Ang Mo Kio Methodist Church.

c. For Vendor's request to AMKMC (TRAC) to provide access to our media recordings

We acknowledge and agree that we will need to seek written permission from Ang Mo Kio Methodist Church to use, share or distribute any photos or media recordings taken by Ang Mo Kio Methodist Church and its representatives. Such requests will be considered on a case-by-case basis, and Ang Mo Kio Methodist Church reserves all rights to give or revoke our permission accordingly. Should permission be granted to us, we agree to include credit to Ang Mo Kio Methodist Church in writing (example – Photo credit to Ang Mo Kio Methodist Church).

Kindly acknowledge the above clause by sending us a return email on your agreement to discard all personal information of the respective persons when they are no longer in use.

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: • 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?	
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?	

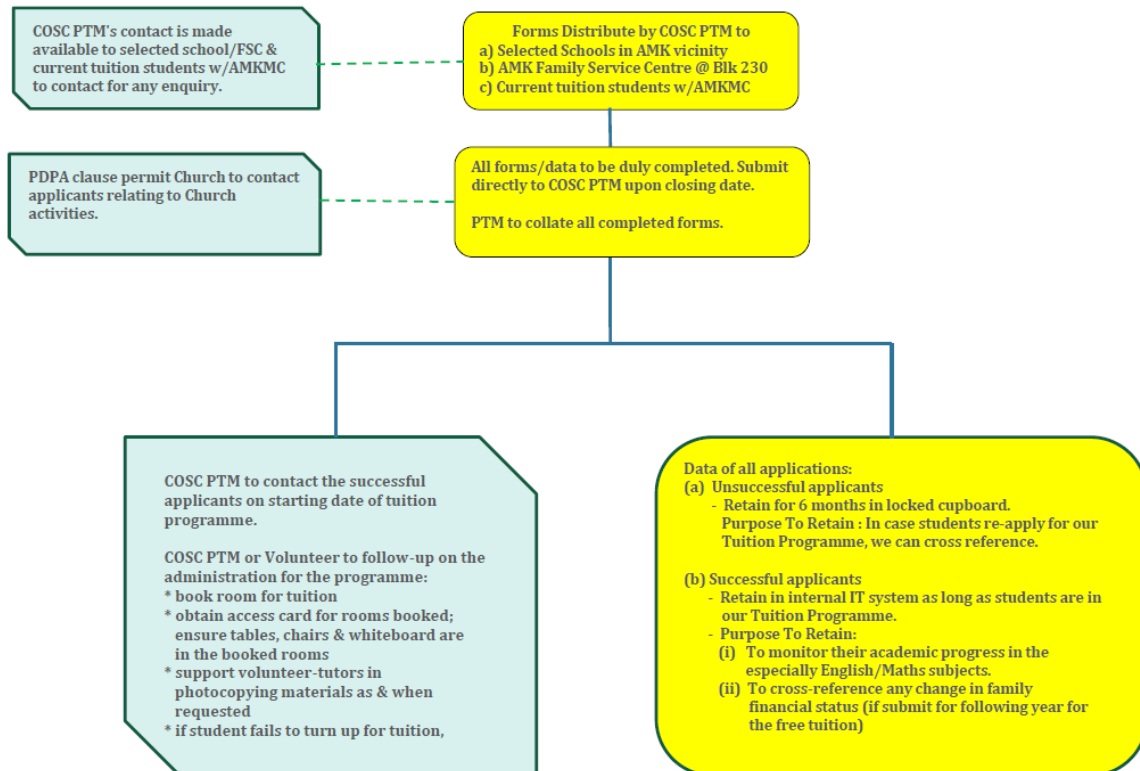
Use of Personal Data		
8	Do you limit the use of personal data collected to only purposes that you have obtained consent for?	
9	For personal data collected before 2 July 2014, are you using the personal data only for the purposes you have obtained consent for?	
10	If you intend to use the personal data 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?	

SAMPLE WORKFLOW

Workflow for Secondary Tuition Programme



Annex D**THIRD PARTY REGISTER**

Ministry: _____

Event: _____

Date of Event: _____

Date	Vendor	Purpose	Details Released	Remarks

Submitted by:

Name

Annex E**FEEDBACK REGISTER**

Date Submitted	Submitted By	Mode of Feedback	Description of Incident	Date of Incident	Response Date	Status (Pending/In-Progress/Resolved)