

**GRACE BAPTIST CHURCH LIMITED****Personal Data Protection Policy**CC consent - 2<sup>nd</sup> April 2019EC consent – 25<sup>th</sup> January 2019**1.0 BACKGROUND**

The privacy of personal data is important and Grace Baptist Church Limited ("GBC") is committed to accord personal data the due level of care as presented in this Personal Data Protection Policy ("PDP Policy") to comply with its obligations under the Singapore's Personal Data Protection Act 2012 ("PDPA").

The Personal Data Protection Commission ("PDPC") is a Singapore Government statutory body established on 2 January 2013 to administer and enforce the PDPA so as to foster an environment of trust among organisations that collect, use and disclose personal data about individuals – whether they are employees or third parties.

The PDPA comprises various rules governing the collection, use, disclosure and care of personal data and the national Do Not Call ("DNC") Registry that allows individuals to register their Singapore telephone numbers to opt out of receiving marketing messages (in the form of voice calls, text or fax messages) from organisations. GBC has to ensure that such messages are not sent to Singapore telephone numbers registered with the DNC Registry.

The provisions relating to the DNC Registry came into force on 2 January 2014 and the main personal data protection rules requiring organisations to comply with the nine (9) obligations of PDPA are effective since 2 July 2014.

GBC is obliged to collect, use and disclose personal data only with the individual's knowledge and consent (with some exceptions as stated in the PDPA), for specified and reasonable purposes.

**2.0 OBJECTIVE AND SCOPE**

Whenever GBC collect, use and disclose personal data about individuals (whether they are employees or third parties) in the course of GBC's operations, such collection, usage and disclosure of personal data must comply with this Policy.

The PDP Officer, who is servicing as GBC Administrator, shall be appointed by the Board of Directors to provide support and guidance for implementation of this Policy. The PDP Officer will review and propose updates to the Policy on a periodic basis to the Board of Directors for approval. GBC employees must comply with this Policy.

**3.0 DEFINITIONS**

The following definitions apply within this document:

<b>Term</b>	<b>Definition</b>
PDPA	Singapore Government's Personal Data Protection Act 2012 (PDPA)
PDPC	Personal Data Protection Commission (PDPC) is a Singapore Government statutory body. PDPC Website: <a href="http://www.pdpc.gov.sg">http://www.pdpc.gov.sg</a>

DNC Registry	The Do Not Call (DNC) Registry is a database of Singapore telephone numbers, including mobile, fixed-line, residential and business numbers.
GBC	Grace Baptist Church Limited, a registered charity under the Charities Act of Singapore.
Board of Directors	The Board of Directors as described in the Memorandum and Articles of Association of Grace Baptist Church Limited, i.e. consisting of not less than four (4) of which at least two (2) Directors from each of the English Congregation and Chinese Congregation are elected and appointed by GBC Ordinary Members to serve as Trustee of GBC, and shall include the powers and responsibilities as a Charity Trustee under the Charities Act of Singapore, and all other applicable laws in Singapore.
Employee	Employee refers to an individual employed and/or salary paid by GBC, regardless of whether the person is a pastoral staff or any other staff of GBC, and other individuals elected and appointed by GBC Ordinary Members to hold office such as the Congregation Leaders.
Third Parties	Third parties include members, ministry leaders and their committee members, visitors, donors, beneficiaries (and missionaries), contractors, suppliers, etc.
Personal Data	<p>Personal data refers to data, whether true or not, about an individual whether alive or deceased (for 10 years or less) who can be identified from that data; or from that data and other information to which GBC has or is likely to have access.</p> <p><u>Examples:</u></p> <ul style="list-style-type: none"> <li>• Full name</li> <li>• Passport, NRIC or FIN number</li> <li>• Photograph or video image of an individual</li> <li>• Mobile telephone number</li> <li>• Personal email address</li> <li>• Thumbprint</li> <li>• DNA profile</li> <li>• Residential address and telephone number</li> </ul>
Business Contact Information ("BCI")	BCI refers to an individual's name, position name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about the individual, not provided by him or her solely for his or her personal purposes. (Example: Personal Data on the Business Name Cards)

#### 4.0 PDPA NINE (9) KEY DATA PROTECTION OBLIGATIONS

To comply with the nine (9) key data protection obligations in the PDPA, the following guidelines are established by GBC.

##### 4.1 THE CONSENT OBLIGATION

GBC will generally seek an individual's express or implied consent for the collection, use and disclosure of the individual's personal data. As good practice, where GBC is required to obtain consent, you should obtain consent that is in writing or recorded in a manner that is accessible for future reference. This is to allow GBC to prove that it has obtained consent if required.

GBC allows individuals to withdraw consent, with reasonable notice. Prior to processing the withdrawal request, GBC will inform them of the likely consequences of withdrawal. Upon withdrawal, GBC will continue to maintain the relevant personal data in its custody subject to retention obligations set out in the PDPA, but will not use or disclose the personal data to any other party.

When collecting personal data from an individual, ensure a notification statement is provided to the individual including the categories of personal data, purpose and disclosure in connection with its GBC operation. Personal data should only be used and disclosed according to the guidelines set in this policy. If there is any doubt, please contact GBC's PDP Officer.

There are **exceptions** in the PDPA where GBC may collect, use and/or disclose personal data without the consent of individuals. This includes the following circumstances:

- a. To respond to an emergency that threatens the life, health or safety of the individual or another individual;
  - b. For evaluative purposes and managing or termination of employees;
  - c. Where the personal data is publicly available (e.g. on the internet);
  - d. Personal data which is subject to legal privilege or for the purposes of an investigation.
- The collection, use and disclosure of Business Contact Information (e.g. business name cards) do not require consent of the individuals.

## **4.2 THE PURPOSE LIMITATION OBLIGATION**

GBC will collect, use or disclose personal data about an individual for the purpose(s) for which consent was granted. Any such purpose should always be 'specific' and 'reasonable'. GBC will not require the individual to consent beyond what is reasonable in relation to GBC's operation.

## **4.3 THE NOTIFICATION OBLIGATION**

GBC will notify individuals of the purposes relating to collection, use and/or disclosure of their personal data before or at the time of such collection, use or disclosure of personal data.

## **4.4 THE ACCESS AND CORRECTION OBLIGATION**

On written request of an individual to access his own personal data (collected from the said individual by GBC), GBC shall, as soon as reasonably possible, provide the individual with the personal data about the individual that is in the possession or under the control of GBC, and at a minimum administration fee to be determined by GBC's PDP Officer.

When GBC receives the written request from an individual requesting GBC to correct the personal data about the individual that is in the possession or under the control of GBC, GBC shall, unless GBC is satisfied on reasonable grounds that the correction should not be made, correct the personal data as soon as practicable.

There are, however, prohibitions and exceptions under the PDPA that may apply, such as opinion data kept solely for an evaluative purpose.

## **4.5 THE ACCURACY OBLIGATION**

GBC will ensure that personal data collected by or on behalf of GBC is reasonably accurate and complete.

## **4.6 THE PROTECTION OBLIGATION**

GBC employees must be vigilant to safeguard personal data in their possession as well as personal data that are entrusted to them, and must keep it secure and limit access only to those on a 'need to know' basis.

GBC maintains appropriate physical, technical and organizational security measures to protect your personal data and will exercise appropriate due diligence in the selection of its third party

service providers (such as maintenance of IT network and security systems) and require that they maintain adequate technical and organizational security measures to safeguard the personal data, and to process the personal data only as instructed or permitted by GBC and for no other purposes.

#### **4.7 THE RETENTION LIMITATION OBLIGATION**

GBC will cease retention of personal data as soon as it is no longer necessary for any operation or legal purposes.

#### **4.8 THE TRANSFER LIMITATION OBLIGATION**

GBC will transfer personal data to another country outside Singapore only in accordance with the requirements prescribed under the PDPA.

#### **4.9 THE OPENNESS OBLIGATION**

GBC will designate the PDP Officer to develop and implement, and make available the policy and guidelines that are necessary for GBC to meet its obligations under the PDPA.

#### **5.0 GENERAL ENQUIRIES**

Individuals may contact the designated PDP Officer for enquiries relating to the PDPA or this Policy.

#### **6.0 VIOLATIONS AND DISCIPLINARY ACTION**

GBC could be subjected to penalties for violating the PDPA. Employees who violate the PDPA may also be subjected to penalties, including fines and imprisonments. Failure to comply with this Policy may result in disciplinary actions to be determined by the Board of Directors.