



DATA PROTECTION POLICY

This Data Protection Policy (“Policy”) sets out the basis which Kampong Kapor Community Services (“**KKCS**”, “**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of persons in accordance with the Personal Data Protection Act 2012 (the “**PDPA**”). This Privacy Statement applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or otherwise process personal data for our purposes.

1. DEFINITION

1.1 As used in this Privacy Statement:

“**person**” means an individual who has (a) contacted us through any means to find out more about any services we provide, (b) donated to us, (c) submitted a volunteer, job or internship application with us, or (d) contacted us through any means for any other purposes; and

“**personal data**” means data, whether true or not, about an individual 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 name, NRIC, contact information such as your address, email address or telephone number, medical records, educational records, financial records, photographs and other audio-visual information, employment information, education background, and information about your usage of and interaction with our website, whether such data is stored in electronic or non-electronic form.

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, USE AND DISCLOSURE 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 These personal data may be furnished to us in forms filled by you, face to face meetings, emails or telephone conversations. We may also keep a record of any contact you have with us. These data would be collected only for business purpose or for the purpose(s) stated by us when we gather the personal data from you.
- 2.3 You are deemed to have given your consent for the collection, usage and disclosure of your personal data in the following circumstances:
- 2.3.1 when you voluntarily provide your personal data to us at our premise or in connection with any business with our Company or visit our website;
 - 2.3.2 it is reasonable for you to have provided the personal data to us in the circumstance which you have provided; and
 - 2.3.3 in any other circumstances where consent is deemed under the PDPA.
- 2.4 We may collect and use your personal data for any or all of the following purposes:
- 2.4.1 providing appropriate social services to our clients/service users;
 - 2.4.2 engaging our volunteers, members and donors;
 - 2.4.3 working with our partners/reporting to Government Authorities;



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- 2.4.4 complying with any applicable laws, code of practice, or assisting in law enforcement and investigations conducted by any regulatory authority; and
 - 2.4.5 providing you with information on our upcoming events or activities, where you have specifically requested to receive such information;
 - 2.4.6 for volunteer / internship / employment application and recruitment purposes;
 - 2.4.7 verifying your identity;
 - 2.4.8 responding to, handling, and processing queries, requests, applications, complaints and feedback from you; and
 - 2.4.9 transmitting to any unaffiliated third parties, including our third-party service providers and agents, and relevant government and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes.
- 2.5 We may disclose your personal data:
- 2.5.1 where such disclosure is required for, or in connection with, the provision of the services to you (e.g. hospitals and other Social Service Agencies etc);
 - 2.5.2 to third party service providers, agents and other organisations we have engaged to perform any of the purposes listed in clause 2.4 above for us;
 - 2.5.3 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
 - 2.5.4 any other party to whom you authorised us to disclose your personal data to, or where necessary, to undertake any action requested by you.
- 2.6 The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to your employment contract should you be hired) has been terminated or altered in any way, for a reasonable period



thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

3. WITHDRAWING YOUR CONSENT

- 3.1 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.
- 3.2 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 endeavour to respond your request within ten (10) business days of receiving it.
- 3.3 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 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 3.1 above.
- 3.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.



4. ACCESS TO AND CORRECTION OF PERSONAL DATA

4.1 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.

4.2 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.

4.3 We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) 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).

5. ACCURACY OF PERSONAL DATA

5.1 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.

6. PROTECTION OF PERSONAL DATA

6.1 KKCS will take all reasonable precautions and put in place sufficient security arrangements to prevent loss and theft, unauthorised collection, access, modification, disclosure and misuse or similar risks.



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6.2 You should, however, be aware that no form of electronic storage or mode of data transmission over the Internet is completely secure. KKCS shall, in this respect, continuously review and enhance the security of our information systems to minimise potential breaches from occurring.

7. RETENTION OF PERSONAL DATA

7.1 KKCS will retain your personal data for a reasonable period for the purposes as specified in this Policy or until you request for the deletion or as required by law.

7.2 KKCS will not retain any personal data if the purpose for which the data was collected for is no longer being served or that retention is no longer required for operational, legal or regulatory purposes.

8. TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

8.1 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.

9. THIRD PARTY CONSENT

9.1 In the event you have provided personal data of third parties (e.g. your emergency contact person, family member, authorised representatives) to us, we rely on you to have sufficiently obtained the prior consent of such third parties to allow us to collect, use and/or disclose their personal data.

10. DATA PROTECTION OFFICER

10.1 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:

Telephone No. **62997662:**

Fax No. : 62942116



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Email : dpo@kkcs.org.sg

Address : Blk 2 Kitchener Road #03-89 Singapore 200002

10.2 We will attempt to resolve your query within a reasonable timeframe and will inform you in writing if more time is required to investigate and respond to you. We will not respond to any anonymous query.

11. EFFECT OF NOTICE AND CHANGES TO NOTICE

11.1 This notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use or disclosure of your personal data by us.

11.2 KKCS reserves the right to update this Policy at any time. You may determine if any such update has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective Date : 11 March 2021

Last Updated : 20 May 2021