

# **Halogen Foundation Personal Data Protection Policy**

## **Our Promise to Protect Your Personal Data**

Halogen Foundation Singapore takes its responsibility to protect personal data seriously. Your privacy is important to us and we are committed to complying with applicable law, including the Singapore Personal Data Protection Act (No. 26 of 2012) (the “**PDPA**”).

## **Section 1: Introduction – About this DPP**

1. The purpose of this document (“**Data Protection Policy**”, or “**DPP**”) is to inform you of how Halogen Foundation collects, uses, discloses, processes or otherwise handles your personal data, and to let you know how you can exercise your rights in respect of your personal data.
2. The portion of the DPP that applies to your personal data will depend on the nature of your transactions, agreements or interactions with us.
3. Please note that though we make an effort, as per legal requirements, to provide reasonably adequate information concerning our policies as it pertains to personal data, this DPP is not an exhaustive list of all the situations or scenarios concerning personal data. Feel free to approach our PDP Officer if you need clarification about any specific situation.
4. We update the DPP from time to time to ensure that our standards and practices remain relevant, are up to date, comply with applicable laws and guidelines, and remain applicable to industry trends. The latest version of the DPP supersedes and replaces the earlier versions.

## **How this DPP becomes a part of your journey with us**

5. The DPP is an integral part of your journey with us. It applies to and forms part of the terms and conditions governing your transactions, agreements or interactions with us, whenever we handle your personal data.
6. We bring it to your attention and make it a part of or complementary to your transactions, agreements or interactions with us, in addition to the website and making the copies of this DPP available as mentioned above, by:
  - (i) making the DPP available upon request;
  - (ii) including a reference to the DPP in applicable documents / recordings or other media including, generally for all data subjects, agreements, documents, and various forms (e.g. consent forms, data collection forms, feedback forms, application forms, questionnaires, surveys, and any other forms etc.) which may be given to you in the course of your interaction with us.

7. The DPP, having been brought to your attention, becomes binding by your taking any of the following steps:
- (i) proceeding with your transactions, agreements or interactions with us;
  - (ii) submitting information to us via forms or other data collection means or processes;
  - (iii) signing up / applying for our programmes;
  - (iv) interacting with our websites, electronic forms;
  - (v) calling or sending messages to us; and
  - (vi) transacting with us.

### **Your other / specific agreements**

8. This DPP supplements but does not supersede nor replace any other consents you may have previously or specifically provided to us in respect of your personal data, and your consents here are in addition to any consents by you.

### **Who will comply with this DPP**

9. We ask and require that each of the following parties / persons to abide by this DPP:
- (i) all Halogen Foundation Singapore employees;
  - (ii) all volunteers and trainees;
  - (iii) third parties (including third party partners, service providers, or affiliates) whom we work with and who have agreed to abide by this DPP.

### **About the PDPA**

10. More information about the PDPA can be found at the website of the Personal Data Protection Commission (“PDPC”) at [www.pdpc.gov.sg](http://www.pdpc.gov.sg)

## **Section 2: Your personal data**

### **What kind of data will this DPP apply to**

11. This DPP applies to “personal data”, which, in this DPP and in line with the PDPA, refers to any data, whether true or not, about an individual (i.e. the data subject) 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 to, including data in our records as may be updated from time to time.
12. The exact type of personal data that may apply in your case will vary depending on the how you have interacted with us. Examples of such personal data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s),

mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us or via other forms of interaction with you.

### **What is not personal data**

13. Personal data does not include data about a data subject, which has been anonymised. Anonymisation is the process of removing identifying information such that the remaining data does not identify any particular individual. Techniques can include pseudonymisation<sup>1</sup>, aggregation, replacement, data reduction<sup>2</sup>, data suppression<sup>3</sup>, data shuffling<sup>4</sup>, or masking<sup>5</sup>.
14. Halogen Foundation practices and undertakes reasonable safeguards to anonymise personal data in appropriate situations, especially when using personal data for research purposes.

### **Section 3: Consent What this DPP enables you and us to do**

15. By applying this DPP, you:
  - (i) consent to the relevant person(s) (see “**Who will comply with this DPP**” above) handling your personal data in ways which enable us to serve you, provide you with the relevant services, attend to the relevant transaction, or to facilitate our interactions with you; and
  - (ii) enable the exercise of your rights under the PDPA in an operative and applicable framework, including securing the right to access your personal data, withdraw (or manage) your consents and preferences as to your personal data.
16. Your consent may not be necessary or required in some situations as there may be applicable law or regulation which renders this unnecessary, or where certain permissions or rights or duties have been accorded to Halogen Foundation Singapore which enable / require us to handle the personal data. Where such law or regulation applies, we will act in accordance with those other laws and regulations.

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<sup>1</sup> Replacing identifiers with other references. For example, replacing an individual’s name with a tag or reference number.

<sup>2</sup> Removing values that are not required for the purpose. For example, removing ‘Ethnicity’ from a data set of individual’s attributes.

<sup>3</sup> Banning or hiding the value within a given range. For example, replacing age ‘43’ with the range ‘40–45’.

<sup>4</sup> Mixing up or replacing values with those of the same type so that the information looks similar but is unrelated to the actual details. For example, the surnames in a customer database could be sanitised by replacing them with those drawn from another database.

<sup>5</sup> Removing certain details while preserving the look and feel of the data. For example, representing a full string of numbers on a credit card as 4346 XXXX XXXX 5379 instead of ‘4346 6454 0020 5379.’

## **Withholding / Withdrawing Consent**

17. You are entitled under applicable law to withhold / withdraw consent to the collection, use or disclosure of personal data, and Halogen Foundation will respect your choices in this regard. You may withhold consent at any juncture that you are asked for consent, and you may also apply the process / method to withdraw consent as stated in this DPP (see **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data** below).
18. However, as is recognised by and provided for under the PDPA, it may be that any choice you make to withhold or withdraw consent may impact our ability to proceed with your transactions, agreements or interactions with us, and in particular, it may not be possible, without undue risk, cost or liability to Halogen Foundation to proceed with a particular transaction, agreement or interaction with you, and we may be left with no choice but to cease or refrain from the same.
19. At the same time, it should be noted that your withholding / withdrawal of consent will not prevent us from exercising our legal rights (including any remedies, or undertaking any steps as we may be entitled to at law).

## **Section 4: Collection of Personal Data How we collect personal data**

20. Generally, depending on the situation, we may collect personal data in the following ways:
  - (i) when you submit any form to volunteer or participate in any of our programmes or events;
  - (ii) when you interact with our staff, volunteers, and other representatives etc. via telephone calls (which may be recorded), letters, fax, face-to-face meetings and email;
  - (iii) when your images are captured by our CCTV cameras while you are within our premises, or by photographs or videos taken by us or our representatives when you attend events or programmes hosted by us;
  - (iv) when you attend Halogen Foundation's events (e.g. public forums and corporate events) and your voice and image data is captured on our audio and video recordings;
  - (v) when you use our services provided through online and other technology platforms, such as websites and apps, including through the use of any online platforms / technologies or tools (e.g., web portals, security tokens);
  - (vi) when you request that we contact you, be included in an email or other mailing list; or when you respond to our request for additional personal data, our promotions and other initiatives;
  - (vii) when you are contacted by, and respond to, our staff, volunteers, representatives and other service providers;

- (viii) when we receive your personal data from referral parties, public agencies, your employer and other third parties;
- (ix) when you provide any information to us in market surveys, lucky draws, contests;
- (x) when you browse any Halogen Foundation website (you generally do so anonymously but please see the section below on cookies), and you provide such information or login with your account credentials; and
- (xi) when you submit your personal data to us for any other reasons.

### **Collection of personal data about you from third parties, & collection of data about third parties from you**

21. We may also collect personal data about you from third parties such as:
- (i) your representatives / intermediaries / agents or your next-of-kin who may either be doing so on your behalf, or in connection with their own transactions, agreements or interactions with us (in which event we will endeavour to collect only such personal data as may be relevant);
  - (ii) your employers or educational institution; and
  - (iii) your service providers (e.g. event organisers, etc.).
22. If you provide us with any Personal Data relating to a third party (e.g. information of your next-of-kin, spouse, children, parents, friends, students, and/or employees), by submitting such information to us, we rely on you and will assume that you are representing to us that you have obtained the consent from the third party to provide us with their personal data for the respective purpose for which we are collecting this personal data.

### **Accuracy of personal data we collect from you**

23. We also rely on you and will assume that you have ensured that all personal data submitted to us is complete, accurate, true and correct.

### **Risks of relying on data we collect from you that is without consent or which is inaccurate**

24. If consents are not procured or if you fail to provide us with complete and accurate information, we may, in some situations, be prevented from proceeding with the transaction, agreement or interaction in question. Halogen Foundation will take the approach that best safeguards you, others and us from risks.

### **How much personal data we collect**

25. Halogen Foundation Singapore will endeavour to limit the collection of personal data to what is reasonable or necessary for such applicable purposes as described in this DPP.

## **Withholding information**

26. If you withhold information, this can have the same effect as when you withdraw consent (see “**Withholding / Withdrawing Consent**” above), and as stated in the “**Risks of relying on data we collect from you that is without consent or which is inaccurate**” section above, we may well have no choice but to decline to proceed with the transaction, agreement or interaction in question to avoid exposing us, you or others to risk.

## **Section 5: Why we Handle Your Personal Data (i.e. the “Purposes”) & to Whom We Disclose It to**

27. Halogen Foundation Singapore handles your personal data for the purposes set out in this section. Any one or more of the listed purposes may apply to your personal data, depending on the actual situation. The following does not purport to be an exhaustive listing, although an effort is made to set out as many salient purposes as may be applicable.
28. In the sub-sections that follow we set out some of the Purposes which apply to collection or use of personal data in certain scenarios and also identify some of the relevant recipients in the disclosure of personal data. We would also highlight that while a party may be listed as a recipient or source of personal data in these sections, that same party may also be a recipient or source (albeit not listed or mentioned expressly) in other scenarios.

### **To Facilitate Conduct of Programmes or Events**

29. We may handle your personal data to facilitate the conduct our leadership and entrepreneurial programmes or events.
30. The personal data may be disclosed / shared with staff, volunteers, school educators (principals and teachers), data intermediaries, and other representatives.

### **To Promote Halogen Foundation Singapore’s Activities**

31. We may also disclose or use personal data for promotional activities as it relates to Halogen Foundation to increase awareness of its programmes and to promote its activities.

### **To Raise Funds**

32. We may handle your personal data in order to execute crowdfunding activities. Fundraising could also executed through a third party acting on our behalf.

33. In the case of third party entities, Halogen Foundation Singapore will ensure that agreements are in place with such third parties to hold them to the standards of this DPP.

### **To leverage the use of information technology tools and platforms to provide services**

34. Halogen Foundation Singapore is progressive and is continually exploring ways to advance the seamless and efficient delivery of our through the use of information technology (“IT”) tools and platforms.
35. For this purpose, Halogen Foundation Singapore may handle personal data using IT platforms and tools promulgated by Salesforce.com. Halogen Foundation Singapore apply and require the application of reasonable and defensible security and access controls in the use of such systems, such that organisations other than the Halogen transacting with you have only such access as is on a need to know basis for purposes and in a manner consistent with this DPP and/or where (and to the extent) necessary to meet your needs.

### **Section 6: Use of Singapore telephone numbers for Marketing**

36. If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving promotional formation via your Singapore telephone number(s), then from time to time, Halogen Foundation may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) including, among other things, with information about our events and programmes.
37. In relation to particular programmes or events, we may also have specifically notified you of other purposes for which we collect, use or disclose your personal data. If so, we will collect, use and disclose your personal data for these additional purposes as well, unless we have specifically notified you otherwise.

### **Section 7: Security, Retention & IT matters Security**

38. Halogen Foundation Singapore will take reasonable efforts to protect personal data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any personal data we may have collected from or about you. E.g., that no harmful code will enter our website (for example viruses, bugs, trojan horses, spyware or adware).

### **Retention**

39. Halogen Foundation Singapore retains such personal data as may be required

for business or legal purposes, and such purposes do vary according to the circumstances.

40. Halogen Foundation Singapore will securely dispose of or anonymise personal data which it can reasonably determine is no longer needed and does not hold on to personal data for longer than is necessary or “just in case”.

## **IT Matters**

41. While we strive to protect your personal data, we cannot ensure the security of the information you transmit to us via the Internet, and we urge you to take every precaution to protect your personal data when you are on the Internet. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.
42. If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person. Please inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorized transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorised and/or fraudulent use of your username and password.

## **Cookies**

43. When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. We may employ cookies in order for our server to recognise a return visitor as a unique user including, without limitation, monitoring information relating to how a visitor arrives at the website, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).
44. Cookies are small text files placed in the 'Cookies' folder on your computer's hard disk and allow us to remember you. The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on a computer. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visitor.
45. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

## **Third-Party Sites**



46. Our website may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Some of these third party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable privacy policy of the third party website to determine how they will handle any information they collect from you.

## **Section 8: Contacting Us – Withdrawal of Consent, Access and Correction of your personal data**

47. If you have any questions or feedback relating to your personal data or our DPP, would like to withdraw your consent to any use of your personal data as set out in this DPP; or would like to obtain access and make corrections to your personal data records, please contact our PDP Officer as follows:

Personal Data Protection Officer  
Halogen Foundation  
Address:  
email: [ivy@halogenfoundation.org](mailto:ivy@halogenfoundation.org)

48. Please note that if your personal data has been provided to us by a third party (e.g. teachers, friends and colleagues who refer you to us), you should contact the relevant party directly to make any queries, feedback, and access and correct your personal data through that party.
49. This Personal Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.