

# Halogen Foundation Singapore

## Personal Data Protection Policy



## 1. Your Data and Privacy is Important to Us

### 1.1. Purpose of policy

Halogen Foundation Singapore (“HFS”) is committed to safeguarding the personal data entrusted to it by the individuals. This Policy sets out how HFS collects, uses, and discloses personal data about you so that we can serve you better. It also sets out how you can update us or request to be unsubscribed from our records.

### 1.2. Definitions

“activity(ies)” means the programmes and events that HFS performs for the purpose of enacting its objectives and mission.

“individual(s)” means a natural person, whether living or deceased, of whom is the owner of the personal data, or whom the personal data identifies.

“personal data” means the data, whether true or not, about an individual who can be identified from that data, in whatever form.

“PDPA” means the Personal Data Protection Act 2012 (No. 26 of 2012) and its schedules and sections.

“staff” means an individual under the formal employment of HFS, under any and all contract terms.

“youth development partner(s)” means an organisation that is a school, education institution, social service agency, or similar organisation that has youth under supervision or guardianship with which HFS has a formal arrangement to provide goods and services to.

## 2. Policy Statement

HFS will:

- (i) Comply with regulatory requirements as stated in the PDPA;
- (ii) Respect individual rights;
- (iii) Be transparent and honest to the individuals whose personal data are held by us;
- (iv) Provide training and support for staff and volunteers who handle personal data, so that they may confidently comply with this policy
- (v) Properly document and protect privacy and personal data by appropriate security and store with trusted and authorised parties;
- (vi) Retain and store personal data for no longer than necessary.

## **3. Data Collection, Usage and Disclosure**

### **3.1. Personal data collected**

Types of personal data collected is dependent upon the individual's interaction with HFS. Personal data collected includes, but is not limited to:

- (i) Contact details (i.e. full name and aliases, mailing address(es), contact number(s), email address(es));
- (ii) Identification information (i.e. NRIC/FIN number);
- (iii) Demographic information (i.e. nationality, gender, date-of-birth, marital status);
- (iv) Occupational information (i.e. place of work, designation, years of work experience, Curriculum Vitae(s), résumés, character referees);
- (v) Donation history;
- (vi) Participation history in any HFS activity;
- (vii) Questionnaire responses in any HFS activity;
- (viii) Correspondence history including feedback, survey responses, and personal opinions made known to us; and
- (ix) Photographs, video footage and images, and other audio-visual information captured.

### **3.2. Purpose and usage for personal data collection**

3.2.1. Personal data collected by HFS allows us to understand your needs, serve the community, and engage you as a valued stakeholder in the work of youth development.

3.2.2. These purposes include the following:

- (i) To provide and engage through activities of HFS;
- (ii) To notify partners, volunteers, employees, and other stakeholders of our events and programmes;
- (iii) To comply with legal processes and/or requirements of government agencies or the relevant governance administrator;
- (iv) To file necessary documentation with the relevant tax authority for purposes of tax deductions and revenue filing;
- (v) To report on HFS activities through reasonable use of visual aids and written testimonials on electronic and published mediums; and
- (vi) To solicit donations from business owners, corporations, executives, funding entities, and existing donors.

3.2.3. Any other purpose deemed relevant to the mission of HFS and/or the objectives of the HFS activity but not listed above will be notified directly to the individual and consent will be sought before usage of the personal data.

### **3.3. Personal data acquisition**

Personal data is to be collected by fair, transparent and lawful means, without misleading or deceiving individuals as to the purposes for collection of personal data about them. HFS may collect personal data from a number of channels, including but not limited to:

- (i) Application form(s) submitted by individuals to HFS for purpose of applying for, volunteering for, or registering for HFS activities;
- (ii) Job application(s) made for a job or internship position in HFS;
- (iii) A donation, whether monetary or in-kind, to HFS;
- (iv) Photographic images, video footage and images, and other audio-visual information taken by representatives during HFS events or from CCTV cameras within our premises;
- (v) Youth development partners who act as custodians of an individual's personal data where the individual is a minor under the supervision of the partner and its representatives;
- (vi) Face-to-face interactions, conversations, and exchanges; and
- (vii) Electronic interactions, conversations, and exchanges (i.e. website, social media).

### **3.4. Consent**

- 3.4.1. HFS shall always seek consent from the individual to collect, use or disclose the individual's personal data, except in specific circumstances where collection, use or disclosure without consent is authorised or required by law.
- 3.4.2. Consent for use of individual's personal data supersedes the individual's inclusion into the 'Do Not Call' (DNC) registry, unless otherwise stated by the individual.
- 3.4.3. HFS may not be able to fulfil certain services if the individual is unwilling to provide consent to the collection, use, or disclosure of certain personal data.

### **3.5. Deemed Consent**

- 3.5.1. HFS may assume the individual has consented to collection, usage, and disclosure of their personal data in situations where the individual provided the personal data for obvious purposes.
- 3.5.2. HFS may deem the individual's consent was obtained for personal data collected prior to 2nd July 2014 for the purpose of which the personal data was collected. The consent may include for HFS usage and, where applicable, include disclosure.

- 3.5.3. HFS may assume the individual's consent was obtained when given the individual's personal data from a third party authorised to disclose the personal data for necessary use for HFS activities.
- 3.5.4. HFS need not seek consent from staff for purposes related to the staff's work in HFS. However, staff's consent shall be obtained if such purpose is unrelated to their work. Staff shall be informed that their personal data may be disclosed to public and arrangements may be made to limit such disclosure with mutual agreement.

### **3.6. Consent withdrawal**

- 3.6.1. 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 HFS to fulfil its legal obligations.
- 3.6.2. Withdrawal may be done by completion and submission of the Consent Withdrawal Form found in Annex A of this document.
- 3.6.3. Upon receipt of the Consent Withdrawal Form, HFS shall acknowledge the receipt within five (05) working days. HFS shall comply with the withdrawal request and fulfil the withdrawal within ten (10) working days, and inform the individual prior to withdrawal if such withdrawal will affect the services and arrangements between the individual and HFS. Should HFS be unable to comply within ten (10) working days, the individual will be informed of the reasonable time in which HFS is able to fulfil the withdrawal.
- 3.6.4. Where reasonable and rectifiable, HFS shall cease correspondence and remove images from HFS electronic and published mediums.
- 3.6.5. Prior to the fulfilment of consent withdrawal, the individual may continue to receive correspondence and/or observe their image used in HFS electronic and published mediums for the purpose of HFS activities.
- 3.6.6. Upon the fulfilment of consent withdrawal, HFS will not contact the individual directly or personally inform of the execution.
- 3.6.7. HFS may cease such services or arrangements as a result of the withdrawal.

### **3.8. Obligation to accuracy**

- 3.8.1. HFS shall make every reasonable effort to ensure that individuals' information it keeps are accurate and complete.

- 3.8.2. HFS relies on individuals' self-notification of any changes to their personal data that is relevant to HFS.
- 3.8.3. For updating of personal data and changes made to personal data, refer to Section 5.

### **3.9. Data disclosure and transfer of personal data**

- 3.9.1 HFS may disclose individual personal data to government agencies and third-party service providers on a 'need-to-know' basis, relevant to HFS activities and/or required by legislation. Such disclosure shall be done in a manner that is secure and appropriate align with PDPA requirements.
- 3.9.2. Personal data is not transferred out of Singapore. Should a transfer be required, the individual will be notified and consent will be obtained before any transfer will be made.

## **4. Data storage and security**

### **4.1. Protection of personal data**

- 4.1.1. All personal data held shall be secured and protected against unauthorised access and theft.
- 4.1.2. HFS shall ensure that:
- (i) Personal data access is restricted within the organisation;
  - (ii) Necessary physical security is provided to protect personal data records and files;
  - (iii) Personal computers and other computing devices that may have access to personal data are password protected. Passwords are managed in accordance with industry best practices; and
  - (iv) Personal data and other files that contain sensitive or confidential personal data are secured and only made available to staff with authorised and necessary access.

### **4.2. Storage of personal data**

- 4.2.1. HFS shall take reasonable and appropriate security measures to protect the storage of personal data such as:
- (i) Making confidential on documents with personal records clearly and prominently;
  - (ii) Storing hardcopies of documents with personal records in locked file cabinet systems; and
  - (iii) Storing electronic files that contain personal data in secured folders.

- 4.2.2. Where HFS stores personal data on the cloud (or any similar remote access server) through a third-party provider, HFS shall undertake to adopt industry best practices and ensure due diligence of reliability and security of the third-party provider.

### **4.3 Security of data transmission and storage**

- 4.3.1. In addition to 4.2.2, HFS shall take reasonable measures to ensure the security of data transmission matching industry best practices.
- 4.3.2. Individuals shall be notified of any data breach, whether committed by HFS or a third-party provider, within three (03) days of HFS' awareness of said breach. Rectification measures may be deployed subsequently and duly informed to affected individuals and/or youth development partners.

### **4.4. Retention Limitation Obligation**

HFS shall retain the individual's personal data only for as long as it is reasonable to fulfil the purposes for which the information was collected for or as required by law.

## **5. Access and correction of personal data**

### **5.1. Updating and correction of personal data**

- 5.1.1. Any individual may request to update or correct their personal data at any time, unless such personal data should not be corrected under Section 22(4) of the PDPA or if the request made is a suspected fraudulent attempt.
- 5.1.2. Updating and correction may be done by completion and submission of the Correction Request Form found in Annex B of this document.
- 5.1.3. Upon receipt of the Correction Request Form, HFS shall acknowledge the receipt within five (05) working days. HFS shall respond with the confirmation of correction within thirty (30) days. Should HFS be unable to comply within thirty (30) days, the individual will be informed of the reasonable time in which HFS is able to fulfil the request.

### **5.2. Access of personal data records**

- 5.2.1. Any individual may request for their personal data stored by HFS, and/or how their personal data had been used or disclosed over the past year.
- 5.2.2. Updating and correction may be done by completion and submission of the Access Personal Data Form found in Annex C of this document. HFS will charge a

nominal administrative fee for processing the request, and the quantum of the fee shall depend on the nature and complexity of the access request.

- 5.2.3. Upon receipt of the Access Personal Data Form, HFS shall acknowledge the receipt, inform the individual of the fee amount, and the expected time in which HFS is able to fulfil the request, within ten (10) working days.
- 5.2.4. Access requests may be denied if the personal data provided is expected to:
- (i) Threaten the safety or physical or mental health of an individual other than the individual who made the request;
  - (ii) Cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
  - (iii) Reveal personal data about another individual;
  - (iv) Reveal the identity of an individual who has provided personal data about another individual and the individual providing the personal data does not consent to the disclosure of his identity; or
  - (v) Be contrary to the national interest.

## **6. Openness Obligation**

HFS shall develop and publish data protection policy statements to inform staff, declaring the manner that their personal data are collected, used and disclosed. The data protection policy statements are made available to staff and the public in the HR policy.

## **7. Audio-Visual Information**

### **7.1 CCTV video surveillance**

- 7.1.1. In accordance with Section 3.1, photographs, video footage and images, and other audio-visual information may constitute personal data if an identifiable individual is captured. This shall include CCTV video surveillance footage and images.
- 7.1.2. HFS shall put up appropriate notices to inform individuals that the premises are covered by CCTV video surveillance.

### **7.2 Photography and video capture at HFS activities**

- 7.2.1. Individuals will be informed prior to the activity conducted by HFS or prior to the individual's participation in the activity of the capturing of photographic and video footage and images.
- 7.2.2. HFS shall put up appropriate notices to inform individuals that the activity and premises on which the activity is conducted at will be photographed and captured on video.

- 7.2.3. Individuals may choose to decline consent by:
- (i) Stating the request not to capture the individual on photographs or video footage to the HFS staff in charge of the activity prior to the individual's participation;
  - (ii) Stating the request not to use the individual's photograph or video footage for marketing or communication purposes to the HFS staff in charge of the activity prior to the individual's participation; or
  - (iii) Ceasing to participate in the activity.

## **8. Changes and Review of Policy**

- 8.1. The Personal Data Protection Policy shall be maintained and updated by the Data Protection Office, reviewed and approved by the Management.
- 8.2. Reviews shall be made in a timely manner by recommendation, changes in legislation or best practices, or developments in the way HFS uses personal data, from time to time without any prior notice.
- 8.3. All communications, transactions and dealings with HFS shall be subject to the latest version of this policy in force at the time.

## **9. Data Protection Office**

- 9.1. The Data Protection Office handles all queries regarding personal data protection and compliance with the PDPA.
- 9.2. Individuals may contact HFS on any aspect of this policy, or their personal data, or to provide any feedback that they may have.
- 9.3. Data Protection Office contact details:

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