

## **Data Protection Policy**

The purpose of this document ("**Data Protection Policy**") is to inform you of how Singapore Children's Society manages Personal Data which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) ("**the Act**"). Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us, or signing up for any services or events offered by us, you agree and consent to Singapore Children's Society as well as our representatives and/or agents (collectively referred to herein as "**Children's Society**", "**us**", "**we**" or "**our**") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Entities' authorised service providers and relevant third parties (e.g. Schools, Family Service Centres, Social Service Offices, Government Agencies) in the manner set forth in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to Children's Society in respect of your Personal Data, and your consents herein are additional to any rights which any of the Entities may have at law to collect, use or disclose your Personal Data.

Children's Society may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Data Protection Policy as updated from time to time on our website at [www.childrensociety.org.sg](http://www.childrensociety.org.sg). Please check back regularly for updated information on the handling of your Personal Data.

### **1. Personal Data**

- 1.1 In this Data Protection Policy, "**Personal Data**" refers to any 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, including data in our records as may be updated from time to time.
- 1.2 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.

### **2. Collection of Personal Data**

- 2.1 Generally, we collect Personal Data in the following ways:
  - (a) when you submit an application form or registration form, or other forms relating to any of our services or events;
  - (b) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services or participate in our events;
  - (c) when you interact with our employees or volunteers, for example, via telephone calls, letters, face-to-face meetings, social media platforms and emails;
  - (d) when you use our electronic services, or interact with us via any of our websites or use services on any of our websites;

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- (e) when you request that we contact you or request that you be included in an email or other mailing list;
  - (f) when you respond to our campaigns, initiatives or to any request for additional Personal Data;
  - (g) when you submit an employment application or when you provide documents or information including your resume and/or CVs in connection with any appointment as an officer, member, representative or any other position;
  - (h) when your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend our events;
  - (i) when you are contacted by, and respond to, our employees or volunteers;
  - (j) when we receive references from partners and third parties, for example, where you have been referred by them;
  - (k) when you fill up our surveys;
  - (l) when we seek information from third parties about you in connection with the services you have applied for; and/or
  - (m) when you submit your Personal Data to us for any other reason.
- 2.2 When you browse our websites, you generally do so anonymously but please see the section below on cookies (section 5). We do not, at our websites, automatically collect Personal Data unless you provide such information or login with your account credentials.
- 2.3 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.
- 2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the services you have requested.

### 3. **Purposes for the Collection, Use and Disclosure of Your Personal Data**

- 3.1 Generally, Children's Society collects, uses and discloses your Personal Data for the following purposes:
- (a) responding to your queries, feedback, complaints and requests;
  - (b) verifying your identity;
  - (c) managing the administrative and business operations of Children's Society and complying with internal policies and procedures;
  - (d) facilitating business asset transactions involving any of the Entities;
  - (e) matching any Personal Data held which relates to you for any of the purposes listed herein;
  - (f) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to review, develop and improve the quality of our services;
  - (g) preventing, detecting and investigating crime and analysing and managing risks;

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- (h) facilities management (including but not limited to maintaining the security of our premises);
- (i) managing the safety and security of our premises, services and events (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- (j) monitoring or recording phone calls and public-facing interactions for quality assurance, training and performance evaluation and identity verification purposes;
- (k) in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- (l) conducting investigations relating to disputes, billing or fraud;
- (m) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on Children's Society (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
- (n) any other purpose reasonably related to the aforesaid.

3.2 In addition, Children's Society collects, uses and discloses your Personal Data for the following purposes:

- (a) If you are an existing or prospective donor:
  - (i) soliciting donations;
  - (ii) creating and maintaining donor profiles in our system database for internal records and reference;
  - (iii) managing relationships with you (including but not limited to sending of thank you letters and collaterals such as annual review and donation forms);
  - (iv) processing tax deductions for eligible donations by you;
  - (v) generating publicity materials for our services; and/or
  - (vi) any other purpose reasonably related to the aforesaid.
- (b) If you are an existing or prospective volunteer of Children's Society:
  - (i) assessing your suitability as a volunteer of Children's Society;
  - (ii) creating and maintaining a consolidated electronic volunteer database;
  - (iii) managing relationships with you (including but not limited to sending of thank you letters, invitations and collaterals such as annual review and donation forms);
  - (iv) facilitating our various support programmes and events which you participate in;
  - (v) inviting you to our fund-raising and social service events;

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- (vi) generating publicity materials for our services and campaigns; and/or
  - (vii) any other purpose reasonably related to the aforesaid.
- (c) If you are an existing or prospective beneficiary of Children's Society, or a parent or guardian of the same:
- (i) assessing your eligibility as a beneficiary;
  - (ii) creating and maintaining a consolidated beneficiary database
  - (iii) managing relationships with you (including but not limited to communicating with you in carrying out our support programmes and sending you invitations to events)
  - (iv) facilitating support programmes and events which you participate in;
  - (v) inviting you to our events;
  - (vi) generating publicity materials for our services and campaigns; and/or
  - (vii) any other purpose reasonably related to the aforesaid.
- (d) If you are an existing or prospective participant (including an invited speaker or lecturer) of our courses, events and programmes:
- (i) assessing and processing any applications or requests made by you for any courses, events and programmes offered by us;
  - (ii) creating and maintaining your profile in our system database for internal records and reference;
  - (iii) facilitating your use of our online portals;
  - (iv) facilitating and providing opportunities for networking between yourself and other existing or prospective participants (including invited speakers or lecturers) of our courses, events and programmes; and/or
  - (v) inviting you to our events;
  - (vi) generating publicity materials for our services and campaigns; and/or
  - (vii) any other purpose reasonably related to the aforesaid.
- (e) If you are an employee, officer or owner of an external service provider or vendor outsourced or prospected by Children's Society:
- (i) managing project tenders and quotations, processing orders or managing the supply of goods and services;
  - (ii) processing and payment of vendor invoices and bills;
  - (iii) managing business operations; and/or
  - (iv) any other purpose reasonably related to the aforesaid.

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- (f) If you submit an application to us as a candidate for employment:
  - (i) conducting interviews;
  - (ii) processing your application (including but not limited to pre-recruitment checks involving your qualifications and facilitating interviews);
  - (iii) obtaining employee references and for background screening;
  - (iv) assessing your suitability for the position applied for; and/or
  - (v) any other purpose reasonably related to the aforesaid.

3.3 Furthermore, where permitted under the Act, Children's Society may also collect, use and disclose your Personal Data for the following "Children's Society Additional Purposes":

- (a) providing or offering our services to you and inviting you to our events;
- (b) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of services and events by Children's Society;
- (c) administering and organising contests, promotional events, competitions and fundraising or volunteer recruitment campaigns, and personalising your experience at Children's Society's touchpoints;
- (d) conducting research, analytics and surveys to enable us to understand and determine your preferences and demographics for us to offer you services and programmes which may be relevant to your preferences and profile; and/or
- (e) any other purpose reasonably related to the aforesaid.

3.4 In relation to particular services or in your interactions with us, 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.

## 4. Disclosure of Personal Data

4.1 Children's Society will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following entities or parties:

- (a) Children's Society's related entities;
- (b) our fund-raising event partners;
- (c) our social service event partners;
- (d) companies providing services relating to medical screening, insurance, consultancy or other services in connection with the services and events offered by Children's Society;
- (e) agents, contractors or third party service providers who provide operational services to Children's Society, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security, employee recognition or other services to Children's Society;

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- (f) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Entities;
- (g) external banks, credit card companies and their respective service providers;
- (h) our professional advisers such as consultants, auditors and lawyers;
- (i) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies (including the Ministry of Social and Family Development, the National Council of Social Service, the Inland Revenue Authority of Singapore and the Registry of Societies) to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
- (j) any other party whom you authorise us to disclose your Personal Data to.

### 5. **Use of Cookies**

- 5.1 A cookie is information that a Web site puts on your hard disk so that it can remember something about you at a later time. Cookies are stored as text files on your hard disk so servers can access them when you return to Web sites you've visited before. Cookies cannot access, read or modify any other data on an electric device, nor does it capture any data which allows us to identify you individually. 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 visit. However, you may not be able to enter certain part(s) of our website.

### 6. **Data Security**

- 6.1 Children's Society 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, or that for example no harmful code will enter our websites (for example viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with using websites. While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet or when you use our online portals, and we urge you to take every precaution to protect your Personal Data when you are on the Internet.
- 6.2 Our Website may contain links to other third party websites. For the avoidance of doubt, this Data Protection Policy does not apply to the third parties websites. Children's Society takes no responsibility for the privacy practices of such websites.

### 7. **Contacting Us – Feedback, Withdrawal of Consent, Access and Correction of your Personal Data**

- 7.1 If you:
- (a) have any questions or feedback relating to your Personal Data or our Data Protection Policy;
  - (b) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
  - (c) would like to obtain access and make corrections to your Personal Data records, you can contact our DPOs via the following channels:
    - Email: [dpo@childrensociety.org.sg](mailto:dpo@childrensociety.org.sg)

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- Call: 6273 2010 between 8.30am and 5.30pm from Mondays to Fridays (excluding public holidays)
- Write: 210 Middle Road #05-03 Singapore 188994

7.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Children's Society may not be in a position to administer any contractual relationship in place, which in turn may also result in the termination of any agreements with Children's Society, and your being in breach of your contractual obligations or undertakings. Children's Society's legal rights and remedies in such event are expressly reserved.

## 8. **Governing Law**

8.1 This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.