

Personal Data Protection Policy

Covenant Community Methodist Church

Version 1.0

Contents

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1. Policy information

Document Owner
This policy was prepared by <i>Covenant Community Methodist Church ("CCMC")</i>
Organisation and Scope of policy
This policy applies to all the staff, including clergy and lay as well as third parties who have dealings with <i>CCMC</i> . A copy of this policy shall be made available upon request.
Policy operational date
26 November 2014
Date approved by <i>Covenant Community Methodist Church</i> Executive Committee
25 November 2014
Policy review date
15 November 2014

PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy outlines the management of Personal Data in accordance with the Personal Data Protection Act (“PDPA”).

This policy seeks to help understand the purpose for which CCMC collects; uses and/or discloses Personal Data.

CCMC reviews this Policy on a regular basis to ensure that it is consistent with any changes in legal or regulatory requirements. Any changes made will be published at CCMC’s website <http://www.ccmc.org.sg>.

1. Personal Data

In this Personal Data Protection Policy, “Personal Data” refers to any data or information from which a person can be identified either (a) from that data; or (b) from that data and other information to which CCMC has or is likely to have access. Examples of such Personal Data include Full name, NRIC Number or FIN (Foreign Identification Number), Passport number, Photograph or video image of an individual, Mobile telephone number, Personal email address and any other information relating to the person that has been provided to CCMC in one form or another.

2. Collection of Personal Data

CCMC may collect Personal Data as follows:

- a. Application form(s) submitted by an individual to CCMC, such as baptism/membership application forms or other forms relevant to programme and activities organized or managed by CCMC;
- b. Where an individual contacts staff or representatives of CCMC to make enquiries or in relation to pastoral care, whether such contact is by email, voice calls, or otherwise;
- c. Where an individual attends at the CCMC Office for the purpose of making enquiries or to make requests relating to pastoral care or any events, activities, courses or programs organized, conducted or managed by CCMC ;
- d. Where an individual makes a donation to CCMC ;
- e. Where an individual makes a request to CCMC to contact that individual for any purpose;
- f. Where an individual submits that individual’s Personal Data for the purpose of employment;
- g. Where an individual submits that individual’s Personal Data for the purpose of volunteering at CCMC events, activities, programs or courses.
- h. Where an individual submits that individual’s Personal Data for the purpose of donating to CCMC or a cause.
- i. Where an individual’s Personal Data is submitted to the Trinity Annual Conference (TRAC) for representing CCMC at the Annual Conference and to the General Conference.
- j. Through an application to be a service provider to CCMC;
- k. Through the interaction with CCMC staff for official purposes;
- l. When responding to a request for additional Personal Data;
- m. When Personal Data is submitted to CCMC for any other reason.

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

CCMC may collect, use and/or disclose Personal Data as follows:

- a. For planning, organising and holding church services, events, activities, courses and programs;
- b. For administration and management of CCMC's operations, functions or other internal matters as the case may be including record keeping;
- c. For pastoral care of CCMC members or other individuals where applicable;
- d. To communicate with an individual whereby such communication may take the form of voice calls, SMS, other messages receivable on a mobile phone, email, fax or post in respect of:
 - any of the matters described in this clause;
 - the individual's membership with CCMC ;
 - responding to a request or query by the individual;
 - responding to and/or resolving any complaints;
 - any matters by reason of which the individual is reasonably associated with, affiliated with or connected to CCMC ; or
 - any other matters in respect of which it is reasonably necessary for CCMC to communicate with the individual;
- e. For providing services to one or more individuals, a community or the general public;
- f. For Internal and external communications and publications;
- g. For the purposes of the CCMC Pastoral Care Ministry, which include without limitation the following carried out by members of the Pastoral Care Ministry:
 - For addressing an individual at CCMC events or activities to welcome that individual;
 - For communicating with an individual in the manner described at sub- clause (b) of this clause;
 - For visitations at an address provided by the individual, including but not limited to the individual's home, place of work, hospital or dormitory;
 - For meeting with the individual, including to have a meal with the individual, for counseling, to communicate personal experiences and to provide spiritual support; and
 - For conducting ceremonies, including but not limited to house/office/business blessings, weddings and funerals; or
- h. For evaluative purposes;
- i. For training purposes;
- j. For publicity and communication purposes
- k. For verification and update purposes
- l. For conducting research for statistical profiling and other purposes to review, develop and improve the services of CCMC;
- m. For conducting financial reporting and analysis related to CCMC operations;
- n. For managing CCMC infrastructure and operations and complying with internal policies and procedures;
- o. For archival of documents and records ;
- p. For managing and terminating a membership or an employment relationship;
- q. For security purposes;
- r. For any CCMC related matters;
- s. For any other purposes of which CCMC may notify individuals from time to time.

4. Disclosure of Personal Data

Personal Data will be protected and kept confidential but, this is subject to the provisions of any applicable law. CCMC will not disclose Personal Data to third parties without first obtaining consent to do so. However CCMC may disclose Personal Data to third parties without first obtaining consent in situations where such disclosure is permitted by the PDPA or by law or where such disclosure to third parties is necessary or ancillary to CCMC's purposes as stated in Clause 3 above.

5. Administration and Management of Personal Data

CCMC will take reasonable effort to ensure that Personal Data is accurate and complete. However, individuals must update CCMC of any changes in their Personal Data that had been initially provided. CCMC will not be responsible for relying on inaccurate or incomplete Personal Data arising from individuals not updating CCMC of any changes in their Personal Data.

CCMC will also put in place reasonable security arrangements to ensure that Personal Data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of Personal Data. However, CCMC cannot assume responsibility for any unauthorised use of Personal Data by third parties which are attributable to factors beyond CCMC's control.

CCMC retains Personal Data in accordance with legal, regulatory, business and operational obligations.

6. Consent

CCMC shall seek consent from individuals to collect, use or disclose the individual's Personal Data, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law.

Consent may be collected through written documentations (e.g. consent form, written note) or electronically (email consent, electronic forms).

CCMC may not be able to fulfill certain services if individuals are unwilling to provide consent to the collection, use or disclosure of certain Personal Data.

7. Withdrawal of Consent

Withdrawal of consent for the collection, use and/or disclosure of Personal Data in CCMC's possession can be made in person at the CCMC office or by email to the CCMC Data Protection Officer (DPO) at dataprotection@ccmc.org.sg.

From such a request for withdrawal of consent being made, CCMC will process the request within 30 days and thereafter not collect, use and/or disclose Personal Data in the manner stated in the request. With the withdrawal of consent to any or all use or disclosure of Personal Data, depending on the nature of the request, CCMC may not be in a position to continue to provide the services or administer any contractual relationship that is in place.

8. Access and Correction of Personal Data

Request can be made to have access to or make corrections to Personal Data records, but CCMC has the right to charge a reasonable fee for processing such a request. Such request can be submitted in person at the CCMC office, by telephone or by email at dataprotection@ccmc.org.sg . Requests will be processed within 30 days. Personal Data will only be released by the Church Data Protection Officer upon verification of the requestor's identity card and a signed request form.

9. Contacting CCMC

For any question or complaint relating to the use or disclosure of Personal Data, or if more information about CCMC personal data protection practices is needed, please contact CCMC Data Protection Officer in person at the CCMC office, by telephone or by email at dataprotection@ccmc.org.sg .

For more details on PDPA, please refer to <https://www.pdpc.gov.sg/legislation-and-guidelines/overview>