



Personal Data Protection Policy

Policy Information

Document Owner		
Policy prepared by Data Protection Officer (DPO) of Toa Payoh Methodist Church		
Scope of Policy		
<p>This policy applies to all staff and volunteers of Toa Payoh Methodist Church (TPMC), as well as its sub-contractors, if any.</p> <p>A copy of this policy shall be provided to any individual upon request and is available on TPMC website.</p>		
Policy Review Committee		
Local Church Executive Committee of Toa Payoh Methodist Church		
Policy Operational Date		10 Aug 2014
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19 Mar 2024	2.0	To update policy in line with amendments to guidelines provided by the Personal Data Protection Act wef 17 May 2022.

TABLE OF CONTENTS

	PAGE
1. Objective	2
2. Definitions	2
3. Policy Statement	2
4. Stakeholder Responsibilities	3
5. Consent, Purpose Limitation and Notification Obligations	3
6. Accuracy Obligation	5
7. Protection Obligation	5
8. Data Disclosure and Transfer Limit Obligation	6
9. Retention Limitation Obligation	6
10. Accountability Obligation	7
11. Access and Correction Obligation	7
12. Data Breach Notification	7
Appendix A Privacy Policy and Consent to Use of Data	9
Appendix B Personal Data Protection Checklist	9

1. Objective

- 1.1 This Personal Data Protection Policy (PDPP) defines the responsibilities of Toa Payoh Methodist Church (TPMC) in ensuring compliance to the Personal Data Protection Act (PDPA) guidelines by ensuring proper management, security control and supervision in the collection, usage and disclosure of personal data.

2. Definitions

- 2.1 Personal data means data, whether true or not, about an Individual who can be identified from that data; or from that data and other information to which TPMC has or is likely to have access.
- 2.2 'Individual' is defined as a natural person, whether living or deceased. For TPMC, individuals can refer to (but not limited to):
- i. Local Church Executive Committee Members
 - ii. Pastors of TPMC & Staff / Interns (either paid or not paid)
 - iii. Church Members / Volunteers / Connect Group Members
 - iv. Visitors (TPMC Services / Programmes / Venue)
 - v. Invited Speakers
 - vi. Appointed Contractors
 - vii. Donors and Beneficiaries
- 2.3 Purpose would refer to objectives or reasons TPMC has collected the personal data for.

3. Policy Statement

- 3.1 TPMC is committed to safeguarding the personal data entrusted to us by individuals. TPMC ensures the effective implementation of the policy through the following measures:
- i. Formulate PDPP in compliance with the PDPA guidelines by Personal Data Protection Commission (PDPC).
 - ii. Provide training at staff and volunteers orientation briefing so that personal data would be treated with consistency and care.
 - iii. A consent clause will be included in TPMC data collection forms.
 - iv. Store personal data collected in secured location / computer systems.
 - v. Grant access rights to personal data based on job requirements and on needs basis.

4. Stakeholder Responsibilities

4.1 Local Church Executive Committee of TPMC

- i. Appoint the Data Protection Officer (DPO).
- ii. Review and approve the PDPP.

4.2 Data Protection Officer

- i. Document and maintain PDPP in compliance with PDPA.
- ii. Communicate PDPP to Staff and Ministry Heads of TPMC.
- iii. Liaison party for all matters relating to the policy.
- iv. Manage queries and complaints relating to the policy.
- v. Establish correction or preventive action for breaches of policy.

4.3 TPMC Pastors / Staff & Interns / Ministry Heads / Volunteers / Contractors

- i. Read, understand and comply with the policy and process that relate to the personal data they may handle in their role.
- ii. Consult DPO in situations where the handling of the personal data is not aligned. Conclusion and subsequent action will be documented and filed in compliance with the policy.

5. Consent, Purpose Limitation and Notification Obligations

5.1 Collection of Personal Data

All registration forms are to provide a clause or separate notice to clearly state and seek consent for the following:

- i. The purpose for the collection of data collected.
- ii. The usage of the data collected.
- iii. The ways personal data may be disclosed.

The Privacy Clause and Consent to use of personal data is found in Appendix A.

5.2 Provision for Withdrawal of Consent

- i. Toa Payoh Methodist Church will upon written request for withdrawal of consent, archive the information and will not use the information until consent is given. The request will be processed within **2 weeks**.
- ii. For withdrawal of membership, the Individual's personal data will be archived for **1 year** before it is removed. A letter of confirmation will be sent to the Individual and his/her new church (if applicable).
- iii. In the event where an individual is not able to give consent, TPMC may not be able to fulfill or deliver the intended services to the individual. In such circumstances, TPMC will not be held responsible for the undelivered services to the individual.

5.3 Collection of National Registration Identification Card Information

National Registration Identification Card (NRIC) information will only be collected if it is required:

- i. By the law or authorities by the Government.
- ii. To accurately establish or verify the identity of an individual to a high degree of fidelity.

Therefore, TPMC will continue to collect NRIC for the following purposes:

- Church membership and baptism
- Primary school registration
- Activities which involve travelling out of Singapore, requiring the need for passport details, purchase of travel insurance and other logistics arrangements
- Activities which involve staying in or activities which require NRIC for registration, purchase of insurance and other arrangements.
- Member care
- Rough sleepers / Financial assistance / Support application
- Children's Ministry

If there is a need to collect NRIC information and it does not fall under the above list, the approval from DPO must be sought.

5.4 Event Coverage & CCTV

TPMC captures church events in the form of video and photographs. The following measures will be put in place to protect the personal data in these forms.

- i. Notices are put up at the sanctuary entrance and premises that photographs and videos will be taken for publicity, ministry use and other purposes where appropriate.
- ii. Notices are put up at the church entrance to inform of the CCTV video surveillance in the facilities.
- iii. Access to CCTV video surveillance, videos and photographs are limited to authorised persons.

6. Accuracy Obligation

6.1 TPMC shall make every reasonable effort to ensure that individuals' information is accurate and updated when requested.

6.2 Information voluntarily submitted by an Individual to TPMC shall prima facie be deemed complete and accurate.

6.3 Individuals remain primarily responsible to ensure that all personal data submitted to TPMC is complete and accurate. They are to notify TPMC of any change to their personal data where applicable.

7. Protection Obligation

7.1 Storage and Retention of Data

- i. TPMC will ensure that all personal data is kept confidential and accessible only by the Data Protection Officer or authorised personnel for the purposes for which that information was sought, and to provide services to the individual.
- ii. All staff working areas must be secured including workstations, meeting discussion areas, filing cabinets and printers. Access to work areas must be limited by appropriate security measures.
- iii. Access to office equipment containing such information must be password locked.
- iv. Soft copy databases must be password protected where applicable and stored by the dedicated Ministries during planning and destroyed when the information is no longer required after the activity.
- v. Hardcopy registration files/forms containing personal data must be kept strictly in the office under the Ministries' care during planning and destroyed when the information is no longer required after the activity.

- vi. Access to soft copy databases and hard copy files should only be given to authorised staff of the Church Office.
- vii. All staff are not allowed to save any copies of databases in their own computer hard drives or portable storage devices.
- viii. All information that is no longer needed should be destroyed either by shredding or permanently deleting electronic records after 3 years from the date of the event / activity.

8. Data Disclosure and Transfer Limitation Obligation

8.1 TPMC will only disclose personal data to external parties only on a need-to-know basis for the purposes that the personal data have been collected for.

External parties would include the following:

- i. Trinity Annual Conference (TRAC) & Methodist Church of Singapore (MCS).
- ii. Methodist Schools and Methodist Cooperative
- iii. Agents, contractors, data intermediaries or service providers such as telecommunications, mailing, information technology, payment, payroll, insurance, training, storage and archival, to the Organisation.
- iv. Banks and financial institutions.
- v. Charity organisations

8.2 As many cloud service providers have their servers located outside of Singapore, storing data in the cloud will likely require the transfer of data overseas. Appropriate steps should be taken to check and ensure that the recipient of the personal data is bound by legally enforceable obligations to provide the transferred data with a standard of protection that is at least comparable to the PDPA's protections.

8.3 TPMC will also disclose personal data on a need-to-know basis to relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by the relevant authorities.

9. Retention Limitation Obligation

9.1 TPMC will retain and maintain its personal data records for the purpose of engagement, operational planning of activities, as well as communication of events, programmes and church-related information.

9.2 Personal data records will be removed only when there is a request for transfer, withdrawal or when the information is no longer required.

10. Accountability Obligation

- 10.1 TPMC will publish this data protection policy on our website. An individual may read or download a copy **at tpmc.org.sg/pdpp**.
- 10.2 All feedback can be emailed to DPO at **dataprotection@tpmc.org.sg**. Pastor-in-Charge and Governance Committee Chairperson will be kept informed of feedback received.
- 10.3 The response to the query must be carried out within 10 working days, upon receiving the feedback.
- 10.4 Follow-up action must be carried out within a reasonable time.

11. Access & Correction Obligation

- 11.1 Under the Act, an Individual has the right of access to his personal data in TPMC or information which may have been used or disclosed by TPMC within a year before the date of his request.
- 11.2 Those making a personal data access or correction request may be asked by TPMC to provide additional information which will help TPMC to process the request.
- 11.3 The DPO shall verify the identity of the individual before responding to the request for access or correction.

12. Data Breach Notification Obligation

In the event of a data breach, the DPO will activate the Data Breach Management Plan.

Step	Action	Responsibility
i	Report data breach incident to DPO via email with the required details - Date & Time of Incident / Event - Name of person reporting the case - Brief description of the data breach incident	Anyone
ii	DPO will inform Data Breach Management Team* (DBMT) which consist of the following persons: - Pastor-In-Charge - Governance Chairperson - Operations Manager / DPO - IT Executive For any breach involving digital devices, DBMT will consult Cyber Insurer via Kennedys Krisis hotline: - Singapore: +65 6436 4418 / Worldwide: +44 203 137 8749	DPO

Step	Action	Responsibility
iii	<p>DBMT, with advisors from Cyber Insurer where required, will identify, prepare and respond to the data breach as follows:</p> <p><u>C</u>ontain the data breach to prevent further compromise of data and implement mitigating action(s) to minimise potential harm from the breach after an initial appraisal has been conducted to determine the extent of the breach.</p> <p><u>A</u>ssess the data breach by gathering the facts to determine the root cause (where possible) and assessing the effectiveness of the containment action(s) thus far before processing to implement full remedial actions. Where necessary, continuing efforts should be made to prevent further harm from the data breach.</p> <p><u>R</u>eport the data breach to:</p> <ul style="list-style-type: none"> - PDPC (https://eservice.pdpc.gov.sg/case/db) if data breach is assessed to cause (or likely to cause) <ul style="list-style-type: none"> • Significant harm that a reasonable person would identify as a possible outcome breach. • Affect at least 500 individuals. - Notification is to be done to the PDPC no later than 3 working days after the day TPMC determines that it is a notifiable data breach. - The affected individuals need to be notified as soon as practicable, at the same time or after notifying the PDPC (if required under the Data Breach Notification Obligation) <p><u>E</u>valuate TPMC's response to the data breach and consider the actions that can be taken to prevent future data breaches. Where necessary, continuing efforts should be made to prevent further harm from the data breach.</p>	DBMT
iv	DPO to record the assessment and carry out any corrective / preventive action with any relevant parties before closing the case.	DPO

APPENDIX A

Privacy Policy and Consent to Use of Data

Toa Payoh Methodist Church is committed to safeguarding your personal data. In submitting this form, you agree and consent to the use of information and contact details you have provided for the purpose of activities, programmes and services of the church. For any correction, withdrawal or limitation of consent, please write in with full particulars to dataprotection@tpmc.org.sg.

Data Protection Officer
Toa Payoh Methodist Church
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Singapore 319641
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APPENDIX B

Personal Data Protection Commission Help & Resources

Please refer to www.pdpc.gov.sg/Help-and-Resources for tools and resources on personal data protection including Do Not Call Registry, Newsletter Updates as well as Assessment Tools for Organisations and Data Protection Practices for ICT Systems.