



The Methodist Church in Singapore

**PERSONAL
DATA
PROTECTION
POLICY**

May 2015

INTRODUCTION

1. Paya Lebar Methodist Church (PLMC) is committed to safeguarding the personal data entrusted to it by individuals. This Policy outlines the principles and practices PLMC adopt for the collection, usage and disclosure of personal data in compliance with the Personal Data Protection Act 2012 (PDPA).

DEFINITIONS

Personal Data

2. Personal data is defined widely to include “any data about an individual who can be identified from that data; or from that data and other information to which the organisation has or is likely to have access”. This includes personal particulars, medical records, educational records, financial records, etc, whether the data is stored in electronic or non-electronic form.

Data Protection

3. The PDPA is a data protection law that governs the collection, use and disclosure of personal data by organisations.
4. The PDPA does NOT apply to:
 - Personal data about an individual that is contained in a record that has been in existence for at least 100 years.
 - Personal data of a deceased individual (for 10 years from death), except the need to make reasonable security arrangements to protect such data compliance with requirements to disclosure.

RESPONSIBILITIES AND APPOINTMENT

5. The Local Conference Executive Committee (LCEC) of PLMC is responsible for ensuring PLMC complies with the following legal obligations:
 - Develop and implement its data protection policies and practices
 - Nominate a Data Protection Officer
 - Develop process to receive and respond to complaints that may arise with respect to the application of PDPA
 - Communicate to its staff information policies and practices
 - Make information available on request about its data protection and practices and its process to receive and respond to complaints
6. All PLMC staff, paid and unpaid, including lay and clergy office bearers, shall comply with this Personal Data Protection policy.
7. The Director of Administration is PLMC’s Data Protection Officer.

PROCEDURES

Data Collection, Usage and Disclosure

Data Collection and Consent

8. The type of Personal Data collected by PLMC may include an individual’s –
 - Name, telephone number(s), mailing address, email address and any other information relating to you which you have provided in any forms you may have submitted to use, or in other forms of interaction with you;
 - Personal identification and/or passport number;
 - Title, date of birth/age, gender, marital status, nationality, occupation, education history;

- Credit card / bank account information; and
 - Camera or video footage that identifies individuals (including CCTV footage).
9. All forms used by PLMC will have a clause or notice that clearly states and seeks consent for the following –
- Purpose for the collection of data; and
 - Usage of the data collected.
10. Written parental / guardian consent will be required for the collection of Personal Data of persons (below the age of 16) or those with certified medical / mental conditions.

Access and Correction of Personal Data

Access to Personal Data

11. Individuals whose personal data are kept by PLMC shall be allowed to access their personal data. Due verification shall be carried out for all queries made, whether verbally or in writing, for personal information. Matters that may be used for verification include the following:
- Name as in NRIC
 - NRIC/ FIN Number
 - Address
 - Contact Number(s)
 - Email Address
12. Such verification shall be carried out before disclosure of personal data.

Accuracy and Correction of Personal Data

13. PLMC will make every reasonable effort to ensure that an individual's personal data it keeps are accurate and complete. PLMC relies on the individual's notification of any changes to his personal data.
14. PLMC will ensure that an individual's personal data is updated / amended upon written request from the individual.

Withdrawal of Consent

15. Individuals may withdraw their consent for PLMC to use and disclose their personal data at any time, unless such personal data is necessary for PLMC to fulfill its legal obligations. PLMC will upon written notice of withdrawal of consent take steps to dispose of or anonymize the information.

Protection and Confidentiality of Information

16. PLMC will keep all personal data confidential and accessible to only authorised personnel and for authorised purposes.
17. PLMC will take reasonable and appropriate security measures to protect the storage of personal data against unauthorized access and theft. PLMC will ensure that:
- All IT networks that host personal data are secured and protected against unauthorized access.
 - Personal computers and other computing devices that may have access to personal data are password protected.
 - Personnel and other files that contain sensitive or confidential personal data are secured and only made available to staff with authorized access.

- Hardcopies of documents with personal records are in locked file cabinets.
- Softcopies of documents are kept secure.

Retention of Data

18. PLMC will retain and maintain its personal data records for as long as it is needed for the purpose of organizing and planning, as well as communication of events, programmes and church matters. PLMC will ensure that personal data collected will be disposed appropriately when it is no longer needed (for example, at the end of a project or a course).

Openness / Transparency

19. PLMC will make its data protection policies and procedures available upon written request. PLMC shall also publish a data protection policy statement on its website.
20. Feedback may be provided anytime to the PLMC's Data Protection Officer. PLMC will consider all feedback and take appropriate action upon such feedback.

CCTV, Video Recording and Photography

21. CCTV, video recording and photos captured within the compound of PLMC or captured during all PLMC organized events / activities will be under the ownership of PLMC and could be used and accessed by authorized personnel of PLMC.

Third Party Disclosure

22. PLMC may disclose and / or transfer personal data to a third party (for example, hotel, tour agency) when required for specific purposes (for example, organizing a church camp). Such transfer shall be done in a manner that is secure and appropriately aligned with PDPA requirements.

Policy Review

23. This Personal Data Protection Policy shall be maintained and updated by the Data Protection Officer, reviewed and approved by the LCEC in a timely manner.