



Personal Data Protection Policy

Approved by LCEC

Effective : 31 July 2026

PAYA LEBAR METHODIST CHURCH PERSONAL DATA PROTECTION POLICY

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, use, disclosure, retention, protection, transfer and disposal of personal data in accordance with the Personal Data Protection Act 2012 (PDPA) and all applicable amendments.

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 organization 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, disclosure, retention, protection, transfer and disposal of personal data by organizations.
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.

Data Protection Officer

5. Data Protection Officer/s (DPO) refer to the individual/s appointed by PLMC to oversee compliance with PDPA obligations.

Data Breach

6. A data breach refers to any unauthorized access, collection, use, disclosure, copying, modification, disposal or loss of personal data, or any action that compromises the security, confidentiality, integrity or availability of personal data.

RESPONSIBILITIES AND APPOINTMENT

7. The Local Church Executive Committee (LCEC) of PLMC is responsible for ensuring PLMC complies with the following legal obligations:

- Develop and implement data protection policies and practices.
 - Appointing DPO
 - 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.
8. The DPO shall:
- Monitor compliance with this policy.
 - Advise church ministries and departments on data protection matters.
 - Manage data breach incidents.
 - Conduct periodic reviews of personal data handling practices.
 - Maintain records of complaints and requests.
 - Co-ordinate staff awareness and training
9. All PLMC staffs, paid and unpaid, including lay and clergy office bearers, volunteers, ministry leaders, committee members, shall comply with this Personal Data Protection policy.

PROCEDURES

Data Collection, Usage and Disclosure

Data Collection and Consent

10. The type of Personal Data collected by PLMC may include an individual,
- Name, telephone number(s), mailing address, email address and any other information relating to a person which has been provided in any forms submitted to use, or in other forms of interaction with a person.
 - Personal identification and/or passport number.
 - 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 CCT V footage).
11. 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.
12. Personal data may also be collected, used or disclosed without consent where permitted or required under the PDPA, including situations involving legal obligations, emergencies, investigations, employment-related purposes or other statutory exceptions.

13. Collection of NRIC / Other National Identification Number (ID)

PLMC will not retain the physical ID but may collect and use the NRIC/Foreign Identification/Birth Certificate/Work Permit/Passport or make copies of these IDs in circumstances required by law or where necessary to precisely verify an individual's identity to a high degree of fidelity. In the context of PLMC's operations, the collection of NRICS may be necessary in the following (not exhaustive) –

- Baptism & Membership
- Marriage Solemnization
- Staff Employment
- Mission Trips/Church Camps
- Primary 1 Registration
- Financial Assistance (Walk-Ins)

14. 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

15. Individuals whose personal data is kept by PLMC shall be allowed to access their personal data. Due verification shall be carried out for all queries made in writing. Matters that may be used for verification include the following:

- Name as in NRIC
- NRIC/FIN Number
- Address
- Contact Number(s)
- Email Address

16. PLMC shall respond to access and correction requests as soon as is reasonably possible and generally within 14 working days. Where PLMC is unable to respond within 14 working days, it should inform the requester of the expected response date.

17. Such verification shall be carried out before disclosure of personal data.

Accuracy and Correction of Personal Data

18. PLMC will make every reasonable effort to ensure that an individual's personal data it keeps is accurate and complete. PLMC relies on the individual's notification of any changes to his personal data.

19. PLMC will ensure that an individual's personal data is updated / amended upon written request from the individual.

Withdrawal of Consent

20. 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 cease using or disclosing the personal data for the withdrawn purpose, unless required by law, operational necessity, or other lawful basis under the PDPA.

Protection and Confidentiality of Information

21. PLMC will keep all personal data confidential and accessible to only authorized personnel and for authorized purposes.
22. PLMC will take reasonable and appropriate security measures to protect the storage of personal data against unauthorized access and theft. PLMC will ensure that:
- Multi-factor-authentication where feasible
 - Anti-malware and cybersecurity protection measures are in place.
 - 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 with strong password requirements.
 - Personnel and other files that contain sensitive or confidential personal data are secured and only made available to staff with authorized access. Files should be encrypted and secure back-up procedures are in place.
 - Hardcopies of documents with personal records are in locked file cabinets.
 - Soft copies of documents are kept secure.
 - Staff awareness training is conducted as necessary.
 - Incident reporting procedures are in place.

Data Retention

23. Personal data shall be retained only for as long as reasonably necessary to fulfil the purposes for which it was collected, satisfy legal or regulatory requirements, resolve disputes, or support legitimate church administrative functions.
24. The DPO, in consultation with Head of Ministries, shall periodically review retained records and arrange for secure deletion, destruction or anonymization of personal data that is no longer required.

Openness / Transparency

25. PLMC will make its data protection policies and procedures available upon written request. PLMC should also publish its data protection policy statement on its website.
26. Contact details of the DPO shall be made publicly available through PLMC's website and other appropriate communication channels.

27. Feedback may be provided anytime to the PLMC's DPO. PLMC will consider all feedback and take appropriate action upon such feedback.

CCTV, Video Recording and Photography

28. 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 can be used and accessed by authorized personnel of PLMC.
29. Reasonable notice shall be provided where photography, recording or livestreaming is conducted.
30. Appropriate notices shall be displayed where CCTV monitoring is conducted. Recordings shall only be used for security, safety, operational, ministry or event-related purposes and shall only be accessible to authorized personnel.

Electronic Communications and Messaging Platforms

31. PLMC may communicate with members, worshippers, co-workers, staff and other individuals through electronic means including email, telephone, SMS, messaging applications, social media platforms and online ministry tools.
32. Personnel using such communication channels shall take reasonable precautions to protect personal data and minimize unnecessary disclosure of information.
33. Where group communications are used, reasonable efforts shall be made to avoid disclosing personal information beyond what is necessary for ministry or administrative purposes. Personal data shall not be shared through personal communication channels for unauthorized purposes.
34. Ministry leaders and co-workers shall exercise caution when using messaging platforms, including but not limited to WhatsApp, Telegram, or similar applications. Sensitive personal information should not be shared through such platforms unless necessary and appropriate safeguards are in place.

Third Party Disclosure

35. Before engaging service providers that process personal data, PLMC shall conduct reasonable due diligence and ensure contractual safeguards are in place.
36. Such agreements should require:
- Protection of personal data
 - Limitation of use to authorized purposes
 - Security controls

- Breach notification obligations
- Return or destruction of data upon termination

37. Any disclosure of personal data requires the approval of DPO. PLMC may disclose and/or transfer personal data to service contractors it engages in, or to a third party (e.g., hotel, tour agency) engaged for specific purposes (e.g., organizing a church camp). Such transfer shall be done in a manner that is secure and appropriately aligned with PDPA requirements. Likewise, the third party engaged by PLMC shall undertake in writing to protect data in its possession /use and delete all data after the service contract expire or the event ends.

Overseas Data Transfers

38. PLMC shall not transfer personal data outside Singapore unless it has taken appropriate measures to ensure that the recipient provides a standard of protection comparable to that required under the PDPA.

Data Breach Management

39. PLMC shall promptly identify, assess, contain, investigate, and remediate any actual or suspected data breach involving personal data. All personnel and third parties must immediately report suspected breaches through approved channels. PLMC shall determine whether a breach is notifiable under the PDPA and, where required, notify the relevant authorities and affected individuals within the prescribed timelines. All breaches shall be documented, and appropriate corrective and preventive measures shall be implemented to prevent recurrence.

Policy Review

40. 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.

Privacy Policy and Consent to Use of Personal Data

By interacting with, submitting information to, or signing up for any organized activity offered by Paya Lebar Methodist Church (PLMC) and her ministries, you agree and consent to PLMC collecting, using, disclosing and sharing your personal data for the purpose of pastoral care, church ministry, administration and communication of services, programs, activities, and any other purpose that it is reasonably related to. Should you provide us with personal information relating to a third party (e.g., your spouse, child, parent, relative, foreign domestic worker, or friend), you represent to us that you had obtained the third party's consent to provide us with their personal data for the respective purposes.

Paya Lebar Methodist Church respects personal data and privacy and will not share such information unless authorized to do so. Should you wish to withdraw or limit your consent, please write with full particulars to our DPO at – Paya Lebar Methodist Church 5 Boundary Road Singapore 549954 or email dpo@plmc.org