



Personal Data Protection Policy

Faith Methodist Church

November 2014

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1. Policy information

Document Owner

This policy was prepared by Faith Methodist Church

Organisation and Scope of policy

This policy applies to all the staff, including clergy and lay as well as contractors of Faith Methodist Church. A copy of this policy shall be made available to any individual upon request. It is also residing at our Faith web page under *Personal Data Protection Policy*

Policy operational date

25 Nov 2014

Date approved by LCEC of Faith Methodist Church

25 Nov 2014

Policy review date

01 Nov 2015

1. Introduction

2.1. Purpose of policy

Faith Methodist Church is committed to safeguarding the personal data entrusted to it by the Individuals.

Faith Methodist Church manages Individual's personal data in accordance with Singapore Personal Data Protection Act 2012 (No. 26 of 2012) and other applicable laws. This policy outlines the principles and practices adopted by Faith Methodist Church in protecting personal data.

2.2. Definitions

Personal data

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 the organization has or is likely to have access.

Individual

Individual means a natural person, whether living or deceased.

For the Faith Methodist Church, individuals include, but not limited, to the followings;

- Staff (either paid or not paid. Unpaid staff include volunteers, lay person holding office or represents Faith Methodist Church in anyway.)
- Members
- Donors
- Students
- Beneficiaries
- Prospects
- Customers
- Researchers
- Visitors

Purpose

The term "purpose" refers to objectives or reasons the organization relating to personal data.

2. Policy statement

Faith Methodist Church will:

- comply with regulatory requirements as stated in the PDPA 2012,
- respect individuals' rights,
- be open and honest to the individuals, whose data are held by us,
- provide training and support for staffs and volunteers who handle personal data, so that they may confidently comply with this policy.

Faith Methodist Church recognises that our primary commitment with reference to the Data Protection Act is to ensure individuals' personal data are not misused and may result in harmful consequences. We strive to achieve this by ensuring personal data are:

- obtained fairly and lawfully and shall not be processed unless certain conditions are met;
- obtained for specified and lawful purposes and not further processed in a manner incompatible with that purpose;
- adequate, relevant and not excessive;
- accurate and up to date;
- kept for no longer than necessary;
- protected by appropriate security and kept with trusted and authorized parties.

Faith Methodist Church is also committed to being open and transparent and will respond to any legitimate enquiries from individuals regarding usage, storage, accuracy and of their personal data in a timely manner.

3. Responsibilities

3.1. Faith Methodist Local Church Executive Committee responsibilities

Faith Methodist Church Executive Committee is the responsible authority for ensuring Faith Methodist Church 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 about its data protection policies and practices
- Make information available on request about its data protection policies and practices and its process to receive and respond to complaints

Each committee which manages personal data is responsible for formulating their respective operational procedures in compliance to this policy (including induction and training) to ensure that good Data Protection practices are established and implemented.

3.2. Faith Methodist Church staffs, lays' and vendors' responsibilities

All Faith Methodist Church staffs, paid and unpaid, including lay and clergy office bearers, shall comply with this Personal Data Protection policy.

All staff shall read, understand and acknowledge any policies and procedures that relate to the personal data that they may manage in Faith Methodist Church.

Staff shall seek approval from the **Data Protection Officer** in the occasion that there is a need to consider using personal data in a manner not consistent with this policy, or an official disclosure request is received. The considerations, approval and processes of the disclosures shall be documented and filed.

Significant breaches of this policy shall be referred to according to Faith Methodist Church's disciplinary procedures.

4. Data collection, usage and disclosure

4.1. Personal data

The type of personal data that Faith Methodist Church may collect from individuals will depend upon the Individual category (Staff, member, Visitor, Donor...). Normally the personal data collected by Faith Methodist Church may include an individual's:

Personal data examples:

- 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, sex, marital status, nationality and occupation
- Christian background (church, baptism, theological studies, missions...)
- credit card/ bank account information (if we ever allow Giro deduction of tithes and offerings)
- camera or video footage that identifies individuals (including CCTV footage)

4.2. Purpose limitation

Faith Methodist Church collects uses and discloses personal data for the following purposes;

- Small groups administration
- Human resource administration,
- Education and training,
- Event organisation and management,
- Missions organisation and management,
- Fundraising, donations and activities for charitable causes,
- Tenancy management,
- Service intermediation(insurance and banking),
- Members services,
- Queries and requests handling,
- Meet regulatory requirements (Charity portal declaration),
- Advertising and communication.

Other examples of Churches purposes:

- a. Planning, organising and holding church services, events, activities, courses and programs;
- b. Administration and management of Faith Methodist Church's operations, functions or other internal matters as the case may be including record keeping;
- c. Pastoral care of Faith Methodist Church members or other individuals where applicable;
- d. To communicate with an individual in respect of:
 - any of the matters described in this clause;
 - the individual's membership with Faith Methodist Church;
 - responding to a request or query by the individual;
 - responding to and resolving any complaints;
 - any matters by reason of which the individual is reasonably associated with, affiliated with or connected to Faith Methodist Church; or
 - any other matters in respect of which it is reasonably necessary for Faith Methodist Church to communicate with the individual;

- whereby such communication may take the form of voice calls, SMS, other messages receivable on a mobile phone (e.g. WhatsApp, Tango, Line, WeChat, Skype messages etc.), email, fax or post;
- e. Providing services to one or more individuals, a community or the general public;
 - f. Internal and external communications and publications;
 - g. For the purposes of the Faith Methodist Church Small Group Ministry, which include without limitation the following carried out by members of the Small Group Ministry:
 - Addressing an individual at Faith Methodist Church events or activities to welcome that individual;
 - Communicating with an individual in the manner described at sub- clause (b) of this clause;
 - Visitations at an address provided by the individual, including but not limited to the individual's home, place of work, a hospital or dormitory etc.;
 - Meeting with the individual, including to have a meal with the individual, for counselling, to communicate personal experiences and to provide spiritual support; and
 - Conducting ceremonies, for example house blessings, weddings and funerals; or
 - h. Any other purposes of which Faith Methodist Church may notify individuals from time to time.]

Faith Methodist Church shall only collect personal data relevant to the purpose of the collection. Each data shall indicate if it is mandatory in order to accomplish the purpose. Individuals shall be informed of the purpose of collecting optional data (e.g. to improve services rendered).

4.3. Collection of information

Personal data is to be collected by fair and lawful means, without misleading or deceiving individuals as to the purposes for collection of personal data about them. The avenues by which Faith Methodist Church may collect personal data include, but are not limited to:

- Application form(s) submitted by an individual to Faith Methodist Church, such as membership application forms or other forms relevant to events and activities organised or managed by Faith Methodist Church;
- Where an individual contacts staff or representatives of Faith Methodist Church to make enquiries or in relation to pastoral care, whether such contact is by email, voice calls, or otherwise;
- Where an individual attends at the Church Office for the purpose of making enquiries or to make requests relating to pastoral care or any events, activities, courses or programs organised, conducted or managed by Faith Methodist Church;
- Where an individual makes a donation to Faith Methodist Church;
- Where an individual makes a request to Faith Methodist Church to contact that individual for any purpose;
- Where an individual submits that individual's personal data for the purpose of employment;
- Where an individual submits that individual's personal data for the purpose of volunteering at Faith Methodist Church events, activities, programs or courses.]

4.4. Consent

Faith Methodist Church shall seek consent from individual 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). In situations that consent cannot be conveniently obtain in written form or electronically, Faith Methodist Church may opt to obtain verbal consent and such process shall be approved by Data Officer.

Faith Methodist Church 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.

4.5. Deemed Consent

Faith Methodist Church may assume individual has consented to collection, usage and disclosure of their personal data in situations where the individual provided information for **obvious** purposes.

Faith Methodist Church may deem individual's consent was obtained for personal data collected prior to 2nd July, 2014 for the purpose of which the personal data was collected. The consent may include for Faith Methodist Church's usage and where applicable include disclosure.

Faith Methodist Church need not seek consent from staff (including volunteers and part time workers) for purposes related to the staff's work in FAITH METHODIST CHURCH. However, staff's consent shall be obtained if such purpose is unrelated to their work. Staff shall be informed that their personal data may be disclosed to public and arrangements may be made to limit such disclosure with mutual agreement.

4.6. Consent withdrawal

Any individual may withdraw their consent to the use and disclosure of their personal data at any time, unless such personal data is necessary for Faith Methodist Church to fulfil its legal obligations. Faith Methodist Church shall comply with the withdrawal request, and inform the individual if such withdrawal will affect the services and arrangements between the individual and Faith Methodist Church. Faith Methodist Church may cease such services or arrangements as a result of the withdrawal.

4.7. Notification obligation

Faith Methodist Church shall collect this personal data directly from the Individuals. However, Faith Methodist Church may also collect individual's personal data from third parties provided the consent was obtain from the individual or required by law.

Prior or during collecting personal data, Faith Methodist Church shall made know to the individual the purpose for which the personal data was collected, except when such personal data is provided by an individual for an obvious purpose. (E.g. individual provided personal data to register for an event, as such the purpose is for that event participation).

4.8. Accuracy obligation

Faith Methodist Church shall make every reasonable effort to ensure that individuals' information it keeps are accurate and complete. Faith Methodist Church relies on individuals' self-notification of any changes to their personal data that is relevant to Faith Methodist Church.

4.9. Data disclosure and Transfer of personal data in and outside Singapore

Faith Methodist Church may disclose Individuals Personal Data to the following group of internal/external organisations for appropriate purposes and subjected to compliance of applicable laws:

1. Trinity Annual Conference
2. members of Local Church Executive Committee and ministries chairperson or leaders
3. agents, contractors, data intermediaries or third party service providers who provide services, such as telecommunications, mailing, information technology, payment, payroll, insurance, training, storage and archival, to the Organisation;
4. banks and financial institutions;
5. Faith Methodist Church's professional services providers such as auditors;

6. relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by relevant government;
7. charity organisations; and
8. any relevant person related to achieving the intended purposes.

Faith Methodist Church will transfer personal data to a country or territory outside Singapore when required for mission purposes. Such transfer shall be done in a manner that is secure and appropriate align with PDPA requirements.

5. Security and storage

5.1. Protection Obligation

Faith Methodist Church shall adopts security arrangements that are reasonable and appropriate to the circumstances, while taking into consideration the nature of the personal data, the form in which the personal data is collected (physical or electronic) and the possible impact to the individual concerned if an unauthorized person were to obtain, modify or dispose of the personal data. Each department shall determine such arrangement appropriate for their operating unit. The Data Officer shall review and examine such arrangements and provide necessary recommendations.

5.1.1. Storage of Personal Data

Faith Methodist Church shall take reasonable and appropriate security measures to protect the storage of personal data, such as:

- Marking confidential on documents with personal records clearly and prominently;
- Storing hardcopies of documents with personal records in locked file cabinet systems;
- Storing electronic files that contain personal data in secured folders.
- Archived paper records and data backup files may be stored in off-site facilities or service providers provided such facilities are secured.

5.1.2. Protection of Personal Data

All personal data held must be secured and protected against unauthorised access and theft.

Faith Methodist Church shall ensure that:

- Faith Methodist Church IT networks that host personal data are secured and protected against unauthorised access.
- Personal computers and other computing devices that may access to personal data are password protected. Passwords are managed in accordance with industry best practices.
- Personnel and other files that contain sensitive or confidential personal data are secured and only made available to staff with authorised access.
- Ensure that IT service providers' services or provisions complies with security standards in line with industry practices.

In the event of a security breach, the Data Officer shall be notified. The Data Officer shall investigate if such breach is a malicious act and shall take appropriate action after consulting with Faith Methodist Church Executive Committee.

5.2. Retention Limitation Obligation

Faith Methodist Church shall retain individual's personal data only for as long as it is reasonable to fulfill the purposes for which the information was collected for or as required by law.

Faith Methodist Church shall establish a personal data retention schedule and ensures that personal data managed are processed regularly. Faith Methodist Church may anonymise collected personal data or destroy records containing personal data according to the retention schedule.

Faith Methodist Church shall ensure the disposal of personal data is performed appropriately with little possibility to recover the information from disposal process. Such method may include shredding paper records and permanent delete and wiping of electronic records.

6. Access and correction of personal data

6.1. Access to personal data

Individuals whose personal data are kept by Faith Methodist Church shall be allowed to access to their personal data. Faith Methodist Church shall disclose such information, including the usage and disclosure history of the personal data that has occurred within a year of the date of request. Individuals may make request from Faith Methodist Church for such disclosure and correction by writing to Faith Methodist Church in accordance to clause 6.3.

6.2. Correction of Personal data

Faith Methodist Church is committed to ensure that all personal data kept are accurate and up-to-date. To achieve this, Faith Methodist Church recognizes individual's participation in informing Faith Methodist Church of any changes, error or omission in their personal data is essential Faith Methodist Church shall provide facilities and processes to allow individuals to submit corrections to their personal data.

Faith Methodist Church shall notify all other organisations of such corrections, if the individual's personal data was disclosed by Faith Methodist Church to that organization one year prior to this correction. Such notification shall take place except if Faith Methodist Church deems the personal data is no longer relevant or needed by the organization for the purpose that Faith Methodist Church's disclosure was made earlier.

6.3. Access and correction process

The Data Protection Officer will have oversight of all personal data access or correction requests and ensures that they are processed in accordance with this policy.

Request for Personal data access or correction by individuals, including any enquires and complains shall be submitted to Faith Methodist Church in writing to the Data Protection Officer at the following address and contact information;

400 Commonwealth Drive
Singapore 149604
Tel: 64719420

OR email to:
mail@faithmc.sg

All Faith Methodist Church staffs shall forward any personal data access or correction request to the Data Protection Officer in a timely manner.

Faith Methodist Church may request for additional information from the requestor to aid in the investigation. The Data Protection Officer shall verify the identity of the individual before responding to the request for access or correction. Faith Methodist Church may respond to the requestor via telephone call, written note or electronic mail. In any case, the Data Officer shall make a record of such requests and responds for future reference and verification.

6.4. Openness obligation

Faith Methodist Church shall develop and publish data protection policy statements to inform staff, including part time staff, members and volunteers, declaring the manner that their personal data are collected, used and disclosed. Such statement shall be made available to staff upon request, or may be published in an appropriate manner that Faith Methodist Church deems fit. It shall be published on FAITH METHODIST CHURCH's web site.

Solicitation – Do not call registry

This section is intentionally left blank.

7. CCTV, video recording and photography

CCTV, video footage and photos may constitute personal data if an identifiable individual is captured.

- Appropriate notices are put up at the gate, church entrance, to clearly state the use and purpose of CCTV video surveillance.
- Notices are put up at entrance to Worship areas, to inform visitors and volunteers that photographs and videos taken may be used by Faith Methodist Church for communication purpose in print or electronic media.
- For special event, it should be stated in the invitation that photographs of attendees will be taken at the function for publicity on print and electronic media. Appropriate notice should also be put up at the reception or entrance to inform the attendees on the event day.
- If photos and videos are taken out of the context of the above, Faith Methodist Church must obtain individual's consent before using them.

Only authorized staff of Faith Methodist Church are allowed to access these personal data. Where in doubt, seek the advice of the Data Protection Officer.

8. Using our website

As with most websites, when you visit Faith Methodist Church website or use an application on Faith Methodist Church website, Faith Methodist Church may record anonymous information such as IP address (where not used to identify a specific individual), time, date, referring URL, pages accessed and documents downloaded, type of browser and operating system.

Faith Methodist Church also uses "cookies". A cookie is a small file that stays on your computer until, depending on whether it is a sessional or persistent cookie, you turn your computer off or it expires. Cookies may collect and store your personal data. You may adjust your internet browser to disable cookies. If cookies are disabled you may still use Faith Methodist Church website, but may be limited in the use of some of the features.

Faith Methodist Church websites may contain links to or from other websites. Faith Methodist Church is not responsible for the privacy practices of other websites. This privacy policy applies only to Faith Methodist Church. We encourage you to read the privacy policies of other websites you link to from Faith Methodist Church's website.

9. Policy review

This Personal Data Protection Policy shall be maintained and updated by the Data protection officer, reviewed and approved by the Local Church Executive Committee in a timely manner.