



Society of St. Vincent de Paul
(National Council of Singapore)



SSVP Ltd.

Affiliate of
Society of St Vincent de Paul
(National Council of Singapore)

EXTERNAL DATA PROTECTION NOTICE v1.0 (15 Oct 2021)

This Data Protection Notice (“**Notice**”) sets out the basis which **Society of St Vincent de Paul (National Council of Singapore)** and its affiliate **SSVP Ltd** (collectively known as “**SSVP**”, “**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of our members, volunteers, employees, beneficiaries (known as Friends in Need (FINs)), prospective FINs, customers, donors and other third parties in accordance with the Personal Data Protection Act (“**PDPA**”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

Collection, use, disclosure or otherwise processing of personal data of our service users on behalf of government ministries or statutory boards will be in accordance with guidelines set out in the government’s data management policy. **SSVP** will comply with the relevant requirements under the government’s data management policy.

PERSONAL DATA

1. As used in this Notice:

“personal data” means data, whether true or not, about an individual (whether members, volunteers, employees, beneficiaries (known as Friends in Need (FINs)), prospective FINs, customers, donors and other third parties) who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

“Conferences” are branches constituted under SSVP (National Council of Singapore).

"Programmes" are formalised services and programmes organised by SSVP with an Executive Committee managing the services and programmes for FINs. For clarity, any reference to Conferences will include "Programmes" set up by SSVP.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include but are not limited to:
 - a. Names;
 - b. Identification numbers such as NRIC, FIN, work permit and birth certificate numbers and copies, if required;
 - c. Contact information such as residential address, email addresses, telephone and mobile numbers and other contact details;
 - d. Nationality;
 - e. Gender;
 - f. Date of birth;
 - g. Marital status and marriage certificates;
 - h. Medical history and records;

- i. Photographs and other audio-visual information,
- j. Academic and Employment information and histories; and
- k. Financial information such as credit card numbers, debit card numbers or bank account information; and
- l. Details of your next-of-kin, spouse and other family members.

If you are a job applicant, SSVP may also collect the following additional Personal Data:

- a. Resume, educational qualifications, professional qualifications and certifications and employment references;
 - b. Employment and training history;
 - c. Salary information; and
 - d. Work-related health issues and disabilities;
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
5. We may collect and use your personal data for any or all of the following purposes:
- a. establishing or managing your relationship with us. This includes:
 - i. **Where you are a prospective Friend-In-Need (“FIN”),**
 1. processing and evaluating your application for our services.
 - ii. **Where you are a FIN,**
 1. providing the services and/or financial aid requested by you;
 2. monitoring, evaluating and/or auditing of services provided. This may include an assessment of the quality of the services provided and the effects of the services provided (both in the short and long term, and after you have stopped using the services); and
 3. research related to your personal circumstances or services you used. We will notify you and obtain your written consent before using your personal data for any specific research project, unless otherwise permitted under the PDPA or other legislation.

- iii. **Where you are a FIN's authorised representative**
 - 1. processing and evaluating the FIN's application for our services.
 - iv. **Where you are a donor,**
 - 1. processing your donations and your tax-deduction claims.
 - v. **Where you are a SSVP conference member or volunteer,**
 - 1. processing and evaluating your suitability to join a SSVP conference as a member or volunteer;
 - 2. assigning case work and projects to members and volunteers;
 - 3. differentiate the involvement level of the SSVP members; and
 - 4. monitoring, evaluating and/or auditing of services you participated in.
 - vi. **Where you are job applicant seeking employment with SSVP,**
 - 1. processing and evaluating your suitability for employment at SSVP.
- b. providing you with information on our upcoming events or activities and other marketing and publicity activities, where you have specifically requested to receive such information;
 - c. verifying your identity and the accuracy of your personal details and other information provided;
 - d. responding to, handling, and processing queries, requests, applications, complaints and feedback from you;
 - e. complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - f. transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes;
 - g. assessing and evaluating your suitability for employment in any current or prospective position within the organisation;
 - h. performing obligations under or in connection with your contract of employment with us, including payment of remuneration and tax;
 - i. performing obligations under or in connection with the provision of our goods or services to FINs;
 - j. understanding individual SSVP conferences' resource levels and compositions;
 - k. marketing and publicity purposes;
 - l. registering, organizing and administering of events; and
 - m. any other incidental purposes related to or in connection with the above.
6. We may disclose your personal data:
- a. where such disclosure is required for, or in connection with, the provision of the services requested by you;
 - b. to third party service providers, agents and other organisations we have engaged to perform any of the purposes listed in clause 5 above for us;

- c. to comply with any applicable laws, regulations, codes of practice, guidelines, rules or requests by public agencies, or to assist in law enforcement and investigations; and
 - d. any other party to whom you authorised us to disclose your personal data to, or where necessary to undertake any action requested by you.
7. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to your employment contract should you be hired) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

WITHDRAWING YOUR CONSENT

8. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you or your authorised representative in writing. You or your authorised representative may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request via email or otherwise in writing to our Data Protection Officer at the contact details provided below. If you are unable to submit your request in writing or if you require any assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.
9. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.
10. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in the manner described in clause 8 above.
11. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

12. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request via email or otherwise in writing, to our Data Protection Officer at the contact details provided below. If you require assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.
13. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
14. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

PROTECTION OF PERSONAL DATA

15. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, use of privacy filters, and disclosing personal data both internally and to our authorised third-party service providers and agents only on a need-to-know basis.
16. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

17. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer at the contact details provided below.

RETENTION OF PERSONAL DATA

18. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
19. We will cease to retain your personal data or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

20. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

DATA PROTECTION OFFICER

21. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Data Protection Officer

Email address: pdpa@ssvpsingapore.org

EFFECT OF NOTICE AND CHANGES TO NOTICE

22. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
23. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date : 15/10/2021

Last updated : 15/10/2021