TAMIL METHODIST CHURCH
SINGAPORE
Personal Data Protection Policy

Introduction

The Tamil Methodist Church, Short Street in Singapore (hereafter referred as "church") is committed to safeguarding the personal data entrusted to the church by its members and non-members.

Tamil Methodist Church strives to manage the individual's personal data in accordance with Singapore Personal Data Protection Act 2012 (No. 26 of 2012) (hereafter referred as "PDPA") and other applicable written laws.

Purpose

The purpose of this policy is to provide a framework for the Personal Data Protection measures to be followed and applied while dealing with the personal data related to the functioning of the church.

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. (Examples – Name and NRIC number, Name and home address)

Individual - Individual means a natural person, whether living or deceased.

For the Tamil Methodist Church "individual" includes, but not limited, to the following:

- Staff (either paid or not paid. Unpaid staff include volunteers, lay person holding office or represents church in anyway.);
- Members;
- Donors;
- Beneficiaries;
- Contractors;
- Vendors;

Implementation

1. Policy statement

Tamil 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 the church; and

- provide training and support for staffs and volunteers who handle personal data, so that they may confidently comply with this Policy.

Tamil Methodist Church's primary commitment with reference to the PDPA is to ensure the individuals' personal data are not misused and does not lead to any harmful consequences.

We strive to achieve this by ensuring personal data are:

- obtained fairly and lawfully with the consent of the individual;
- not processed unless the required conditions have been met;
- obtained for a specified, lawful purpose ;
- not further processed in a manner incompatible with the intended purpose;
- not collected unless necessary for the specific purpose;
- kept for no longer than necessary;
- protected by appropriate security measures and
- in possession of only the trusted and authorized parties.

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

2. Responsibilities

2.1 Responsibilities of Local Church Executive Committee (LCEC)

The (LCEC) is the responsible authority for ensuring the church complies with the following legal obligations:

- Develop and implement its data protection policies and practices;
- Appoint a Data Protection Officer ("DPO");
- Develop a process to receive and respond to complaints that may arise with respect to the application of PDPA 2012;
- Communicate the information about its data protection policies and practices to its staff; and
- Make information available on request about its data protection policies and practices

Any significant breach of this Policy shall be dealt with by the LCEC.

2.2. Responsibilities of the church staff and office bearers

- All the church staff paid and unpaid, as well as the lay and clergy office bearers shall comply with this Policy.

- They shall read, understand and acknowledge the policy and practices that relate to the personal data that they may manage and use.
- Staff shall seek approval from the Data Protection Officer or LCEC Chairman or Pastor-in-Charge when 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 disclosures shall be documented and filed.

3. Data collection, usage and disclosure

3.1. Purpose limitation

The Church collects, uses and discloses personal data primarily for the following purposes:

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

Church shall only collect personal data relevant to the purpose of the collection or 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) Personal data shall be collected after obtaining due approval from the DPO or Pastor-in-charge or LCEC Chairman.

3.2. Consent

Church shall seek consent from individuals to collect, use or disclose the individual's personal data, except in specific circumstances where collection, use or disclosure without consent is authorized under this PDPA Act or required by any other written law.

Consent may be collected through written documentations (e.g. consent form, written note) or electronically (email consent, other social media used by the Church). In situations that consent cannot be conveniently obtained in written form or electronically, Church may opt to obtain verbal consent and such process shall be approved by DPO.

Church may not be able to fulfil certain services if individuals are unwilling to provide consent to the collection, use or disclosure of certain personal data.

3.3. Deemed consent

Church will deem the individual has consented to collection, usage and disclosure of their personal data in situations where the individual provided information for obvious purposes and has not raised any concerns or objections.

Church will deem that the consent has been provided by the individual for their personal data collected prior to 19th October, 2020 for the purpose of which their personal data was collected, unless consent for such use is withdrawn after this date. The consent is considered as for the Church's usage and where applicable, includes disclosure to relevant third party. (e.g. bank).

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

3.4. 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 Church to fulfil its legal obligations. Church shall comply with the withdrawal request and inform the individual if such withdrawal will affect the services and arrangements between the individual and Church. Church may have to cease such services or arrangements as a result of the withdrawal.

3.5. Notification obligation

Church shall collect this personal data directly from the individuals. However, Church may also collect individual's personal data from third parties provided the consent was obtained from the individual or required by law by the third party.
Prior or during collecting personal data, Church shall make known 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).

3.6. Accuracy obligation

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

3.7. Data disclosure and transfer of personal data in and outside Singapore

Church may have to disclose Individual's personal data to the following group of external organisations, if and when required, for appropriate purposes and subjected to compliance of applicable written laws:

- Third party service providers, such as telecommunications, mailing, information technology, payment, payroll, insurance, training, storage and archival;
- Banks and financial institutions;
- Church's professional services providers such as auditors;
- 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;
- Charity organisations; and
- Any other relevant person or agency who needs the data to achieve Church's intended purpose.

Church may be required to provide individual's personal data to a country or territory outside Singapore for any Church related activities (e.g. to obtain an invitation letter for visa). Such activities shall be done in a manner that is secure and appropriately aligned with PDPA 2012 requirements.

4. Security and storage

4.1. Protection obligation

Church shall adopt 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. The DPO shall review and examine such arrangements and provide necessary recommendations.

4.1.1. Retention and Storage of personal data

Church will retain historic personal data such as past membership records, baptism records, marriage records and such for an indefinite period of time as Church may receive requests for such data even after several years. However, in the case of any other data collected for short term purposes (example – personal data collected for registering in an event) Church or personnel authorised to collect on behalf of the Church shall cease to retain any documents containing personal data, or remove the means by which the personal data can be associated with particular individuals, as soon as it is reasonable to assume that

(a) the purpose for which that personal data was collected is no longer being served by retention of the personal data; and
(b) retention is no longer necessary for its intended purposes.

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

- Marking "Confidential" on any personal records clearly and prominently;
- Storing hardcopies of documents with personal records in a locked storage;

- Storing electronic files that contains personal data in secured storage and limiting access to the computer/cloud storage; and
- Delete any email that contains personal data sent by an authorised staff/office bearer to a third party (e.g. Bank) immediately after it is confirmed that the third party has received the data. This is the sole responsibility of the staff/office bearer handling the personal data

4.1.2. Protection of personal data

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

Church shall ensure that:

- Church computer systems that contain personal data are secured and protected against unauthorised access;
- Personal computers and other computing devices that may have access to personal data are password protected.
- Passwords are managed in accordance with industry best practices;
- Personnel and other hardcopy files that contains sensitive or confidential personal data are secured and only made available to staff with authorised access; and
- Ensure that IT service provider complies with security standards in line with industry practices.

In the event of a security breach, the DPO shall be notified. The DPO shall investigate if such breach is a malicious act and shall take appropriate action after consulting with the LCEC Chairman, Pastor-in-charge or the LCEC as appropriate.

4.2. Retention limitation obligation

Church shall retain individual's personal data only for as long as it is reasonable to fulfil the purposes for which the data was collected for or as required by any written law.

Authorized staff/office bearer handling personal data shall dispose the data appropriately and ensure that the data cannot be retrieved after the disposal process. Such method may include shredding paper records and permanently deleting electronic records.

5. Access and correction of personal data

5.1. Access to personal data

Individuals whose personal data are kept by Church shall be allowed to access to their personal data when requested. 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 for such disclosure by writing to Church in accordance with Clause 5.3.

5.2. Correction of personal data

Church will contact the individuals whenever their personal data is needed to ensure that their latest personal data is used for its intended purpose.

5.3. Access and correction process

The DPO will have oversight of all personal data correction requests and ensures that they are processed in accordance with this Policy.

Request for personal data enquires and complaints shall be submitted to the Church in writing to the following address:

Tamil Methodist Church
8, Short Street, Singapore 188214
Telephone number: 63366148
Email address: tmc1887@singnet.com.sg

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

5.4. Openness obligation

Church shall publish personal data protection policy statements to inform staff, including part time staff and office bearers. Such statement shall be made available to individuals up on request or may be published in an appropriate manner that Church deems fit.

6. Policy review

This Policy shall be maintained and updated by the DPO as and when required, especially when the PDPA act is updated or changed. DPO shall submit the updated policy to LCEC and obtain approval to implement the proposed revised Policy.