

# **Personal Data Protection Policy**

**NOV 2020  
VERSION 3**

## Document Versioning

<b>Date Release</b>	<b>Summary of Changes</b>
Jul 2020	Baseline version
Sep 2020	Revised NRIC clause
Nov 2021	Revised Retention Policy

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# 1. Document Overview

## **Document Purpose**

This is the Personal Data Protection Policy (PDPP) of Church of Singapore (Harvest), (“COSH”). It depicts the policy adopted by Church of Singapore (Harvest) with respect to the collection, handling, disclosure, storage and archival of personal data of an individual which is in its possession or which may come into its possession.

## **Document Owner**

Data Protection Officer (DPO) of COSH

## **Terms of Reference**

This document policy is formulated in compliance with the Personal Data Protection Act (“PDPA”) guidelines provided by the Personal Data Protection Commission (“PDPC”):

- Advisory Guidelines on Key Concepts in the Personal Data Protection Act (revised 2 July 2017)
- Advisory Guidelines for the Social Service Sector (updated 31 August 2018)
- Advisory Guidelines on the Personal Data Protection Act for NRIC and other National Identification Numbers (published on 31 August 2018)

## **Policy Review Committee**

Church Management Committee of COSH

## **Terms & Definitions**

- a) An “Individual” is defined as a natural person, whether living or deceased. In COSH, an individual refers to (but not limited to):
- i) Local Church Executive Members
  - ii) Pastors of Church of Singapore (Harvest)
  - iii) Staff (either paid or not paid)
  - iv) Intern assigned to work in Church
  - v) Church Members
  - vi) Church Volunteers
  - vii) Small Group Members inclusive of those who are not our church members
  - viii) Visitors to the Church
  - ix) Invited Speaker (locally or overseas)
  - x) Appointed Contractors
  - xi) Donors
  - xii) Beneficiaries
- b) “Personal Data” is defined as data, whether true or not, collected from an individual with his/her full consent. This data can be used to identify the individual and it is used to facilitate the Church in carrying out the church activities. Some examples of “Personal Data” includes but not limited to, the following information:
- i) An individual’s biodata (name, date of birth, gender, marital status etc.)
  - ii) Family details
  - iii) Employment details
  - iv) Residential address and contact information
  - v) Health and death notes

- v) Christian background, spiritual related information such as baptism date, marriage date, gifting, Christian trainings, ministries involved
  - vi) Photos, video footage and CCTV footage of the individual taken during the events held at Church of Singapore (Harvest) or by Church of Singapore (Harvest).
  - vii) Personal identification number and/or passport number
  - viii) Signature; or
  - ix) Photograph.
- c) For the purposes of this Policy, “pastoral care” shall refer to, in general and without limitation, the offering of emotional and spiritual support and guidance by COSH pastoral care co-workers (whether employees or volunteers). Pastoral care may include one or more of the following:
- i) providing of care for the well-being of individuals;
  - ii) counselling;
  - iii) maintenance of personal relationships;
  - iv) mentoring;
  - v) performing of ceremonies;
  - vi) providing of religious education; or
  - vii) the facilitation of individuals’ practice of Christianity.

## 2. Policy Statement

Church of Singapore (Harvest) is committed to protecting the personal data entrusted to us by an individual. We ensure the effective implementation of the policy through various measures:

- a) Formulate PDPP in compliance to the PDPA guidelines by the PDPA Advisory Committee
- b) Conduct briefing and/or orientation to the staff of Church of Singapore (Harvest) to raise their awareness of the policy
- c) Provide consent clause in all our data collection forms
- d) Review and update our policy to ensure its validity and effectiveness in accordance with the PDPA guidelines
- e) Store personal data collected in secured location or in computer system with password protection
- f) Grant access rights to personal data based on job’s requirements and on need basis
- g) This document shall be made available upon request. This document may be found at COSH’s website ( <https://harvest100.wixsite.com/cosh> ) or at COSH’s office located as below (the “Church Office”).

Any enquiries or request relating to the policy shall be directed to the DPO via postal mail, email, or office telephone:

151 Chin Swee Road

Manhattan House

Singapore 169876

Tel: 6749 3220

[Email: info@cosh.org.sg](mailto:info@cosh.org.sg)

- h) This document may be amended from time to time as and when COSH in its absolute discretion deems necessary or appropriate.

### 3. Policy's Stakeholder

Below are the guidelines of the roles and responsibilities of the stakeholder of the policy:

#### **a) Local Church Management Committee**

- i. Appointment of Data Protection Officer
- ii. Review and approve the personal data protection policy

#### **b) Pastors of Church of Singapore (Harvest)**

- i. Understand the Personal Data Protection Policy of Church of Singapore (Harvest) and ensure effective implementation of the policy
- ii. Work closely with the Data Protection Officer to handle any breaches of the policy which warrants corrective or preventive actions

#### **c) Personal Data Protection Officer ("DPO")**

- i. Document and maintain PDPP in compliance to the PDPA in the collection, handling, storage, disclosure and archival of personal data which is in, or which will come into COSH's possession.
- ii. Communicate PDPP to Church of Singapore (Harvest)
- iii. Manage queries and complaints relating to PDPP
- iv. Liaison party for all matters relating to the PDPP
- v. Establish correction or preventive action for breaches of policy
- vi. Alert Church Management committee to any risks that might arise with regard to PDPP
- vii. The DPO is to ensure that the following information is made available at the Church Office upon request by any person:
  - a. the business contact information of at least one DPO;
  - b. the procedure for an individual to request access to personal data about that individual which is in COS's possession or control; and
  - c. the procedure to lodge a complaint to COS.

**d) All staff of Church of Singapore (Harvest) (Part Time, Full Time & Intern), Church Volunteers (Church of Singapore (Harvest) Members or Non-Church of Singapore (Harvest) Members), Lay Persons representing Church of Singapore (Harvest) & Contractors Appointed by Church of Singapore (Harvest)**

- i. Read, understand and comply with the policy in accordance to the designated role and duties assigned by COSH
- ii. Seek approval from the Data Protection Officer in situations where the handling of personal data is not aligned with the policy. The conclusion and subsequent action taken shall be documented and filed as compliance to the policy.
- iii. All persons, who collect, process or use personal information on behalf of COSH shall be accountable to the DPO.

## **4. Data Collection, Consent, Usage, Disclosure & Archival**

### **4.1 Data Purpose**

- a) COSH collects, uses, and discloses personal data for purposes which may include, but are not limited to, the following:
  - a. Planning, organising and holding church services, events, activities, courses and programmes;
  - b. Administration and management of COSH's operations, functions or other internal matters as the case may be including record keeping and maintaining records of COSH's members;
  - c. Pastoral care of COSH members or other individuals where applicable;
  - d. To communicate with an individual in respect of:
    - i. any of the matters described in this paragraph;
    - ii. the individual's membership with COSH;
    - iii. responding to a request or query by the individual;
    - iv. responding to and resolving any complaints;
    - v. any matters by reason of which the individual is reasonably associated with, affiliated with, or connected to COSH; or
    - vi. any other matters in respect of which it is reasonably necessary for COSH 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 COSH Pastoral Care Ministry, which include without limitation the following carried out by members of the Pastoral Care Ministry:
    - i. Addressing an individual at COSH events or activities to welcome that individual;
    - ii. Communicating with an individual in the manner described at sub-paragraph (b) of this paragraph;
    - iii. 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.;
    - iv. Meeting with the individual, including to have a meal with the individual, for counselling, to communicate personal experiences and to provide spiritual support; and
    - v. Conducting ceremonies, for example house blessings, weddings, and funerals;  
or
  - h. Any other purposes of which COSH may notify individuals from time to time.
- b) Subject to the provisions of the PDPA or this Policy, COSH may disclose personal data to persons or entities which may include the following:
- a. COSH staff, co-workers and volunteers;
  - b. Agents, contractors or third-party service providers who provide services to COSH, for example website maintenance, courier, printing, accommodation, transport, security, training etc.;
  - c. Providers of professional services, including audit and legal services;
  - d. Government authorities and law enforcement agencies; or
  - e. Any other person or entity to whom an individual has provided consent to COSH for disclosure of his or her personal data.



## 4.2 Data Collection & Consent

- a) Where an individual submits his or her personal data to COSH and has been made aware of the purposes stated in Part 4.1 above, the individual is deemed to have agreed to and consented to the collection, use and disclosure of his or her personal data by COSH for those purposes.
- b) If COSH intends to collect, use, or disclose personal data in a manner different to that set out in paragraph Part 4.2d below or for a purpose other than those stated in Part 4.1 above, COSH is to obtain fresh consent, whether in writing or otherwise, from the individual for the additional manner or purpose.
- c) COSH is to only collect personal data that is reasonably necessary to fulfil the purposes for which the personal data is collected.
- d) 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 COSH may collect personal data include, but are not limited to:
  - a. Where application form(s) (Hardcopy and Electronic Form designed using Google Form or any other means of online form) submitted by an individual to COSH, such as membership application forms or other forms relevant to events and activities organised or managed by COSH;
  - b. Where an individual contacts staff or representatives of COSH to make enquiries or in relation to pastoral care, whether such contact is by fax, post, email, voice calls, or otherwise;
  - c. Via verbal through telephone or face to face;
  - d. Via messaging platform through electronic devices such as voice calls, SMS, WhatsApp, Telegram, WeChat, etc;
  - e. Via contract tracing methods;
  - f. 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 COSH;
  - g. Where an individual makes a donation to COSH;
  - h. Where an individual makes a request to COSH to contact that individual for any purpose;
  - i. Where an individual submits that individual's personal data for the purpose of employment;
  - j. Where an individual submits that individual's personal data for the purpose of volunteering as a co-worker at COSH's events, activities, programs or courses.

**Note:** In event where an individual is not able to give the consent, Church of Singapore (Harvest) may not be able to fulfil or deliver the intended services to the individual. In such scenario, Church of Singapore (Harvest) shall not be held responsible for the undelivered services to the individual.

- e) Personal data collected before 2 July 2014:
  - a. COSH is not required to obtain consent for the collection of personal data before 2 July 2014.
  - b. If an individual does not want COSH to retain his or her personal data collected before 2 July 2014, the individual must give reasonable notice to COSH to withdraw his or her consent to COSH's retention of that personal data. Upon receiving such reasonable notice, COSH is to cease to retain that individual's personal data (except where such retention is required or authorised by law). COSH is to inform the individual of any likely legal consequences of withdrawing his or her consent.
- f) Personal data collected after 2 July 2014
  - a. After 2 July 2014, COSH is to obtain the consent of an individual before collecting personal data about that individual. This includes the collection of additional personal data about an individual whom COSH has collected personal data before 2 July 2014.
  - b. Where one of the exceptions in the PDPA applies, consent is not required for the collection of personal data.

### 4.3 National Registration Identification Card (NRIC) Policy

In compliance to the Advisory Guidelines on the Personal Data Protection Act for NRIC and other National Identification Numbers published on 31 August 2018, Church of Singapore (Harvest) generally is not allowed to collect, use or disclose the NRIC number or photocopy the NRIC of an individual.

NRIC will only be collected if it is required by:

- i) the law or the authorities of the Government.
- ii) Church of Singapore (Harvest) to accurately establish or verify the identity of an individual to a high degree of fidelity.

Hence, we will continue to collect and use NRIC for the following purposes:

- a) church membership and baptism
- b) holy matrimony form
- c) primary school registration
- d) activities which involve travelling out of Singapore, hence the need for passport details and purchase of travel insurance and other logistics arrangement
- e) member care and needy fund application
- f) Children Ministry – Students Registration & Teacher Application

If there is a need to collect NRIC number which does not fall under the above list, the approval from the DPO must be sought.

## 4.4 Data Usage

- a) COSH may use personal data collected before 2 July 2014 for the purposes for which the personal data was collected, whether such use occurs before or after 2 July 2014.
- b) COSH is to obtain consent to use personal data that has been collected after 2 July 2014.
- c) Where an individual withdraws his or her consent in accordance with paragraph 4.13d of this Policy, COSH must cease to use that individual's personal data within 2 weeks, whether that personal data was collected before or after 2 July 2014.
- d) Where one of the exceptions in the PDPA applies, consent is not required for the use of personal data, whether the personal data was collected before or after 2 July 2014.
- e) COSH is to obtain the consent of an individual to use personal data for a purpose other than the purposes for which the personal data was first collected, whether such use occurs before or after 2<sup>nd</sup> July 2014.

## 4.5 Deemed Consent

Church of Singapore (Harvest) hereby deems an individual's consent was obtained for personal data collected **prior** to 2<sup>nd</sup> July 2014 for the purpose of which the personal data was collected.

## 4.6 Data Access

- a) On request by an individual, COSH is to provide the individual with personal data about that individual that is in its possession or control, and information about the way COSH or another organisation may have used or disclosed that personal data within 1 year before the date of request, unless the exceptions in the PDPA apply. If COSH has supplied such personal data to third parties, COSH shall endeavour to be as specific as possible about how it has used or disclosed that personal data.
- b) COSH is to respond to an individual's request within a reasonable time and at minimal cost to the individual. The requested information shall be made available in a generally understandable form. For example, any abbreviations or codes used to record information should be explained to the individual.
- c) COSH is not required to provide the individual's personal data or other information where such provision could reasonably be expected to:
  - a. threaten the safety or physical or mental health of the individual making the request or another individual;
  - b. reveal personal data about another individual; or
  - c. be contrary to the national interest.

## 4.7 Consent Withdrawal

An individual may withdraw their consent to the use and disclosure of their personal data at any time.

The withdrawal request shall be done through formal writing to the DPO. DPO will comply with the withdrawal request unless such personal data is necessary for Church of Singapore (Harvest) to fulfill its legal obligations.

Prior to granting the withdrawal request, the DPO will explicitly inform the individual that:

- i) The withdrawal will affect the services and arrangements between the individual and Church of Singapore (Harvest).
- ii) That Church of Singapore (Harvest) will not be held responsible for any undelivered services or arrangement required

## 4.8 Accuracy Obligation

- a) COSH shall make every reasonable effort to ensure that individuals' information is accurate and updated. However, we also rely on the diligence of the individual to notify our staff on any changes to their personal data. Where amendment is necessary, COSH should amend the personal data as required through the correction, deletion, or addition of personal data. Where appropriate, the amended personal data shall be transmitted to third parties having access to the personal data in question.
- b) COSH is to ensure that any routine updating of personal data to be carried out must be reasonably necessary to fulfil the purposes for which the information was collected.
- c) COSH is to ensure that personal data that is used on an ongoing basis, including personal data that is disclosed to third parties, is reasonably and generally accurate.
- d) An individual may make a request to COSH under paragraph 4.13d to correct an error or omission in the personal data about that individual that is in COSH's possession or control.

## 4.9 Storage, Protection and Retention of Data

a) COSH will store and retain personal data as it is required for identification of the individual and to provide services to the individual as long as it is necessary to fulfil the purpose(s) for which the data is collected.

b) Paragraph (a) will be exempted when the conditions below are fulfilled: -

i) A church member who has left the church, data will only be retained for 5 years.

ii) A deceased church member, data will only be retained for 2 years.

iii) All data will be deleted once it has fulfilled para (i) and (ii) except for name and church membership number of the member.

COSH is to ensure that any personal data that is no longer serving the purpose(s) for which it is collected, or not necessary for any legal or business purpose, is removed or made anonymous.

c) The personal data is stored in a central database which can only be accessed by the staff of COSH. Some of the protection measures taken to secure the personal data include:

i. Marking "Confidential" on documents with personal records clearly and prominently

ii. Storing hardcopies of documents with personal records in file cabinet with locks

iii. Storing electronic personal data in a data server which can only be accessed by staff only

iv. Storing archived records offsite

v. Secured network infrastructure (i.e. password-protected, firewall, server room access limited to IT Personnel only)

vi. Personal computers and other computing devices that may access to personal data are password protected. Passwords are managed in accordance with industry best practices

vii. Files that contain sensitive or confidential personal data are secured and only made available to staff with authorized access

viii. Ensure that IT service providers' services comply with security standards in line with industry practices.

d) COSH is to take reasonable steps to protect personal data in its possession or control by making reasonable arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal, or similar risks related to personal data in its possession or control.

e) COSH may implement protection measures, for example:

i. physical measures such as locked filing cabinets and restriction of access to offices;

ii. restriction of personnel access to personal data, for example, security clearance and limiting of access to a "need-to-know" basis; and

- iii. technological measures such as the password protection and encryption of information stored in an electronic medium.
  
- f) Where in COSH's sole opinion, certain personal data is of a more sensitive nature, that personal data is to be under a higher standard of protection. Where personal data is disclosed to third parties, COSH is to use her best endeavours to ensure that those third parties provide a comparable standard of protection to that personal data. Nothing in this Policy shall operate to make COSH liable for any loss, destruction, unauthorised access, unauthorised use, misuse, or other wrongful handling of the personal data caused by an act or omission of the third parties. No indemnity is provided by COSH to third parties for any wrongful acts or omissions of those third parties.
  
- g) COSH is to ensure that all employees and volunteers are aware of the importance of protecting the confidentiality of personal data.
  
- h) COSH is to ensure that care is taken when personal data is to be disposed of or destroyed to prevent unauthorised parties from gaining access to that personal data.

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

#### **4.10 Data Disclosure and Transfer**

On a need basis, Church of Singapore (Harvest) is required to disclose individual's personal data for specified intended purposes to the following identified parties:

- a) Internal Parties (including Church of Singapore (Harvest) pastors, staff, COSH members, appointed Lay persons, Ministry volunteers & personnel as authorized by DPO)
  
- b) External Parties
  - i. 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
  
  - ii. Banks and financial institutions;
  
  - iii. 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;
  
  - iv. Charity organizations
  
- c) COSH may disclose personal data collected before 2 July 2014 for the purposes for which that personal data was collected, whether such disclosure occurs before or after 2 July 2014.

- d) COSH is to obtain consent to disclose personal data that has been collected after 2 July 2014.
- e) Where an individual withdraws his or her consent in accordance with paragraph 4.13d of this Policy, COSH must cease to disclose that individual's personal data within a reasonable time, whether that personal data was collected before or after 2 July 2014.
- f) Where one of the exceptions in the PDPA applies, consent is not required for the disclosure of personal data, whether the personal data was collected before or after 2 July 2014.
- g) COSH is to obtain the consent of an individual to disclose personal data for a purpose other than the purposes for which the personal data was first collected, whether such disclosure occurs before or after 2 July 2014.

Church of Singapore (Harvest) will transfer personal data to a country or territory outside Singapore on need basis for mission purposes. The transfer shall be done in compliance with this policy.

#### **4.11 Personal data of deceased individuals**

Part 4.8 and 4.9 of this Policy shall apply in respect of personal data about deceased individuals.

#### **4.12 Update of Personal data**

COSH is committed to maintaining the personal data of the church members with accuracy. We maintain the personal data via different sources:

- a) By staff through events organized by/in the Church. The events include birth announcement, home blessings, death notifications, hospitalization, home bound visitations, marriage solemnization, church trainings or events registration form and any other activities organized by the Church
- b) Membership Particular Update Form which is distributed to the members annually prompting the individual to provide updates to an individual's personal data
- c) Online Update via our corporate website
- d) Via Info Counter where the individual will write down in a logbook the changes of his / her particulars

The changes are then updated into the database by the staff authorized by the DPO.

## 4.13 Requests / Complaints process

- a) An individual may withdraw his or her consent to the collection, use or disclosure of his or her personal data by giving reasonable notice to COSH to do so.
- b) An individual who does not wish for COSH to retain his or her personal data may give reasonable notice to COSH to withdraw his or her consent to the retention of his or her personal data. COSH is to inform the individual of any likely legal consequences of withdrawing his or her consent. COSH must cease to retain personal data about the person within a reasonable time unless there are circumstances under which retention does not require the individual's consent.
- c) Where an individual withdraws his or her consent for COSH to collect, use or disclose his or her personal data, COSH may be prevented from responding to a request of that individual or to perform the purposes set out in Part IV above, in particular the purposes relating to the Pastoral Care Ministry.
- d) An individual who wishes to make a request, or to lodge a complaint to COSH pertaining to any failure to comply with the provisions of the PDPA, may make the request or lodge the complaint by doing either of the following:
  - a. visiting the Church Office and filling in a Requests/Complaints form;
  - b. contacting the DPO, whose business contact information is available at <https://harvest100.wixsite.com/cosh> and at the Church Office; or
  - c. in writing by post sent to the Church Office.
- e) The DPO is to investigate the complaint within a reasonable time of receiving the request or complaint and is to contact the complainant within a reasonable time, in order to address any concerns relating to compliance with the PDPA.
- f) Where individuals inquire about lodging complaints, the DPO is to give individuals information on the procedure referred to in paragraph Part 4.13d of this Policy.
- g) Where necessary, the DPO shall take appropriate measures which may include amendment of this Policy.



## 5. CCTV, Video Recording and Photography

Church of Singapore (Harvest) captures church events in the form of video or photograph. We are committed to protect the personal data in these forms through the following measures:

- a) Notices are put up at the church entrance located at Part 2g and appropriate places to clearly state the use and purpose of CCTV video surveillance.
- b) Notices are put up to inform all who are in our premises that photographs, and videos will be taken for corporate communication, publicity, ministry use & other purposes as appropriate.
- c) The access to CCTV Video Surveillance, photographs and videos are only by authorized personnel.
- d) The photographs and videos will be retained in a central repository which can be accessed by Church of Singapore (Harvest) staff only.