



1 INTRODUCTION

- 1.1 Charis Methodist Church (“CMC”) is committed to complying with the Personal Data Protection Act (“PDPA”) in the collection, use and disclosure of personal data which is in its possession or will come into its possession.
- 1.2 Personal data means data about an individual who can be identified either from that data and or from other information to which CMC has or is likely to have access. Personal data includes, but is not limited to the following:
- a) Name;
 - b) NRIC/FIN/Passport number;
 - c) Address;
 - d) Date of birth;
 - e) Gender;
 - f) Marital status;
 - g) Contact information, for example telephone numbers and email addresses;
 - h) Name of employer, job title/position held and employment history;
 - i) Qualification and educational records;
 - j) Medical and insurance records;
 - k) Financial information such as bank account or credit/debit card numbers;
 - l) Signature;
 - m) Photograph;
 - n) Video;

whether in electronic or hardcopy form.

- 1.3 CMC recognizes both the rights of individuals to protect their personal data and the needs of the organisation to collect, use and disclose personal data for purposes that a reasonable person would consider appropriate in the circumstances.

2 SCOPE

- 2.1 This Data Protection Policy (“Policy”) forms the policies and practices adopted by CMC in the collection, use and disclosure of personal data which is in its possession or which may come into its possession.

3 DATA PROTECTION OFFICER

- 3.1 CMC has appointed the Church Manager to be the Data Protection Officer (“DPO”) who will be responsible for ensuring CMC’s compliance with the PDPA.



- 3.2 The DPO may delegate his/her roles and responsibilities to others. A reference in this Policy to the DPO shall include the delegates of the DPO, where applicable.
- 3.3 All persons, whether employees, church members or volunteers, who collect, process, or use personal information on behalf of CMC shall be accountable to the DPO.
- 3.4 The DPO is responsible for ensuring that CMC complies with the Personal Data Protection Act in the collection, use and disclosure of personal data which is in or which will come into CMC's possession.
- 3.5 The DPO will ensure that CMC is open about the Policy regarding the management of personal information. This document shall be made available upon request in accordance with clause 4 below.
- 3.6 The DPO will ensure that the following information is made available at the Church Office upon request by any person:
 - a) Procedure for an individual to request access to personal data about that individual which is in CMC's possession or control;
 - b) Procedure to limit or withdraw consent;
 - c) Procedure to lodge a complaint to CMC.

4 POLICY TO BE MADE AVAILABLE

- 4.1 This document shall be made available upon request. This document may be found at CMC's website at www.charismc.org.sg or at CMC's office located at 91 Koon Seng Road, Singapore 427032 (the "Church Office").
- 4.2 This document may be amended from time to time as and when CMC in its absolute discretion deems necessary or appropriate.

5 PURPOSES FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

- 5.1 CMC 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 programs;
 - b) Administration and management of CMC's operations, functions or other internal matters as the case may be including record keeping;
 - c) To communicate with an individual in respect of:



- i. Any of the matters described in this clause;
- ii. The individual's membership with CMC;
- 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 CMC;
- vi. Any other purposes of which CMC may notify individuals from time to time;

whereby such communication may take the form of voice calls, SMS, messages receivable on a mobile phone or smart device (e.g. WhatsApp, Messenger, Facebook Chat, Tango, Line, WeChat, Skype, etc.), email, online contact form, fax or post;

- d) Providing services to one or more individuals, a community or the general public;
- e) Internal and external communications and publications;
- f) For the purposes of providing Pastoral Care and Ministry of CMC members or other individuals (see Clause 5.2);

5.2 For the purposes of this Policy, Pastoral Care and Ministry shall refer to, in general and without limitation, the offering of emotional and spiritual support and guidance by CMC co-workers (whether employees, church members or volunteers). Pastoral Care and Ministry may include any of the following:

- a) Addressing an individual at CMC events or activities to welcome or follow up with that individual;
- b) Providing care and concern for the well-being of individuals, including visitations at an address provided by an individual, such as the individual's home, place of work, hospital or dormitory, etc.;
- c) Counselling;
- d) Maintenance of personal relationships, including sharing of personal experience;
- e) Mentoring;
- f) Performing ceremonies (house blessings, weddings, funerals, etc.);
- g) Providing Christian education;
- h) Facilitation of individuals' spiritual growth and practice of our faith;
- i) Social concern and outreach;
- j) Evangelism and witness;
- k) Missions;
- l) Discipleship and nurture;
- m) Age-group ministries including Sunday Schools, Youth, Young Adults and Seniors.

5.3 The Pastoral Care and Ministry co-workers (whether employees, church members or volunteers) of CMC will respect the privacy and confidentiality of individuals.

5.4 Subject to the provisions of the PDPA or this Policy, CMC may disclose personal data to persons or entities which may include the following:



- a) CMC staff, co-workers and volunteers;
- b) Agents, contractors or third-party service providers who provide services to CMC, for example, IT and website maintenance, courier, printing, accommodation, transport, security, training, catering, etc.;
- c) Providers of professional services, including auditing and legal services;
- d) Affiliated bodies, including The Methodist Church in Singapore and the Chinese Annual Conference;
- e) CMC's oversight committees, including Local Conference Executive Committee, Pastor-Parish Relations and Staff Committee, Finance and Administration Committee and Nominations Committee;
- f) Government authorities and law enforcement agencies;
- g) Any other person or entity to whom an individual has provided consent to disclosure of his or her personal data.

6 CONSENT

- 6.1 Where an individual submits his or her personal data to CMC, the individual is deemed to have agreed to and consented to the collection, use and disclosure of his or her personal data by CMC for the purposes stated in Clause 5 above.
- 6.2 If CMC intends to collect, use or disclose personal data in a manner different to that set out in Clause 7.2 or for a purpose other than those stated in Clause 5 above, CMC will obtain fresh consent, whether in writing or otherwise, from the individual for the additional manner or purpose.

7 COLLECTION OF PERSONAL DATA

- 7.1 CMC will only collect personal data that is reasonably necessary to fulfil the purposes for which the personal data is collected.
- 7.2 Personal data will 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 CMC may collect personal data include, but are not limited to:
 - a) Application form(s) submitted by an individual to CMC, such as event registration forms, membership application forms or other forms relevant to events and activities organized or managed by CMC (see Clause 7.3);
 - b) Where an individual contacts staff or representatives of CMC to make enquiries or in relation to Pastoral Care and Ministry programs and activities, whether such contact is by email, voice calls, SMS, smart devices, or otherwise;
 - c) Where an individual attends at the Church Office for the purpose of making enquiries or to make requests relating to Pastoral Care and Ministry events, activities, courses or programs organized, conducted or managed by CMC;



- d) Where an individual makes a donation to CMC;
 - e) Where an individual submits that individual's personal data to request for a letter for priority primary school registration at a Ministry of Education school;
 - f) Where an individual submits that individual's personal data for the booking of church premises (such as for weddings);
 - g) Where an individual submits that individual's personal data for the purpose of employment;
 - h) Where an individual submits that individual's personal data for the church to prepare letters of reference or support as requested by that individual;
 - i) Where an individual submits that individual's personal data for the purpose of volunteering as a volunteer or co-worker at CMC's events, activities, programs or courses;
 - j) Where an individual makes a request to CMC to contact that individual for any purpose.
- 7.3 A clause or separate notice (or facsimile) shall be included or attached to the application form(s) to clearly state and seek the consent for the collection, use and disclosure of his or her personal data (see Appendix A).
- 7.4 Written parental or guardian consent will be required for the collection of personal data of persons (below the age of 16) or those with certified medical or mental conditions.
- 7.5 For personal data collected before 2 July 2014:
- a) CMC is not required to obtain consent for the collection of personal data before 2 July 2014.
 - b) If an individual does not want CMC to retain his or her personal data collected before 2 July 2014, the individual must give notice to CMC to withdraw his or her consent to CMC's retention of that personal data. Upon receiving such notice, CMC will cease to retain that individual's personal data within two weeks after receipt of the notice (unless stated otherwise), except where such retention is required or authorized by law. CMC will inform the individual of any likely legal consequences of withdrawing his or her consent.
- 7.6 Personal data collected after 2 July 2014:
- a) After 2 July 2014, CMC 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 CMC 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.



8 USE OF PERSONAL DATA

- 8.1 CMC 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.
- 8.2 CMC will obtain consent to use personal data that has been collected after 2 July 2014.
- 8.3 Where an individual withdraws or limits his or her consent in accordance with Clause 14.4 of this Policy, CMC will cease to use, or limit the use of, that individual's personal data within two weeks (unless stated otherwise), whether that personal data was collected before or after 2 July 2014.
- 8.4 CMC will 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 July 2014.
- 8.5 Consent is not required for the use of personal data for the following exceptions:
 - a) In an emergency situation;
 - b) For investigation purpose;
 - c) Where information is available publicly;
 - d) When information is required for evaluative purposes.

9 DISCLOSURE OF PERSONAL DATA

- 9.1 CMC 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.
- 9.2 CMC will obtain consent to disclose personal data that has been collected after 2 July 2014.
- 9.3 Where an individual withdraws or limits his or her consent in accordance with Clause 15.4 of this Policy, CMC will cease to disclose, or limit the disclosure of, that individual's personal data within two weeks (unless stated otherwise), whether that personal data was collected before or after 2 July 2014.
- 9.4 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.
- 9.5 CMC will 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.



10 PERSONAL DATA OF DECEASED INDIVIDUALS

10.1 Clauses 9 and 13 of this Policy shall apply in respect of personal data about deceased individuals.

11 RETENTION OF PERSONAL DATA

11.1 CMC shall retain personal data of individuals as long as it is necessary to fulfil the purpose for which the data is collected and for such other use as to be part and parcel of CMC Pastoral Care and Ministry. As a guide:

- a) We will retain and maintain personal data records for the purpose of engagement, operational planning of activities, as well as communication of events, programs and church-related information.
- b) We will retain members' personal data (baptism, membership, marriage and death data) indefinitely for record purposes.
- c) Other records will be kept at least 7 years (for financial records) or 10 years (for legal records).

11.2 CMC will ensure that any personal data that is no longer serving the purpose(s) for which it is collected, or that is no longer necessary to be retained for the purposes of the CMC Pastoral Care and Ministry, or for any legal or business purpose, is removed or made anonymous.

12 ACCESS TO PERSONAL DATA

12.1 On request by an individual, CMC will provide the individual with personal data about that individual that is in its possession, and information about the way CMC or another organisation may have used or disclosed that personal data within one year before the date of request, unless the exceptions in the PDPA apply. If CMC has supplied such personal data to third parties, CMC shall endeavour to be as specific as possible about how it has used or disclosed that personal data.

12.2 Due verification will be carried out for all requests received, whether verbally or in writing, before use or disclosure of personal data can be made. Methods for verification include the following:

- a) Full name as in NRIC/FIN;
- b) NRIC/FIN number;
- c) Full address;
- d) Contact number(s);
- e) Email address.



- 12.3 CMC will 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.
- 12.4 CMC is not obliged 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 (such as for commercial interest, etc.);
 - c) Be contrary to the national interest.

13 PROTECTION OF PERSONAL DATA

- 13.1 CMC will take reasonable steps to protect personal data in its possession or control by making reasonable arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks related to personal data in its possession or control.
- 13.2 CMC will implement protection measures, as necessary, including but not limited to:
- a) Restriction of access to offices, for example, door lock and biometric (digital) lock;
 - b) Physical measures such as locked filing cabinets and drawers;
 - c) Restriction of personnel access to personal data, for example, security clearance, document markings and limiting of access to a "need-to-know" basis;
 - d) Technological measures such as the password protection and encryption of information stored in an electronic medium.
- 13.3 Where personal data is disclosed to third parties, CMC will 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 CMC liable for any loss, destruction, unauthorized access, unauthorized 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 CMC to third parties for any wrongful acts or omissions of those third parties.
- 13.4 CMC will ensure that all employees, co-workers and volunteers are aware of the importance of protecting the confidentiality of personal data.
- 13.5 CMC will ensure that care is taken when personal data is to be disposed of or destroyed to prevent unauthorized parties from gaining access to that personal data.



14 ACCURACY OF PERSONAL DATA

- 14.1 Where personal data is likely to be used by CMC to make a decision that affects an individual or is likely to be disclosed to another organisation, CMC shall take reasonable steps to ensure that the personal data is reasonably accurate when it is collected. Where amendment is necessary, CMC 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.
- 14.2 CMC will ensure that any routine updating of personal data to be carried out will be done within 2 weeks to fulfil the purposes for which the information was collected, unless otherwise stated.
- 14.3 CMC 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.
- 14.4 An individual may make a request to CMC under Clause 15.4 to correct an error or omission in the personal data about that individual that is in CMC's possession or control.

15 REQUESTS AND COMPLAINT PROCESS

- 15.1 An individual may withdraw or limit his or her consent to the collection, use or disclosure of his or her personal data by giving reasonable notice to CMC to do so.
- 15.2 An individual who does not wish for CMC to retain his or her personal data may give reasonable notice to CMC to withdraw or limit his or her consent to the retention of his or her personal data. CMC will inform the individual of any likely legal consequences of withdrawing or limiting his or her consent. CMC will cease to retain personal data about the person within two weeks unless there are circumstances under which retention does not require the individual's consent.
- 15.3 Where an individual withdraws or limits his or her consent for CMC to collect, use or disclose his or her personal data, CMC may be prevented from responding to a request of that individual or to perform the purposes set out in Clause 5 above, in particular the purposes relating to the Pastoral Care and Ministry.
- 15.4 An individual who wishes to make a request, or to lodge a complaint to CMC 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) Contacting the DPO, whose business contact information is available at www.charismc.org.sg and at the Church Office;
- b) In writing by post sent to the Church Office;
- c) In writing by email sent to office@charismc.org.sg.

15.5 The DPO will respond to the individual within 3 working days and investigate the complaint upon receiving the request or complaint. Unless otherwise stated, the DPO will address any concerns relating to compliance with the PDPA and contact the complainant within two weeks of receipt.

15.6 Where necessary, the DPO shall take appropriate measures which may include amendment of this Policy.

APPENDIX A

CHARIS METHODIST CHURCH DATA PROTECTION ACT (PDPA) ACKNOWLEDGEMENT

Privacy Policy and Consent to Use of Personal Data

By interacting with, submitting information on this form / card to or signing up for any organized activity offered by Charis Methodist Church, you agree and consent to Charis Methodist Church collecting, using, disclosing and sharing of your personal data, for the purpose of our pastoral care, church ministry, administration and communication of services, programs, ministries, activities, and any other purpose that it is reasonably related to. Charis Methodist Church respects personal data and privacy, and will not share such information with any third parties unless authorized to do so.

Should you wish to withdraw or limit your consent, please inform our Data Protection Officer at:

Charis Methodist Church
91 Koon Seng Road
Singapore 427032
Tel: 63445750
Email: office@charismc.org.sg