



## AWWA PERSONAL DATA PROTECTION POLICY

The security of your personal data is important to AWWA Ltd (“**AWWA**”, “**we**”, “**us**” or “**our**”) and we are committed to protecting and respecting your privacy. This Personal Data Protection Policy (“**Policy**”) sets out AWWA’s personal data protection policy and the basis which we may collect, use, disclose, process and manage personal data of our existing or prospective personnel, donors, business partners, service users and their authorised representatives in accordance with the Singapore Personal Data Protection Act 2012 (“**PDPA**”) and the Advisory Guidelines for the Social Service Sector by the Personal Data Protection Commission. This Policy 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. AWWA will comply with the relevant requirements under the government’s data management policy.

Please read this Policy carefully to understand our Personal Data Protection Policy. By providing your personal data to us, you are consenting to AWWA’s Personal Data Protection Policy and the collection, usage, disclosure, processing and management of your personal data as described in the Policy.

### **PERSONAL DATA**

#### 1. As used in this Policy:

“Personnel” means volunteers, board and committee members and all employees of AWWA including full-time or part-time employees, permanent or on contract basis, and interns.

“personal data” means data, whether true or not, about an individual 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. Such individuals include, but are not limited to, our existing or prospective Personnel, donors, business partners, service users and their authorised representatives.

“service users” means individuals who use any of the services provided by AWWA and they include, but are not limited to, clients, potential clients and their family members or authorised representatives, any person who participates in AWWA’s organised activities.

## TYPES OF PERSONAL DATA WE COLLECT

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, the following:
  - a. Personal particulars (e.g., name, identification numbers such as NRIC, FIN, work permit and passport numbers, contact information such as residential/ mailing addresses, email addresses, telephone and mobile numbers, nationality, date of birth, details of next of kin, spouse and family members where applicable);
  - b. Specimen signature(s);
  - c. Medical and legal history and records;
  - d. Photographs and other audio-visual information,
  - e. Employment information; and
  - f. Financial information (e.g. bank account information).
  
3. If you are a prospective or existing Personnel, AWWA may also collect additional personal data including, but not limited to, the following:
  - a. Educational information (e.g., Resume, educational qualifications, professional qualifications and certifications and employment references);
  - b. Registration license details such as those issued by Singapore Medical Council, Singapore Dental Council, Allied Health Professions Council and other relevant professional registration bodies;
  - c. Employment details (e.g., occupation, directorships and other positions held, employment history, salary, and/or benefits);
  - d. Personal particulars (e.g., gender, religion, marital status, details of next-of-kin, spouse and other family members); and
  - e. Medical information (e.g., work-related health issues and disabilities).

The exact amount of personal data to be collected will be dependent on AWWA's purposes and needs which may vary from time to time.

4. Other terms used in this Policy shall have the meanings given to them in the PDPA (where the context so permits).

## COLLECTION OF YOUR PERSONAL DATA

5. 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"), or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. In so far as possible, 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). If you provide us with any personal data relating to a third party, by submitting such information to us, you undertake that you



have obtained the consent of such third party to provide us with their personal data for the collection, use and disclosure described in this Policy.

6. Depending on your relationship with AWWA (whether as an existing or prospective Personnel, donor, business partner, service user or service user's authorised representative, etc), we may collect and use your personal data for any or all of the purposes including, but not limited to, the following:
  - a. establishing your relationship with us such as processing and evaluating your application for services;
  - b. performing obligations under or in connection with our provision of services to you or requested by you or your provision of services to us;
  - c. maintaining contact and communicating with you including, but not limited to, providing you with information on our upcoming events or activities and other publicity activities, where you have specifically consented to receive such information;
  - d. responding to, handling and processing queries, requests, applications, complaints and feedback from you;
  - e. 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);
  - f. conducting surveys, research or statistical analysis (e.g., related to your personal circumstances or services you used) in order to help us serve you better;
  - g. managing and processing donations and sponsorships including, but not limited to, your tax deduction claims;
  - h. verifying your identity and the accuracy of your personal details and other information provided;
  - i. performing screening and due diligence checks as may be required under applicable law or regulation;
  - j. performing human resource and recruitment processes including, but not limited to, (1) processing and evaluating your suitability for employment, internship or volunteerism, (2) performing obligations under or in connection with your employment, internship or volunteerism such as payment of remuneration/stipend where applicable, (3) managing and terminating our relationship with a Personnel, (4) all administrative and human resources related matters within our organisation such as administering payroll, granting access to our premises and computer systems, processing leave applications, claims and expenses reimbursements, administering your insurance and other personnel benefits;
  - k. managing our business operations, complying with internal policies and procedures and audit and record keeping purposes;
  - l. internal and external publicity purposes through various mediums, such as printed newsletters, brochures, flyers, posters, banners, electronic publications, websites and social media platforms (including, but not limited to, photographs and audio/video recordings from AWWA events);
  - m. 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;

- n. any other incidental purposes related to or in connection with the above or purposes permitted by applicable law;
- o. any other purposes which AWWA may inform you in writing from time to time, but for which AWWA will seek your separate consent (except where permitted or authorised by law).

#### **DISCLOSURE OF YOUR PERSONAL DATA**

- 7. AWWA is committed to keeping your personal data confidential. However, we may from time to time and in compliance with all applicable laws on data privacy, disclose your personal data to third parties, whether located in Singapore or elsewhere, in order to carry out the purposes set out in clause 6 above. Please be assured that when we disclose your personal data to such parties, we will require that the third party ensure that your personal data are kept confidential and secured at all times and that the third party has privacy policies that provide a standard of protection that is at least comparable to the PDPA.
- 8. Depending on the nature of the engagement, AWWA may disclose your personal data to various parties, including but not limited to the following:
  - a. to third party service providers, agents and other organisations we have engaged to perform any of the purposes listed in clause 6 above;
  - b. when it is necessary for your interest (such as referral for external services or sharing your personal data with other social service agencies in order to improve inter-agency service delivery and coordination);
  - c. to donors and sponsors for evaluating and monitoring funding support;
  - d. when it is necessary to ensure safety and protection of life during times when there is indication and assessment of harm and risk to self or others (such as to dormitory operators, Ministry of Manpower, Ministry of Health, paramedics, medical professionals, clinics/hospitals, etc.);
  - e. to third party service providers, agents, contractors, consultants, auditors or advisers, such as those who provide administrative, marketing and research, training, data processing, auditing, technology and payment services;
  - f. to comply with any applicable laws, regulations, codes of practice, guidelines, rules or requests by public agencies and statutory bodies such as Ministry of Social and Family Development, Ministry of Health and Ministry of Manpower, or to assist in law enforcement and investigations. As a social service agency, AWWA may be required to share relevant data and participate in national and multi-agency efforts relating to the delivery of social services and related initiatives and activities;
  - g. when disclosure is permitted under any of the statutory exemptions under the PDPA; and
  - h. to any other party to whom you authorised us to disclose your personal data to, or where necessary to undertake any action requested by you.

## **WITHDRAWING YOUR CONSENT**

9. 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 to our Data Protection Officer at the contact details provided below.
10. 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. In general, we will endeavour to respond to your request within 10 business days from receipt of the duly completed withdrawal request form.
11. 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 services to you.
12. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

## **ACCURACY OF YOUR PERSONAL DATA**

13. AWWA relies on personal data provided by you (or your authorised representative) to provide services to you. You should ensure that your personal data provided to us is current, complete and accurate at all times.

## **ACCESS TO AND CORRECTION OF YOUR PERSONAL DATA**

14. If you wish to make a request (a) 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) to correct or update any of your personal data which we hold about you, you may submit your request to our Data Protection Officer at the contact details provided below. Please note that an administrative fee may be charged for processing your request, depending on the nature and complexity of the request. We will inform you of any such fee before processing your request.
15. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days after receiving your request. Should we not be able to respond to your request within this time or if we are unable to provide you with any personal data or to make a correction requested by you, we shall inform you accordingly



and will generally provide the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

#### **PROTECTION OF YOUR PERSONAL DATA**

16. AWWA takes your personal data confidentiality seriously and has put in place reasonable measures 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 authentication and access controls, up-to-date antivirus protection, and disclosing personal data both internally and to our authorised third-party service providers and agents only on a need-to-know basis.
17. 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.

#### **RETENTION OF YOUR PERSONAL DATA**

18. AWWA only retains your personal data for as long as it is necessary to fulfil the purpose for which it was collected, for our business and legal purposes, or as required or permitted by applicable laws. In general, we do not retain personal data after the original purposes for which the personal data was collected have ceased to be applicable, unless otherwise required by law or other mandatory directions by court or government authorities or for purposes of legal proceedings or other similar proceedings or investigations. For unsuccessful employment/internship/volunteer applications, AWWA will retain your personal data for no longer than one year for the purposes of evaluating your suitability for future positions, unless you inform us otherwise as per clause 9.

#### **TRANSFERS OF YOUR PERSONAL DATA OUTSIDE OF SINGAPORE**

19. AWWA generally does not transfer your personal data outside of Singapore, unless otherwise required or permitted by law. In the event that your personal data is transferred, stored, processed outside Singapore, 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

20. You may contact our Data Protection Officer at [PDPA\\_DPO@awwa.org.sg](mailto:PDPA_DPO@awwa.org.sg) if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request.

#### EFFECT OF POLICY AND CHANGES TO POLICY

21. This Policy 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.
22. We may revise this Policy from time to time to ensure that this Policy is consistent with any developments in the way AWWA uses your personal data or any changes to the laws and regulations applicable to AWWA. We will make available this Policy on our website together with the date of last update. Please refer to the Policy from time to time for any changes and/or updates. All communications, transactions and dealings with us shall be subject to the latest version of our Policy in force at the time. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

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