



## Personal Data Protection Policy

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Prepared By	Kay Pang (Risk Management Committee)	Security Level		Normal / Restricted / Confidential			

This data protection policy provides information about how AWWA Ltd (“we”, “us”, “our”) collects, manages, uses or discloses personal data while recognising the need to protect personal data and the need to collect, use or disclose it for purposes that are believed to be reasonable and appropriate in the course of providing services to our clients and beneficiaries.

This policy complies with the requirements of the Personal Data Protection Act 2012 and its regulations (“PDPA”) and applies to the personal data collected of all individuals who are our clients, beneficiaries, employees and members of their families, volunteers, donors, participants in our events. In this policy, “personal data” shall have the same meaning ascribed to it in the PDPA.

This data protection policy will apply consistently to those individuals who are not in any of the above categories but about whom we collect, use or disclose personal data in the same way in which it applies to the above. For clients and beneficiaries who are minors or a person who is not legally capable of managing his/her affairs, it shall also include his/her legal guardian.

### 1. Purpose of Collecting, Using or Disclosing Personal Data

We collect personal data from and about our clients and potential clients and their family members, our donors, employees, volunteers and other individuals. We may use or disclose the personal data for purposes such as evaluating the client’s suitability for social services or administering social services to the clients or in any case, to enable us to provide our services efficiently and effectively and comply with our legal obligations.

### 2. Collection, Use and Disclosure of Personal Data

AWWA collects personal data in various ways, including in person to person meetings and interviews, and through information and data collected through completed forms or questionnaires (and documents and/or information provided). We collect, use or disclose personal data only if:

- (i) consent, as provided under the PDPA, is given; or
- (ii) the collection, use or disclosure of the personal data without consent is required or permitted by the PDPA or an exception under the law permits the collection, use or disclosure of personal data without consent.

We will notify each and everyone of the purposes for which personal data may be collected, used and disclosed.

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### 3. CCTV, Video Recording and Photography

CCTV, video footage and photos may constitute personal data. Appropriate notification will be provided to inform about the use and purpose of such personal data. We will take reasonable efforts to ensure the security of such data.

### 4. Disclosure of Personal Data to Third Parties

We do not disclose personal data to third parties except when required by law, when we have consent or deemed consent from the party involved or in cases where we have engaged a third party to provide necessary services to us, such as:

- (i) service providers and data processors working on our behalf and providing services such as hosting and maintenance services, analysis services, email messaging services, delivery services, handling of payment transactions, solvency checks and address checks etc;
- (ii) AWWA consultants and professional advisers (eg accountants, lawyers, auditors),

any such third parties whom we engage will be bound contractually to keep all information confidential.

### 5. Withdrawal of Consent

Any consent given, or deemed to have been given in respect of the collection, use or disclosure of your personal data for any purpose may be withdrawn by writing to our Data Protection Officer at [PDPA\\_DPO@awwa.org.sg](mailto:PDPA_DPO@awwa.org.sg).

Upon being notified of the withdrawal of consent, we will within a reasonable time, cease collecting, using and disclosing your personal data.

Please note that the withdrawal of consent to use or disclosure of any or all of an individual's Personal Data, under certain circumstances may result in AWWA not being able to provide the individual with its services.

### 6. Accuracy of Personal Data

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We will make reasonable efforts to ensure that the personal data that we collect is accurate and complete. To ensure that their personal data is accurate and complete, all individuals should provide AWWA with updates of any changes as soon as possible.

## 7. Access to and Correction of Personal Data

Individuals may, at any time, request for details of their personal data collected by AWWA or request for an update or correction of their personal data.

All requests should be made in writing sent to our Data Protection Officer (“DPO”). We may require the person making the request to provide proof of his or her identity and/or documents or other evidence to support the request.

There are circumstances where we are not required to provide individuals making request for information about themselves maintained by AWWA. These include situations where we are not permitted by the PDPA to disclose the information to you or are allowed to provide you only with limited information. You may refer to the PDPA or contact our Data Protection Officer for more information.

Any correction to personal data will be made as soon as practicably possible, unless there are reasonable grounds for us to believe that the correction should be not made. We will also send the corrected personal data to organisations with which we have shared the original data twelve months prior to the correction being made.

We may charge a fee for providing third parties with access to your personal data and to cover the incremental costs related to the request(s) made by you.

## 8. Protection and Retention of Personal Data

We will take reasonable steps to ensure the security of personal data that is in our possession or under our control and will endeavour to protect it against risks such as loss or unauthorised access, destruction, use, modification or disclosure. Only authorised or relevant personnel will be permitted to have access to personal data of third parties.

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We will cease to retain personal data as soon as it is reasonable to assume that the purpose for which the personal data has been collected is no longer served by its retention and if the retention of such data is no longer required for legal and business purpose.

### 9. Do-Not-Call Provisions

The Do-Not-Call (“DNC”) provisions under the PDPA prohibit organizations from sending marketing messages to Singapore telephone numbers registered with the DNC Registry. The DNC Registry, however, does not cover non-marketing messages sent for other purposes such as surveys, customer-service and other service related notices.

AWWA will ensure that the DNC provisions under the PDPA are complied with if we intend to send marketing messages to Singapore telephone numbers.

### 10. Data Protection Officer

The roles of the DPO include:

- (i) Developing appropriate policies for handling personal data in manual or electronic form for compliance with the PDPA;
- (ii) Communicating AWWA’s personal protection policies and processes to stakeholders;
- (iii) Handling queries and/or complaints about personal data;
- (iv) Liaising with the Personal Data Protection Commission, if necessary.

You may contact the DPO if you have any queries or complaints about your personal data, this Policy or the PDPA at the following:

Email: [PDPA\\_DPO@awwa.org.sg](mailto:PDPA_DPO@awwa.org.sg)

Address: 9 Lorong Napiri, Singapore 547531.

Attention: Data Protection Officer.