

Chapel of Christ the Redeemer - Personal Data Protection Policy

Introduction

1 ***Chapel of Christ the Redeemer*** (“CCR”) recognises the importance of safeguarding

personal data when dealing with information relating to its members, worshippers at its services, attendees of its programs, visitors and staff, and therefore is committed to fully implementing and complying with the provisions of the Personal Data Protection Act (“***PDPA***”). CCR’s Personal Data Protection Policy set out here explains the procedures and systems in place to comply with the PDPA (the “***Policy***”), in respect of personal data as defined under the PDPA.

1.1 ***Definition***

‘Incident’ refers to something that negatively affects the business or information which should be protected.

‘Breach’ is a security incident leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal or business data. A breach can potentially have a number of consequences for individuals, which can result in physical, material, or non-material damage. This can include loss of control over their personal data, limitation of their rights, discrimination, identity theft or fraud, financial loss, unauthorised reversal of pseudonymisation, damage to reputation, and loss of confidentiality of personal data protected by professional secrecy. It can also include any other significant economic or social disadvantage to those individuals.

‘Information Security’ is the preservation of confidentiality, integrity and availability of information. (ISO 27000, Terms and Definitions, 3.28)

“Personal Data” refers to 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 organisation has or is likely to have access. This personal data includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, government-issued identification numbers, financial data etc.

Personal data in Singapore is protected under the Personal Data Protection Act 2012 (PDPA).

Publicly Available Data -The term “publicly available” is defined in section 2(1) of the PDPA and refers to personal data (about an individual) that is generally available to the public, including personal data which can be observed by reasonably expected means at a location or an event at which the individual appears and that is open to the public.

Purposes for the Collection, Use and Disclosure of Personal Data

- 2 CCR receives or collects the personal data of its members, worshippers at its services, attendees of its activities and programs, visitors and staff for purposes reasonably required by it as a place of worship with its attendant activities and programs.
- 3 These purposes include the following, whether within or outside Singapore:
 - a. Operational planning and implementation of activities and programs such as bible teaching, family life ministry, fellowship and discipleship

- b. Communication of activities, programs and other church-related information including church bulletin and other publications
- c. Maintenance of records such as membership, participants of activities and programs, baptism, marriage, birth, death and financial pledges and giving
- d. Management and administration of employment relationships with staff such as work related dealings, evaluation of performance, crediting salaries, administering staff benefit schemes and conducting audits on finance claims
- e. Reporting and sharing of information within the Diocese of Singapore including amongst her parishes in furtherance of her religious objectives
- f. Other purposes as may reasonably be appropriate in the circumstances of the collection of personal data.

Note: CCR may use photographs / videos captured at its services, activities and programs for publicity purposes on its various platforms.

- 4 CCR will not use the personal data for any purpose other than that for which it was collected. Should CCR require any personal data in its possession to be used for a purpose other than those for which consent was originally given, fresh consent will be sought in order to use the data for that new purpose.
- 5 In the course of processing personal data for the above purposes, CCR may disclose such personal data to third parties within or outside Singapore. These third parties include:
 - a. Governmental organisations or authorities to whom CCR is required by law to disclose the data
 - b. Individuals who are legally entitled to the data
 - c. Third parties who require the data in order to process and operate programs in which an individual intends to participate
 - d. Third parties who provide CCR with data processing, administration, health, insurance or legal services, or other professional or management services
 - e. Other persons as may reasonably be appropriate in the circumstances of the collection of personal data.
- 6 Disclosure to third parties outside Singapore shall only be to organisations that are required or undertake to process the data with a comparable level of data protection as required under Singapore law.

Minors below 13

- 7 CCR shall not collect, use or disclose personal data of persons below the age of 13 for any purpose unless written parental or guardian consent has been given for such purpose.

Withdrawal of consent

- 8 Should you wish to withdraw or limit your consent to CCR’s collection, use and disclosure of your personal data for a particular event, please contact the organizer of the said event. If you wish to withdraw or limit your consent for all purposes, please write in with full particulars to our Data Protection Officer (“DPO”) using the contact details provided in paragraph 19 below.

Confidentiality

- 9 Any personal data collected by CCR shall be accessible only by designated parties on a need-to-know basis to serve the purpose for which the data was collected. Such parties shall observe strict confidentiality at all times.
- 10 In the event personal data is disclosed to third parties, such third parties will be assessed with regard to their ability to observe confidentiality at all times and to use the personal data only for the purpose for which it was disclosed to them.

Data Protection Officer

- 11 CCR has designated a DPO to deal with day-to-day data protection matters and complaints, encourage good data handling practices and ensure that CCR complies with the Act and implements the Policy through the following steps:
- a. Conducting briefings and trainings to staff and ministry leaders at least once a year, or more as required
 - b. Review the terms of engagement with third parties such as agents, partners or data intermediaries, if any
 - c. Set clear timelines for the retention period of the various personal data
 - d. Together with the Vicar of CCR, to lead the Incident Response Team to manage any incident of breach relating to PDPA

Accuracy

12 CCR endeavours to take all reasonable steps to ensure that personal data in its possession or under its control is accurate, up-to-date, and complete. If there is any error or omission in the personal data you have provided to CCR, please write in to the DPO with the necessary details for correction of your data. If any personal data you have provided to CCR becomes inaccurate, please contact our DPO to update your data.

Access

13 Should you wish to access any personal data collected by CCR or understand how such data has been used or disclosed, please write in to our DPO with your request. The DPO will provide you with the requested information within a reasonable time, after verification of your identity. Kindly note that CCR reserves the right to charge a reasonable administrative fee of \$20 for responding to any such requests.

Retention

14 CCR will retain personal data for as long as it is necessary to serve the purpose for which it has been collected. Once the data in CCR's possession is no longer necessary to serve the purpose for which it was collected, the data will be destroyed or anonymised in a secure manner. An annual declaration form (see Appendix 1 - Year-End Leadership Declaration) from all relevant leaders will be submitted to DPO, by end of January of each year, to confirm the deletion of all personal data collected that no longer serves its purpose.

Protection

15 CCR endeavours to:

- a. maintain all personal data in its possession or under its control securely. To this effect, CCR has put in place measures to ensure the protection of data in its possession against unauthorised access, collection, use, disclosure, copying, modification, disposal or other risks.
- b. put in place documented procedures (SOP – Standard Operating Procedures), if necessary, relating to handling of personal data, referencing the risk mitigation steps.
- c. provide adequate training for all employees and key ministry leaders handling personal data
- d. all other assets not owned by CCR will be under the responsibility of the asset owner to put in place physical measures to protect the assets from loss or damage.

Transfer

16 CCR shall not transfer any personal data in its possession to any parties outside Singapore except as specified in this Policy. Any outside party to which CCR intends to transfer data in its possession must have protections equivalent to those provided for in the PDPA.

Complaints

17 If an individual feel that his data has been erroneously or improperly handled by CCR, he may lodge a complaint in writing to the DPO. Once a complaint has been received, the DPO will send an acknowledgement and will contact the relevant departments to investigate the complaint. The outcome of the investigation will be communicated by the DPO to the complainant in writing, notifying him of the outcome.

Incident

18. In the event of a suspected/potential incident that may lead to a breach, please contact the Church Office at 6782 6653 or email to <redeemer@ccr-redeemer.org>. CCR will investigate & respond to all incidents reported.

If the matter is deemed urgent, you may contact the personnel provided in Appendix 2 - Emergency contact list.

Enquiries

19. CCR is committed to protecting the privacy and personal data of its members, worshippers at its services, attendees of its programs, visitors and staff. For enquiries about CCR's Policy, please write to the DPO:

Data Protection Officer
Chapel of Christ the Redeemer
2 Tampines Avenue 3
Singapore 529706

Updating the Policy

20. This Policy may be updated from time to time to take account of changes in policy, technology, and/or to ensure compliance with any legislative changes.

Proposed by Jeremiah Chua, Julia Foo and Pauline Low
Updated by Julia Foo
Approved by PCC 14 November 2023
Updated as at 14 November 2023

Appendix 1 - Year-End Leadership Declaration

MINISTRY LEADER ANNUAL PDP DECLARATION

IN COMPLIANCE WITH CCR PERSONAL DATA PROTECTION (PDP) POLICY

**Required*

1. Your Name *

2. Your Ministry *

3. Your Role / Position in the Ministry *

4. Date *

Example: 7 January 2019

5. Declaration

In accordance to the requirements of the CCR Personal Data Protection Policy, I declare, to the best of my knowledge, that all relevant parties in my Ministry have been informed and complied with the following at the end of last year. This is with regard to the personal data I have been entrusted with in the course of carrying out my role in this Ministry.

Tick all that apply.

- Destroyed all hard-copies of documents containing the personal data of anyone involved in our ministry activities that are no longer in use.
- Deleted all soft-copy files of documents that are no longer in use, containing the personal data of anyone involved in our ministry activities from our personal and workplace computers, laptops, notebooks, hard drives, flash drives, phablets, tablets and other electronic storage devices, including virtual storage sites such as Google Drive, Dropbox, and other like cloud storage sites.
- Ensured the termination of all social media groups such as Whatsapp groups created by my ministry to facilitate the administration of the related activities.
- Other: _____

Appendix 2 - Emergency contact list

- Acting DPO – Rev Bernard Yee, mobile no. 9012 1441
- Vicar – Rev Glenn Chan, mobile no. 9423 7080
- Vicar's Warden, email address: vicarswarden@ccr-redeemer.org