

Data Protection Policy

Arc Children's Centre Co Limited

Arc Children's Centre Co Limited ('we', 'us', 'our', etc.) respects the right of individuals to protect their personal data.

1. What we do

We are dedicated to nurturing and enriching the lives of children with cancer or other life-threatening illnesses, in a joyful and healthy environment.

Our care is also extended to the children's families, providing moral support to the parents as their child undergoes treatment. Working closely with the children's healthcare team, Arc strives to be part of the circle of care for every child in need. Each day is meaningful at Arc, because every child makes it all worthwhile.

We are committed to protecting yours and your family's personal information when you are using our services. We want our services to be safe and want to have an enjoyable environment for our users. This Privacy Policy relates to our use of any personal information we collect from you. By making our policies public, we would have fulfilled our Openness obligation to some extent as prescribed by the PDPA 2012.

This data protection policy gives you information about how we collect, use and disclose personal data about you while recognising both your right to protect personal data about you and our need to collect, use or disclose it for purposes that we believe are reasonable and appropriate in the circumstances of our charitable work.

It applies to the personal data we collect of all individuals ('you', 'your', etc.) who are our clients, donors, employees, including volunteers, and online users of our website at <http://www.arcchildren.org/>.

2. Why we collect personal data

We collect personal data from and about our clients and our potential clients and from our donors, employees and other individuals. Collection may also include videography, photography and voice recordings at Arc's events (indoor or out). We use and/or disclose that personal data so that we are able to operate the Centre for our clients and provide our related services to them and their families meaningfully, efficiently and effectively.

To share our joy of love and tender care to our little darlings, we also post (with consent) pictures and stories of our children's journey of hope on our Facebook pages as they face each new day with renewed courage and enthusiasm with other kindred children at Arc Children's Centre. Precious moments posted can also serve as a source of inspiration to those who have overcome similar afflictions. And as they look back and remember the kindness they experienced during their challenging moments in life, this memory will hopefully, cause them to pay-forward the same kindness to those now in need by volunteering their time, perhaps, at Arc.

3. When and how we collect personal information

If your child is a potential client, we collect personal data about you and your child initially when we get a referral from your doctor (with consent). We usually collect more personal data about you, and information about your family, when we meet parent(s)/guardian to assess your application for admission into the Arc. If you are not a client or potential client, where possible, we collect personal data directly from you. We do this in various ways, including in-person meetings and using relevant forms.

If at any time you would prefer not to provide any personal data that we request, please let us know. We will then explain our purpose for collecting that personal data. If you still do not wish to provide it we will discuss with you whether or not we can provide you with our services without it.

We collect, use, or disclose personal data about you only if:

- you give, or are deemed to have given, your consent under the Personal Data Protection Act (PDPA) to us collecting, using or disclosing that personal data, or
- collection, use or disclosure by us of that personal data without your consent is necessary or authorised under the PDPA or any other written law;
- you email us or send us an application form via an email. (More info on our website/Facebook policy is available [here](#).)

Where we ask you to consent to us collecting, using or disclosing personal data about you we will first give notice of our purpose for doing so. We will not use or disclose personal data about you for any other purposes without first informing you of the additional purpose/s and getting your consent to do so for the additional purpose/s.

In some circumstances, you are deemed to have consented to us the collecting, using or disclosing personal data about you for a purpose. For example, if you pose for a photograph by our photographer at one of our events or if you fill up a form and send it to us, you are deemed to have consented to us collecting, using or disclosing the personal data about you that is in the photograph (that is, your image).

We may collect personal data about you from another individual or organisation (eg a doctor or clinic) but only if consent had been given by you to that other individual or organisation to disclose your personal information for specified purposes of which we are in a position to provide.

4. When use or disclosure of your personal information can be done without prior consent

We are permitted by the PDPA to collect, use or disclose personal data about you without your consent in various circumstances that include the following:

- if it is publicly available (for example, if it is on FaceBook) or if it is business contact information
- if there is an emergency
- if we do so for evaluative purposes (such as assessing a job or volunteering application)
- where the disclosure is related to law enforcement or where the collection, use or disclosure is in connection with certain legal issues

If you would like more information about the circumstances under which we may collect, use or disclose personal data without your consent, please contact our Data Protection Officer.

5. Withdrawing your consent

On giving us reasonable notice, you may at any time withdraw consent you have given, or are deemed to have given to us collecting, using or disclosing personal data about you for any stated purpose/s. Notice of withdrawal of consent should be given in writing (which can include email) sent to our Data Protection Officer.

The consequences of you withdrawing consent to us collecting, using or disclosing personal data about you for any purpose may be onerous on you. Therefore:

- we may require you to provide proof of your identity and
- we will inform you in writing (which may be by email) of the likely consequences of withdrawing your consent for any specified purpose/s.

If you still wish to withdraw your consent thereof, we will act on your interest and cease retaining, using or disclosing your personal data, unless doing so without your consent is permitted or authorised under the PDPA or other written law. We will also cause any and all of our data intermediaries to cease retaining, using or disclosing the personal data.

In addition, we will cease to retain documents containing that personal data, or remove the means by which it can be associated with you (anonymization), as soon as it is reasonable for us to assume that retention is no longer necessary for any legal or business purpose.

6. Access to personal data and information about use

On (written) request by you, we will, as soon as reasonably possible, provide you with information on:

- personal data about you that is in our possession or under our control and
- the way in-which we have, or may have, used or disclosed that personal data within a year before the date of your request.

Your request to us should be made in writing (which includes email) sent to our Data Protection Officer. We may require you to provide proof of your identity.

Whilst the Act allows a levy to be charged for the time and manpower mobilised to provide you with the information you have requested, our policy is we will not be using this allowance unless the work involved is complex and time-consuming. In any case, the amount to be levied will not be excessive or unreasonable.

There are some circumstances where we are not required to provide you with any information and others, where we are not allowed by the PDPA to do so. In some circumstances we may be able to provide you with limited information. You may obtain information about all of these circumstances from our Data Protection Officer.

7. Correction of errors in, or omissions from, personal data about you

You may request us to correct error or omission in the personal data about you that we hold or that is under our control. Your request to us should be made in writing (on a prescribed form or an email) sent to our Data Protection Officer. We may require you to provide proof of your identity and/or documents or other evidence supporting your request.

There are some circumstances where we need not make a correction and other circumstances where we are not required to act on such a request (as given in the Act's schedules). You may obtain information about these circumstances from our Data Protection Officer.

Unless we are satisfied on reasonable grounds that a correction should not be made, we will correct the personal data as soon as practicable. We will also send the corrected personal data to every other organisation to which we have disclosed within a year before the date we made the correction (unless that other organisation does not need the corrected personal data for any legal or business purpose). Alternatively, with your consent, we will send the corrected personal data only to specific organisations as agreed with you.

Another organisation that has disclosed your personal data to us might notify us that it has corrected it. If this happens, unless we are satisfied on reasonable grounds that we should not make the correction, we will correct your personal data that is in our possession or under our control.

8. Please be sure to provide us your information accurately

We make reasonable efforts to ensure that the personal data that we collect about you, as well as any personal data that is collected by someone else on our behalf, is accurate and complete where either:

- we are likely to use it to make a decision that affects you or
- we are likely to disclose it to another organisation

It is also your responsibility to ensure the accuracy of information when filling in our forms for admission, donation or when making any queries with Arc.

9. Protection of personal data

We take reasonable steps to ensure the security of personal data in our possession or under our control and to protect it against risks such as loss or unauthorised access, destruction, use, modification or disclosure. Only authorised personnel are permitted to have access to personal data about you.

We also ensure (with a signed agreement) our vendors and data intermediaries who may be collecting and/or processing personal data for us adopt policies and processes that meet the requirements of their compliance to the PDPA.

10. Retention of personal data

We will cease to retain documents (hard & soft copies) containing personal data about you, or we remove the means by which it can be associated with you (anonymize), as soon as it is reasonable to determine that the purpose for which we collected that personal data is no longer being served by its retention and retention is no longer necessary for legal or business purposes.

11. Complaint procedure

We strive for excellence in providing our services to our clients and in all our interactions with donors, and with our employees (which includes volunteers), as well as with the community generally. This includes our compliance with the PDPA.

Please direct any queries or complaints you have about the way in which we collect, use or disclose personal data about you to our Data Protection Officer. Generally, we will NOT entertain any anonymous complaints for obvious reasons. If you raise a complaint anonymously we will nevertheless note the matter raised and, if possible, try and investigate and resolve it appropriately.

Whenever you make a complaint our Data Protection Officer will seek to obtain sufficient information from you to enable us to investigate it. Please be prepared to provide our Data Protection Officer with information as to, for example:

- the type of action, or lack of action, by us that has given rise to your concern;
- whether it was an isolated incident or an ongoing one and, in the case of an isolated incident, when it occurred;
- a copy of any relevant correspondence you hold and;
- details about what you consider should have happened or should not have happened

Immediately upon receiving a complaint our Data Protection Officer must investigate it and within two weeks, advise you of:

- the outcome of the complaint and the reasons for that outcome or;
- write to you (which may be by email) advising you that the Data Protection Officer needs more time to investigate the complaint and stating when the Data Protection Officer expects to have an outcome on the complaint for you.

If a complaint is settled to your complete satisfaction, our Data Protection Officer is not required to advise you in writing of the outcome of the complaint, unless you request a written response (which may be by email).

If a complaint is not settled to your complete satisfaction, our Data Protection Officer will advise you of the outcome of the complaint and the reason(s) for that outcome in writing (which may be by email). If you are not satisfied with the outcome, you may consider escalating your concern to higher management or the Authority.

12. **Do we Transfer Data to entities outside Singapore?**

There has been no occasion when we have had to transfer personal data/information to another body or entity outside Singapore.

If the need does arise, we will do so in compliance with the Act by ensuring the receiving entity has in place the same security and protection measures that are aligned (or better) to those which we have adopted.

13. **DNC**

Arc does not make calls, send SMSs or faxes to promote Arc or seek for donations.

If and when we do, we are mindful of the need to scrub our lists against the DNC register to ensure we comply with the DNC rule of not calling/sending any specified messages to anyone who may have registered their hand-phones, landline phones and/or fax line with PDPC (the DNC register).

14. **NRIC and other National Identification Numbers (New)**

Since the revision of the PDPA Advisory Guidelines on the collection of NRIC and other National Identification Numbers (NINs) that the PDPC issued on 31 August, 2018, we wish to state our practices on the matter.

The new guideline advises that business entities can only collect NRIC numbers when the Law requires it, and when such collection is necessary to establish or verify the identity of individuals to a high degree of fidelity.

At the moment, Arc collects your NRIC numbers in the following situations:

a) **When you register your child for admission into Arc**

The identity of the child is very important when you are registering for admission into Arc, where identity of the child and other related persons have to be established correctly (to a higher degree of fidelity) because of personal medical history/records. Also, if we do use the same NRIC or NINs, it would be when we apply to Early Childhood Development Agency (ECDA) or Ministry of Education (MOE) on your behalf for your child to be exempted from attending regular schools or kindergartens; and

b) **When a donor requests for tax exempt on a donation made to Arc**

In this situation, the collection of NRIC number is considered “required under the law” in the new PDPA guideline since IRAS is a Government agent.. Once the purpose for which the information collected is served, we will be retaining the same for a business (auditing) and legal purpose. As soon as the mandatory retention period is served, we will delete your information - in hard and soft copy, from our system.

15. Data Protection Officer

We have appointed a Data Protection Officer who is contactable as follows:

Email	dpo@arcchildren.org
Call	6252 4898 / 6252 9832
Post	77 Lorong Limau #01-51 Singapore 320077

16. Changes to this data protection policy

We reserve the right to review our policies from time to time, amend and/or update this data protection policy to reflect current practice and/or changes to the 2012 Act.

DPO

For Arc Children’s Centre Co, Ltd.

Last updated: February, 2020