



# **DATA PROTECTION POLICY**

**iC2 PreHouse Limited**

2 May 2019

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## Introduction

We at **iC2 PrepHouse Limited** respect the privacy and confidentiality of personal data in our possession or under our control. We have implemented policies and practices to safeguard the collection, use, disclosure and storage of personal data provided to us, in compliance with the Singapore Personal Data Protection Act (PDPA) 2012.

## How We Collect Your Personal Data and Types of Personal Data We Collect About You

The PDPA defines personal data as “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 the organisation has or is likely to have access”. We collect personal data through the following methods / channels:

### Internal Collection Channels

| Collection Points             | Data Collectors  | Types of Data Collected   |
|-------------------------------|--|---|
| Admin Office / Reception Area | Administration / Volunteer Management / Donor Management | <ul style="list-style-type: none"><li>• From Students during Registration:<ul style="list-style-type: none"><li>○ Birth Certificate / NRIC / FIN / Passport number</li><li>○ Date of Birth</li><li>○ Gender</li><li>○ Citizenship</li><li>○ Nationality</li><li>○ Ethnicity</li><li>○ Residential Address</li><li>○ Personal Contact Information</li><li>○ Current School</li><li>○ Education History</li><li>○ Medical / Vision Impairment History</li><li>○ Other Medical Conditions</li><li>○ Likes / Dislikes</li><li>○ Behaviour at School and Home</li></ul></li><li>○ From Parents / Guardians:<ul style="list-style-type: none"><li>▪ NRIC / FIN / Passport number</li><li>▪ Relationship to child</li><li>▪ Marriage status</li><li>▪ Contact information</li><li>▪ Address (if different from child)</li><li>▪ Language spoken</li></ul></li><li>○ Family Structure</li></ul> |

| Collection Points           | Data Collectors | Types of Data Collected   |
|-----------------------------|-----------------|---|
|                             |                 | <ul style="list-style-type: none"> <li>○ Other information about family background</li> <li>● From Parents/Guardians upon Application for Additional Subsidy: <ul style="list-style-type: none"> <li>○ Household / Personal Income</li> <li>○ Occupation</li> <li>○ IRAS Notice of Assessment</li> <li>○ Family / Household Structure</li> <li>○ Occupation of Household Members</li> </ul> </li> <li>● From Volunteers during Registration: <ul style="list-style-type: none"> <li>○ Last 4 digits and alphabet of NRIC / Last 4 digits of FIN or Passport number for foreigner</li> <li>○ Date of Birth</li> <li>○ Gender</li> <li>○ Nationality</li> <li>○ Languages Spoken / Written</li> <li>○ Personal Contact Information</li> <li>○ Previous Volunteering History</li> <li>○ Skills</li> <li>○ Criminal or Medical History</li> </ul> </li> <li>● From Donors (Tax Deductible Donation): <ul style="list-style-type: none"> <li>○ NRIC / FIN / Passport number</li> <li>○ Personal Contact Information</li> </ul> </li> </ul> |
| Department – Operations     | Operations      | <ul style="list-style-type: none"> <li>● For Events / Sessions within/outside the centre: <ul style="list-style-type: none"> <li>○ Students’ Personal Contact Information</li> <li>○ Parents’ / Guardians’ Personal Contact Information</li> <li>○ Volunteers’ Personal Contact Information</li> <li>○ Photos &amp; Video Footage</li> </ul> </li> </ul>  |
| Department - Human Resource | Human Resource  | <ul style="list-style-type: none"> <li>● From Interviewees / Job Applicants: <ul style="list-style-type: none"> <li>○ Personal Details</li> <li>○ Personal Contact Information</li> <li>○ Ethnicity</li> <li>○ Work permit / visa status</li> <li>○ Professional Profile</li> <li>○ Education Qualifications</li> <li>○ Family Background &amp; Details</li> <li>○ Medical Details / Health Information</li> <li>○ Criminal Background / Past Offences</li> </ul> </li> </ul>   |
| Department - Human Resource | Payroll         | <ul style="list-style-type: none"> <li>● Bank Details</li> </ul>  |

## External collection channels

| Collection Points               | Data Collectors                          | Types of Data Collected  |
|---------------------------------|--|--|
| External Venues                 | Operations/Third-Party Service Providers | <ul style="list-style-type: none"> <li>• For Events / Sessions held at external venues:               <ul style="list-style-type: none"> <li>○ Students' Personal Contact Information</li> <li>○ Parents' / Guardians' Personal Contact Information</li> <li>○ Volunteers' Personal Contact Information</li> <li>○ Photos &amp; Video Footage</li> </ul> </li> </ul> |
| Third Party Website (Giving.sg) | Volunteer Management / Donor Management  | <ul style="list-style-type: none"> <li>• Name</li> <li>• NRIC / FIN for tax-deduction purposes</li> <li>• Personal Contact Information</li> </ul>  |
| Job Search Portals              | Human Resource                           | <ul style="list-style-type: none"> <li>• Personal Contact Information</li> <li>• Personal Details</li> <li>• Education Qualifications</li> <li>• Professional Profile</li> <li>• Work history</li> <li>• Curriculum vitae (Resume)</li> </ul>  |
| Public Agencies                 | Administration / Front Office            | <ul style="list-style-type: none"> <li>• Personal Details</li> <li>• Personal Contact Information</li> </ul>   |

## How We Use Your Personal Data

We may use the personal data we have collected about you for one or more of the following purposes:

| Function       | Purposes  |
|----------------|---|
| Administrative | <ul style="list-style-type: none"> <li>• Process applications and registration of students</li> <li>• Process applications for additional subsidies</li> <li>• Respond to inquiries and feedback</li> <li>• Provide service and support for clients</li> <li>• Create, develop, operate, deliver and improve our services</li> <li>• Comply with legal obligations and regulatory requirements</li> <li>• Internal purposes for accounting, auditing, and booking</li> <li>• Internal purposes for anonymised data analysis and research</li> <li>• Update student/parent/guardian records in our database</li> <li>• Send details and receipts for fund-raising campaigns</li> </ul> |

| <b>Function</b>                         | <b>Purposes</b>   |
|---|---|
| Accounting/Finance                      | <ul style="list-style-type: none"> <li>• Billing and payment processing</li> <li>• Process payment for products and services</li> <li>• Salaries, claims &amp; disbursements</li> <li>• Process and administer freight and shipping services</li> <li>• Process and administer employees' travel and reservation services</li> </ul>  |
| Volunteer Management / Donor Management | <ul style="list-style-type: none"> <li>• Process applications for registration / termination / withdrawal of volunteers</li> <li>• Process and administer donations received</li> <li>• Process applications for volunteering opportunities at our events and / or services</li> <li>• Organise campaigns to raise funds and recruit volunteers</li> <li>• Send out emails and/or other relevant information to stakeholders who are interested in our events and services</li> </ul> |
| Operations                              | <ul style="list-style-type: none"> <li>• Plan the provision of educational courses</li> <li>• Analyse academic and learning outcomes and preferences</li> <li>• Process and administer student records</li> <li>• Provide information about programmes of study</li> </ul>  |
| Human Resource                          | <ul style="list-style-type: none"> <li>• Benefits &amp; compensation management</li> <li>• Payroll processing</li> <li>• Processing &amp; administration of employment records</li> <li>• Recruitment &amp; selection</li> <li>• Staff Appraisals</li> <li>• Training &amp; career development</li> </ul>   |
| Website Management                      | <ul style="list-style-type: none"> <li>• Communicate with clients and website visitors</li> <li>• Respond to inquiries and feedback</li> <li>• Provide update, information and/or pictures of past and upcoming events</li> </ul>   |

### **Who We Disclose Your Personal Data To**

We may disclose some of the personal data we have collected about you to the following parties or organisations outside **iC2 PrepHouse Limited**:

| <b>Parties / Organisations</b> |   |
|--------------------------------|---|
| Data Subjects Themselves       | <ul style="list-style-type: none"> <li>• Clients</li> <li>• Parents / Next-of-Kin / Guardians</li> <li>• Donors</li> <li>• Volunteers</li> <li>• Employees / Staff</li> </ul> |

| <b>Parties / Organisations</b>                              |   |
|---|---|
| Education and Training Establishments, and Examining Bodies | <ul style="list-style-type: none"> <li>• Schools /Tertiary Institutions</li> <li>• Education Departments/Ministries</li> <li>• Examination Bodies</li> <li>• External Training Providers</li> <li>• Other Education Entities</li> </ul>   |
| Government Agencies, Bodies & Departments                   | <ul style="list-style-type: none"> <li>• Ministry - Education</li> <li>• Ministry - Manpower</li> <li>• Ministry - Social Services / Family Development</li> <li>• Registration &amp; Licensing Authorities (e.g. SLA for property caveats)</li> </ul>  |
| Healthcare, Social and Welfare Advisors or Practitioners    | <ul style="list-style-type: none"> <li>• Childcare Centres</li> <li>• Clinics/Hospitals</li> <li>• Social Welfare Institutions</li> </ul>   |
| The Media   | <ul style="list-style-type: none"> <li>• Newspapers</li> <li>• Digital Media</li> <li>• Other Media Organisations</li> </ul>  |
| Suppliers and Providers of Freight/Courier Services         | <ul style="list-style-type: none"> <li>• Freight / Courier Services</li> <li>• Payroll Processing Services</li> </ul>   |
| Other Voluntary, Charitable & Non-Profit Organisations      | <ul style="list-style-type: none"> <li>• Health Care Agency (e.g. AIC)</li> <li>• Services for disabled persons (e.g. SG Enable)</li> <li>• Voluntary, Charitable &amp; Non-Profit Organisations</li> </ul>   |
| Providers of Professional Services                          | <ul style="list-style-type: none"> <li>• HR Portal (Staff HR and Payroll)</li> <li>• Information Technology Service Provider (Hardware and Essential Software)</li> <li>• Insurers (Employee, Business and Volunteer Insurance Provider)</li> <li>• Other Services (Collaboration in providing additional services, e.g. inclusiveness events, counselling services)</li> </ul> |

## **How We Manage the Collection, Use, Disclosure and Storage of Your Personal Data**

We take our responsibilities under the PDPA seriously. We are committed to implementing policies, practices and processes for data protection that comply closely with the PDPA obligations. These are elaborated in the rest of this Policy document.

### **Obtaining Consent**

If we collect personal data directly from you, we will ordinarily first notify you of the purposes for which we are collecting it and obtain your express consent to us collecting, using and disclosing it for those purposes. We will not collect more personal data than necessary for the stated purposes. However, when you voluntarily provide personal data to us for a purpose which you are aware of, and it is reasonable that you do so, we may rely on you being deemed

to have consented to us collecting, using and disclosing your personal data for that purpose. Under certain circumstances, we may collect, use and/or disclose personal data about you without your consent for example, so that we can comply with our statutory obligations or where personal data is publicly available.

### **Third-Party Consent**

If you have a one-on-one meeting with us or do a transaction with us on behalf of another individual, you must first obtain consent from that individual in order for us to collect, use or disclose his/her personal data for the purposes for which the personal data will be collected, used and disclosed.

### **Withdrawal of Consent**

If you have given us consent to collect, use and disclose personal data about you, you may withdraw that consent at any time. You should give us reasonable advance notice of your withdrawal of consent. Should we require more time to give effect to your withdrawal of consent, we will inform you of the time frame by which the withdrawal of consent will take effect. We will notify you of the likely consequences of your withdrawal of consent, e.g. without your personal contact information we may not be able to inform you of future updates, or that the quality of our service may be impacted.

Your request for withdrawal of consent can take the form of an email or letter to our Data Protection Officer at [info@ic2.com.sg](mailto:info@ic2.com.sg).

### **Accessing and Making Correction to Your Personal Data**

You may ask us to tell you what personal data we hold about you and how we have, or may have, used or disclosed it within a year before the date of your request. We will respond to your request as soon as reasonably possible and, in any event, we will respond to you within 30 days after receiving your request. We may charge a fee for the time and effort spent by our staff in processing your request, but we will let you know the amount of the fee before you incur it.

You may also ask us to correct an error or omission in the personal data we hold about you. Unless we are satisfied on reasonable grounds that a correction should not be made, we will correct the personal data as soon as practicable, and send the corrected personal data to every other organisation to which the personal data was disclosed by the organisation within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

When you make any such request, we may need to verify your identity by checking your NRIC or other legal identification document.

### **Accuracy of Your Personal Data**

We will take reasonable precautions and verification checks to ensure that the personal data we hold is reasonably accurate, complete and up-to-date. From time to time, we may do a verification exercise for you to update us on any changes to the personal data we hold about you. If we are in an ongoing relationship with you, it is important that you update us if there are any changes in the personal data we hold about you (such as a change in your home address or mobile number).

### **Protection of Personal Data**

We have implemented an Information Security Policy that governs how we protect personal data. We make reasonable security arrangements to protect personal data about you that is in our possession or under our control to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. All our employees will take reasonable and appropriate measures to maintain the confidentiality and integrity of your personal data, and will only share your data with authorised persons on a 'need to know' basis.

External data intermediaries who process and maintain your personal data on our behalf will be bound by contractual data security arrangements we have with them.

### **Retention of Personal Data**

We will cease to retain any documents containing personal data about you or remove the means by which the personal data can be associated with you, as soon as it is reasonable to assume that the purpose for which we collected that personal data is no longer being served by retention of it, and retention is no longer necessary for legal or business purposes. We have a Document Retention Policy that spells out how long we ought to retain each type of document containing personal data and that requires such documents to be destroyed (paper documents) or deleted (electronic documents and data stored in databases) securely. Certain retention periods are based on statutory or regulatory requirements.

### **Transfer of Personal Data**

If there is a need for us to transfer your personal data to a country or territory outside Singapore, we will ensure that the recipient organisation will be obliged to provide a standard of protection to such transferred data that is comparable to the protection it receives under Singapore law.

### **Compliance with Laws**

Where required to do so by law, we will disclose personal data about you to the relevant authorities or to law enforcement agencies.

### **Links to Other Sites**

Our website may contain links to other websites that are not operated by us. If you click on a third party link, you will be directed to that third party's website. It is important that you review the Privacy Policy of every site you visit. We have no control over, and are unable to assume any responsibility for, the content, privacy policies or practices of any third party sites or services.

### **Changes to This Data Protection Policy**

We may update our Data Protection Policy from time to time. We will notify you of any changes by posting the policy on this page. Please revisit this page periodically for any changes. Changes to this Policy are effective when they are posted on this page.

### **Contacting Us**

If you have any questions about our collection, use, and/or disclosure of personal data about you; feedback regarding this Policy, or any complaint you have relating to how we collect, use, disclose and store personal data about you, you may contact our Data Protection Officer.



Any query or complaint should include, at least, the following details:

- Your full name and contact information
- A brief description of your query or complaint

Please send our Data Protection Officer an email at [info@ic2.com.sg](mailto:info@ic2.com.sg).

End of Privacy Notice

02 May 2019