Personal Data Protection Policy

June 2021
Version 2.4

Document Control History

Date Release	Summary of Changes
Nov 2014	Baseline version
May 2019	Updated version to include policy on collection, usage and storage of NRIC
Feb 2020	Updated version to include collection, usage and storage of personal data for contact tracing purposes
Aug 2020	Inclusion of a clause indicating the printing of pledger names as part of the data usage
Feb 2021	Updated version to include a new section on Data Breach Management Plan (Section 6)
June 2021	Updated version to include the collection and usage of NRIC and COVID-19 vaccination related documents.

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1. Document Overview

Document Purpose

This is the Personal Data Protection Policy (PDPP) of Faith Methodist Church. It depicts the policy adopted by Faith Methodist Church with respect to the collection, handling, storage and archival of personal data of an individual.

Document Owner

Data Protection Officer (DPO) of Faith Methodist Church

Terms of Reference

This document policy is formulated in compliance with the following guidelines provided by the Personal Data Protection Commission (the "Commission"):

- Advisory Guidelines on Key Concepts in the Personal Data Protection Act (revised 27 July 2017)
- Advisory Guidelines for the Social Service Sector (updated 31 August 2018)
- Advisory Guidelines on the Personal Data Protection Act for NRIC and other National Identification Numbers (published on 31 August 2018)
- Advisories on Collection of Personal Data for Coronavirus Disease 2019 (COVID19) Contact Tracing and Use of Safe Entry (Dated 24th April 2020)
- Phase Three (Heightened Alert) – Precautionary Measures for Religious Activities first issued on 11th June 2021 and updated on 18th June 2021

Policy Review Committee

Local Church Executive Committee of Faith Methodist Church

Terms & Definitions

a) An "Individual" is defined as a natural person, whether living or deceased. In Faith Methodist Church, an individual refers to (but not limited to):

i) Local Church Executive Committee Members
ii) Pastors of Faith Methodist Church
iii) Staff (either paid or not paid)
iv) Intern assigned to work in Church
v) Church Members
vi) Church Volunteers
vii) Small Group Members inclusive of those who are not our church members
viii) Visitors to the Church
ix) Invited Speaker (locally or overseas)
x) Appointed Contractors
xi) Donors
xii) Beneficiaries

b) "Personal Data" is defined as data collected from an individual with his/her full consent.

This data can be used to identify the individual and it is used to facilitate the Church in carrying out the church activities. Some examples of "Personal Data" includes but not limited to, the following information:

i) An individual's biodata
ii) Family details
iii) Residential address and contact information
iv) Health and death notes
v) Christian background, spiritual related information such as baptism date, marriage date, gifting, Christian trainings, ministries involved
vi) Credit card / bank account information. This information collected is strictly used by Finance Department of Faith Methodist Church only
vii) Photos, video footage and CCTV footage of the individual taken during the events held at Faith Methodist Church
viii) Personal identification number and/or passport number
ix) COVID-19 Vaccination Report which is collected on voluntary basis

2. Policy Statement

Faith Methodist Church is committed to protecting the personal data entrusted to us by an individual. We ensure the effective implementation of the policy through various measures:

a) Formulate PDPP in compliance to the PDPA guidelines by the PDPA Advisory Committee

b) Conduct briefing and/or orientation to the staff of Faith Methodist Church to raise their awareness of the policy

c) Provide consent clause in all our data collection forms

d) Review and update our policy to ensure its validity and effectiveness in accordance to the PDPA guidelines

e) Store personal data collected in secured location or in computer system with password protection

f) Grant access rights to personal data based on job's requirements and on need basis

3. Policy's Stakeholder

Below are the guidelines of the roles and responsibilities of the stakeholder of the policy:

a) Local Church Executive Committee

- Appointment of Data Protection Officer
- Review and approve the personal data protection policy

b) Pastors of Faith Methodist Church

- Understand the Personal Data Protection Policy of Faith Methodist Church and ensure effective implementation of the policy
- Work closely with the Data Protection Officer to handle any breaches of the policy which warrants corrective or preventive actions

c) Personal Data Protection Officer

- Document and maintain personal data protection policy in compliance to the Act
- Communicate personal data protection policy to Faith Methodist Church
- Manage queries and complaints relating to the policy
- Liaison party for all matters relating to the policy
- Maintain the policy
- Establish correction or preventive action for breaches of policy

d) All staff of Faith Methodist Church (Part Time, Full Time & Intern), Church Volunteers (Faith Methodist Church Members or Non-Faith Methodist Church Members), Lay Persons representing Faith Methodist Church & Contractors Appointed by Faith Methodist Church

- Read, understand and comply with the policy in accordance to the designated role and duties assigned by Faith Methodist Church
- Seek approval from the Data Protection Officer in situations where the handling of personal data is not aligned with the policy. The conclusion and subsequent action taken shall be documented and filed as compliance to the policy

4. Data Collection, Consent, Usage, Disclosure & Archival

4.1 Data Collection & Consent

Faith Methodist Church collects personal data via:

a) Registration / Application Forms (Hardcopy and Electronic Form designed using Google Form or posted via our corporate website)

Note: In event where an individual is not able to give the consent, Faith Methodist Church may not be able to fulfill or deliver the intended services to the individual. In such scenario, Faith Methodist Church shall not be held responsible for the undelivered services to the individual.

b) Verbal through telephone or face to face.

c) Messaging through electronic devices such as SMS, WhatsApp, Telegram, WeChat, and others

d) Email

e) Contact tracing methods

f) Online registration such as Eventbrite for admission to worship services with limited capacity

4.2 National Registration Identification Card (NRIC) Policy

In compliance to the Advisory Guidelines on the Personal Data Protection Act for NRIC and other National Identification Numbers published on 31 August 2018, Faith Methodist Church will not collect, use or disclose the NRIC number or photocopy the NRIC of an individual.

NRIC will only be collected if it is required by:

- The law or the authorities of the Government.
- Faith Methodist Church to accurately establish or verify the identity of an individual to a high degree of fidelity.

Hence, we will continue to collect and use NRIC for the following purposes:

a) church membership and baptism

b) holy matrimony form

c) primary school registration

d) activities which involve travelling out of Singapore, hence the need for passport details and purchase of travel insurance and other logistics arrangement

e) member care and needy fund application

f) Children Ministry – Students Registration & Teacher Application

g) COVID19 Contact Tracing and Safe Entry to the Church's premises

If there is a need to collect NRIC number which does not fall under the above list, the approval from the DPO must be sought.

4.3 Data Usage

The personal data collected is used for the following purposes:

a) Small groups administration

b) Human Resource & Finance administration

c) Event Organisation, Planning & Management which includes but not limited to, church activities, services, training (formal and informal), church retreats or outings, programs and gatherings

d) Missions organisation and management

e) Fundraising, donations and activities for charitable causes

f) Tenancy management

g) Service intermediation (insurance and banking)

h) Members services such as membership & baptism

i) Queries and requests handling

j) Meeting the requirements of the law and authority

k) Corporate communication and publicity

l) Pastoral Care Ministry such as counseling of an individual who seeks support and/or guidance, hospital visitation, members home visitation funeral wake services, house blessings, marriages and others

m) Communication with an individual on matters related to the individual and the Church in the form of spoken or written via any forms of electronic communications devices or face to face.

n) Post Event Analysis to better understand the spiritual needs of the church

o) To contact worshippers in the event of contact tracing implementation

p) Publishing of pledger names in church media platform such as church bulletin, corporate website and others.

q) COVID-19 Contact Tracing & Use of Safe Entry – In compliance with the advisories on collection of personal data for COVID-19 contact tracing, the Church will collect personal data (including NRIC, FIN or Passport Numbers) of individuals for the sole purposes of COVID-19 response measures.

This includes the COVID19 Vaccination Report / Pre-Event Test Result / Exemption Report. For worshippers who do not wish to submit the above-mentioned documents, the Church will prompt the worshipper to produce the above-mentioned documents prior to entering the premises where the religious activities are held.

For collection of personal data for the purposes not included in the above list, the approval from the DPO must be sought.

4.4 Deemed Consent

Faith Methodist Church hereby deems an individual's consent was obtained for personal data collected **prior** to 2nd July, 2014 for the purpose of which the personal data was collected.

4.5 Consent Withdrawal

An individual may withdraw their consent to the use and disclosure of their personal data at any time.

The withdrawal request shall be done through formal writing to the DPO. DPO will comply with the withdrawal request unless such personal data is necessary for Faith Methodist Church to fulfill its legal obligations.

Prior to granting the withdrawal request, the DPO will explicitly inform the individual that:

- The withdrawal will affect the services and arrangements between the individual and Faith Methodist Church.
- That Faith Methodist Church will not be held responsible for any undelivered services or arrangement required

4.6 Accuracy Obligation

Faith Methodist Church shall make every reasonable effort to ensure that individuals' information is accurate and updated. However, we also rely on the diligence of the individual to notify our staff on any changes to their personal data.

4.7 Storage and Retention of Data

Faith Methodist Church will store and retain personal data as it is required for identification of the individual and to provide services to the individual.

The personal data is stored in a central database which can only be accessed by the staff of Faith Methodist Church. Some of the measures taken to secure the personal data include:

- Marking "Confidential" on documents with personal records clearly and prominently
- Storing hardcopies of documents with personal records in file cabinet with locks
- Storing electronic personal data in a data server which can only be accessed by staff only
- Storing archived records offsite

- Secured network infrastructure (i.e. password-protected, firewall, server room access limited to IT Personnel only)

- Personal computers and other computing devices that may access to personal data are password protected. Passwords are managed in accordance with industry best practices

- Files that contain sensitive or confidential personal data are secured and only made available to staff with authorized access

- Ensure that IT service providers' services comply with security standards in line with industry practices.

In the event of a security breach, the Data Officer shall be notified. The Data Protection Officer shall investigate if such breach is a malicious act and shall take appropriate action after consulting with the Local Church Executive Committee.

4.8 Data Disclosure and Transfer

On a need basis, Faith Methodist Church is required to disclose individual's personal data for specified intended purposes to the following identified parties:

a) Internal Parties (including Faith Methodist Church pastors, staff, LCEC members, appointed Lay persons, Ministry volunteers & personnel as authorized by DPO)

b) External Parties

i. Trinity Annual Conference (TRAC)

ii. Agents, contractors, data intermediaries or third party service providers who provide services, such as telecommunications, mailing, information technology, payment, payroll, insurance, training, storage and archival, to the Organisation

iii. Banks and financial institutions;

iv. Relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by relevant government;

v. Charity organizations

Faith Methodist Church will transfer personal data to a country or territory outside Singapore on need basis for mission purposes. The transfer shall be done in compliance with this policy.

4.9 Update of Personal data

Faith Methodist Church is committed to maintaining the personal data of the church members with accuracy. We maintain the personal data via different sources:

a) By staff through events organized by/in the Church. The events include birth announcement, home blessings, death notifications, hospitalization, home bound visitations, marriage solemnization, church trainings or events registration form and any other activities organized by the Church

b) Membership Particular Update Form. which is distributed to the members annually prompting the individual to provide updates to an individual's personal data

c) Online Update via our corporate website

d) Via Info Counter where the individual will write down in a log book the changes of his / her particulars

The changes are then updated into the database by the staff authorized by the DPO.

4.10 Openness Obligation

Faith Methodist Church will release this policy by posting the policy in our corporate website. An individual may read or download a copy of the PDPP at www.faithmc.sg/DPP.

Any enquiries or request relating to the policy shall be directed to the DPO via postal mail, email or office telephone:

400 Commonwealth Drive
Singapore 149604
Tel: 64719420
Email: mail@faithmc.sg

5. CCTV, Video Recording and Photography

Faith Methodist Church captures church events in the form of video or photograph. We are committed to protect the personal data in these forms through the following measures:

a) Notices are put up at the church entrance located at Commonwealth and appropriate places at Anglo Chinese Junior College (ACJC), to state clearly the use and purpose of CCTV video surveillance

b) Notices are put up to inform all who are in our premises that photographs and videos will be taken for corporate communication, publicity, ministry use & other purposes as appropriate.

c) The access to CCTV Video Surveillance, photographs and videos are only by authorized personnel.

d) The photographs and videos will be retained in a central repository which can be accessed by Faith Methodist Church staff only.

6. Data Breach Management Plan

Should there be a breach of data, the Data Protection Officer (DPO) will activate the Data Breach Management Plan as detailed below:

Step	Action	Responsibility
a	Report data breach incident to the DPO via email with the following details :-	Anyone

Step	Action	Responsibility
	• Date and time of event • Name of the person who reported the case • A brief description of the nature of the data breach	
b	**<u>Fact Findings</u>** Initiate meeting (through phone, email or face to face) with the person who reported the case to collect tangible evidence of the case :- • Source of the data leakage – How did the person find out the case. • Nature of data leaked • Person(s) affected by the leak DPO to record details of meeting in the Data Protection Investigation Form and get the person who reported the case to sign on the form.	DPO & Person Concerned
c	<u>Assessment</u> Review facts gathered and assess the level of risk of the data breach and propose corrective action (CA) and/or preventive action (PA) measures and present to the Property Management Committee for approval of action. Property Management Committee will escalate to LCEC if deemed necessary. DPO to record the assessment in the Data Protection Investigation Form.	DPO
d	Upon approval by the Property Management Committee, DPO to carry out the Corrective / Preventive Action and close the case.	DPO