



PERSONAL DATA  
PROTECTION COMMISSION  
S I N G A P O R E

**SHINE DATA PROTECTION NOTICE**

## SHINE DATA PROTECTION NOTICE

This Data Protection Notice (“**Notice**”) sets out the basis which *SHINE Children and Youth Services* (“**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data in accordance with the Personal Data Protection Act (“**PDPA**”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

Collection, use, disclosure or otherwise processing of personal data on behalf of government ministries or statutory boards will be in accordance with guidelines set out in the government’s data management policy. *SHINE Children and Youth Services* will comply with the relevant requirements under the government’s data management policy.

### **PERSONAL DATA**

1. As used in this Notice:

“personal data” means 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 we have or are likely to have access.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, contact information such as residential address, email address or telephone number, nationality, gender, date of birth, marital status, medical history, photographs and other audio-visual information and employment information.
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

### **COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

4. We generally collect your personal data that (a) you knowingly and voluntarily provide to us directly, or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
5. We may collect and use your personal data for any or all of the following purposes:
  - providing you with information on our upcoming events or activities, where you have specifically requested to receive such information;
  - verifying your identity and the accuracy of your personal details and other information provided;
  - responding to, handling, and processing queries, requests, applications, complaints and feedback from you;
  - complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
  - any other purposes for which you have provided the information;

- transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
- any other incidental purposes related to or in connection with the following:

### 5.1. CLIENTS AND FAMILY MEMBERS

- Where you are a prospective service user,
  - processing and evaluating your application for our services
- Where you are a service user,
  - collection of your's and family member's name, contact information such as residential address, email address or telephone number, nationality, gender, date of birth, marital status, medical history, school, living arrangement, photographs and other audio-visual information and employment information
  - providing the services requested by you; and
  - monitoring, evaluating and/or auditing of services provided. This may include an assessment of the quality of the services provided and the effects of the services provided (both in the short and long term, and after you have stopped using the services).
- Where you are a service user's authorised representative
  - processing and evaluating the service user's application for our services

### 5.2. DONORS

- collection of name, NRIC number, contact information such as residential address, email address or telephone number
- processing your donations and your tax-deduction claims

### 5.3. VOLUNTEERS

- collection of name, contact information such as residential address, email address or telephone number, nationality, gender, date of birth, marital status, medical history, race and religion, highest qualifications, conviction and counselling history, photographs and other audio-visual information and employment information.
- processing and evaluating your suitability to volunteer; and
- monitoring, evaluating and/or auditing of services you participated in.

### 5.4. EMPLOYEES AND JOB APPLICANTS

- collection of names, NRIC number, contact information such as residential address, email address or telephone number, nationality, gender, date of birth, marital status, medical history, marriage certificate, child's birth certificates, spouse's contact details such as phone number and bank details
- assessing and evaluating your suitability for employment in any current or prospective position within the organisation;
- performing obligations under or in connection with your contract of employment with us, including payment of remuneration and tax;
- all administrative and human resources related matters within our organisation, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your insurance and other benefits, processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;

- managing and terminating our employment relationship with you, including monitoring your internet access and your use of our intranet email to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances;
  - assessing and evaluating your suitability for employment/appointment or continued employment/appointment in any position within our organisation;
  - ensuring business continuity for our organisation in the event that your employment with us is or will be terminated;
  - performing obligations under or in connection with the provision of our goods or services to our clients; and
  - facilitating any proposed or confirmed merger, acquisition or business asset transaction involving any part of our organisation, or corporate restructuring process.
6. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to your employment contract should you be hired) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).
7. We may disclose your personal data:
- where such disclosure is required for, or in connection with, the provision of the services requested by you;
  - to third party service providers, agents and other organisations we have partnered/engaged to perform any of the purposes listed in clause 5 above for us;
  - to comply with any applicable laws, regulations, codes of practice, guidelines, rules or requests by public agencies, or to assist in law enforcement and investigations; and
  - any other party to whom you authorised us to disclose your personal data to, or where necessary to undertake any action requested by you;
  - without consent, to respond to an emergency that threatens the life, health or safety of you or another individual
8. We will not disclose your personal data if it results in the following circumstances:
- threaten the safety or physical or mental health of an individual other than the individual who made the request;
  - cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
  - reveal personal data about another individual;
  - reveal the identity of an individual who has provided personal data about another individual and the individual providing the personal data does not consent to the disclosure of his identity; or
  - be contrary to the national interest

## **WITHDRAWING YOUR CONSENT**

9. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you or your authorised representative in writing. You or your authorised representative may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request via email or otherwise in writing to our Data Protection Officer at the contact details provided below. If you are unable to submit your request in writing or if you require any assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.
10. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within fourteen (14) business days of receiving it.
11. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue our relationship with you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in the manner described in clause 8 above.
  - 11.1. If you are a client, we may not be able to continue providing our goods or services to you.
  - 11.2. If you are a donor, we may not be able to process tax-deductions to you.
  - 11.3. If you are a volunteer, we may not be able to process and evaluate your application to volunteer.
  - 11.4. If you are an employee or job applicant, we may not be able to process and evaluate your application.
12. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

## **ACCESS TO AND CORRECTION OF PERSONAL DATA**

13. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request via email or otherwise in writing, to our Data Protection Officer at the contact details provided below. If you require assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.
14. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
15. We will respond to your request as soon as reasonably possible. In general, our response will be within fourteen (14) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons

why we are unable to do so (except where we are not required to do so under the PDPA).

16. Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organisation has on record, if the record of your personal data forms a negligible part of the document.

### **PROTECTION OF PERSONAL DATA**

17. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
18. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

### **ACCURACY OF PERSONAL DATA**

19. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer at the contact details provided below.

### **RETENTION OF PERSONAL DATA**

20. We may retain your personal data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.
21. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data were collected, and are no longer necessary for legal or business purposes.

### **TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

22. We adopt a cloud-based solution to store and process your personal data. The standard of protection accorded to your personal data by our service provider has been assessed to be conforming to Level 3 of the Multi-Tier Cloud Security (MTCS) Singapore Standard (SS584). Level 3 solutions are assessed to provide the most stringent standards of protection. For more information on the MTCS SS584, please visit the Infocomm Media Development Authority website<sup>1</sup>.

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<sup>1</sup> <https://www.imda.gov.sg/-/media/imedia/files/industry-development/infrastructure/factsheet.pdf?la=en>

**DATA PROTECTION OFFICER**

23. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Contact No. : 6286 9905  
Email Address : dpo@shine.org.sg

**EFFECT OF NOTICE AND CHANGES TO NOTICE**

24. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
25. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued relationship with us constitutes your acknowledgement and acceptance of such changes.

Effective date : 12/04/2019  
Last updated : 12/04/2019