

PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy outlines the management of Personal Data in accordance with the Personal Data Protection Act.

This policy clarifies the purpose for which ACC collects, uses and/or discloses Personal Data.

ACC reviews this Policy on a regular basis to ensure that it is consistent with any changes in legal or regulatory requirements. Any changes made will be published on ACC's website at

1 Definitions

1.1 In this Personal Data Protection Policy, the following abbreviations shall have the following meanings unless otherwise required by the context:

- a. "ACC" refers to **Alive Community Church**.
- b. "ACC Office" refers to the office of ACC and is currently at 291 New Bridge Road Oriental Plaza #02-10, Singapore 088756.
- c. "ACC Programme" refers to any programme, event, course or activity organised, conducted, managed or sponsored by ACC, whether in whole or in part. This shall include but not be limited to any church services or meetings, care group/cell meetings, crusades and public meetings, mission trips, bible studies, church camps and retreats, pastoral care or counselling meetings or events, seminars, picnics and other social outings.
- d. "Personal Data" refers to any data or information from which you can be identified either (a) from that data; or (b) from that data and other information to which ACC has or is likely to have access.
- e. "DPO" refers to the Data Protection Officer ("DPO") of ACC who may be contacted at dpo@alivecommunity.net.
- f. "PDPA" refers the Personal Data Protection Act, of Singapore.
- g. "you" refers to a person, whether individual, corporate or unincorporated, who is a member, staff, employee, volunteer, associate, supplier, contractor of or with ACC, or any person who interacts in any manner with ACC.

2 Personal Data

2.1 Examples of Personal Data include, but are not limited to:

- a. name and identification information such as Unique Identification Number (NRIC, FIN, passport numbers);
- b. contact information such as address, email address and telephone or other contact numbers;
- c. personal information such as nationality, gender, date of birth, marital status, photographs and other audio-visual information or recordings;
- d. personal medical information such as any illnesses, allergies or food preferences;
- e. information provided for purposes of care and counselling;
- f. employment information; and
- g. financial information such as credit card numbers, debit card numbers or bank account information.

3 Collection of Personal Data

3.1 Depending on the nature of your interaction with ACC, ACC may collect Personal Data as follows:

- a. Application form(s) you submit to ACC, such as baptism/membership application forms;
- b. Information submitted when you attend or intend to attend or make enquiries or application to attend any ACC Programme;
- c. Recording, photography and videography when you attend any ACC Programme;
- d. Where you contact or meet staff or representatives of ACC to make enquiries or in relation to pastoral care or counselling;

- e. Where you make a donation to ACC or to a cause that ACC is involved with;
- f. Where you make a request to ACC to contact you for any purpose;
- g. Where you submit your Personal Data for the purpose of employment;
- h. Where you submit your Personal Data for the purpose of volunteering at any ACC Programme;
- i. Through an application to be a service provider to ACC;
- j. Through the interaction with ACC staff for official purposes;
- k. When responding to a request for additional Personal Data;
- l. When Personal Data is submitted to ACC for any other reason.

3.2 Collection of Personal Data can be through orally (including through voice or data calls) or in writing (including by email or other electronic or digital form) or through photography or video (whether digital or otherwise) or through any other form.

4 Purposes for the Collection, Use and Disclosure of Personal Data

4.1 ACC generally does not collect Personal Data unless (a) you provide it to ACC voluntarily either directly or via a third party who has been duly authorised by you to disclose your Personal Data to ACC; or (b) it is permitted or required by the PDPA or other laws.

4.2 Where possible, ACC shall seek your consent before using your Personal Data for a purpose that would not reasonably be known to you at the point that your Personal Data was collected (except where permitted or authorised by law).

4.3 ACC may collect, use and/or disclose Personal Data as follows:

- a. For planning, organising and holding any ACC Programme;
- b. For administration and management of ACC's operations, functions or other internal matters as the case may be including record keeping;
- c. To communicate with you on:
 - i. any of the matters described in this clause;
 - ii. your membership with ACC;
 - iii. any matters by reason of which you are reasonably associated with, affiliated with or connected to ACC;
 - iv. responding to your request or query;
 - v. responding to and/or resolving any complaints;
 - vi. any other matters in respect of which it is reasonably necessary for ACC to communicate with you;
- d. For providing services to one or more individuals, a community, group or society, or the general public;
- e. For internal and external communications and publications;
- f. For pastoral care or counselling, where applicable, which includes but is not limited to the following:
 - i. For welcoming or addressing you at any ACC Programme;
 - ii. For communicating with you;
 - iii. For visitations with you, whether at your home, office, dormitory or other address by prior appointment;
 - iv. For visitations at a hospital or hospice to provide prayer, encouragement and spiritual support;
 - v. For meeting with you in a personal or group basis in a social setting to provide counselling, encouragement and spiritual support; and
 - vi. For conducting ceremonies, including but not limited to house/office/business blessings, dedications, baptisms, birthdays, weddings and funerals;
- g. For evaluative purposes;
- h. For training purposes;
- i. For publicity and communication purposes;

- j. For verification and update purposes;
- k. For conducting research for statistical profiling and other purposes to review, develop and improve the services of ACC;
- l. For conducting financial reporting and analysis related to ACC operations;
- m. For managing ACC infrastructure and operations and complying with internal policies and procedures;
- n. For archival of documents and records;
- o. For managing and terminating a membership or an employment or contractual relationship;
- p. For security purposes;
- q. For any ACC related matters;
- r. For any other purposes of which ACC may notify you from time to time.

5 Disclosure of Personal Data

5.1 Personal Data will be protected and kept confidential.

5.2 ACC will not disclose Personal Data to third parties without first obtaining consent to do so.

5.3 However, ACC may disclose Personal Data to third parties (including government agencies) without first obtaining your consent in situations where such disclosure is required by the PDPA or by law or where such disclosure to third parties is necessary or ancillary to ACC's purposes as stated in Clause 4 above.

6 Administration and Management of Personal Data

6.1 ACC will take reasonable effort to ensure that Personal Data is accurate and complete. However, you must update ACC of any changes in your Personal Data that had been initially provided. ACC will not be responsible for relying on inaccurate or incomplete Personal Data if you do not update ACC of any changes in your Personal Data.

6.2 ACC will also put in place reasonable security arrangements to ensure that Personal Data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of Personal Data. However, ACC cannot assume responsibility for any unauthorised use of Personal Data by third parties which are attributable to factors beyond ACC's control.

6.3 ACC retains Personal Data in accordance with legal, regulatory, business and operational obligations.

6.4 ACC will cease to retain your Personal Data, or remove the means by which the Personal 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 was collected, and is no longer necessary for legal or business purposes.

7 Consent

7.1 ACC will seek your consent to collect, use or disclose your Personal Data, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law or is specifically set out in this Personal Data Protection Policy.

7.2 Consent may be collected through written documentations (e.g. consent form, written note) or electronically (email consent, electronic forms).

7.3 In situations where there is any ACC Programme, ACC may take photographs or audio-visual recordings/ footage. In such situations, and unless you inform ACC of your withdrawal or partial withdrawal of consent in the manner as stipulated herein:

- a. ACC reserves the right to post such photographs in the internal area of the ACC Office or premises or in its internal bulletins.
 - b. ACC reserves the right to use the photographs and audio-visual footage in its internal productions.
 - c. ACC reserves the right to use the photographs and audio-visual recordings for external publications or any electronic platform (eg. its website, social media) as long as your picture is obscure (ie. fleeting, in the background, blurred or is ancillary (and the not the main part) of the photograph or audio-visual recording/ footage).
 - d. Save as otherwise stated herein, ACC will not put up your photographs or audio-visual recordings on any electronic platform (eg. its website, social media) without first obtaining your consent.
- 7.4 ACC may not be able to provide certain services to you if you are unwilling to provide consent to the collection, use or disclosure of certain Personal Data.

8 Withdrawal of Consent

8.1 Withdrawal (or partial withdrawal) of consent for the collection, use and/or disclosure of Personal Data in ACC's possession can be made in person at the ACC office or by email to the DPO.

8.2 From such a request for withdrawal of consent being made, ACC will process the request within 30 days and thereafter not collect, use and/or disclose Personal Data in the manner stated in the request. With the withdrawal of consent to any or all use or disclosure of Personal Data, depending on the nature of the request, ACC may not be in a position to continue to provide the services or administer any contractual relationship that is in place.

9 Access and Correction of Personal Data

9.1 You may request for access to or to make corrections to your Personal Data records, but ACC has the right to charge a reasonable fee for processing such a request, depending on the type of information requested for. Such request can be submitted in person at the ACC office or to the DPO by email. Requests will be processed within 30 days. Personal Data will only be released by the DPO upon verification of your identity card and a signed request form, and will not be released to any other person whatsoever (unless required by law or Court Order).

10 Contacting ACC

10.1 For any question or complaint relating to the use or disclosure of Personal Data, or if more information about ACC's personal data protection practices and policy is needed, please email our DPO at dpo@alivecommunity.net