

DATA PROTECTION NOTICE SERVICE-USERS, DONORS AND VOLUNTEERS

This Data Protection Notice (“**Notice**”) sets out the basis which *HCSA Community Services* (“**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of our prospective service-users, service-users, service-users' authorised representative, donors, volunteers 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 of our service-users on behalf of government ministries or statutory boards will be in accordance with guidelines set out in the government’s data management policy. *HCSA Community 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 (whether a prospective service-users, service-users, service-users' authorised representative, donors, volunteers or otherwise) 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, identification numbers such as NRIC, FIN, work permit and birth certificate, 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, employment information and financial information such as credit card numbers, debit card numbers or bank account 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 do not collect your personal data unless
- (a) It is provided to us voluntarily by you 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:
- (a) Establishing or managing your relationship with us. This includes:
 - (i) Where you are a prospective service-user,
 - Processing and evaluating your application for our services.
 - (ii) Where you are a service-user,
 - Providing the services requested by you;
 - 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); and
 - Research related to your personal circumstances or services you used, in particular, for our research entitled (Insert Title of Research Project). We will notify you and obtain your written consent before using your personal data for any specific research project, unless otherwise permitted under the PDPA or other legislation.

- (iii) Where you are a service-user's authorised representative
 - Processing and evaluating the service-user's application for our services.
 - (iv) Where you are a donor,
 - Processing your donations and your tax-deduction claims.
 - (v) Where you are a volunteer,
 - Processing and evaluating your suitability to volunteer; and
 - Monitoring, evaluating and/or auditing of services you participated in.
 - (b) Providing you with information on our upcoming events or activities, where you have specifically requested to receive such information;
 - (c) Verifying your identity;
 - (d) Responding to, handling, and processing queries, requests, applications, complaints and feedback from you;
 - (e) 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; and
 - (f) Any other purposes for which you have provided the information.
6. We may disclose your personal data:
- a. Where such disclosure is required for, or in connection with, the provision of the services requested by you;
 - b. To third-party service providers, agents and other organisations we have engaged to perform any of the purposes listed in clause 5 above for us;
 - c. 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
 - d. Any other party to whom you authorised us to disclose your personal data to, or where necessary to undertake any action requested by you.
7. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us 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).

DEEMED CONSENT BY NOTIFICATION

8. We may collect or use your personal data, or disclose existing personal data for secondary purposes that differ from the primary purpose which it had originally collected for pursuant to clauses 5 and 6. If *HCSA Community Services* intends to rely on deemed consent by notification for such secondary purposes, *HCSA Community Services* will notify you of the proposed collection, use or disclosure of his personal data through appropriate mode(s) of communication.
9. In particular, we may rely on deemed consent by notification to collect, use or disclose your personal data for the following purposes:
 - (a) **Impact Reporting and Fundraising Analysis:** Personal data from donors can be analysed to understand donation trends and improve fundraising strategies, ensuring future campaigns are more effective;
 - (b) **Donor Recognition:** Information may be used to acknowledge and thank donors publicly (with consent) to encourage continued support;
 - (c) **Personalised Communication:** Donor data can be used to tailor updates and communications, making engagement more relevant and fostering stronger relationships;
 - (d) **Outcome Measurement:** Personal data can be used in aggregated form to measure the long-term impact of services and report outcomes to stakeholders or funding bodies; and
 - (e) **Volunteer Engagement and Retention:** Data on volunteer participation can be analysed to improve volunteer programs, identify training needs, and implement recognition initiatives to boost retention.
10. Before relying on deemed consent by notification, *HCSA Community Services* will assess and determine that the collection, use and disclosure of the personal data will not likely have an adverse effect on you.
11. You will be given a reasonable period to inform us if you wish to opt-out of the collection, use and disclosure of your personal data for such purposes.
12. After the lapse of the opt-out period, you may notify us that you no longer wish to consent to the purposes for which your consent was deemed by notification by withdrawing your consent for the collection, use or disclosure of your personal data in relation to those purposes.

RELIANCE ON THE LEGITIMATE INTERESTS EXCEPTION

13. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for the legitimate interests of *HCSA Community Services* or another person. In relying on the legitimate interests exception of the PDPA, *HCSA Community Services* will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.

14. In line with the legitimate interests' exception, we will collect, use or disclose your personal data for the following purposes:
 - (a) Fraud detection and prevention;
 - (b) Detection and prevention of misuse of services;
 - (c) **Fundraising Efficiency (Donors):** Using donor data to develop targeted fundraising campaigns helps maximise resources and engagement;
 - (d) **Coordination of Care (Service-users):** Disclosing relevant service-user data to partner organisations (with consent) ensures comprehensive and coordinated care for individuals, enhancing service effectiveness; and
 - (e) **Ensuring Safety and Compliance (Volunteers):** Collecting personal data helps ensure volunteers meet safety and regulatory requirements, such as undergoing background checks when working with vulnerable groups.

The purposes listed in this clause may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter.

WITHDRAWING YOUR CONSENT

15. 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.
16. 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 ten (10) business days of receiving it.
17. 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 providing our goods or services to 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 15 above.
18. 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

19. 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.

20. 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.
21. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) business days after receiving your request, we will inform you in writing within thirty (30) business 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).
22. 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

23. 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 minimised collection of personal data, authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), up-to-date antivirus protection, web security measures against risks, and usage of one-time password (OTP) / 2-factor authentication (2FA) / multi-factor authentication (MFA) to secure access, and security review and testing performed regularly.
24. 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

25. 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

26. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
27. 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 was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

28. We generally do not transfer your personal data to countries outside of Singapore other than to our appointed third-party service providers, agents and other organisations in clauses 5 and 6 above. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

DATA PROTECTION OFFICER

29. 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. : +65 6745 3532
Email Address : dpo@hcsa.org.sg

EFFECT OF NOTICE AND CHANGES TO NOTICE

30. 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.
31. 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 use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date : 12/11/2024
Last updated : 12/11/2024