

Methodist Church of the Incarnation
Personal Data Protection Policy

INTRODUCTION

This Data Personal Policy provides for control in the collection, usage and disclosure of personal data to enable Methodist Church of the Incarnation (MCI) to comply with the Personal Data Protection Act 2012 (PDPA).

DEFINITION

1. Personal Data

Personal data refers to data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which the organisation has or is likely to have access. This includes personal particulars, medical records, educational records, employment records, financial records, etc, whether the data is stored in electronic or non-electronic form.

Personal particulars include:

- Full name
- Unique Identification (ID) such as NRIC number, passport number, foreign identification number
- Personal mobile number
- Facial image in photographs or video images e.g CCTV images
- Any set of data, e.g name, age, address, telephone number, occupation etc, when taken together would be able to identify the individual.

2. Definition of Collection, Use and Disclosure

Collection refers to any act or set of acts through which an organisation obtains control over or possession of personal data.

Use refers to any act or set of acts by which an organisation employs personal data. A particular use of personal data may occasionally involve collection or disclosure that is necessarily part of the use.

Disclosure refers to any act or set of acts by which an organisation discloses, transfers or otherwise makes available personal data that is under its control or in its possession to any other organisation.

3. Data Protection

The PDPA is a data protection law that governs the collection, use and disclosure of personal data by organisations.

The PDPA does NOT apply to:

- Personal data about an individual that is contained in a record that has been in existence for at least 100 years.
- Personal data of a deceased individual, except that the provisions relating to the disclosure of personal data and section 24 (protection of personal data) shall apply in respect of personal data about an individual who has been dead for 10 years or fewer.

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APPOINTMENT

MCI will appoint at least one Data Protection Officer (DPO) to ensure that MCI complies with the PDPA. The legal responsibility for complying with the PDPA remains with MCI.

The Governance Chairperson is MCI's DPO. The DPO has delegated the responsibility of managing and keeping the personal data in accordance with the approved policies and procedures to the Office Administrator.

PROCEDURES

1. Collection of Personal Data and Consent

a. Collection of Personal Data

All registration forms are to provide a clause or notice to clearly state and seek consent for the following:

- the purpose for the collection of data
- the usage of the collected data
- the ways the personal data will be used/disclosed.

b. Provision for Withdrawal of Consent

MCI will upon written request for withdrawal of consent, cease to collect, use or disclose the personal data and archive the information until consent is given; unless such personal data is necessary for MCI to fulfil its legal obligations. This will be done within 10 business days after receipt of the request.

2. Access of Data

MCI will upon request, provide an individual with his/her personal data in the possession of MCI and information about the ways in which the personal data may have been used or disclosed within a year before the date of request.

For queries by telephone, staff must perform the following verification checks on the individual (requesting for information) before disclosure of said individual's own personal information:

- Name as in NRIC
- Unique ID
- Address
- Contact Number(s)
- Email Address

For queries through email or post, staff must follow up with a telephone call to verify the identity of the individual (requesting for information) before disclosure of personal data.

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Staff are to provide the requested information only on verification of identity.

Personal information relating to other individuals will be provided only on a need-to-know basis. If staff are in doubt, do not release such information until clearance is obtained from the Data Protection Officer.

3. Protection and Confidentiality of Information

a. Confidentiality

MCI will keep all personal data confidential and accessible only to authorised and need-to-know personnel. All staff are bound by confidentiality obligations in their employment contract.

b. Office/Staff Work Area and storage of personal data

The following security arrangements are in place:

- Access to office is through locked doors. Visitors do not have access to office unless on official business. Entrance to the office is under CCTV surveillance.
- Staff computer are password protected.
- Physical files containing personal data must be marked 'Confidential' clearly and prominently and kept in locked cupboard when not in use.
- Electronic copy of personal data are password protected.

c. Safeguard for staff working from home

MCI staff are not encouraged to bring hard copy of confidential or sensitive data/information home. If there is a need to do so, permission must be sought from Pastor-in-charge or DPO or Office Administrator.

The personal device used must not be shared and it must be password protected. When it is not in use, it must be shut down.

d. Databases and Registration Files/Forms

Soft copy databases containing personal data must be password protected where applicable and stored in the church office. Access to the softcopy of document containing personal data are given only to authorised persons.

Hard copies of documents containing personal data, including registration forms, are to be kept in locked cupboards when not in use. No unauthorised copies of such documents shall be made. If and when copies are made, they shall be securely kept and properly destroyed when no longer required.

Committee or Ministry organising a project shall properly dispose of or archive documents containing personal data (whether in soft or hard copies) at the conclusion of the project.

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4. Accuracy and Correction of Data

MCI will ensure that data collected is accurate and complete; when in doubt, a request will be made to the individual for a verbal or written declaration that the personal data provided is accurate and complete.

MCI will ensure that personal data is updated and amended when requested.

5. Retention of Data

MCI will retain and maintain its personal data records for the purpose of church membership and organising activities, as well as communication of events, programmes and church matters. MCI will cease to retain the documents, soft or hard copy, as soon as it is reasonable to assume that the purpose for which the personal data was collected is no longer required and retention is no longer necessary for legal or business purposes.

There is a policy on the retention and disposal period of document that collects personal data. Proper disposal of confidential document that are no longer needed are to be shredded or by similar means.

6. Transfer of Data

MCI will not disclose personal data to third parties without the consent of the individual unless otherwise permitted by law.

MCI will not transfer personal data to a country or territory outside Singapore except in accordance with the requirements prescribed under the PDPA.

7. Accountability Obligation

MCI have policies and procedures in place to meet the obligations under PDPA and shall make the policies and practices available upon request. The PDPA Policy will be published in MCI's website.

Feedback may be provided anytime to the Data Protection Officer at dpo@mci.org.sg, with specific details. MCI will consider all feedback and take appropriate action upon receipt of such feedback.

When there is suspected or actual data breach, staff must inform the Pastor-in-charge and DPO of the full details, as soon as possible.

8. Policy Review

This Personal Data Protection Policy shall be maintained and updated by the Data Protection Officer, reviewed and approved by the LCEC in a timely manner.