

# KAY POH ROAD BAPTIST CHURCH

## PERSONAL DATA PROTECTION POLICY

23 Aug 2023

### Introduction

- (1) The *Personal Data Protection Act 2012* (PDPA) establishes a data protection law that comprises various rules governing the collection, use, disclosure, and care of personal data.
- (2) The PDPA recognises: (a) the rights of individuals to protect their personal data, including rights of access and correction, and (b) the needs of organisations to collect, use, or disclose personal data for legitimate and reasonable purposes.
- (3) **Kay Poh Road Baptist Church (KPRBC)** is committed to complying with all of the church's obligations under the PDPA.
- (4) This policy sets out how KPRBC will collect, use, and disclose an individual's personal data.

### Definition of Personal Data

Data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which KPRBC has or is likely to have access.

This includes unique identifiers (e.g. NRIC number, passport number); as well as any set of data (e.g. name, age, address, telephone number, occupation, etc), which when taken together would be able to identify the individual. Videos and photographs may constitute personal data if an identifiable individual is captured.

### Main Data Protection Obligations

KPRBC will comply with the nine main data protection obligations listed in the PDPA:

- (1) Consent Obligation. KPRBC will only collect, use, or disclose personal data for purposes for which an individual has given his or her consent. ***If the personal information is given voluntarily, then the individual is deemed to have given consent.*** KPRBC will allow individuals to withdraw consent, with reasonable notice, and inform them of the likely consequences of withdrawal.
- (2) Purpose Limitation Obligation. KPRBC will only collect, use, or disclose personal data about an individual for the purposes that a ***reasonable person*** would consider ***appropriate in the circumstances*** and for which the individual has given consent.
- (3) Notification Obligation. KPRBC will notify individuals of the purposes for which the organisation is intending to collect, use, or disclose their personal data ***on or before such collection, use, or disclosure of personal data.***
- (4) Access and Correction Obligation. Upon request, KPRBC will provide ***an individual his/her personal information*** unless disclosure would reveal confidential information or compromise operations. KPRBC will also ***correct any error or omission in an***

**individual's personal data** upon his or her request unless satisfied on reasonable grounds that a correction should not be made.

- (5) Accuracy Obligation. KPRBC will make **reasonable effort** to ensure that personal data collected by or on behalf of the organisation is **accurate and complete**, if it is likely to be used to make a decision that affects the individual, or if it is likely to be disclosed to another organisation.
- (6) Protection Obligation. KPRBC will make **reasonable security arrangements** to protect the personal data that the organisation possesses or controls to prevent unauthorised access, collection, use, or disclosure; or similar risks.
- (7) Retention Limitation Obligation. KPRBC will cease retention of personal data when it is no longer necessary for any business or legal purpose.
- (8) Transfer Limitation Obligation. KPRBC will transfer personal data to an organisation in another country **only according to the requirements prescribed under the regulations**. The foreign third party (for example, overseas missions partners) must have in place comparable standards of protection of personal data.
- (9) Data Breach Notification Obligation. Should a breach occur, KPRBC will assess whether the data breach is notifiable and notify the affected individuals and/or the Commission where it is assessed to be notifiable.
- (10) Accountability Obligation. KPRBC will implement the necessary policies and procedures in order to meet its obligations under the PDPA and shall make information about its policies and procedures publicly available.

### **CCTV, Video Recordings and Photography**

CCTV, video footage and photographs may constitute personal data if an identifiable individual is captured.

- (1) CCTV. **Notices are placed in prominent locations** to inform individuals that CCTVs have been deployed in the church premises for security and surveillance purposes.
- (2) KPRBC-organised events. Consent will be sought in the invitation/sign-up form indicating that photos of attendees will be taken at the function and may be used for publicity purposes on print and electronic media.

The Consent Obligation **does not apply** when the photographer or videographer is acting in his personal capacity (for example, when a congregation member takes photos for his own personal purposes at a KPRBC event or worship services). If photos and videos are taken out of the context of the above, KPRBC **will obtain the individual's consent** before using them for any purpose in print or electronic media.

### **Personal Data Requests/Queries**

Individuals who wish to exercise their right to **access, modify, or delete their personal data records held by KPRBC or choose to withdraw their consent for the use and disclosure of their personal data** must make the request **in writing (with full particulars included)** to the KPRBC Data Protection Officer at administrator@kprbc.org.sg. Upon request, KPRBC will provide **an individual his/her personal information** unless disclosure would reveal confidential information or compromise operations. Queries on this policy are to also be

sent to [administrator@kprbc.org.sg](mailto:administrator@kprbc.org.sg). KPRBC will respond to data requests/queries as soon as reasonably possible from the time the request is received. If KPRBC is unable to respond to an access request within 30 days after receiving the request, KPRBC shall inform the individual in writing within 30 days of the time by which it will be able to respond to the request.

#### Contact Details

Data Protection Officer  
administrator@kprbc.org.sg  
Kay Poh Road Baptist Church  
7 Kay Poh Road  
Singapore 248963