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Introduction

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

Definition

A. Personal Data

Personal data is defined widely to include “any data 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, financial records, etc, whether the data is stored in electronic or non-electronic form.

B. 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 (for 10 years from death), except the need to make reasonable security arrangements to protect such data compliance with requirements in relation to disclosure.

Appointment

The Director of Administration and Finance is BRMC’s Data Protection Compliance Officer.

Procedures

1. Collection of Personal Data and Consent

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 data collected
- the ways the personal data will be disclosed.

Please see Schedule.

Withdrawal of Consent

BRMC will upon written notice of withdrawal of consent take steps to dispose of or anonymize the information.

2. Accuracy and Correction of Data

BRMC will ensure that data collected is accurate and complete. When in doubt, a request will be made to the individual for clarification that the personal data provided is accurate and complete.

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

3. Protection and Confidentiality of Information

BRMC will keep all personal data confidential and accessible to only authorised personnel and for authorised purposes.

Staff working areas including the following are to be kept secure.

- Work desks, Meeting/ Discussion rooms
- Filing cupboards, Printers and Fax machines

Databases and registration files/forms

- Soft copies of documents containing personal data, including databases, are to be kept secure and accessible only by authorised persons.
- Hard copies of documents containing personal data, including registration forms, are to be securely kept in cupboards with limited authorised access.
- Due care shall be taken in handling such documents and to ensure that they not left in an unsecured state such that unauthorised persons may have access to the documents.
- No unauthorised copies of such documents shall be made.
- If and when copies of such documents are made, they shall be securely kept and properly destroyed when no longer required. For example, a committee organising a project shall properly dispose of or archive documents (whether in soft or hard copies) containing personal data at the conclusion of the project.

4. Third Parties

BRMC will not disclose personal data to third parties without the consent of the individual.

5. Retention of Data

BRMC will retain and maintain its personal data records for the purpose of organising and planning of activities, as well as communication of events, programmes and church matters.

6. Transparency

BRMC will make information on data protection policies and procedures available upon written request.

Feedback may be provided anytime to the Data Protection Compliance Officer. BRMC will consider all feedback and take appropriate action upon such feedback.

7. Access Obligation

Requests for information

Due verification shall be carried out for all queries made, whether verbally or in writing, for personal information. Matters that may be used for verification include the following:

- Name as in NRIC
- NRIC/ FIN Number
- Address
- Contact Number(s)
- Email Address

Such verification shall be carried out before disclosure of personal data.

8. Collection, Use and Disclosure of NRIC Numbers

The Personal Data Protection Commission Adversary guideline on the Collection, Use and Disclosure of NRIC Numbers states the following:

“3.1 Organisations are generally not allowed to collect, use or disclose NRIC numbers (or copies of NRIC).

They may do so only in the following specified circumstances:

- a) Collection, use or disclosure of NRIC numbers (or copies of NRIC) is required under the law (or an exception under the PDPA applies); or
- b) Collection, use or disclosure of NRIC numbers (or copies of NRIC) is necessary to accurately establish or verify the identities of the individuals to a high degree of fidelity.”

Barker Road Methodist Church’s Statement:

We have established that for our membership records, NRIC is needed as these are our official records to identify individuals for pledges, baptism, membership, marriage, primary 1 registration, death certifications etc.

Individuals that register participants for its activities and programs are not to collect NRIC numbers unless required by event venue, travel or insurance purposes.

If in doubt to check with Data Protection Compliance Officer.

Confidentiality Policy and Consent to Use of Data

By participating, including signing up for and providing personal information, in the worship services or activities of Barker Road Methodist Church and her Ministries, you consent to Barker Methodist Church collecting, using, disclosing and sharing amongst the relevant Ministries your personal data, for the purpose of organising and planning of activities, as well as communication of events, programmes and church matters. Barker Road Methodist Church respects personal data and confidentiality, and will not share such information with any third party unless authorised to do so. Should you wish to withdraw or limit your consent, please write with full particulars to our Data Protection Compliance Officer at the following address:

Barker Road Methodist Church
48 Barker Road,
Singapore 309917
admin@brmc.org.sg

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