



EtonHouse Community Fund

Personal Data Protection Policy

EtonHouse Community Fund (ECF) respects the privacy of individuals and recognizes the importance of the personal data entrusted to us and believe that it is our responsibility to properly manage, protect, process, use and/or disclose our employees, volunteers, beneficiaries and stakeholders' personal data.

At ECF, we are also committed to adhering to the provisions and principles of the Singapore Personal Data Protection Act 2012. The Act establishes a data protection law that comprises various rules governing the collection, use, disclosure and care of personal data.

It recognises both the rights of individuals to protect their personal data, including rights of access and correction, and the needs of organisations to collect, use or disclose personal data for legitimate and reasonable purposes.

The Act takes into account the following concepts:

Consent

Organisations may collect, use or disclose personal data only with the individual's knowledge and consent (with some exceptions);

Purpose

Organisations may collect, use or disclose personal data in an appropriate manner for the circumstances, and only if they have informed the individual of purposes for the collection, use or disclosure; and

Reasonableness

Organisations may collect, use or disclose personal data only for purposes that would be considered appropriate to a reasonable person in the given circumstances.



In projecting the three main concepts above, the Act contains nine main obligations which organisations are expected to comply with if they undertake activities related to the collection, use and/or disclosure of personal data: -

- i. The Consent Obligation
- ii. The Purpose Limiting Obligation
- iii. The Notification Obligation
- iv. The Access and Correction Obligation
- v. The Accuracy Obligation
- vi. The Protection Obligation
- vii. The Retention Limitation Obligation
- viii. The Transfer Limitation Obligation
- ix. The Openness Obligation

While ECF will not be going into the details of these Obligations in this Personal Data Protection Statement, rest assured that ECF is constantly mindful of them in our collection, use and disclosure of personal data.

Should anyone wish to know more about these obligations, a summary can be found in the Advisory Guidelines of the Personal Data Protection Commission at:

<https://www.pdpc.gov.sg/Overview-of-PDPA/The-Legislation/Personal-Data-Protection-Act>

1. Purpose for the Collection, Use & Disclosure of Personal Data

In general, subject to applicable exceptions permitted in the Act, before ECF collects any personal data from our employees, volunteers, beneficiaries and stakeholders, ECF will notify them of the purposes for which their personal data may be collected, used and/or disclosed, as well as obtain consent for the collection, use and/or disclosure of their personal data for the intended purpose.

Depending on our employees, volunteers, beneficiaries and stakeholders' relationships with ECF, the personal data collected may be used and/or disclosed for the following purpose:



For Employees/Staff Generally

In order to comply with its contractual, statutory, and management obligations and responsibilities, ECF is required to collect personal data relating to its employees.

All such data will be processed in accordance with the provisions of the Act and the relevant school's rules and policies, including those on data protection, as may be amended from time to time. Our employees' relationship with ECF will in most cases, be governed by the Employment Contract, Staff Handbook and/or Board Policies, all of which shall state expressly or implicitly the purposes for, and the manner in, which our employee personal data will be used.

The purposes listed below serve only to supplement and clarify the matter, without limiting, superseding or supplanting any express or implied terms in the abovementioned documents:

- a. for managing ECF partnering relationships with existing employees;
- b. for managing monetary contributions and records from existing employees;
- c. for managing staff benefit schemes attributed from ECF events and/or activities;
- d. for monitoring the use of ECF's computer and/or network resources;
- e. for issuance of ECF passes, invitations, newsletters and the like of related to the event and/or activities;
- f. for disclosure where necessary to external parties for purposes of school administration, to Government agencies for official purposes and to external third parties for, or in connection with, the above purposes, or where required by law; and
- g. for any other purposes not related to those listed above or in the participation/involvement with ECF related events and activities, which ECF may inform our existing employee of in writing from time to time, to seek separate consent.

For Donors Generally

For existing or prospective donors of ECF, some of the reasons/ purposes for collecting, using and/or disclosing personal data are as follows:



- a. soliciting donations
- b. creating and maintaining donor profiles in our system database for internal records and reference
- c. managing relationships (including but not limited to sending thank you letters, invitations to events, collaterals etc)
- d. processing tax deductions for eligible donations
- e. generating publicity materials

For Volunteers Generally

For existing or prospective volunteers of ECF, some of the reasons/ purposes for collecting, using and/or disclosing personal data are as follows:

- a. assessing suitability as a volunteer of ECF
- b. creating and maintaining a consolidated electronic volunteer database
- c. managing relationships (including but not limited to sending thank you letters, invitations to events, collaterals etc)
- d. Generating publicity materials for our programmes

For Beneficiaries Generally

For existing or prospective beneficiaries of ECF, or their parents or guardians, some of the reasons/ purposes for collecting, using and/or disclosing personal data are as follows:

- a. assessing eligibility as a beneficiary of ECF
- b. creating and maintaining a consolidated electronic beneficiary database
- c. managing relationships (including but not limited to sending thank you letters, invitations to events, collaterals etc)
- d. Generating publicity materials for our programmes



For The Public and Other Third Parties Generally

ECF is committed to engaging and embracing its surrounding community, ecosystem as well as society at large. As a result, ECF often organises activities in which external stakeholders or the general public are invited to participate.

While it is impossible to list all the events in which ECF hopes the public will participate, some events that members of the public can look forward to including community outreach activities, fundraising and others (Events).

Naturally, in encouraging spontaneous interactions with the public, there will be opportunities, and often a need to collect, use and/or disclose personal data from members of the public. Some of the reasons/ purposes are as follows:

- a. For security/ verification purposes at certain Events;
- b. For logistical/ administrative purposes for certain Events; (e.g. catering and transportations)
- c. To keep our community and employees updated of future ECF Events/ products which we feel may interest them;
- d. For Contact Tracing; and
- e. For marketing/ publicity purposes (e.g. Photographs and video with voice)

For Events where provision of personal data is a pre-requisite to attendance, attendees shall be informed in advance so that they may make an informed decision as to whether or not to attend. ECF will also endeavour to inform attendees and stakeholders of the purposes for which personal data collected from them will be used.

Should our employees, volunteers, beneficiaries and stakeholders at any time feel that the manner in which ECF has acted, or seeks to act, in respect of the collection, use or disclosure of personal data for an Event is inappropriate; please feel free to make their concerns known to the event organizer and/or the company (ECF).



2. Disclosure of Personal Data to Third Parties

ECF will not disclose our employees, volunteers, beneficiaries and stakeholders' personal data to any third parties without first obtaining consent permitting ECF to do so or unless any such disclosure is permitted under any of the statutory exemptions under the Act.

In this respect, please note that ECF may disclose our employees, volunteers, beneficiaries and stakeholders' personal data to third parties in certain circumstances without first seeking consent if such disclosure is either required or permitted under the Act, including without limitation, if the disclosure is required by law and/or regulations or if there is an emergency.

3. Request for Access, Correction and/or Withdrawal of Personal Data

Subject to certain exceptions in the Act, our employees, volunteers, beneficiaries and stakeholders may request to access and/or correct the personal data currently in our possession or withdraw their consent for the collection, use and disclosure of our employees, volunteers, beneficiaries and stakeholders' personal data in ECF possession at any time by submitting a written request.

For a request to access personal data, ECF will provide our employees, volunteers, beneficiaries and stakeholders with the relevant personal data within a reasonable time from such request being made.

For a request to correct personal data, ECF will process their request, including undertaking necessary verification activities, as soon as practicable after the request has been made. ECF will send the corrected personal data to every other organisation to which the personal data was disclosed by ECF within a year before the date the correction was made unless that other organisation does not need the corrected personal data for any legal or business purpose.

Our employees, volunteers, beneficiaries and stakeholders may be charged a reasonable fee for the handling and processing of their requests to access and/or correct their personal data, but they will be notified in advance of such costs.

For a request to withdraw consent; ECF will process the request within a reasonable time from such a request for withdrawal of consent being made. In some cases, requests for withdrawal of consent may adversely impact our employees, volunteers, beneficiaries and stakeholders' relationship with ECF as it may hinder ECF's ability to continue to interact with them. ECF will notify our employees, volunteers, beneficiaries and stakeholders in advance of such impact if any.



4. Administration and Management of Personal Data

ECF will take appropriate measures to keep our employees, volunteers, beneficiaries and stakeholders' personal data accurate, complete and updated.

ECF will also take appropriate precautions and preventive measures to ensure that our employees, volunteers, beneficiaries and stakeholders' personal data are adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of our employees, volunteers, beneficiaries and stakeholders' personal data.

ECF will also take reasonable efforts to ensure that the personal data in our possession or under our control is destroyed as soon as it is reasonable to assume that:

- i. the purpose for which that personal data was collected is no longer being served by the retention of such personal data;
- ii. and retention is no longer necessary for any other legal or business purposes.

ECF websites may contain links to other websites not maintained by ECF. Such third-party websites are subject to their own data protection and privacy practices and our employees, volunteers, beneficiaries and stakeholders are encouraged to examine the data protection policies of those websites.

5. Responsibility of EMPLOYEES AND STAKEHOLDERS

The Act also imposes certain responsibilities on all those who process personal data at the organisation. These obligations include holding and using data in a secure manner, making sure that data is handled in line with what individuals have been told, having appropriate arrangements in place for the access to (and sharing of) data, and making sure that individuals' data is accurate and retained for a suitable period.

If a data breach occurs (e.g., personal data held by the company (ECF) is lost, stolen, inadvertently disclosed to an external party, or accidentally published), this should be reported immediately to the company (ECF) so that ECF may review the circumstances and liaise as necessary internally and with the relevant external authorities.