



Data Protection Policy

Club Rainbow (Singapore)

Club Rainbow (Singapore) ('we', 'us', 'our', etc.) respects the right of individuals to protect their personal data. This data protection policy gives you information about how we collect, use and disclose personal data about you while recognising both your right to protect personal data about you and our need to collect, use or disclose it for purposes that we believe are reasonable and appropriate in the circumstances of our work assisting children with chronic and life-threatening illnesses and their families.

It applies to the personal data of all individuals ('you', 'your', etc.) who are our beneficiaries, members of the families of our beneficiaries, donors to us, participants in our public events (such as Ride for Rainbows), our employees, including volunteers, and online users of our website at www.clubrainbow.org. For our beneficiaries, 'you', 'your', etc. also includes a parent or parents, a guardian and another caregiver who takes responsibility for the beneficiary's welfare.

If you are not in any of these categories but we collect, use or disclose personal data about you in the course of our work, this data protection policy will apply to that personal data consistently with the way in which it applies to the above individuals.

1. Purpose of collecting, using or disclosing personal data

We collect personal data from or about our beneficiaries and potential beneficiaries and, in each case, their families and from our donors, employees, including volunteers, and other individuals. We use and/or disclose that personal data so that we are able to provide our services (which are described on our website) efficiently and effectively and so that we can comply with our legal obligations.

2. Collection, use and disclosure of personal data

With one exception, we collect personal data directly from you in various ways, including in-person meetings and by asking you to fill up various forms. The exception is where we collect personal data about potential beneficiaries from their doctor with the consent of their parent(s), guardian or other caregiver.

If at any time you would prefer not to provide some personal data that we request, please let us know. We will then explain our purpose for collecting that personal data. If you still do not wish to provide it, we will discuss with you whether or not we can proceed without it, which we may not be able to do so.

We collect, use, or disclose personal about you only if:

- you give, or are deemed to have given, your consent under the Personal Data Protection Act (PDPA) to us collecting, using or disclosing that personal data or
- collection, use or disclosure by us of that personal data without your consent is required or authorised under the PDPA or any other written law

Where we ask you to consent to us collecting, using or disclosing personal data about you, we will first inform you of our purposes for doing so. We will not use or disclose personal data about you for any other purposes without first informing you of the additional purposes and getting your consent to us doing so for the additional purpose(s).

In some circumstances, you are deemed to have consented to us collecting, using or disclosing personal data about you for a purpose. For example, if you pose for a photograph by our photographer at one of our events or if you send us your CV when you apply for a job with us you are deemed to have consented to us collecting, using or disclosing the personal data about you that is in the photograph (that is, your image) or the CV.

We are permitted by the PDPA to collect, use or disclose personal data about you without your consent in various circumstances that include the following:

- if it is publicly available or if it is business contact information
- if it was provided to us by another individual to enable us to provide a service for the personal or domestic purposes of that other individual
- if there is an emergency
- if we do so for evaluative purposes (such as assessing a job or volunteering application)
- where the disclosure is related to law enforcement or where the collection, use or disclosure is in connection with certain legal issues

If you would like more information about the circumstances under which we may collect, use or disclose personal data without your consent, please contact our Data Protection Officer.

If you browse our website, we do not capture any data that allows us to identify you.

3. Withdrawing your consent

On giving us reasonable notice, you may at any time withdraw any consent you have given, or are deemed to have been given, to us collecting, using or disclosing personal data about you for any purpose. Any notice of withdrawal of consent should be given in writing (which includes email) sent to our Data Protection Officer.

The consequences of you withdrawing consent to us collecting, using or disclosing personal data about you for any purpose may be onerous for you. Therefore:

- we may require you to provide proof of your identity and
- we will inform you in writing (which may be by email) of the likely consequences of withdrawing your consent for the specified purpose

If you still wish to withdraw your consent, we will act on your request and cease collecting, using or disclosing the personal data, unless doing so without your consent is required or authorised under the PDPA or other written law. We will also cause any and all of our data intermediaries to cease collecting, using or disclosing the personal data.

In addition, we will cease to retain our documents containing that personal data, or remove the means by which it can be associated with you, as soon as it is reasonable for us to assume that retention is no longer necessary for our legal or business purposes.

4. Access to personal data and information about use

On request by you, we will as soon as reasonably possible provide you with:

- personal data about you that is in our possession or under our control and
- information about the ways in which we have, or may have, used or disclosed that personal data within a year before the date of your request

Your request to us should be made in writing (which includes email) sent to our Data Protection Officer. We may require you to provide proof of your identity.

There are some circumstances where we are not required to provide you with information, and others where we are not allowed by the PDPA to do so. In some circumstances we may be able to provide you with limited information. You may obtain information about all of these circumstances from our Data Protection Officer.

We may charge you a fee for providing you with access to your personal data or information about how we may have used or disclosed it. The fee will reflect our incremental costs associated with responding to your request. You may obtain information about the fee from our Data Protection Officer.

5. Correction of errors in, or omissions from, personal data about you

You may request us to correct an error or omission in the personal data about you that we hold or that is under our control. Your request to us should be made in writing (which includes email) sent to our Data Protection Officer. We may require you to provide proof of your identity and/or documents or other evidence supporting your request.

There are some circumstances where we do not make a correction and other circumstances where we are not required to act on such a request. You may obtain information about these circumstances from our Data Protection Officer.

Unless we are satisfied on reasonable grounds that a correction should not be made, we will correct the personal data as soon as practicable. We will also send the corrected personal data to every other organisation to which we have disclosed it within a year before the date we made the correction (unless that other organisation does not need the corrected personal data for any legal or business purpose). Alternatively, with your consent, we will send the corrected personal data only to specific organisations as agreed with you.

6. Accuracy of personal data

We make reasonable efforts to ensure that personal data that we collect about you is accurate and complete if we are likely to use it to make a decision that affects you or we are likely to disclose it to another organisation.

7. Protection of personal data

We take reasonable steps to ensure the security of personal data about you that is in our possession or under our control and to protect it against risks such as loss or unauthorised access, destruction, use, modification or disclosure. Only authorised personnel are permitted to have access to personal data about you.

8. Retention of personal data

We cease to retain documents containing personal data about you as soon as it is reasonable to assume that the purpose for which we collected that personal data is no longer being served by its retention and retention is no longer necessary for legal or business purposes.

9. Feedback procedure

We strive for excellence in providing services to our beneficiaries and in all our interactions with donors, and with our employees (which includes our volunteers), as well as with the community generally. This includes our compliance with the PDPA.

Please direct any queries or feedbacks you have about the way in which we collect, use or disclose personal data about you to our Data Protection Officer. We will not deal with anonymous feedback

because we are unable to investigate them. If you raise a feedback anonymously, we will nevertheless note the matter raised.

Whenever you make a feedback, our Data Protection Officer will seek to obtain sufficient information from you to enable us to investigate it. Please be prepared to provide our Data Protection Officer with information as to, for example:

- the type of action, or lack of action, by us that has given rise to your concern
- whether it is an isolated incident or is ongoing and, in the case of an isolated incident, when it occurred
- a copy of any relevant correspondence you hold and
- details about what you consider should have happened or should not have happened

Upon receiving a feedback, our Data Protection Officer will investigate it and within five business days advise you of:

- the outcome of the complaint and the reasons for that outcome or
- write to you (which may be by email) advising you that the Data Protection Officer needs more time to investigate the complaint and stating when the Data Protection Officer expects to have resolved the complaint for you

If a complaint is settled to your complete satisfaction, our Data Protection Officer is not required to advise you in writing of the outcome of the complaint, unless you request a written response (which may be by email).

If a complaint is not settled to your complete satisfaction, our Data Protection Officer will advise you of the outcome of the complaint and the reason(s) for that outcome in writing (which may be by email).

10. Data Protection Officer

We have appointed a Data Protection Officer who is contactable as follows. Please attention to “The Data Protection Officer” and,

- send an email to dpo@clubrainbow.org
- call 6377 1789
- write to us at Blk 538 Upper Cross Street, #05-263, Singapore 050538

11. Changes to this data protection policy

We reserve the right to review, amend and/or update this data protection policy at any time and from time to time.