



**Lutheran Church in Singapore
Personal Data Protection Act
(PDPA) Policy**

Contents

Personal Data Protection Act (PDPA) Policy 3

- 1. Introduction 3
- 2. Policy will be made available 3
- 3. Purposes for collection, use and disclosure of personal data 3
- 4. Collection of personal data 4
- 5. Requests / Complaints process 5

Revision History

- 1. Approved by LCS ExCo Meeting, Dated 29 April 2019

Lutheran Church In Singapore

PERSONAL DATA PROTECTION ACT (PDPA) POLICY

(Approved by LCS ExCo Meeting, Dated 29 April 2019)

1. Introduction

Lutheran Church in Singapore (Including her local congregations) (“**LCS**”) is committed to compliance of the Personal Data Protection Act (the “**PDPA**”) in the collection, use and disclosure of personal data.

a) This Personal Data Protection Policy (the “**Policy**”) contains policies and practices adopted by LCS in the collection, use and disclosure of personal data.

b) Personal data means data, whether true or not, about an individual who can be identified either from that data and or from other information to which LCS has or is likely to have access. Personal data includes, but is not limited to the following:

- i. Name;
- ii. NRIC/FIN (Foreign Identification Number)/Passport number;
- iii. Residential address;
- iv. Date of birth;
- v. Gender;
- vi. Marital status;
- vii. Nationality;
- viii. Contact particulars such as personal telephone numbers and personal email address;
- ix. Financial information such as bank account or credit/debit numbers;
- x. Photograph and video image.
- xi. Medical Records

c) LCS respects the privacy and confidentiality of individuals.

2. Policy will be made available

LCS reserves the rights to amend this Policy from time to time and in whatever manner it will see fit in its absolute discretion by posting the amendments on its website. Such amendments will take effect immediately upon posting on LCS’s website.

3. Purposes for collection, use and disclosure of personal data

LCS collects, uses and discloses personal data for purposes which may include, but are not limited to, the following:

- a) Planning, organising and conducting of church services, events, activities, seminars, courses and programmes;
- b) Administration and management of LCS’s operations, processes, functions or other internal matters as the case may be, including but not limited to record keeping;
- c) Pastoral care, mentoring and follow up of members or other individuals where applicable;

- d) Communication with any individual in respect of:
 - i. any of the matters set out in this clause;
 - ii. the individual's membership with LCS;
 - iii. any request or query by the individual;
 - iv. any complaints;
 - v. any matters by reason of the individual being reasonably associated with, affiliated with or connected to LCS; or
 - vi. any other matters in respect of which it is reasonably necessary for LCS to communicate with the individual;

whereby such communication may take the form of email, letter, fax, voice call, SMS and any other message receivable on a mobile phone, a computer or an electronic gadget (e.g., messages via WhatsApp, Line, WeChat, Viber, Skype, Facebook messenger, etc.);

- e. Providing services to one or more individuals, a community or the general public;
- f. Internal and external communications and publications;
- g. For the purposes of the LCS's ministries, which include but not limited to the following carried out by LCS's staff, leaders or volunteers:
- h. Addressing an individual at LCS events or activities to welcome that individual;
- i. Communicating with an individual in the manner set out in this clause;
- j. Visitations of the individual;
- k. Meeting and interacting with the individual; and
- l. Conducting ceremonies such as weddings, house blessings and funerals

4. Collection of personal data

- a) LCS will collect personal data that is reasonably necessary to fulfil the purposes for which the personal data is collected.
- b) Personal data will be collected by reasonable and lawful means, without intentionally misleading or deceiving individuals as to the purposes for collection of personal data about them.
- c) The manners in which LCS may collect personal data include but are not limited to the following:
 - i. Application form, whether online and in hard copy, submitted by an individual to LCS, such as membership application form or other forms relating to events and activities organised or managed by LCS;
 - ii. Where an individual contacts staff or representatives of LCS to make enquiries on or in relation to pastoral care, mentoring, follow up, life groups, services or any events, activities, courses or programs organised, conducted or managed by LCS, whether such inquiries are in writing or verbally;
 - iii. Where an individual attends at or writes in to the Church Office for the purpose of making enquiries or to make requests relating to pastoral care, mentoring, follow up, life groups, services or any events, activities, courses or programs organised, conducted or managed by LCS;
 - iv. Where an individual makes a donation to LCS;

- v. Where an individual makes a request to LCS to contact that individual for any purpose;
- vi. Where an individual submits that individual's personal data for the purposes of employment;
- vii. Where an individual submits that individual's personal data for the purpose of volunteering at LCS' events, activities, programmes or courses;
- viii. Where an individual submits that individual's personal data for the purposes of membership.

5. Requests / Complaints process

- a) The data subject may request for (i) information on the personal data in our possession and the ways in which the data may have been used or disclosed and (ii) correction of any error or omission in the data.
- b) An individual may withdraw his or her consent to the collection, use or disclosure of his or her personal data by giving reasonable written notice to LCS to do so.
- c) An individual who does not wish LCS to retain his or her personal data may give reasonable written notice to LCS to withdraw his or her consent to the retention of his or her personal data. LCS will cease to retain personal data about the person within a reasonable time from receiving such written notice of withdrawal unless there are circumstances under which retention does not require the individual's consent.
- d) Where an individual withdraws his or her consent for LCS to collect, use or disclose his or her personal data, LCS may no longer be able to carry out the purposes set out in Part 3 above for or in relation to the individual.
- e) An individual who wishes to make a request, or to lodge a complaint to LCS pertaining to any matters relating to the PDPA, may make a written request or lodge a written complaint by doing one of the following:
 - i. visiting the Church Office and filling in a written request or complaint;
 - ii. contacting the DPO at email address is dpo@lutheran.org.sg or the telephone number of the Church Office; or
 - iii. in writing by post sent to the Church Office and attention to "Data Protection Officer".
- f) The DPO will investigate the complaint within a reasonable time of receiving the written request or complaint and will contact the complainant within a reasonable time, in order to address any concerns relating to matters with the PDPA.
- g) LCS reserves the right to reject, among others, frivolous or vexatious requests or complaints.