

# Data Protection Policy

## Yellow Ribbon Fund

**Yellow Ribbon Fund** ('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 administration of the Yellow Ribbon Fund.

It applies to the personal data of all individuals ('you', 'your', etc.) who are our beneficiaries, donors to us, and online users of our website at <http://www.yellowribbon.org.sg/yellow-ribbon-fund/index.html>.

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

### **1. Purposes for us collecting, using or disclosing personal data**

We collect personal data from applicants for a Yellow Ribbon Fund Start Bursary Award or for assistance from the Yellow Ribbon Emergency Fund, including personal data about their family and other connections). We use that personal data to assess the application and, where approved, to disburse funds.

We also collect personal data from our donors and potential donors (such as our guests for Dining Behind Bars). We use that personal data collected from donors to process their donations for tax deductibility and for other purposes for which they provide us with express consent. We use and disclose personal data collected from Dining Behind Bars guests to arrange their entry into Changi prison and to arrange and conduct the event.

We collect personal data from other individuals (such as members of our Management Committee and members of any sub-committee of our Management Committee) to satisfy regulatory requirements and to ensure the smooth and effective conduct of Management Committee and sub-committee meetings and affairs.

### **2. Our collection, use and disclosure of personal data**

We collect personal data directly from you. We do this in various ways, including telephone calls and by asking you to fill up forms. 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. 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 the 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 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).

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 was provided to us by another individual to enable us to provide a service for the personal or domestic purposes of that other individual
- 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.

#### **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 or that is collected on our behalf 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, or we remove the means by which it can be associated with 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. Complaints procedure**

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

Please direct any queries or complaints you have about the way in which we collect, use or disclose personal data about you to our Data Protection Officer. Generally, we are unable to deal with anonymous complaints because we are unable to investigate them. If you raise a complaint anonymously we will nevertheless note the matter raised and, if possible, try and investigate and resolve it appropriately.

Whenever you make a complaint 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 was 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

Immediately upon receiving a complaint our Data Protection Officer must investigate it and within two 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). If you are not satisfied with the outcome, you may take your complaint to the Personal Data Protection Commission.

#### **10. Data Protection Officer**

We have appointed a Data Protection Officer who is contactable as follows:

- send an email to [koh\\_shukai@SCORE.gov.sg](mailto:koh_shukai@SCORE.gov.sg)
- call 6214 2867
- write to us at 407 Upper Changi Road North, 20 km (Within Prison HQ Complex Blk B) Singapore 507658

#### **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.