



## BEDOK METHODIST CHURCH KINDERGARTEN

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### **PERSONAL DATA PROTECTION POLICY STATEMENT**

- a) Bedok Methodist Church Kindergarten, (“BMCK”) recognizes the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.
- b) BMCK is committed to the Personal Data Protection Act of Singapore (2012) which governs the collection, use and disclosure of personal data.
- c) This Policy Statement contains useful information about how and why BMCK collect, use and disclose your personal data. You can have our assurance that it will only be used in accordance with this statement.

### **Purposes for which your Personal Data is collected, used/processed and Disclosed**

- a) BMCK holds personal data on its students and their parents, including: contact details, assessments/ attendance information, conduct, characteristics such as ethnic group, special educational needs, any relevant medical information, photographs and video-recordings.
- b) The data is used in order to support the education of the students, to monitor and report on their progress, to provide appropriate personal and social care, and to assess the performance of the kindergarten as a whole, together with any other uses normally associated with this provision in an educational environment. BMCK may make use of limited personal data (such as contact details) relating to students, their parents or guardians to maintain relationships with students of BMCK and for fundraising, special school events and educational purposes.
- c) Photos of children taken in large group settings during school activities and special events for the purpose of portfolio may appear in another child’s or other children’s portfolios.
- d) Data is shared as necessary with third party companies to provide extended services, examples include transport, medical and online services such as email.
- e) Bedok Methodist Church( “BMC”), of which BMCK is a part of, may use limited personal data such as photographs and video-recordings of the students for the purpose of

promoting the kindergarten to the congregation or public. Such data may also be used to update, inform and enlighten the congregation on the ministry and works of the kindergarten.

- f) BMCK may retain and use personal data after a student has graduated to provide references, educational history and alumni services consistent with an educational environment. Please note that your data will still be held on BMCK database for administrative purposes.
- g) Video footage and photographs may constitute personal data if an identifiable individual is captured. Such photographs and videos taken may be used by BMCK for communication and publicity purposes in print or electronic media.

### **Mode of Collection of Personal Data**

Personal data is collected from:

- a) BMCK's Registration form for enrolment of students,
- b) response/consent forms from students/ participants of events and activities; and
- c) on an "as necessary" basis for compliance with regulatory and other administrative needs.

The integrity of data maintained by BMCK will be contingent upon the completeness and accuracy provided by the informants i.e. students/ parents/guardians.

### **Data Protection Officer (DPO)**

As part of BMC, BMCK will rely on BMC's appointed Data Protection Officer (DPO) to ensure that we comply with the Personal Data Protection Act (PDPA) of Singapore.

The DPO's duties include:

- (a) reviewing regularly the policy and practice for handling personal data so as to be compliant with legal requirements and facilitative of the advancement of the purpose of BMC;
- (b) upon review and, where updating is necessary, proposing to and seeking approval from the Local Church Executive Committee of BMC, to do so;
- (c) disseminating data protection policy and practice to members so that they are made aware of their responsibility to comply; and
- (d) handling queries or complaints relating to the Personal Data Protection Act ("PDPA").

- (e) The DPO's contact details shall be given upon request.

### **Protection of Personal Data**

BMCK has put in place necessary security measures and administrative, physical and technical procedures to minimize the risk of unauthorized access or disclosure and unlawful destruction or alteration, and to ensure the appropriate use of information.

- a) BMCK shall use personal data for the stated purpose only.
- b) If required to be used for another purpose, BMCK shall give notification of such intended use and get consent for the use.
- c) For every event being organized, one or two persons shall be appointed to take charge of collection, use, management and protection of the personal data collected for such event.
- d) Protection of the personal data means
  - i. to keep the data confidential;
  - ii. to keep hard copies in locked cupboards or in secure places;
  - iii. to keep soft-copy databases password-protected;
  - iv. to restrict access to authorized persons only; and
  - v. to destroy personal data when no longer required.

### **Retention of Personal Data**

- a) Personal data shall be retained only for as long as it is reasonable to fulfill the purposes for which the data was collected or as required by any written law.
- b) Hard copies of personal data no longer required shall be disposed by shredding or perforation in such manner as will prevent identification of individuals from them.
- c) Soft copies of personal data no longer required shall be disposed by deletion in a permanent manner.

### **Transfer Limitation**

BMCK will not transfer any personal data to a country or territory outside Singapore except in accordance with requirements under the Personal Data Protection Act (PDPA) (*section 26(1), PDPA*). Appropriate steps to be taken by BMCK are:

- It complies with the data protection provisions set out in Parts III to VI of the PDPA in respect of the transferred personal data, if the personal data remains in its possession or under its control.
- If the personal data is transferred to a third-party recipient in a country or territory outside Singapore, the recipient is bound by legally enforceable obligations to provide a standard of protection that is comparable to that under the PDPA.

"Legally enforceable obligations" include obligations imposed on a recipient of personal data under:

- Any law.
- Any contract in accordance with Regulation 10(2) of the Personal Data Protection Regulations 2014 (PDPR).
- Any binding corporate rules in accordance with Regulation 10(3) of the PDPR.
- Any other legally binding instrument.

### **Complaint Procedure**

- a) Any complaint relating to the PDPA shall be referred to the DPO of BMC and/or BMCK principal.
- b) For general queries, feedback or complaint, BMCK will reply within 2 week. For queries that require further investigation or evaluation, do expect a reply in 2 to 4 weeks.
- c) The DPO and/or BMCK principal shall investigate the complaint and report her finding to the respective Management Committee so that a timely and appropriate response is given to the complainant.
- d) Where remedial action is required, the DPO shall ensure it is taken and reported to the Local Church Executive Committee.

### **Rights of Providers of Personal Data**

#### **Access to Personal Data**

- a) Request for access to personal data being held by BMCK may be submitted via a Request form available from BMCK office. Completed form may be emailed or submitted to BMCK. Requests will be verified and replied within a week.
- b) Personal data record will only be released by BMCK Principal or Administrator upon verification of identity documents and the signed request form.

## **Correction of Personal Data/Update**

- a) Notification of any inaccuracy of any personal information in BMCK database is can be submitted to BMCK's principal by stating full name, NRIC no, contact information and the details of the requested correction/update.
- b) BMCK will update any information found to be incorrect within 2 weeks.

## **Withdrawal of Consent**

- a) Any individual may withdraw his/her consent to the use and disclosure of his/her personal data at any time, unless such personal data is necessary for BMCK to fulfill its legal obligations.
- b) BMCK shall comply with the withdrawal request and inform the individual if such withdrawal will affect the services and arrangements between the individual and BMCK
- c) Upon withdrawal of consent, BMCK shall cease to use the personal data and delete it from our records or destroy it.

Any queries on the BMCK's policies relating to the PDPA of Singapore, please email ([bmck@bmc.org.sg](mailto:bmck@bmc.org.sg)).

**BMCK will regularly review and update our Personal Data Protection Policy. The latest version will be available from BMCK office upon request.**

**BMCK Management Committee**

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