

## Privacy Policy

This Privacy Policy (“Policy”) is designed to assist you in understanding how NVPC collects, uses, discloses and/or processes the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

This Policy supplements but does not supersede nor replace any other consents which you may have previously provided to us. We may from time to time update this Policy to ensure that it is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements.

### 1. Your Personal Data

In this Policy and under the Personal Data Protection Act 2012 (No. 26 of 2012) (“PDPA”), “Personal Data” refers to any data or information (whether true or not) about you from which you can be identified, either (i) from that data; or (ii) from that data and other information to which we have or are likely to have access. Examples of such Personal Data that we may collect include:

- a) Your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address, bank account information, credit card information and any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interaction with you;
- b) Photos, films, portraits and/or video recordings of you;
- c) Your employment history, education background and income levels;
- d) Information about your usage of and interaction with our websites, mobile applications and/or services including computer and connection information, bandwidth, statistics on page views, and traffic to and from our websites and mobile applications.

## 2. Collection of Personal Data

2.1. NVPC may collect your Personal Data in one or more of the following ways when you:

- a) visit our premises as CCTV recording is on for 24 hours;
- b) visit our websites or use our mobile applications;
- c) donate through our websites or mobile applications;
- d) offer your volunteer time through our websites or mobile applications;
- e) attend our events, conferences, forums, workshops, talks as photos and/or video recordings may take place for publicity purposes;
- f) register with us for our services which may include events, conferences, forums, workshops, talks, consultancy services etc.;
- g) register with us as volunteers;
- h) donate to NVPC;
- i) interact with any of our employees, interns, volunteers, board and committee members e.g. via meetings, emails or telephone calls;
- j) respond to our request for additional Personal Data;
- k) request that we contact you, be included in an email or other mailing list;
- l) respond to our initiatives or programs;
- m) participate in our research and/or survey e.g. via online, face to face or pen and pencil, conducted by us or our partners/vendors;
- n) submit your Personal Data to us for any other reasons;
- o) apply for employment with NVPC;
- p) apply for an internship with NVPC;
- q) where your Personal Data is given to us from third party social networking services when you choose to connect with those services.

2.2. When you browse our websites or access our mobile applications, you generally do so anonymously, but please see Section 10 below which provides more information on our cookies policy.

2.3. You shall consult your parent or guardian before providing us with your Personal Data if you are under the age of eighteen [18].

2.4. **Accuracy:** NVPC will make reasonable efforts to ensure that the Personal Data we collect is accurate and complete. Please help NVPC by ensuring that all Personal Data that you submit is complete and accurate. You may update us when there are any changes to the Personal Data which you have provided to us by emailing the updates to our teams. We will correct or complete your Personal Data as soon as reasonably practicable.

2.5. NVPC will not be responsible for relying on inaccurate or incomplete Personal Data arising from you not updating us of any changes in your Personal Data that you had

initially provided us with. Failure to provide complete, accurate, true and correct information may result in our inability to provide you with services you have requested and/or to process the necessary administration.

### **3. Purposes for the Collection, Use and Disclosure of Your Personal Data**

3.1. NVPC may collect, use and/or disclose your Personal Data for the purposes for which we have specifically obtained your consent and the purposes for which you have provided your Personal Data to us. Some of the purposes are listed below:

- a. Marketing and Advocacy
  - NVPC may contact you to inform you about NVPC's and/or NVPC-related organisations' products and services, or other information which may be of interest to you. We may also invite you to participate in NVPC events and activities.
- b. Administration and Servicing
  - to carry out your instructions or respond to your queries;
  - assess and process your requests to NVPC;
  - administer your third party interactions through NVPC (e.g. when you donate to other charities or volunteer with other organisations);
  - processing and administering payments, billings, accounts, benefits/entitlements, credit and reference checks, debt-recovery matters, including but not limited to your employment, internship or volunteer assignment with NVPC;
  - compiling statistics for NVPC and/or industry exercises and studies, to design and improve our products and services for you;
  - compliance monitoring and audit reviews;
  - complying with all applicable regulations, laws and internal policies and procedures;
  - providing general information on product enhancements, services and policies which are relevant to your needs;
  - investigating and allegation or suspicion of fraud, misconduct, any unlawful action or omission;
  - archiving, backing-up or destroying Personal Data;
  - informing you of changes and updates to our services, policies, terms and conditions and other administrative information.
- c. Complying with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities and agencies.

- 3.2. Where Personal Data is submitted by you on behalf of another individual or concerns another individual other than yourself (or, in the case of situations where you, as a representative of your company or organisation are submitting the personal data of individuals as part of the disclosures by the company or organisation to us), you represent and warrant to us, that all the necessary consents (procured in accordance with all applicable data protection legislation, including without limitation the PDPA, for such purposes stated in the relevant sections of this Data Protection Policy) have been obtained from the relevant individuals and that you have retained proof of these consents, such proof to be provided to us upon our request.
- 3.3. If you have provided us with your Singapore telephone number(s) and have indicated that you consent to receiving upcoming events and updates from NVPC via your Singapore telephone number(s), then from time to time, we may contact you using such Singapore Telephone number(s), including via voice calls, text, fax or other means with our updates.

#### **4. Disclosure of Personal Data**

Personal Data will be protected and kept confidential but, subject to the provisions of any applicable law, may be disclosed for the purposes listed above, where applicable, to the following parties:

- a) Our employees, volunteers, interns, board and committee members;
- b) NVPC-related organisations;
- c) Banks, CPF or its agent banks, credit card companies and other financial institutions for the processing of any monies receivable or payable;
- d) Third party service providers who provide services to NVPC, e.g. courier services, payroll, mailing, information technology, data processing and storage, and insurance;
- e) Any liquidator, receiver, official assignee/trustee, judicial manager or any other person appointed under or pursuant to any applicable law or court order in connection with the bankruptcy, liquidation, winding up, judicial management or any other analogous process in respect of any individual, company or business
- f) Our professional advisers such as auditors and lawyers;
- g) Any judicial, administrative or regulatory body, any government or public or government agency, or any parties thereof having jurisdiction over NVPC;

- h) Any regulatory, government or statutory body to comply with applicable laws or regulations or upon their valid request;
- i) Any other party to whom you authorise us to disclose your Personal Data.

## **5. Transfer of Personal Data outside Singapore**

Where your Personal Data is to be transferred out of Singapore, we will comply with the PDPA in doing so. This includes obtaining consent<sup>1</sup> from you to transfer your Personal Data overseas, and before you give consent, providing you with a reasonable written summary on the extent of the protection offered to the Personal Data to be transferred overseas, and/or taking appropriate steps to ascertain that the foreign recipient organisation of the Personal Data is bound by legally enforceable obligations to provide to the transferred Personal Data a standard of protection that is at least comparable to the protection under the PDPA<sup>2</sup>.

## **6. Withdrawal of Consent**

- 6.1. If you wish to withdraw your consent to any use or disclosure of your Personal Data as set out in this Policy, you may contact the NVPC Data Protection Officer (DPO). The DPO's contact information is located in Section 12 (Contacting Us).
- 6.2. Please note that if you withdraw your consent to the collection, use, and/or disclosure of your Personal Data, depending on the nature of your request, we may not be able to continue providing our services or performing our contractual obligations to you. Such withdrawal may also result in the termination of any agreements or arrangements you may have with us. NVPC's legal rights and remedies are expressly reserved in such event.
- 6.3. NVPC will strive to effect your withdrawal of consent within 10 working days of your withdrawal and will notify you if more time is required.

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<sup>1</sup> The consent must not have been induced by false or misleading information/practices, and must not be a condition of providing a product or service unless the transfer of the individual's personal data overseas is reasonably necessary to providing the product or service: Regulation 9(4) of the Personal Data Protection Regulations 2014.

<sup>2</sup> Section 26 of the PDPA read with regulation 9 of the Personal Data Protection Regulations 2014.

## **7. Access to your Personal Data**

- 7.1. You may request access to or make corrections to your Personal Data records that NVPC has. Please submit your request to NVPC's DPO identifying yourself and indicating the Personal Data that the request concerns. For the DPO's details, refer to Section 12 (Contacting Us).
- 7.2. NVPC will strive to respond to each request for access or correction as soon as reasonably possible or as soon as practicable, and as accurately and completely as necessary. However, please note that we may refuse your request under certain circumstances as laid out under the PDPA. We may also charge you a reasonable administrative fee for the handling and processing of your request to access your Personal Data. We will provide you with a written estimate of the fee we will be charging.
- 7.3. Our response time to your request is between 30 to 90 working days. Such account shall be in respect of how your Personal Data has been or may have been generally used or disclosed within the year before the date of your request. If more than 30 working days are required, we will inform you within the first 30 working days of the time when we would be able to respond to your request.

## **8. Protection, Policies and Procedures**

- 8.1 We will endeavor to protect your Personal Data in our possession and will guard against risks of unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction, through reasonable and appropriate security measures.
- 8.2 We strive to ensure that our systems are secure and that they meet the industry standards.
- 8.3 To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Personal Data we collect.
- 8.4 Notwithstanding our security measures for protecting your Personal Data, you acknowledge that no data transmission over the internet is completely secure and by providing your Personal Data over the internet, you are transmitting information at your own risk.

## **9. Retention of your Personal Data and Requests to Delete your Personal Data**

- 9.1 We will only retain your Personal Data for as long as it is necessary for our business or legal purposes.
- 9.2 You may request that your Personal Data be deleted by contacting our DPO (refer to Section 12 (Contacting Us)). Do note that we will not be able to delete your Personal Data if we require it for business or legal purposes. In such circumstances, you may nevertheless withdraw your consent to the further use or disclosure of your Personal Data (refer to Section 6 (Withdrawal of consent)).

## **10. Use of Cookies**

- 10.1 We may collect or analyse anonymised information from which individuals cannot be identified (“Aggregate Information”), such as number of users and their frequency of use, the number of page views (or page impressions) that occur on our websites/applications and common entry and exit points into our websites/applications.
- 10.2 We use “cookies” where a small data file is sent to your browser to store and track Aggregate Information about you when you enter our website or use our mobile applications. The cookie is used to track information such as the number of users, their frequency of use, profiles of users, and their preferred sites.
- 10.3 The Aggregate Information collected is used to assist us in analysing the usage of our websites/applications and improving our websites, mobile applications and services.
- 10.4 Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our websites, mobile applications or services.

## **11. Third-Party Sites**

Our websites and mobile applications may contain links to other websites and applications operated by third parties for your convenience and information. You access these websites and applications at your own risk. To the fullest extent permitted under the law, we cannot be responsible for a third-party’s acts, omissions, data policies or their use of cookies nor the content or security of any third-party websites and applications, even if linked to our websites and applications. We recommend that you check the applicable data protection policy of the

third party to determine how they will handle any information they collect from you. Any such liability is expressly disclaimed and excluded.

## **12. Contacting Us**

Should you have any questions, feedback or complaints relating to the use or disclosure of your Personal Data, or if you wish to know more about our data protection policies and practices, please contact our DPO at [dpo@nvpc.org.sg](mailto:dpo@nvpc.org.sg).

## **13. Updates on Privacy Policy**

As part of our efforts to ensure that we properly manage, protect and process your Personal Data, we will be reviewing our policies, procedures and processes from time to time.

We reserve the right to amend the terms of this Policy at our absolute discretion. Any amended Policy will be posted here.

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