

**PRIVACY POLICY**  
**THE PATRICIAN SOCIETY**  
**PERSONAL DATA PROTECTION ACT (PDCA)**  
**EXTERNAL POLICY**

---

**A. THE PERSONAL DATA PROTECTION ACT**

The Personal Data Protection Act (Act No. 26 of 2012) (“PDPA”) regulates the collection, use and disclosure of an individual’s personal data. The general rule laid out by the legislation is that personal data can only be collected, used and / or disclosed with the consent of the individual concerned.

The PDPA has been implemented in two stages. The Do Not Call (“DNC”) registry came into force on 2 January 2014. The remainder of the provisions, including those pertaining to the collection, use and disclosure of personal data, came into force on 2 July 2014.

**B. RELEVANCE OF THIS EXTERNAL POLICY**

The PDPA applies to all organisations, including alumnus organisations such as The Patrician Society (TPS). It requires TPS to put into place practices and policies to meet the prescribed data protection standards. TPS is liable for all the acts committed by its staff, executive committee and volunteers, unless reasonable steps have been taken by TPS to prevent these persons from violating the Act.

This external policy therefore aims to inform the general public about how TPS complies with the PDPA. It also provides a set of practical steps that people may take to gain access to, or make corrections to their personal data provided to TPS. These steps also allow them to withdraw their consent to the collection, use or disclosure of their personal data.

## **C. PERSONAL DATA**

In this Data Protection Policy (“Policy”) and under the PDPA, “personal data” refers to any data (whether true or not) about an individual who can be identified [1] from that data; or [2] from that data and other information to which we have or are likely to have access.

Examples of such personal data may include a person’s:

- name, NRIC, passport or other identification number;
- date of birth;
- contact details such as telephone number(s), mailing address(es), and email address(es);
- education details;
- images, videos, and voice recordings;
- employment and financial details; or
- any other information relating to any individuals which may have been provided to TPS, in any form.

In this Policy, “we”, “us”, “our” or “TPS” refers to The Patrician Society, “you”, “your” or “yours” refers to the persons to whom this Policy applies.

## **EXTERNAL GUIDELINES**

### **A. THE PATRICIAN SOCIETY’S COLLECTION, USE, AND DISCLOSURE OF PERSONAL DATA**

TPS is committed to adhering to its legal obligations under the PDPA. This means that TPS will do its best to comply with the general rule laid out by the PDPA that personal data can only be collected, used and/or disclosed with the consent of an individual (subject to the exceptions and on the terms provided in the PDPA).

**Note:** The information in this Policy merely provides an overview of TPS's obligations under the PDPA. This Policy is not a representation by TPS that is meant to create any private law obligation. TPS's precise legal obligations may be found in the PDPA, the Personal Data Protection Regulations 2014 and any other subsidiary regulations, notices or guidelines in force. TPS may, from time to time, update this Policy to reflect any changes in legal or regulatory requirements.

## **B. COLLECTION**

In general, TPS collects personal data when:-

- you submit any form (such as membership registration, application, consent or public permission);
- you enter into any agreement with TPS;
- you provide other documentation or information in respect of your interactions and transactions with TPS, or when you use or participate in TPS's activities;
- you interact with TPS staff, executive members, and other representatives (for example, via telephone calls, email, fax, letters, fax, cross-platform messaging and Voice over IP services (VoIP) and face-to-face meetings);
- you request that TPS contact you, or be included in an email or other mailing list kept by TPS;
- you respond to TPS's request for additional personal data through other initiatives;
- TPS takes your photographs or videos when you attend its events;
- you submit your personal data to TPS for any other reason.

**Accuracy:** TPS will take reasonable efforts to ensure that the personal data TPS collects is accurate and complete. Please help TPS by ensuring that all personal data you submit is complete and accurate. If you fail to do so, TPS may be unable to provide you with the services that you have requested.

If TPS is likely to use your personal data to make a decision that affects you, or if TPS is likely to disclose your personal data to another organisation, TPS will make reasonable efforts to ensure that personal data collected by or on behalf of us is accurate and complete.

**Security:** TPS will protect the personal data by making reasonable security arrangements. However, TPS cannot completely guarantee the security of your personal data.

### **C. PURPOSES OF COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

In general, TPS may collect, use and disclose personal data for the following non-exhaustive list of purposes:-

- responding to, processing and handling complaints, queries, requests, feedback and suggestions;
- assisting and contacting parties in relation to the services they have requested;
- contacting parties in relation to events TPS is hosting;
- research and advocacy purposes in relation to our alumnus;
- TPS's internal record keeping purposes;
- for use in TPS publications, or to send out TPS publications;
- complying with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities.

TPS will seek your prior consent for any disclosure of your personal information in relation to these purposes and for any other purpose that is not listed above.

TPS will retain your personal data for as long as the purpose(s) for which it was collected remain(s) valid, or for as long as necessary to comply with TPS's legal or business obligations.

**D. CONTACTING THE PATRICIAN SOCIETY: FEEDBACK, COMPLAINTS, ACCESS AND CORRECTION OF YOUR PERSONAL DATA, AND WITHDRAWAL OF CONSENT**

You may contact us if you:-

- have any questions or feedback about how TPS handles personal data;
- have any complaints about how TPS has handled your personal data;
- wish to obtain access or make corrections to your personal data that TPS has; or
- wish to withdraw your consent to TPS's use of your personal data,

Please identify yourself and indicate the personal data that the request concerns. TPS will strive to respond to each request as soon as reasonably possible and as accurately and completely as necessary. However, please note that TPS may refuse your request under certain circumstances as laid out under the PDPA.

**Note on Withdrawal of Consent:-**

If you withdraw your consent to the use of your personal data, depending on the nature of your request, TPS may not be able to continue providing its support or performing its obligations to you. Any withdrawal of consent may also result in the termination of any agreements or arrangements you have with TPS and you being in breach of your contractual obligations or undertakings. TPS reserves its legal rights and remedies in such an event.

Dated this *3rd* day of *July* 2019



**Col (Rtd) Rupert Gwee**  
President,  
The Patrician Society



**Kevin Toh**  
Data Protection Officer,  
The Patrician Society