



“所以天父的儿子若叫你们自由，你们就真自由了。” 约8：36
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PRIVACY POLICY

Commitment of Organisation

The Organisation shall fully comply with the obligations and requirements of the Personal Data Protection Act 2012 (PDPA 2012). The Organisation's officers, management and members of staff shall, at all times, respect the confidentiality of and endeavour to keep safe any and all personal data collected and/or store and/or transmitted and/or used for, or on behalf of, the Organisation.

The Organisation shall endeavour to ensure all collection, storage, transmission and other handling or usage of personal data by the Organisation shall be done in accordance with the obligations and requirements of the PDPA 2012.

Where an individual legitimately requests access to and/or correction of personal data relating to the individual, held by the Organisation, then the Organisation may provide and/or correct that data in accordance with the time and manner stipulated within the PDPA 2012.

Types of Personal Data Collected From Donors, Supporters, Volunteers, Staff, Residents

For the purpose of carrying on the Organisation's activities and businesses, including sale, provision, registration, administration, operation of halfway house, work therapy projects, social enterprise, donation receipts, management of residents, volunteers and related services and operations (including relevant online services and billing service), you as our Donor, Supporter, Volunteer, Staff, Residents, Partners, Service/Product Customer, Vendor may be requested to provide personal data such as, but not limited to, the following, without which it may not be possible to satisfy your request:

- a) Name;
- b) NRIC/Fin/UEN(Company & Organisation) Number;
- c) Correspondence address, Service Provision Address, and/or billing address;
- d) Contact details, including name and telephone number or email address;
- e) Account details, including account numbers, service numbers, or user accounts;
- f) Payment details, including credit card and banking information.

In some instances, you may also be requested to provide certain data that may be used to further improve the Organisation operational activities and/or better tailor the type of information presented to you. In most cases, this type of data is needed for the new intake of our mandated or non mandated resident or staff or applicant for a job in the Organisation where the requested service is a personalised service, or provision of the service is dependant on your providing all requested data. Failure to provide the requested data may prevent the



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Organisation from providing the residential rehabilitation programme or offer the job position to you. This type of data may sometimes include, but is not limited to :

- a) Age;
- b) Gender;
- c) Marital Status;
- d) Salary range and employment details;
- e) Education and Profession;
- f) Hobbies and leisure activities;
- g) Family history and Genogram;
- h) Fostering Experience;
- i) Financial Status;
- j) Criminal Records and admission to Prison/DRC details;
- k) Addictions details;
- l) Legal status;
- m) Medical profile;
- n) Religious Faith;
- o) Halfway House experience;
- p) Needs Assessment

In support of the management and operational activities of the Organisation, information may be automatically collected relating to those services or nature activities of a Charity so the Organisation may perform accurate reporting and administration of your accounts such as, but not limited to, call/connection time, duration, origin, and destination.

The Organisation's web servers may also collect data relating to your online session, the use of which is to provide aggregated, anonymous, statistical information so that the Organisation may better meet the demands and expectations of visitors to its sites.

Under certain circumstances, telephone calls made to and from the Organisation's order and/or service hotlines and/or inquiry telephone numbers will be recorded for the purposes of quality control, the time of calling, such recordings are NOT personal data of the caller and therefore, in respect of the callers, are not subject to the various provisions of the PDPA 2012 and the caller has no rights and/or claims either statutory, contractual or tortious, over or to such data. At all times, care is taken to protect such recordings from in advertent and/or unauthorized access.

The Organisation's Halfway House Centre and the Operational Units operated by Social Enterprise are under CCTV surveillance for security, management of residents and staff purposes. At all times, care is taken to protect such recordings from in advertent and/or unauthorized access. Access to such recordings will only be produced to authorize personnel/law enforcer e.g. Police, Court, Prison Officer and etc.



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Purpose for Collection, Processing and Disclosure of Personal Data

Your personal data may be used for:

- verifying your identity;
- provision of goods and services to you;
- matching your personal data with other data collected for other purposes and from other sources including third parties in relation to the provision of goods and services to you;
- to issue tax exemption receipt for your donation given with in accordance to requirement by Inland Revenue Authority of Singapore;
- marketing and advertising of any goods and/or services to you by the Organisation, related enterprise and affiliated establishments upon your consent in accordance with the prevailing requirements in the PDPA 2012;
- updates of event, newsletter, fundraising, magazines, correspondences and etc of the Organisation;
- provision of residential rehabilitation programme to mandated or non-mandated residents;
- to recruit as volunteer to assist in the daily operational or management functions of the Organisation;
- personal images, photos, footages, personal testimony will be published or printed or included in magazines, newsletters, correspondences, website, any mass media upon your consent in accordance with the prevailing requirements in the PDPA 2012;
- business planning and improving goods and/or services to you by the Organisation, related enterprises and affiliated establishments;
- processing of any benefits in connection with the supply of goods and services to you;
- analysing, verifying, enforcing contractual rights, and/or checking of your credit, payment and/or status in relation to supply of goods and services to you;
- processing of any payment instructions, direct debit facilities and/or credit facilities in relation to supply of goods and services;
- enabling the daily operation of your account and/or collection of amounts outstanding in your account with the Company including the use of debt collection agents;
- enabling the Organisation to comply with any obligations to interconnect, with other industry practices, or with obligations to third parties or government agencies in relation to the supply of goods and services or operation of Halfway House or intake of resident for the residential rehabilitation programme;
- keeping you informed about the rehabilitation programme, goods and services supplied to you and other goods and services made available by the Organisation;
- prevention or detection of crime;
- disclosure as permitted or required by law;
- any other purposes as may be agreed to between you and the Organisation, including the purposes set out in any application or terms and conditions for the programmes or supply of specific goods and services.



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Disclosure

The Organisation may, where such disclosure is necessary to satisfy the purpose, or a directly related purpose, for which the data was collected provide such information to the following parties :

- (a) Any related enterprises or affiliates establishments;
- (b) Any person or Organisation who is acting for or on behalf of the Organisation, or jointly with the Organisation, in respect of the purpose or a directly related purpose for which the data was provided;
- (c) Any other person or Organisation who is under a duty of confidentiality to the Organisation and has undertaken to keep such information confidential, provided such person or Organisation has legitimate right to such information;
- (d) The Organisation dealers, agents, contractors, suppliers and other telecommunication, information service providers and content providers; its professional advisers, including its accountants, auditors and lawyers;
- (e) Government and regulatory authorities and law enforcement agencies and other organisations, as required or authorised by law; and
- (f) Any other purposes as may be agreed to between you and the Organisation, including the purposes set out in any application or terms and conditions for the supply of specific goods and services.

Consent

All personal information collected would be used or disclosed only for the purposes for which it was collected.

Access and Correction

The Organisation fully complies with the “Rights of Access and Correction” obligations of the PDPA 2012.

Any personnel with their personal data parked with the Organisation may exercise the right to access and correction the personal data upon request.

Withdrawal of Consent

The Organisation fully complies with the “Rights of Withdrawal of Consent” obligations of the PDPA 2012.

Any personnel with their personal data parked with the Organisation may exercise their right to Withdrawal of Consent for stopping the receiving of newsletters, magazines, correspondences, events and etc. from the Organisation.

Withdrawal of Consent is allowed as it is not violating any other obligations or legislation or regulation of law enforcers, government agencies or requirements for the operation of a non profit organisation of Halfway House.



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Retention

The Organisation will destroy any personal data it may hold in accordance with its internal policy. Generally speaking, the Organisation policies follow closely to the obligation of applicable statutory or contractual obligation.

Accuracy

Where possible, the Organisation will validate data provided using generally accepted practices and guidelines. This includes the use of check sum verification on some numeric fields such as account numbers or credit card numbers. In some instances, the data provided will be validated against pre-existing data held by the Organisation. In some cases, as per the requirements of the statutory or contractual obligation, the Organisation is required to see original documentation before the personal data may be used, such as Personal Identity Card, Work Pass and/or proof of address. For the purpose of ensuring accuracy or authenticity of the identity document supplied to us, we expect personnel to produce their identity document in person for checking at a time convenient to them.

Security Safeguards

All personal data held by the Organisation will be kept confidential. Appropriate security safeguards are in place to protect personal data against unauthorised access, misuse, disclosure, copying, use, alteration, accidental loss or theft, destruction or damage. Only authorised personnel(s) have access to our systems.

Updates to the Privacy Policy

The Organisation will ensure regular updates or not more than a period of three (3) months of the Privacy Policy to go in line with the latest legislation requirements announcement in PDPA website.

Our mechanisms and processes are in place to receive and address feedback or inquiries about our policies and procedures relating to the handling of personal data. Appropriate measures will be taken to amend policies and procedures if a feedback is found to be justified.

Cookies

We do not use “cookies”, “web-bugs” or any other tracking technologies to collect information from users of our web site.

Links to the other website

Our Organisation’s website contains links to other sites. Please be aware that we are not responsible for the privacy practices of other sites. This Privacy Policy applies solely to information collected by this website.

Prevailing Terms

Any other obligations to applicable statutory or contractual obligation will be prevailed then the PDPA 2012 as stated in government law and regulations.



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Contact us

If you have any queries on the privacy policy and how we use your personal data, you could reach out Data Protection Officer (DPO) through the following means,

(a) **Data Protection Officer : Mr Freddy Wee**

(b) **By email to dpo@breakthroughmissions.org.sg**

(c) **By post to : Breakthrough Missions
The Data Protection Officer
24 Yew Siang Road
Singapore 117758**

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