



**Talent Beacon Fellowship's
Data Protection Policy**

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1. Introduction

1.1. Policy Statement

(a) Talent Beacon Fellowship (“TBF” or “us” or “we” or “our”) is committed to safeguarding the Personal Data of the Individuals (“you” or “your”) under TBF. We recognise the need to respect the privacy of Individuals, and the need to treat Personal Data in an appropriate and lawful manner, and are committed to comply with its obligations in this regard, in respect of all Personal Data we handle.

(b) Additionally, we commit to being open with the Individuals’ whose Personal Data we keep, and will respond to any legitimate enquiries regarding usage, storage, accuracy of the respective Individual’s Personal Data within a reasonable timeframe.

(c) We recommend that you should take time to read through and understand the purpose of our collection, usage and handling of your Personal Data.

(d) Talent Beacon Fellowship also reserves the right to amend our Privacy Policy from time to time and will post our updated Privacy Policy on our website and other platforms that we consider appropriate.

(e) We manage the Individuals’ Personal Data in accordance with Singapore Personal Data Protection Act 2012 (No. 26 of 2012) and other applicable laws.

1.2. Definitions

1.2.1. Personal Data

Personal Data means data, whether true or not, about an Individual who can be identified from that data; or from that data and other information to which the organization has or is likely to have access.

1.2.2. Individual

Individual means a natural person, whether living or deceased.

1.2.3. Authorised Persons

Authorised Persons refer to TBF’s Board of Directors members, staff and consultants engaged by TBF and other persons authorised by the TBF Board of Directors.

2. Responsibilities

2.1. Talent Beacon's Executive Committee Responsibilities

Talent Beacon Fellowship's Executive Committee ("TBF Board of Directors") is the responsible authority for ensuring compliance with the legal obligation of protecting the Individuals' Personal Data. As a result, the TBF Board of Directors has appointed a Data Protection Officer ("DPO"), who will;

- (a) develop and implement the appropriate processes to receive and respond to complaints that may arise with respect to the application of the PDPA;
- (b) make information available on request about our data protection policies and process to receive and respond to complaints.

2.2. Personal Data Protection Obligation

2.2.1. Storage of Personal Data

TBF will adopt reasonable and appropriate security arrangements to protect the storage of data through the following measures:

- (a) Marking confidential on documents with personal records clearly and prominently;
- (b) storing hardcopies of documents securely;
- (c) storing electronic files that contain Personal Data in secured folders; and
- (d) archived paper records and data backup files may be stored in off-site facilities or service providers provided such facilities are secured.

2.2.2. Protection of Personal Data

All Personal Data held must be secured and protected against unauthorised access and theft. TBF shall ensure that:

- (a) IT networks that host Personal Data are secured and protected against unauthorised access;
- (b) personal computers and other computing devices that have access to Personal Data are password protected;
- (c) personnel and other files that contain sensitive or confidential Personal Data are secured and only made available to Authorised Persons; and
- (d) ensure that IT and email service providers' services or provisions comply with security standards in line with industry practices.

In the event of a security breach, the DPO shall be notified. The DPO shall investigate if such breach is a malicious act and shall take appropriate action after consulting with the TBF Board of Directors.

2.2.3. Retention Limitation Obligation

TBF shall retain Individual's Personal Data only for as long as it is reasonable to fulfil the purposes for which the Personal Data was collected for or as required by law. TBF shall ensure the disposal of Personal Data is performed appropriately with little possibility to recover the Personal Data from disposal process, should there be a need to.

3. Data Collection, Usage and Disclosure

3.1. Personal Data

The type of Personal Data that TBF may collect from Individuals will depend upon the capacity of the Individual. Normally, the Personal Data collected by TBF may include an Individual's:

- (a) name, telephone number(s), mailing address, email address and any other information relating to you which you have provided in any forms you may have submitted to use, or in other forms of interaction with you;
- (b) personal identification and/or passport number;
- (c) title, date of birth/age, sex, marital status, nationality and occupation;
- (d) credit card/ bank account information;
- (e) camera or video footage that identifies Individuals; or
- (f) any other personal information that an Individual may offer voluntarily;
- (g) for any other as permitted or law.

3.2. Purpose Limitation

TBF collects, uses and discloses Personal Data for the following purposes:

- (a) Planning, organising and holding TBF meetings, events, activities, courses and programs;
- (b) administration and management of TBF's operations, functions or other internal matters that may be, including record keeping;
- (c) responding to a request or query by the Individual;
- (d) responding to and resolving any complaints;
- (e) any matters by reason of which the Individual is reasonably associated with, affiliated with or connected to TBF or;
- (f) any other matters in respect of which it is reasonably necessary for TBF to communicate with the Individual.

Such communication may take the form of voice or video calls, SMS, other messages receivable on a mobile phone (e.g. WhatsApp, Facebook, Instagram, Skype messages etc.), email, fax or post.

Under no circumstances will your Personal Data be sold or provided to any third party for their marketing or promotional purposes.

TBF shall only collect Personal Data relevant to the purpose of the collection. Each data shall indicate if it is mandatory in order to accomplish the purpose. Individuals shall be informed of the purpose of collecting optional data (e.g. to improve services rendered).

3.3. Collection of Personal Data

Personal Data is to be collected by fair and lawful means, without misleading or deceiving Individuals as to the purposes for collection of Personal Data about them. The avenues by which TBF may collect Personal Data include, but are not limited to:

- (a) Application form(s) submitted by an Individual to TBF, such as membership application forms or other forms relevant to events and activities organised or managed by TBF;
- (b) Where an Individual contacts Authorised Persons of TBF to make enquiries or in relation to any meetings, events, activities, courses or programs organised, conducted or managed by the TBF;
- (c) whether such contact is by email, voice calls, or otherwise;
- (d) Where an Individual makes a donation to TBF;
- (e) Where an Individual makes a request to TBF to contact that Individual for any purpose;
- (f) Where an Individual submits Personal Data for the purpose of employment;
- (g) Where an Individual submits Personal Data for the purpose of volunteering at TBF meetings, events, activities, programs or courses.

However, the transmission of information via the internet or any social media or messaging applications is not entirely secure. By choosing to transmit Personal Data via the internet or any social media or messaging applications, you acknowledge that any such transmission is subject to risk. While we strive to protect your Personal Data, we cannot ensure the security of your Personal Data transmitted via e-mail or the Internet or any social media or messaging applications, whether sent by you or us. Once we have received your Personal Data, we will take the reasonable and necessary steps to protect the data received.

3.3.1 Revised Advisory Guide

The Personal Data Protection Commission revised Advisory Guidelines on the PDPA for NRIC and other National Identification Numbers issued on 31 August 2018 states all organisations are not to collect NRIC numbers or make copies of it by 1st September 2019. However, NRIC is needed for our official records, in order for us to identify Individuals for membership and volunteer records.

3.4. Consent

TBF shall seek consent from Individuals to collect, use or disclose the Individual's Personal Data, except in specific circumstances where collection, use or disclosure without consent is authorised or required by law. Consent may be collected through written documentations (e.g. consent form or written note) or electronically (email consent or electronic forms).

In situations that consent cannot be conveniently obtained in written form or electronically, TBF may opt to obtain verbal consent, and such processes should be first approved by the DPO. In the case that Individuals are unwilling or unable to provide consent to the collection, use or disclosure of Personal Data, TBF may not be able to fulfil certain services.

3.4.1. Deemed Consent

TBF may assume Individuals have consented to collection, usage and disclosure of their Personal Data in situations where the Individual has provided Personal Data for **expressed and implied** purposes.

3.4.2. Withdrawal of Consent

Any Individual may withdraw their consent in writing to the use and disclosure of their Personal Data at any time, unless such Personal Data is necessary for TBF to fulfil its legal obligations. TBF shall comply with the withdrawal request within a reasonable timeframe. Prior to the withdrawal, TBF should inform the Individual should the withdrawal of Personal Data affect services and arrangements between the Individual and TBF. TBF may cease such services or arrangements as a result of the withdrawal.

3.5. Notification Obligation

TBF shall collect Personal Data directly from the Individuals. However, TBF may also collect Individual's Personal Data from third parties provided the consent was obtained from the Individual or required by law. Prior to or during the collection of Personal Data, TBF shall make known to the Individual the purpose for which the Personal Data was collected, except when such Personal Data is provided by an Individual for an obvious purpose. (E.g. Individual provided Personal Data to register for an event, as such the purpose is for that event participation).

3.6. Accuracy Obligation

TBF shall make every reasonable effort to ensure that the Personal Data of Individuals' that is collected is accurate and complete. However, TBF relies on Individuals' self-notification of any changes to their Personal Data that is relevant to TBF.

3.7. External Personal Data Transfer

TBF may disclose Individuals' Personal Data to external organisations for necessary and appropriate purposes. Under no circumstances will your Personal Data be sold or provided to any third party for their marketing or promotional purposes. Additionally, such transfer shall be done in a manner that is secure, appropriate and in compliance with PDPA requirements.

4. Access and Correction of Personal Data

4.1. Access to Personal Data

Individuals whose Personal Data are kept by TBF will be given access to their Personal Data. Should the Individual request access, TBF shall disclose the usage and disclosure history of the Personal Data in accordance with the PDPA Regulations. Individuals may make the request to TBF for such disclosure and correction by writing to TBF in accordance to Clause 4.3.

4.2. Correction of Personal Data

TBF shall notify all other organisations of such corrections, if the Individual's Personal Data was disclosed by TBF to that organization one year prior to this correction. Such notification shall take place except if TBF deems the Personal Data is no longer relevant or needed by the organization for the purpose that TBF's disclosure was made earlier.

4.3 Access and Correction Process

The Data Protection Officer will have oversight of all Personal Data access or correction requests and will ensure that the requests are processed in accordance with this policy. Request for Personal Data access or correction by Individuals, including any enquiries and complaints, shall be submitted to TBF in writing to the DPO at the following address and information;

Talent Beacon Fellowship
1 Coleman St,
#07-02 The Adelphi,
Singapore 179803
8891 3539
Email: admin@talentbeacon.org

All TBF Authorised Persons shall forward any Personal Data access or correction requests to the DPO within a reasonable timeframe. TBF may request for additional information from the Individual who submitted the request to aid in the investigation. The DPO should also verify the identity of the Individual before responding to the request for access or correction. TBF may respond to the Individual who submitted the request by telephone call, written note or electronic mail. In any case, the DPO is to make a record of such requests and responses for future reference and/or verification.

4.4 Openness Obligation

TBF commits to develop and publish data protection policy statements to inform Individuals of the manner in which their Personal Data is collected, used and disclosed. Such statements will be made available to Individuals upon request, or published in a manner that TBF deems fit. This policy statement can also be found on TBF's Facebook page and website.

5. Video Recording and Photography

As video footage and photographs constitutes Personal Data, TBF hereby informs Individuals that we reserve the right to keep and utilise any footage (be it video footage or photos) taken during TBF meetings, events, activities, courses and programs, or any such events affiliated or connected to TBF. Should the Individual take any video footage or photos during TBF meetings, events, activities, courses and programs, or any such events affiliated or connected to TBF, and affiliate us with the footage, we reserve the right to keep and utilise that footage as well.

As part of TBF's responsibility to the Personal Data of Individuals, we hereby undertake to establish the following procedures;

- (a) Notices shall be put up to inform Individuals that photographs and videos taken may be used by TBF for communication and publicity purposes in print or electronic media.
- (b) If photos and videos are used for any other purposes, TBF must obtain the Individual's consent before using them.

Only Authorised Persons of TBF are allowed to access these Personal Data.

6. Policy Review

This Personal Data Protection Policy shall be maintained and put into effect by the DPO and reviewed and updated by the TBF Board of Directors whenever necessary.