

## St Andrew’s Cathedral Home Policies/SOPs

Title/Description	Personal Data Protection Policy		
Applicable For			
Process Owner		Prepared By:  TANG CHILIN Data Protection Officer	Approved By:  Board of Directors
Policy Number	SACH-POL-BD-03		
Effective Date	13 Aug 2024		
Revision Number	00		
Revision Date	Not applicable		

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### Introduction

1. St Andrew’s Cathedral Home (“SACH”) recognises the importance of safeguarding personal data when dealing with information relating to parties seeking admissions, residents and their families, visitors, volunteers, donors and staff, and therefore is committed to fully implementing and complying with the provisions of the Personal Data Protection Act (the “Act”). The St Andrew’s Cathedral Home Personal Data Protection Policy set out here explains the procedures and systems in place to comply with the Act (the “Policy”), in respect of personal data as defined under the Act.

### Purposes for the Collection, Use and Disclosure of Personal Data

2. SACH receives or collects the personal data of parties seeking admissions, residents and their families, visitors, volunteers, donors and staff for purposes reasonably required by it as a sheltered home with resident care and well-being programmes.
3. These purposes include the following, whether within or outside Singapore:
  - a. Evaluation of medical status for fit to resident care and well-being programmes provided by SACH.
  - b. Assessment of financial means by individuals and families to support costs for stay.
  - c. Medical assistance needed from external healthcare providers, where needed, once admitted as resident.
  - d. Support from nominated next-of-kin and extended family during resident stay.
  - e. Management and administration of employment relationships with staff such as work-related dealings, evaluation of performance, crediting salaries, administering staff benefit schemes and conducting audits on finance claims.
  - f. the Diocese of Singapore including amongst her parishes in furtherance of her religious objectives.

4. SACH will not use the personal data for any purpose other than that for which it was collected. Should SACH require any personal data in its possession to be used for a purpose other than those for which consent was originally given, fresh consent will be sought in order to use the data for that new purpose.
5. In the course of processing personal data for the above purposes, SACH may disclose such personal data to third parties within or outside Singapore. These third parties include:
  - a. Reporting and sharing of information with government agencies in Singapore, welfare organisations and healthcare providers involved in wider support of persons needing assistance.
  - b. Other governmental organisations or authorities to whom SACH is required by law to disclose the data.
  - c. Individuals who are legally entitled to access their personal data.
  - d. Volunteers and third-party voluntary organisations who require the data in order to process and operate programmes for residents as sanctioned by SACH.
  - e. Third parties who provide SACH with data processing, administration, health, insurance or legal services, or other professional or management services.
  - f. Other third-party homes or healthcare facility where SACH had deemed necessary to refer the resident to, should resident be found unsuitable for continued stay at SACH.
6. Disclosure to third parties outside Singapore shall only be to organisations that are required or undertake to process the data with a comparable level of data protection as that required under Singapore Personal Data Protection Act.

#### Withdrawal of consent

7. Should you wish to withdraw or limit your consent to SACH's collection, use and disclosure of your personal data, please write in with full particulars to our Data Protection Officer ("DPO") using the contact details provided in paragraph 18 below.

#### Confidentiality

8. Any personal data collected by SACH shall be accessible by employee(s), volunteer-staffed board members and management committee of SACH to serve the purpose for which the data was collected. Such employee(s) and volunteer(s) shall observe strict confidentiality at all times.
9. In the event personal data is disclosed to third parties, such third parties will be required to sign an agreement requiring them to observe confidentiality at all times and to use the personal data only for the purpose for which it was disclosed to them.

#### Data Protection Officer (DPO)

10. SACH has designated a DPO to deal with data protection matters and complaints, encourage good data handling practices and ensure that SACH complies with the Act and implements the Policy. If

you have any questions, complaints or concerns, please contact the DPO using the contact details provided in paragraph 18 below.

#### Accuracy

11. SACH endeavours to take all reasonable steps to ensure that personal data in its possession or under its control is accurate, up-to-date, and complete. If there is any error or omission in the personal data you have provided to SACH, please write in to our DPO with the necessary details for correction of your data. If any personal data you have provided to SACH becomes inaccurate, please contact our DPO to update your data.

#### Access

12. Should you wish to access any personal data collected by SACH or understand how such data has been used or disclosed, please write in to our DPO with your request. The DPO will provide you with the requested information within a reasonable time, after verification of your identity.

#### Retention

13. SACH will retain personal data for as long as it is necessary to serve the purpose for which it has been collected. Once the data in SACH's possession is no longer necessary to serve the purpose for which it was collected, the data will be destroyed or deleted after 3 years in a secure manner.

#### Protection

14. SACH endeavours to maintain all personal data in its possession or under its control securely. To this effect, SACH has put in place measures to ensure the protection of data in its possession against unauthorised access, collection, use, disclosure, copying, modification, disposal or other risks.

#### Transfer

15. SACH shall not transfer any personal data in its possession to any parties outside Singapore except as specified in this Policy. Any outside party to which SACH intends to transfer data in its possession must have protections equivalent to those provided for in the Act.

#### Complaints

16. If an individual feels that his data has been erroneously or improperly handled by SACH, he or she may lodge a complaint in writing by post or email with the DPO. Once a complaint has been received, the DPO will acknowledge receipt of the same in writing by email, and will contact the relevant parties to investigate the complaint.
17. The outcome of the investigation will be communicated by the DPO to the complainant in writing by post or email, notifying him or her of the outcome.

#### Enquiries

18. SACH is committed to protecting the privacy and personal data of its residents, families / well-wishers of residents, volunteers, donors, staff and visitors. For further enquiries about SACH's Personal Data Protection Policy, please write to the DPO at the following address:

Data Protection Officer  
St Andrew's Cathedral Home  
Blk 341 Clementi Ave 5, #01-148  
Singapore 120341  
Email: [sach\\_board@cathedral.org.sg](mailto:sach_board@cathedral.org.sg)

#### Updating the Policy

19. This Policy may be updated from time to time to take account of changes in policy, technology, and/or to ensure compliance with any legislative changes.

*Approved by the SAC Home Board of Directors on 13 Aug 2024*