

## Personal Data Protection Policy

This Data Protection Notice (“**Notice**”) sets out the basis which *Society for the Aged Sick* (“**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of our prospective service users, service users, service users’ authorised representative, donors, volunteers and visitors in accordance with the Personal Data Protection Act (“**PDPA**”).

### Application of this notice

This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

Collection, use, disclosure or otherwise processing of personal data of our service users on behalf of government ministries or statutory boards will be in accordance with guidelines set out in the government’s data management policy. *Society for the Aged Sick* will comply with the relevant requirements under the government’s data management policy.

### Personal Data

1. As used in this Notice:

“**person**” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may enter or has entered into a contract with us for the supply of any products or services by us, or (c) has submitted a job or internship application with us; and

“**personal data**” means data, whether true or not, about an individual (whether a prospective service users, service users, service users’ authorised representative, donors, volunteers or otherwise) who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, identification numbers such as NRIC, fin, work permit and birth certificate, contact information such as residential address, email address or telephone number, personal particulars, medical history, photographs and other audio-visual information, employment information, any criminal record, your housing and financial situation and the identities and contact details of your next of kin/caregiver and your representative.

3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

### **Collection, Use and Disclosure of Personal Data**

4. We generally do not collect your personal data unless
  - (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”) after
    - (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and
    - (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or
  - (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
5. We may collect and use your personal data for any or all of the following purposes:
  - 5.1 establishing or managing your relationship with us.

This includes:

#### Where you are a prospective service user,

- processing and evaluating your application for our services.

#### Where you are a service user,

- To carry out residential, medical, nursing, rehabilitation and other nursing home related services by SAS;
- To seek consultation from/refer to/co-ordinate care services with other care providers for procedures, additional support on treatment, specialist assistance, provision of follow up care as part of integrated or holistic care;
- To organize and evaluate programs and activities that promote the well-being of residents;
- To co-ordinate and facilitate follow-up home visits post-discharge, or provide continuity of care;

- To work with funeral directors, casket companies, morticians or other like persons as may be necessary to discharge duties with respect to a deceased individual;
- To inform your Authorised Person identified in your admission agreement of the outcome of treatments, your well-being or seek consent on your behalf if you are not able to do so;
- To assist in billing, receipt of payment from services that we or others provided to you;
- To facilitate claims for reimbursement, subsidies and financial assistance purposes
- To assist in evaluation, education, training and quality improvement activities that enhance service delivery;
- To conduct research related to your personal circumstances or services you used. We will notify you and obtain your written consent before using your personal data for any specific research project, unless otherwise permitted under the PDPA or other legislation; and
- To maintain the security of the Home with measures including managing visitor access rights and installing security cameras.

Where you are a service user's authorised representative or next of kin/caregiver,

- processing and evaluating the service user's application for our services;
- providing medical and other updates;
- seeking consent for resident matters including emergency/incapacity situations;
- To facilitate applications and claims for reimbursement, subsidies and financial assistance purposes; and
- To process billing and payment of invoices.

Where you are a donor,

- To track and process donation transactions and records;
- To process tax deductible receipts for eligible donations; and
- To correspond with donors through sending of thank you letters, invitations, newsletters and donation collaterals.

Where you are a volunteer,

- To track and process volunteer attendance and their participation records;
- To assess the suitability and matching of volunteers for the various activities;
- To correspond with volunteers by sending thank you letters, invitations, newsletters and notices; and

- To enable us to assign volunteers to the various programmes and activities.

Where you are a visitor,

- To fulfil contact tracing obligation established by the Ministry of Health;
- For temperature and health screening before entry (during pandemic period);
- To notify the relevant staff of your visit to our nursing home;
- To create a data log of your information for security monitoring and fire safety-related matters;

5.2 verifying your identity;

5.3 responding to, handling, and processing queries, requests, applications, complaints and feedback from you;

5.4 complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;

5.5 transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and

5.6 any other incidental purposes related to or in connection with the above.

6. We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law such as during the following situations:

- to respond to an emergency that threatens your life, health and safety or of another individual; and
- necessary in the national interest, for any investigation or proceedings.

7. We may disclose your personal data:

- where such disclosure is required for, or in connection with, the provision of the services requested by you;
- to third party service providers, agents and other organisations we have engaged to perform any of the purposes listed in clause 5 above for us;
- to comply with any applicable laws, regulations, codes of practice, guidelines, rules or requests by public agencies, or to assist in law enforcement and investigations; and
- any other party to whom you authorised us to disclose your personal data to, or where necessary to undertake any action requested by you.

8. You have the right of choice regarding the collection, usage and/or disclosure of your personal data. If you choose not to provide us with the personal data described in this notice, we may not be able to perform our obligations as stated in this notice. You have the right to object to the processing of your personal data and withdraw your consent in the manner described below.
9. If you choose not to provide us with your personal data for the purposes listed in paragraphs 5 and 6, you may submit a request in writing or via email to our Data Protection Officer at the contact details provided below or indicate in the personal data collection form submitted to us (if any). By choosing not to provide us with your personal data, depending on our relationship, we may not be able to provide services to you. Depending on the complexity of the request and its impact to our relationship with you, we will not collect or, within 30 days of our receipt of your request, cease using and/or disclosing your personal data in accordance with your request.
10. The purposes listed in paragraph 5 may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).
11. In the case where we receive unsolicited personal data via email or any other communication channels, the unsolicited personal data will not be retained and will be securely disposed of immediately.

### **Withdrawing of Personal Data**

12. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you or your authorised representative in writing. You or your authorised representative may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request via email or otherwise in writing to our Data Protection Officer at the contact details provided below. If you are unable to submit your request in writing or if you require any assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.

13. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it. Should we require more time to give effect to a withdrawal notice, we will inform you of the time frame by which the withdrawal of consent will take effect.
14. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in the manner described in clause 12.
15. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

#### **Access to and Correction of Personal Data**

16. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request via email or otherwise in writing, to our Data Protection Officer at the contact details provided below. If you require assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.
17. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
18. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Before we accede to your access or correction request, we may need to verify your identity by checking identification document, and the legitimacy of your request. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in

writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

### **Protection of Personal Data**

19. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection and security software on all our devices, encryption, disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis, and requiring 3rd party partners to comply to the PDPA obligations while processing personal data we disclose to them.
20. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures. In the event of a personal data breach, we will endeavour to notify the affected parties no later than within 3 calendar days from when we become aware of the breach.

### **Accuracy of Personal Data**

21. We will make every reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.
22. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer at the contact details provided below.

### **Retention of Personal Data**

23. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
24. We will cease to retain your personal data, or remove the means by which the data

can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

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

25. We generally do not transfer your personal data outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the Singapore PDPA, including entering into an agreement with the receiving party to accord similar levels of data protection as those in Singapore.

### **Data Breach Notification**

26. In the event a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, we shall promptly assess the impact and if appropriate, report this breach within 3 calendar days to the Personal Data Protection Commission (PDPC). We will notify you when the data breach is likely to result in significant harm to you after our notification to PDPC. We may also notify other relevant regulatory agencies, where required.

### **Data Protection Officer**

27. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

**Telephone No.:** [+65 6922 6222](tel:+6569226222)

**Email:** [dpo@societyagedsick.org.sg](mailto:dpo@societyagedsick.org.sg)

**Address:** 130 Hougang Avenue 1, Singapore 538900

### **Effect of notice and changes to notice**

28. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

29. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this

Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

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