



APSN - Personal Data Protection Policy

Introduction

Association for Persons with Special Needs (“**APSN**”) recognises the importance of having effective privacy protections in place and is committed to compliance with Singapore’s Personal Data Protection Act 2012 and its regulations (collectively, “**PDPA**”). In this Privacy Policy, “personal data” shall have the same meaning ascribed to it in the PDPA.

Does this Privacy Policy apply to you?

This Privacy Policy applies to you if you were previously, are currently or may prospectively be a client of APSN, an officer or employee of APSN, a volunteer or member of APSN, a beneficiary of APSN or a family member or caregiver of a beneficiary, a sponsor or donor of APSN, a collaborative business partner, client, service provider, supplier or vendor of APSN, if you contact APSN, if you visit APSN’s websites (“**Site**”), or social media pages, if you send to or receive emails from APSN, or if you participate in APSN’s events. For an individual who is a minor or a person who is not legally capable of managing his/her affairs, this Privacy Policy shall apply to his/her legal guardian.

APSN may collect, use, store or otherwise process personal data within the framework of PDPA in situations where: (a) consent, as provided under the PDPA, is given or deemed given by the data subject; or (b) consent of the data subject is not required pursuant to the PDPA.

Sometimes, APSN, whether in the course of its activities, providing the services and/or in this Privacy Policy, may use or may make reference to third party platforms or services. These are managed by organisations other than APSN. APSN makes no representations or warranties as to the privacy practices of any third-parties. APSN is not responsible and shall not be held liable, in any form or manner whatsoever, for the privacy policies of third parties.



Why does APSN process personal data?

In the course of its activities and/or providing the services, APSN may need to collect, use, store or otherwise process personal data within the framework of PDPA. Such situations where personal data may be processed include the following:

- Provision of social services. For evaluating beneficiary's suitability for social services, assistance and provision of social services and assistance to the beneficiaries in furtherance of the objects of APSN
- Performing agreements. To perform an agreement between you and APSN, in relation to APSN's activities.
- Compliance. For APSN, its members, officers and/or employees to comply with legal and regulatory obligations.
- Safety and security. To protect your vital interests or of other individuals, such as those involving health and safety. This may include for the purposes of authentication of individuals and/or transactions, and the protection of APSN, its clients, volunteers, members, beneficiaries and their family members and caregivers, donors and collaborative business partners.
- Internal Management. For activities such as managing APSN's assets, and its employees, conducting audits and investigations, evaluations, finance and accounting, implementing controls, and management reporting and analysis.
- Relationship management and marketing. For activities such as to establish, maintain, extend a relationship with a client, volunteer, member, beneficiary, donor or collaborative business partner and to provide updates on APSN's activities, administer donations, sponsorships and funding.
- Research and Studies. Carrying out and participating in research and analysis to be able to provide social services and assistance to the beneficiaries in furtherance of the objects of APSN.

In relation to particular products or services or in your interactions with us, APSN may also have specifically notified you of other purposes for which APSN may collect, use, store or otherwise process



your personal data. If so, then APSN may process your personal data for these additional purposes as well, unless APSN has specifically notified you otherwise.

What personal data does APSN collect and/or process?

In the course of its activities and/or providing the services, APSN may need to collect, use, store or otherwise process personal data within the framework of PDPA. APSN may collect personal data in various ways, including in person-to-person meetings and interviews, and through information and data collected through completed forms or questionnaires, documents and/or information provided to APSN.

Personal data that APSN may process include:

- Contact information. This may include your name, address, e-mail address and phone number.
- Financial information. This may include your bank account number, payment status and invoices.
- Identification information. APSN may require certain identification information to ensure that APSN may authenticate your identity in the course of its activities and/or providing the services.
- Health and medical records and family conditions. This may include medical history and information about a family's conditions, financial circumstances, employment status and services the beneficiary or family/caregiver is receiving for purposes of evaluating the potential beneficiary's suitability for social services or administering social services
- Employment information. In processing applications for employment, APSN may process resumes, references, certificates of graduation and qualification and other personal data about candidates. If a candidate's application is not suitable for APSN's current requirements, APSN may keep a record of the application, including the personal data provided, and may contact the candidate again if a suitable position becomes available.
- Media. CCTV recordings, video footage and photos may constitute personal data, and APSN may process such data in accordance with the applicable consent of and/or notification to the data subject.



Does APSN use cookies or site analytics?

APSN may also use cookies to maximise your user experience on the Site. Cookies are text files created on your computer when your web browser loads a website or web application. Cookies help APSN to improve the Site and to deliver a better and more personalised user experience, through allowing APSN to distinguish you from other users of the Site and remembering your preferences. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of a cookie. Please be aware that if you elect to refuse or restrict cookies, you may be unable to access certain parts of the Site. Unless you have adjusted your web browser setting so that it will refuse cookies, the Site may set cookies when you load and navigate around the Site.

The Site may also use third party analytics services. Such services will evaluate your use of the Site, compiling reports on your activity and duration on the Site, while providing other miscellaneous services relating to website activity and usage. Such service providers may also transfer this information to other third parties where required to do so by law, or where such third parties process the information on their behalves.

By using the Site, you consent to such usage and processing of data, and APSN's use of cookies.

Who has access to your personal data?

APSN may share your personal data with third parties in the following circumstances:

- With its affiliates, or with third parties if such is necessary for the purposes as listed above. If appropriate, APSN may require third parties to ensure the protection of the rights of data subjects, by requiring such third parties to implement appropriate technical and organisational measures.
- With its officers, members, volunteers and/or employees if and to the extent necessary for the performance of their responsibilities and services.
- To regulatory agencies and if and when required to do so by law, court order, or other legal process, for example, with law enforcement agencies or other governmental agencies.



What rights can you exercise in relation to your Personal Data?

You may have certain rights under the PDPA that you may exercise in relation to your personal data. Please note that in some cases APSN is not required to comply or fully comply with your request. You may refer to the PDPA for more information.

Withdrawing consent. Where you have consented to the processing of your personal data by APSN, you may have the right to withdraw your consent at any time by contacting APSN's Data Protection Officer using the contact details set out in this Privacy Policy. APSN shall stop the further processing of your personal data within a reasonable period after the withdrawal of your consent. However, this does not affect the lawfulness of the processing before the consent was withdrawn. In any event, please note that the withdrawal of your consent, under certain circumstances, may result in APSN and/or its affiliates not being able to provide you with its/their services and may affect any agreement between you and APSN and/or its affiliates.

Accessing and/or correcting your Personal Data. You may seek access to your personal data and/or ask us to correct or delete any inaccurate, incomplete or out of date information by writing to APSN's Data Protection Officer using the contact details set out in this Privacy Policy. Upon receipt of your request, APSN may request for additional information from you, including relevant proof of identity, in order to process your request. APSN may also charge a reasonable fee to cover applicable administration costs when dealing with any requests for access and/or correction, which APSN shall inform you of in advance.

In any event, please note that there may be circumstances where APSN may not be required to grant a request for access and/or correction. You may refer to the PDPA for more information. APSN shall endeavour to disclose and/or correct such personal data in accordance with applicable legal obligations, and where APSN refuses to do so, it may, where possible, provide you with the reasons for refusal.



Queries and Complaints

If you have any queries in relation to this Privacy Policy, or if you wish to make a complaint about the handling of your personal data by APSN, please contact APSN's Data Protection Officer using the following contact details:

By e-mail: dpo@apsn.org.sg

By post:

Association for Persons with Special Needs
(Attention: Data Protection Officer / PDPA)
900 New Upper Changi Road
Singapore 467354

Amendments

APSN reserves the right to make changes and/or corrections, from time to time, and without notice, to this Privacy Policy.

Governing law and dispute resolution

This Privacy Policy shall be governed by and construed in accordance with the laws of the Republic of Singapore, and any claims or disputes of whatever nature arising out of or in connection with this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of the Republic of Singapore.