



Changi Golf Club **Data Protection Policy**

Definition:

Changi Golf Club (the Club) is a members' club with sport and recreation facilities including a nine hole golf course and a clubhouse.

Overview

The purpose of this policy is to set out Changi Golf Club's procedures of personal data of individuals including members and staff. This policy explains how and why the Club collects, uses, discloses and retains Personal Data.

This policy takes into consideration the Personal Data Protection Act 2012 (Act 26 of 2012) ("PDPA") and all applicable PDA advisory guidelines.

Personal Data Protection Act 2012

The PDPA establishes a data protection law that comprises various rules governing the collection, use, disclosure and care of personal data. It recognizes both the rights of individuals to protect their personal data, including rights of access and correction, and the needs of organizations to collect, use or disclose personal data for legitimate and reasonable purposes.

For more information: <https://www.pdpc.gov.sg/legislation-and-guidelines>

The PDPA contains 2 main sets of provisions, covering data protection (effective 2 July 2014) and a Do not Call ("DNC") Registry (effective 2 January 2014).

The DNC provisions generally prohibits organizations from sending certain marketing messages (in the form of voice calls, text or fax messages) to individuals with Singapore telephone numbers, registered with DNC Registry.

The privacy of individual's data is important to Changi Golf Club. Hence, the Club takes responsibility to protect individual's personal data and complying with PDPA by implementing certain procedures below.

1. Personal Data

In this Data Protection Policy, "Personal Data" refers to any data or information about an individual who can be identified either (a) from that data; or (b) from that data and other information to which Changi Golf Club have or are likely to have access.

Examples of such Personal Data that an individual may provide to us include (depending on the nature of interaction with Changi Golf Club):

Employees (including potential employees):

- a. name, NRIC, passport or other identification number, photos, telephone number(s), mailing address, email address, residential and any other information provided in relation to employees' employment or job application with Changi Golf Club, provided us in any forms which you may have submitted to us, or in other forms of interaction with you (including e-mail);
- b. Employees' payment related information, such as bank account information

Members:

- a. name, NRIC, passport or other identification number, telephone number(s), mailing address, email address, residential and any other information relating to a member which is provided in relation to the member's membership with the club or with the services offered, provided to Changi Golf Club in any forms which may have submitted to Changi Golf Club, or in other forms of interaction with Changi Golf Club (including e-mail);
- b. Members' payment related information, such as bank account or credit card information.

It is important to note that PDPA does not apply to business contact information. Business contact information refers to individual's name, position or title, business telephone number, business address, business electronic mail address, or business fax number and any other similar information about the individual, not provided by him or her solely for his or her personal purposes.

For the avoidance of doubt, Changi Golf Club is not required to obtain consent before collecting, using or disclosing any business contact information or comply with any other obligations in the Data Protection Provisions in relation to business contact information.

2. Collection of Personal Data

Generally, Changi Golf Club collects Personal Data in the following ways (but are not limited to):

Employees (including potential employees):

- a. when a potential employee apply a position with Changi Golf Club directly and/or through relevant third party service providers (e.g. recruitment agency); and
- b. when a potential employee is being interviewed and/or hired by Changi Golf Club
- c. when an employee is working with Changi Golf Club

Members:

- a. when members sign up with Changi Golf Club for its membership;
- b. when members interact with our administrative staff;
- c. when members use any of our services;
- d. when members request that we contact them;
- e. when members are contacted by, and respond to, our marketing representatives and agents;
- f. when members respond to our request for additional Personal Data
- g. when members ask to be included in an email or other mailing list;
- h. when members respond to our promotions and other initiatives;
- i. via closed-circuit television surveillance when members visit premises of Changi Golf Club
- j. when Changi Golf Club receive references from business partners and third parties, for example, where members have been referred by them;
- k. when members submit their Personal Data to us for any other reason;

3. Purposes for the Collection, Use and Disclosure of Your Personal Data

- (I) Generally, Changi Golf Club collects uses and discloses your Personal Data for the following purposes (but not limited to)

Employees (including potential employees)

- a. assessing employee's suitability to assume the job duties of the position applied for;
- b. contacting the potential employees
- c. verifying employee's information and conducting reference checks;
- d. conducting background checks if the employee is offered a job;
- e. determining preliminary remuneration and benefits package to be discussed subject to selection of the position;
- f. headcount and planning;
- g. general administration and record keeping;
- h. audit, risk management and security and/or compliance purposes
- i. internal investigations and legal proceedings; and
- j. compliance with any applicable rules, law and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities.

Members

- a. responding to queries, requests and providing the agreed services;
 - b. managing the infrastructure and operations of Changi Golf Club and complying with internal policies and procedures;
 - c. matching any Personal Data held which relates to you for any of the purposes listed herein;
 - d. to provide members with membership benefits and services;
 - e. resolving complaints and handling requests and enquiries;
 - f. preventing, detecting and investigating crime;
 - g. to keep members updates on the Club's events;
 - h. maintaining member relations
 - i. compliance with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and
 - i. where permitted under the PDPA, Changi Golf Club may also collect, use and disclose Personal Data for the following purposes:
 - Providing information, including events, announcements, promotions; and
 - Conducting market research, understanding and determining members' preferences and demographics for Changi Golf Club to review, develop and improve our services.
- (II) Changi Golf Club may disclose personal data for the purposes indicated above to our employees, third parties, service providers, advisors, related entities , which includes, without limitation, the following persons or entities:

Employees:

To the extent necessary, Changi Golf Club may disclose employees' personal data to a limited number of Changi Golf Club's employees whose job necessitates that they maintain, compile or otherwise have access to employees' personal data.

Changi Golf Club may also disclose employees' personal data to third parties that the Club deals with for the purpose of providing services to members.

Members

Changi Golf Club may disclose members' data (to the extent necessary) to the following third parties:

- Changi Golf Club's service providers and/or professional advisors in fulfilling transactions that the member has requested
- Any person and/or service provider notified by the member as Authorised to give instructions on his/her behalf
- Any third party organization if Changi Golf Club determines that it's reasonably necessary to comply with any law, rule, regulatory and governmental authority.

4. Withdrawal of Consent

Employees (including potential employees) or members may withdraw consent to Changi Golf Club's continue use and disclosure of personal data as described in the policy at any time. Such withdrawal should be made formally in writing to the Data Protection Officer ("DPO") of Changi Golf Club at:

- Email : chris@changigolfclub.org.sg / dianas@changigolfclub.org.sg
- Tel : +65 65455133

5. Access and Correction of Personal Data

Employees (including potential employees, who are not employed by Changi Golf Club) or members may make a request in writing to the DPO of Changi Golf Club to access, update or otherwise change or remove any information that has been provided to Changi Golf Club, through the following methods:

- Email : chris@changigolfclub.org.sg / dianas@changigolfclub.org.sg
- Tel : +65 65455133
- Office Address : 20 Netheravon Road Singapore 508505

Depending on the request, the relevant forms (Appendix 1 & 2) will be made available to the requestor for completion and submission, together with the relevant documentation (if needed) to the DPO for processing. Changi Golf Club may charge a reasonable fee for complying with the request.

6. Administration and Management of Personal Data

Changi Golf Club will take appropriate measures to keep your personal data accurate, complete and updated.

Protection of Personal Data

Changi Golf Club places great importance on ensuring the security of its personal data against risk of unauthorised access, collection, use, disclosure, copying, use, modification, disposal or destruction. Hence, Changi Golf Club has taken reasonable efforts to implement security measures appropriate to the sensitivity of personal data.

Technical measures are also taken, such as firewalls and other security software, to protect its servers and networks from unauthorised use, access and tampering of files and other information that we store.

Employees of Changi Golf Club are required to handle the personal data securely and with strict confidentiality, failing which they may be subject to disciplinary action.

Changi Golf Club will impose compliance with data confidentiality requirements on our vendors, third party service providers, consultants, and professional advisors in our working relationships and/or agreements with these parties. However, Changi Golf Club cannot assume responsibility for any unauthorised use of the personal data which are wholly attributable to factors beyond the Club's control.

Retention of Personal Data

Changi Golf Club will retain Employees and/or members' personal data for:

- a) as long as the purpose of such data that is collected continues to be served; and/or
- b) where necessary for any other legal or business purposes.

Changi Golf Club will take reasonable efforts to ensure that personal data in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable to assume that the purpose stated above is no longer being served.

In the event that the Personal Data is to be transferred out of Singapore, Changi Golf Club will comply with the PDPA in doing so.

Personal Data Transfer outside of Singapore

Changi Golf Club may transfer, store, and/or process the personal data in a country or territory outside of Singapore. Changi Golf Club will comply with the PDPA in doing so.

Changi Golf Club will put in place the appropriate contractual arrangements and binding rules to govern the transfer of data.

7. Updates on Data Protection Policy

Changi Golf Club may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Data Protection Policy as updated from time to time.

8. Offences and Penalties

- (l) An organisation or person commits an offence if the organisation or person:
 - a. with an intent to evade a request under section 21 or 22, disposes of, alters, falsifies, conceals or destroys, or directs another person to dispose of, alter, falsify, conceal or destroy, a record containing:
 - i. personal data; or
 - ii. information about the collection, use or disclosure of personal data;

- b. obstructs or impedes the Commission* or an authorized officer in the exercise of their powers or performance of their duties under this Act; or
- c. knowingly or recklessly makes a false statement to the Personal Data Protection Commission (“Commission”), or knowingly misleads or attempts to mislead the Commission*, in the course of the performance of the duties or powers of the Commission* under this Act.

- (II) An organisation or person that commits an offence under Chapter 1 (a) above is liable:-
- in the case of an individual, to a fine not exceeding \$5,000; and
 - in any other case, to a fine not exceeding \$50,000.

An organisation or person that commits an offence under Chapter 1 (b) or (c) is liable:-

- in the case of an individual, to a fine not exceeding \$10,000 or to imprisonment for a term not exceeding 12 months or to both; and
- in any other case, to a fine not exceeding \$100,000.

- (III) Where an offence under this Act committed by the organisation is proved:-
- to have been committed with the consent or connivance of an officer[#]; or
 - to be attributable to any neglect on his part, the officer as well as the organization shall be guilty of the offence and shall be liable to be proceeded against and punished accordingly.

- (IV) Any act done or conduct engaged in by a person in the course of his employment (“the employee”) shall be treated for the purposes of this Act as done or engaged in by his employer as well as by him, whether or not it was done or engaged in with the employer’s knowledge or approval.

In any proceedings for an offence under this Act brought against any person in respect of an act or conduct alleged to have been done or engaged in, as the case may be, by an employee of that person, it is a defence for that person to prove that he took such steps as were practicable to prevent the employee from doing the act or engaging in the conduct, or from doing or engaging in, in the course of his employment, acts or conduct, as the case may be, of that description.

Appendix 1

Personal Data Withdrawal of Consent Form

Changi Golf Club aims to act in compliance with the requirements of the Personal Data Protection Act 2012 and respects your decision to withdraw consent for Changi Golf Club to collect, use, and disclose your personal data.

Name			
Membership No		NRIC/Passport No.	
Company (if applicable):		Date of Request	

WITHDRAWAL

a) Please select the mode(s) from which you wish to withdraw your consent for receiving updates by Changi Golf Club: (Please tick accordingly)

	Postal service / Mail / Newsletter
	E-Mail/E-Broadcast
	Phone Call

b) I wish to withdraw consent for (Please tick accordingly):

	The collection, use, and disclosure of <u>ALL</u> of my particulars for ALL Club's social events, except for Club membership administration purposes.
	The collection, use, and disclosure of <u>SOME</u> of my particulars for Club's social events, except for Club membership administration purposes. Please state: _____
	The disclosure of my particulars to third parties
	Others Please state: _____

Signature

For Official Use	
Received By:	Date:
Processed By:	Date:

Personal Data Correction / Update Form

Name			
Membership No		NRIC/Passport No.	
Department (if applicable):		Date of Request	

I am requesting to correct / update the following personal data that I have previously submitted to Changi Golf Club:

PREVIOUS DATA	NEW DATA TO BE UPDATED

Please ensure accuracy when providing us with the information requested in this form. The personal data submitted by you to us in this form is necessary for processing your request and any inaccuracies, errors or omissions in the personal data submitted may result in delays in processing the request and/or our inability to process your request.

Your Personal Data Correction/Update request will be subject to approval following our receipt and approval of this completed form.

We reserve the right to refuse to process the Personal Data Correction Form in accordance with Section 22 and Sixth Schedule of the PDPA.

We may have disclosed the personal data to be corrected/updated herein to other organizations with the preceding year and we may disseminate your corrections herein these other organizations. If you wish to restrict the organizations to which we may make such disclosures, please identify them in the box below:

NAME OF ORGANIZATIONS:

Confirmation

I confirm that this request relates to my own personal data. I declare that the information provided in and with this request are true in every respect, and agree that such information may be collected, used and disclosed by Changi Golf Club and its affiliates for the purpose of processing this request and/or in accordance with its data protection policy.

Signature: _____

For Official Use	
Received By:	Date:
Processed By:	Date: