

# **Cahaya Community (Ltd) Privacy Policy Statement**

Updated: 10th June 2020

## **A. OVERVIEW**

### **1. INTRODUCTION**

Cahaya Community (Ltd.) respects the privacy of every individual's personal data. In order to be effective and accountable for our community and family programs, we may collect, use and disclose personal data, and we do so in compliance with the Personal Data Protection Act (PDPA). This Policy sets out our key personal data protection policies.

If you have any questions regarding the contents of this Policy or our data protection practices, or you wish to update your information, please email us at [wearecahaya@gmail.com](mailto:wearecahaya@gmail.com). Our Social Development Director, Mr Gregory Tham, oversees data collection, use/ disclosure and protection.

### **2. PERSONAL DATA**

Personal data refers to data about an individual who can be identified from (i) that data or (ii) that data and other information to which Cahaya Community (Ltd.) has or is likely to have access to.

This includes and is not limited to: an individual's full name, gender, photograph, address, telephone numbers (including residential, business and mobile phone numbers), NRIC number, date of birth, email address, residential address, education and employment history. Where necessary and on a case-by-case assessment, it may also include sensitive information relating to their religion, ethnicity, physical or mental health or condition, or their past activities.

### **3. HOW WE COLLECT PERSONAL DATA**

We provide targeted community-based or family-focused programmes based on a holistic needs and strengths assessment. Such data may be collected:

- (a) Through home visits/ calls/ emails/ texts with families on any programme;
- (b) Through referrals or queries by individuals/families seeking support/ aid;
- (c) Through application form for our programmes;
- (d) Through surveys administered by us;
- (e) Through participation in our programmes;
- (f) Through Personal Data shared to us by government agencies or any public agencies; and
- (g) Through cookies in our web pages/ online platform.

We may collect information about children and youths. This may be provided by children and youths themselves if they are at least 13 years of age, or by their parent or legal guardian if they are below 13 years of age.

The information may also be provided by social workers assisting such children and youths, provided that consent is obtained by the social worker (from the child/youth or his/her parent or legal guardian, as appropriate) to provide the information.

#### **4. PURPOSES FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

We collect these personal data to achieve our objectives of facilitating family development. Specifically, we use data to organise programs relating to: promoting children development (under the Inspire pillar), supporting parents/ adults (under the Empower pillar) and organising development opportunities for volunteers (under Volunteer Development pillar).

The personal data provided may be collected, used and disclosed for the following purposes:

- (a) evaluating your eligibility and suitability for your participation in any programmes;
- (b) general administration and running of our programmes;
- (c) monitoring of performance and compliance with the participation in our programmes;
- (d) offering of other aid, assistance or services provided by Cahaya Community (Ltd.);
- (e) sending updates about our programmes;
- (f) research and analysis for social assistance objectives;
- (g) reviewing our policies and procedures; and
- (h) any other purpose which is reasonable in connection with the above.

We may publish the donor's name in our annual reports, websites and collaterals, unless requested otherwise by the donor. If you do not wish to receive our communications or do not wish to be contacted, you may opt out by writing to our Funding Head at the email address stated above.

#### **5. DISCLOSURE TO AFFILIATES AND THIRD PARTIES**

Cahaya Community (Ltd.) works with fellow community actors to achieve a holistic family growth. As such, for the purposes state above, we may disclose your personal data with your consent to:

- (a) government organisations and self-help groups; and
- (b) any other person or organisation for the reasonable purposes as stated above.

A disclosure will also be made when required by law or in emergency situations that threatens your or another person's life, health or safety to the hospital, police or law enforcement agency.

We do not disclose your Personal Data to third party fundraisers or for marketing purposes.

## **6. YOUR RIGHTS OF ACCESS AND CORRECTION**

Under the PDPA, you have certain rights to seek access to the personal data that is in our possession or under our control. In addition, you also have the right generally to request that we correct any errors or omissions in the personal data that is in our possession or under our control.

Any requests to seek access to or correction of personal data in our possession or under our control should be sent to our Social Development Director.

## **7. ACCURACY OF PERSONAL DATA**

We will make a reasonable effort to ensure that your personal data collected by us is accurate and complete. If there is any change to your personal data, please inform us so that we can make the necessary updates.

## **8. LIMIT TO RETENTION OF PERSONAL DATA**

We will retain your personal data only for as long as the relevant programme is active or for as long as the retention is necessary to support the family.

After which, we will remove the personal data in an appropriate manner, depending on the nature of the personal data and the media it is kept/stored in. This may include the destruction of documents or deletion of electronic data.

## **9. WITHDRAWAL OF CONSENT**

You may withdraw your consent to any collection, use or disclosure of your personal data with reasonable notice. However, this may reduce our effectiveness in assisting you and family further.

## **10. PROTECTING PERSONAL DATA**

We will ensure that personal data in our possession or under our control is protected with reasonable and sufficient security safeguards. These include:

- (a) Storing physical forms containing personal data in a locked cabinet accessible only by authorized personnel; and
- (b) Electronic files containing personal data are stored in a secured database accessible only by authorized personnel whose accounts are password-protected.

## **11. UPDATES ON DATA PROTECTION POLICY**

We will continue to review our policies, procedures and processes to ensure that we are aligned with the best practices across organisations.

We reserve the right to amend the terms of this Policy from time to time. Any amended Policy will be posted on our website, with the date of update provided.

## **12. COOKIE POLICY**

We also automatically collect aggregate information about the use of this Web Site or Facebook, including which pages are most frequently visited, how many visitors this Web Site receives daily. This is to improve user engagement, for both the families we serve and our fellow volunteers.