



Boys' Town

DATA PROTECTION PRIVACY NOTICE

**DATA PROTECTION PRIVACY NOTICE
FOR DONORS, SERVICE USERS, VOLUNTEERS, VISITORS AND
JOB/TRAINEESHIP/INTERNSHIP APPLICANTS**

This Data Protection Privacy Notice (“**Notice**”) sets out the basis which *Boys’ Town* (“**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, job, traineeship or internship applicants in accordance with the Personal Data Protection Act (“**PDPA**”). 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. *Boys’ Town* will comply with the relevant requirements under the government’s data management policy.

PERSONAL DATA

As used in this Notice:

“personal data” means data, whether true or not, about an individual (whether a prospective service users, service users, service users’ authorised representative, donors, volunteers, job applicants 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.

1. **For service users, service users’ authorised representative, donors, volunteers and visitors**

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, nationality, gender, date of birth, marital status, medical history, photographs and other audio-visual information, educational, employment information and financial information such as credit card numbers, debit card numbers or bank account information.

2. **For job applicants / traineeship / internship applicants**

Personal data which we may collect includes, without limitation, your:

- (a) name or alias, gender, last 4 characters of your NRIC/FIN or passport number, date of birth, nationality, and country and city of birth;
- (b) mailing address, telephone numbers, email address and other contact details;
- (c) resume, educational qualifications, professional qualifications and certifications and employment references;
- (d) employment and training history;
- (e) salary information and bank account details;
- (f) work permit details;
- (g) photographs and other audio-visual information.

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. For service users, service users' authorised representative, donors, volunteers and visitors

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) through various platforms such as website, third-party platforms, physical forms etc.

5. We may collect and use your personal data for any or all of the following purposes:

- 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,
 - providing the services requested by you;
 - monitoring, evaluating and/or auditing of services provided. This may include an assessment of the quality of the services provided and the effects of the services provided (both in the short and long term, and after you have stopped using the services); and
 - conducting 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.
 - Where you are a service user's authorised representative,
 - processing and evaluating the service user's application for our services;
 - Where you are a donor,
 - processing your donations and your tax-deduction claims;
 - Where you are a volunteer,
 - processing and evaluating your suitability to volunteer; and
 - monitoring, evaluating and/or auditing of services you participated in.
- providing you with information on our upcoming events or activities, where you have specifically requested to receive such information;
- verifying your identity;
- responding to, handling, and processing queries, requests, applications, complaints and feedback from you;

- 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;
 - any other purposes for which you have provided the information for;
 - 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 any other incidental purposes related to or in connection with the above, for which we will notify you and obtain your consent as necessary.
6. 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.

7. **For job applicants / traineeship applicants / internship applicants**

We generally collect personal data that:

- (a) you knowingly and voluntarily provide in the course of or in connection with your employment or job application with us, or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”, which may include your job placement agent), 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).

8. Your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:
- assessing and evaluating your suitability for employment in any current or prospective position within the organisation;
 - verifying your identity and the accuracy of your personal details and other information provided;
 - performing obligations under or in connection with your contract of employment with us, including payment of remuneration and tax;
 - all administrative and human resources related matters within our organisation, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your insurance and other benefits, processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;
 - managing and terminating our employment relationship with you, including monitoring your internet access and your use of our intranet email to investigate

- potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances;
 - assessing and evaluating your suitability for employment/appointment or continued employment/appointment in any position within our organisation;
 - ensuring business continuity for our organisation in the event that your employment with us is or will be terminated;
 - performing obligations under or in connection with the provision of our goods or services to our clients;
 - facilitating any proposed or confirmed merger, acquisition or business asset transaction involving any part of our organisation, or corporate restructuring process; and
 - facilitating our compliance with any laws, customs and regulations which may be applicable to us.
9. The purposes listed in clauses 5 and 8 above may continue to apply even in situations where your relationship with us as a prospective service user, service user, donor, job applicant etc., 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 a contract with you).
10. After the lapse of the opt-out period, you may notify us that you no longer wish to consent to the purposes for which your consent was deemed by notification by withdrawing your consent for the collection, use or disclosure of your personal data in relation to those purposes.

RELIANCE ON THE LEGITIMATE INTERESTS EXCEPTION

11. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for the legitimate interests of *Boys' Town* or yourself. In relying on the legitimate interests exception of the PDPA, *Boys' Town* will assess if the likely adverse effects on the individual outweighs the benefits to *Boys' Town* and the individual.
12. In line with the legitimate interests exception, we will collect, use or disclose your personal data for the following purposes:
- a. Fraud detection and prevention;
 - b. Detection and prevention of misuse of services;
 - c. Network analysis to prevent fraud and financial crime, and perform credit analysis; and
 - d. Collection and use of personal data on company-issued devices to prevent data loss.

The purposes listed in the above clause 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.

WITHDRAWING YOUR CONSENT

13. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until consent 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.

14. 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) working days of receiving it.
15. 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 withdrawal request. Should you decide to cancel your withdrawal of consent, please inform us in the manner described in clause 13 above.
16. 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 bases for processing personal data.

ACCESS TO AND CORRECTION OF PERSONAL DATA

17. 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.
18. 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.
19. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) calendar days. 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).
20. Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organisation has on record, if the record of your personal data forms a negligible part of the document.

PROTECTION OF PERSONAL DATA

21. 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 minimised collection of personal data, authentication and access controls.

22. 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.

ACCURACY OF PERSONAL DATA

23. We generally rely on personal data provided by you (or your authorised representative). 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

24. 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.
25. 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.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

26. We generally do not transfer your personal data to countries outside of Singapore unless it is necessary. Any personal data to be transferred out of Singapore must obtain approval from the Executive Director, and must be in accordance with the requirements prescribed under the PDPA and the Ministry of Social and Family Development (MSF). 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 PDPA.

COOKIE USAGE

27. A cookie is a small text file stored on a user's device that helps websites remember preferences and track interactions. We use cookies on our site to analyze our site traffic and enhance your user experience by personalizing settings to your preferences. The cookies we use include Google Analytics, which helps us understand and track how you use our website, and YouTube cookies, which aid in tracking video views, allocating bandwidth, and remembering your video playback preferences. These cookies are essential for us to provide you with a good browsing experience and to improve our site. If you wish to opt out of cookie acceptance, you may do so by modifying your internet browser settings.
28. Please note, however, that without cookies, some features of our site may not work as intended. By continuing to use our site, unless you have set your browser to reject cookies, you are agreeing to the use of these cookies.

LINKS TO THIRD PARTY WEBSITES

- 29. Please note that our website may include links to third-party websites for informational purposes. We would like to highlight that we lack control over these external sites and their privacy practices. Once you navigate to a third-party website, any information you provide will be subject to their respective privacy policies.
- 30. While we diligently ensure reliable links to trustworthy sources, we cannot guarantee the accuracy, reliability, or integrity of external websites' content or practices. We recommend exercising your own judgment and discretion when interacting with linked sites. We are dedicated to maintaining professionalism in curating reputable links; regardless of which, we continue to urge visitors to exercise caution and independently review the privacy policies of any and all third-party websites.

WEBSITE SECURITY

- 31. The security of your personal information is important to us. We have implemented security measures, including physical, electronic, and administrative safeguards, to ensure maximum protection of visitors' data on our website. Our commitment to data security ensures the confidentiality, integrity, and availability of all your information we collected online.

DATA PROTECTION OFFICER

- 32. 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:

Contact No. : +65 66905420
Email Address : DPO@boystown.org.sg
Address : 624, Upper Bukit Timah Road, Singapore 678212

EFFECT OF NOTICE AND CHANGES TO NOTICE

- 33. 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.
- 34. We may revise this Notice from time to time without any prior notice. You may determine if any revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services, or continued volunteering your services, or continued employment or participation in our recruitment process, (whichever applicable) constitutes your acknowledgement and acceptance of such changes.

Effective date : 07 June 2023
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