

# Privacy and Data Protection Policy

## 1. Introduction

The purpose of this policy is to inform you of how Compassion International (Singapore) Ltd (“Compassion Singapore”) handles personal data which is subject to the Personal Data Protection Act of Singapore (“PDPA”).

By using our website or otherwise interacting with us you agree and consent to Compassion Singapore, its affiliates and service providers (collectively, “we”, “us”) collecting, using, disclosing and processing your personal data in the ways described in this policy.

Compassion Singapore respects and values our supporters and volunteers and the children we serve. We are committed to protecting your privacy and managing your personal information responsibly in accordance with the Singapore Personal Data Protection Act (“PDPA”) and other applicable laws.

This privacy notice is intended to give you an understanding of how and why we use the information you give us.

## 2. What kind of information do we collect about you?

We only collect personal information about you that is reasonably necessary for the purposes referred to in the following sections of this policy.

The types of personal information we may collect and process include the following:

- your name, email, postal address, telephone number and other contact details
- information associated with internet which may include your web browsing, email, text messaging, social media or other electronic interaction, including your username and social media profile handle
- records of your dealings with us, including by telephone (which may include, with your prior consent, a recording of a telephone conversation) or email, or your interactions with us via social media,
- details of your correspondence with us if you have contacted us
- details of your visit to our website, including your IP address;
- your preferences about how we communicate with you, and the nature of the information we send you,
- your responses to any surveys we conduct or questionnaires we ask you to complete.

We may collect additional information about you depending upon the nature of the interactions we have with you. Examples of the additional information we may collect include –

- a) if you are a supporter or potential supporter - your financial payment details, and information such as your gender, age, or other demographic information and any organisation you are linked with,
- b) if you participate in an event or in an interview with us which is recorded electronically, your image, video and sound recordings,

- c) if you propose participating in a field trip (for example, visiting a sponsored child or a project), sensitive information such as your medical information and the results of background checks and screening (such as criminal history searches and other reference checks about you we think are necessary to undertake),
- d) if you apply to work with us (including as a volunteer) - information that we reasonably need to consider your application, such as information about your qualifications, work history and experience, and the results of background checks (such as criminal records searches or working with children checks) and other reference checks about you we require.

You can decline to give us any personal information we ask for, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about the personal information we ask for, please let us know.

### **3. How we collect information from you?**

#### **Information you give us**

We may collect information from you in the following ways:

- Our use of cookies. A “cookie” is a small file stored on your computer’s browser which assists in managing customised settings of the website and delivery content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our website and on third-party websites. You can use the settings in your browser to control how your browser deals with cookies, but in doing so, you may be unable to access certain pages or content on our website.
- Your communications when you make a donation to us or respond to our mailings and appeals;
- You contact us in relation to volunteering for us, act as an ambassador or fundraise on our behalf;
- You tell us about your ‘Compassion story’;
- You attend an event (e.g. fundraising activity, corporate partnership events, donor event);
- You apply for a job with us or become an employee or provide services via an agency or provide consultancy services directly to us;
- You request and/or receive a copy of any Compassion materials;
- You provide your details as part of making a donation to us; or
- You contact us with inquiries or other correspondence (including via social media) or become involved with us in another way (e.g. by indicating you would like to hear more from us, or you would like to make a donation to us, either directly or via online).

If you provide us with any personal information relating to a third party, by submitting such personal information to us, you also represent to us and must ensure that you have notified the third party of this policy and obtained their consent to it.

#### **Information we receive from other sources**

Your information may be given to us by third parties, if you have asked or agreed to them doing so. They will do so pursuant to their own policies on data protection and privacy. It is a good idea to

check their privacy notice when you provide your information to them to fully understand how they will process your data and may share it with others.

## **4. Our purposes in collecting, using and disclosing personal information**

We collect your personal information and use it to enable us to deal with you more efficiently and effectively and meet your needs. We also collect your personal information to improve what we do and meet other organisational requirements.

Specifically, we will use your personal information for the following purposes –

- (a) to verify your identity when you contact us,
- (b) to send you important information, such as information about a child or program you support, and receipts for donations you make,
- (c) to plan, promote and administer our activities, appeals and events, and send you information about them,
- (d) to organise and manage events or activities in which you will participate (such as field trips),
- (e) to respond to your requests for information and other general enquiries
- (f) to receive and manage any complaint you may make,
- (g) to gather your feedback about the services we provide and how they can be improved,
- (h) to undertake research, and develop and expand our services,
- (i) to teach and train our staff, volunteers, contractors or other workers,
- (j) to recruiting staff (including volunteers),
- (k) to facilitate proper governance processes such as risk management, incident management, compliance monitoring or external audit,
- (l) to enable us to satisfy our legal obligations, comply with applicable laws and meet the requirements of relevant regulators and accrediting bodies, and
- (m) for such other purposes as we may advise you in writing from time to time.

You can choose not to provide use with your personal information, and you can remain anonymous or use a pseudonym in your dealings with us where it is lawful and practicable for you to do so (for example, when making a general enquiry). However, generally, it is not practicable for us to deal with you anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs or activities.

## **5. Do we disclose your personal information to other people?**

We engage third parties to perform a range of administrative, management and operational functions for us. For example, we may engage contractors and service providers to provide us with services such as –

- data collection, processing, analysis and storage (including cloud storage),
- provision of a call-centre,
- secure hosting of credit card information,
- event management and hosting,
- market research and supporter stakeholder satisfaction surveys,
- payroll and payment services,
- information technology services and support, including website maintenance / development,
- printing, archiving, mail-outs.

We will only disclose your personal information to these contractors and service providers where it is required to enable them to provide services to us. We will take reasonable steps to ensure that those contractors and service providers do not breach your privacy in relation to your personal information.

We may also disclose your personal information to a third party if required –

- (a) to manage risk, liabilities and claims (for example, liaising with insurers and legal representatives),
- (b) to obtain advice from consultants and other professional advisers, or
- (c) to meet our legal obligations.

## **6. Do we disclose your personal information overseas?**

By reason of the nature of our ministry and our international affiliations, we work with organisations and contractors and service providers who are located outside Singapore.

We may disclose your personal information to affiliated organisations located outside Singapore, including affiliated organisations in the United States of America, Australia, Philippines, and the countries in which we support development programs or undertake field trips.

We may use such services such as overseas or cloud-based data hosting facilities and overseas call-centre facilities, which result in personal information being transferred to, used, or stored at a location outside Singapore including, but not limited to, Australia, Japan, Philippines and the United States of America.

## **7. How do we interact with you via the internet?**

You can visit our website ([www.compassion.org.sg](http://www.compassion.org.sg)) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to us will be managed in accordance with this policy.

Our website uses cookies. As outlined above, a “cookie” is a small file stored on your computer’s browser, which assists in managing customised settings of the website and delivering content. We

collect certain information such as your device type, browser type, IP address, pages you have accessed on our website and on third-party websites.

You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.

Our website may contain links to third-party websites. We are not responsible for the content or privacy practices of websites that are linked to our website.

We also use website pixels which monitor how you have engaged with our website and allow us to distribute information through online advertising which may be of interest to you through your digital browsing and social media use. You can use the settings in your social media account and web browser to control the use of pixels.

## **8. Access and correction of your personal information/withdrawal of consent**

If you:

- have any questions or feedback relating to your personal information or our policy;
- would like to withdraw your consent to any use of your personal information as set out in this policy; or
- would like to obtain access and make corrections to your personal information records, please contact our Data Protection Officer, as follows:

Email: [dataprotection@compassion.org.sg](mailto:dataprotection@compassion.org.sg)

Address: [1 Commonwealth Lane #07-31 One Commonwealth Singapore 149544](#)

We will respond to your request as soon as reasonably possible and, in general, within ten business days. If you withdraw your consent to any or all use of your personal information, depending on the nature of your request, we may not be in a position to continue to provide our services to you.

## **9. How are amendments made to this Privacy Policy?**

We may amend this Privacy and Data Protection Policy from time to time, with or without notice to you. Please visit our website regularly to keep up to date with any changes.

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**If you have any questions about this privacy and data protection policy, the practices of this site, or your dealings with this website, please use the [contact form](#) on our website and we will respond to your question.**