



**SACA**

**DATA PROTECTION NOTICE FOR DONORS,  
SERVICE USERS AND VOLUNTEERS**



**DATA PROTECTION NOTICE FOR DONORS, SERVICE USERS AND VOLUNTEERS**

This Data Protection Notice (“**Notice**”) sets out the basis which *Singapore After-Care Association* (“**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of our prospective service users, service users, donors, volunteers 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. *Singapore After-Care Association* will comply with the relevant requirements under the government’s data management policy.

**PERSONAL DATA**

1. As used in this Notice:  
“Personal data” means data, whether true or not, about an individual (whether a prospective service users, service users, donors, volunteers 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.
2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, partial identification numbers, 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, employment information and financial information such as bank account information.
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).
4. The Civil Law Act states that minors who are 18 and above have the full capacity to enter into contracts. Thus, consent of minors who are 18 and above will be valid for allowing the collection, use and/or disclosure of their personal data. For minors who are below 18, consent will be obtained from the parent or legal guardian.
5. Prior to any collection, use and/or disclosure of personal data, we would state the purpose, followed by the attainment of consent (written or verbal), unless an exception applies. On most occasions, clients will be deemed to have given consent because they have voluntarily provided their personal data for a specific purpose. For example, if an individual calls us with an enquiry and requires us to follow up with a response, the individual is deemed to consent to the collection and use of his/her name and contact details for us to reach him/her.
6. Most of our programmes require our caseworkers to be in contact with the clients’ family members/significant others as they often play an important role in the clients’ reintegration. Personal data of the family members/significant others is necessary for our case workers to provide case management services to support them. We will rely on the clients to obtain their family members/significant others’ consent. We will also attempt to verify that consent has

been obtained before the collection, use and/or disclosure of the personal data, unless an exception applies.

7. For programmes that commence prior to clients' release, we note that it is not feasible for clients, who are currently in prison, to contact their family members/significant others to attain timely consent. SACA will thereby attain consent from clients to collect their family members'/significant others' personal data for use in contacting them to brief them on the programme and to attain their consent for further collection, use and/or disclosure of their personal data.

This is with reference to the exceptions that

- a) collection and use is necessary for any purpose which is clearly in the interest of the individual, if consent for its collection and use cannot be obtained in a timely manner (PDPA, Section 17(1) and 17(2); Second Schedule, 1(a) and Third Schedule, 1(a)) and
- b) collection and use is necessary for evaluative purposes (PDPA, Section 17 (1) and 17 (2); Second Schedule, 1(f) and Third Schedule, 1(f)).

For reference, please visit this [link](#).

#### **COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

8. 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).
  - c) 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);
        - 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;
  - contacting you and your family members/significant others for any purposes related to the services SACA is providing and/or on matters during the duration of the programme; and
- 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; and
- d) 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 8c 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.
9. 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.

## WITHDRAWING YOUR CONSENT

10. The consent that you provide for the collection, use and/or disclosure of your personal data will remain valid until such time it 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 under clause 27. 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.
11. 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. In general, we shall seek to process your request within ten (10) business days of receiving it.
12. 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 services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us via the contact details provided in clause 27.
13. 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 laws.

#### **ACCESS TO AND CORRECTION OF PERSONAL DATA**

14. 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 (clause 27). If you require assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.

15. 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.
16. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business 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).

## PROTECTION OF PERSONAL DATA

17. 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. This includes minimised collection of personal data, authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), up-to-date antivirus protection, regular patching of operating system and other software, and web security measures against risks.
18. 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

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

20. 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.
21. 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

22. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and 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.

## MANAGING DATA INTERMEDIARIES (DI)

23. Data intermediaries are third-party organisations that process personal data on behalf of another organization.
24. Under the PDPA, DIs are to adhere to the following provisions when it is processing personal data on behalf of another organisation
  - (a) Protection Obligation
  - (b) Data Breach Notification
  - (c) Retention Limitation Obligation

25. To effectively deliver our services and ensure the best support for our clients, we may engage trusted DIs. These partners, carefully selected for their expertise and commitment to data protection, assist us with specific functions such as secure data storage, platform management, and communication services.
26. We have rigorous contracts in place with these intermediaries, mandating strict adherence to the PDPA and our own stringent data privacy policies. Our measures to maintain secure relationships with DIs include but are not limited to:
  - (a) Checking that the DI have robust security measures in place, including data access controls, data encryption and regular security audits
  - (b) Ensuring data is processed only according to our documented instructions
  - (c) Conducting regular audits and reviews to monitor compliance and ensure that our clients' personal data remains protected throughout its lifecycle
  - (d) Ensuring that data shared with the DI is retained only for the duration necessary to fulfil the intended purpose, and is securely deleted or anonymised, as outlined in the contract

**DATA PROTECTION OFFICER**

27. 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. : 62942350  
Email Address : enquiries@saca.org.sg

**EFFECT OF NOTICE AND CHANGES TO NOTICE**

28. 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.

We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.



Last updated: 28/02/2025