

PRIVACY POLICY

Your privacy is important to us.

“**Personal Data**” refers to personal information such as your name, e-mail address, postal address, phone number, NRIC/Passport details, credit card information and other data, whether true or not, that identifies you as an individual.

When dealing with your personal information we as a church are required to observe, commit and comply with our obligations under the Personal Data Protection Act 2012 of Singapore (“PDPA”). Consequently, we will only collect, record, hold, store, disclose, transfer and use your Personal Data as outlined in this privacy policy (the “**Policy**”).

1. How we collect your information

We may collect information from you either directly or from third parties. Information we collect from third parties may be by formal or informal means. We collect personal information about supporters, donors, volunteers, employees, contractors and visitors to our events. Your information is being collected in the following ways:

- face to face in-person contact;
- electronically including through our website, online surveys, & other electronic messaging tools;
- via social media messages or conversation;
- during phone calls;
- voice or image recordings;
- whilst delivering and administering services at our facilities or other facilities; and from forms and other correspondence

All references to “**using the Site**” includes access to and/or use of www.church.org.sg (including both the web and mobile versions) (collectively, the “**Site**”) and our services and functions offered via this Site, including placing orders for purchase of our products.

By providing us with your Personal Information and/or by using the Site, you shall be deemed to have agreed to each and all of the terms, conditions, and notices in the Policy. If you do not agree, please cease your use of the Site and DO NOT provide any personal data to us.

If you have any questions, comments, suggestions or complaints, please do not hesitate to contact our Data Protection Officer at the following details:

Data Protection Officer c/o The Church in Singapore (Christian Stewards) Ltd
1 Derbyshire Road Singapore 309457
admin@church.org.sg
+65-6256-5176

We reserve the right to modify and change the Policy at any time to ensure that it is consistent with industry trends and/or any changes in legal or regulatory requirements. Any changes to this Policy shall be published on the Site. You are deemed to be aware of and bound by any changes to the Policy upon the publication of such changes on the Site.

You may access the Site and browse without providing us with your Personal Data. During such visits to the Site you remain anonymous. However, to utilize our services via the Site, such as registering for events, accessing areas of the website or communicating with us, we may ask you to provide your Personal Data in order that we can provide you with our services.

We may also collect your Personal Data when you interact with our staff including designated members of respective church service groups via telephone calls, notes, letters, face-to-face meetings and/or emails.

You may also choose to sign up for a customer account using your social media account or voluntarily link your customer account to your social media account or use certain other social media features available through our Site. In such a case, you agree that we may access information about you which you have provided under your social media provider in accordance with the provider's policies and we will manage your Personal Data which we have collected from your social media account in accordance with this Policy.

The Personal Data we collect may include your name, delivery address, email address, contact number, date of birth, and gender.

At all times you may choose (i) not to submit your Personal Data to us; or (ii) to subsequently withdraw your consent to our use of your Personal Data. However, please note that we may not be able to provide or continue to provide (as the case may be), our services to you as a result. Your withdrawal of consent will not affect any legal consequences arising from such withdrawal.

2. True, Accurate and Up to Date Information

You agree and acknowledge that it is your responsibility to ensure that all information submitted to us by you is true, accurate and not misleading and that such information is kept up to date. Failure on your part to do so may result in our inability to provide you with the products and services you have requested. We reserve the right to request for documentation to verify the information submitted to us by you.

3. Third Party Personal Data

You agree and acknowledge that where you provide to us Personal Data of a third party, it is your responsibility to obtain the requisite prior consent from such third party for you to provide his/her Personal Data to us for the relevant purposes and you represent to us that you have duly done so.

4. Storage of your Personal Data

We store your Personal Data in soft copy formats on our computer servers.

We will only keep your Personal Data for as long as we are either required to by law or as is relevant for the purposes for which it was collected.

Personal Data collected by us is subject to review annually to determine whether such information remains necessary for any legal or business purpose or if such information need no longer be retained by us.

5. Use and Disclosure of Personal Data

We do not rent, sell or trade your Personal Data to any third party.

We gather your Personal Data for purposes of providing and improving our services to you. The collected Personal Data may be used, or shared with third parties (including our related companies, our service providers (such as courier companies), and our suppliers and merchants) as we deem necessary, for some or all of the following purposes:

- a) to facilitate your use of the Site, including processing registrations you place for events organized through the Site and responding to your queries and requests;
- b) to maintain a database of updated contacts for the church newsletter to be delivered electronically and by post;
- c) to update you on key upcoming events and announcements;
- d) to obtain your feedback after an event or interaction during activity;
- e) to resolve complaints and handle requests and enquiries;
- f) to conduct business analysis including carrying out research on our users' demographics and behaviour;
- g) to compare information, and verify with third parties in order to ensure that the information is accurate;
- h) to administer and manage your customer account (if any) and your relationship with us;
- i) to carry out financial transactions in relation to payments you make;
- j) to audit the downloading of data from the Site;
- k) to improve the layout and/or content of the pages of the Site and customise them for users of the Site;
- l) to verify and identify visitors on the Site;
- m) to provide you with information we think you may find useful or which you have requested from us, including information about our church gospel and other associated outreach activities, provided you have indicated that you have not objected to such contact;
- n) in connection with business asset transactions (which may extend to any mergers, acquisitions or asset sales);
- o) making activity reservations on your behalf, such as hotel accommodation and transportation booking; and

If we need to use your personal data for any other purposes, we will notify you and obtain your consent beforehand. You will be given the opportunity to withhold or withdraw your consent for the use of your personal data for these other purposes.

6. Overseas Transfer

In the event that we transfer your Personal Data to third parties located overseas, we shall take steps to ensure that the receiving jurisdiction has in place a standard of protection accorded to Personal Data that is comparable to the protection under the Personal Data Protection Act 2012 of Singapore ("PDPA").

- a) restricting physical and online access to confidential data only to authorized personnel;
- b) maintaining technology products to prevent unauthorised computer access;
- c) securely destroying your Personal Data when it is no longer needed for any legal or business purpose;
- d) ensuring that sensitive and private data exchange between you and the Site happens over a SSL secured communication channel and that such exchange is encrypted and protected with digital signatures;
- e) ensuring all employees are bound by appropriate confidentiality provisions and
- f) ample training for staff handling sensitive and private data around proper disposal techniques when they are no longer required.

Our management reviews our security system regularly, and upgrades it from time to time to keep your Personal Data safe.

7. Security Disclaimer

We take precautions to ensure that your Personal Data is protected against unauthorised or unintended use, access or disclosure. However, we cannot be held responsible for unauthorised or unintended use, access or disclosure that is beyond our control. To the extent permitted by law, we shall not be liable in any event for any damages of any kind (including but not limited to special and exemplary damages) or for any loss of reputation or goodwill, whether based in contract, tort (including negligence), equity, strict liability, statute or otherwise, suffered as a result of unauthorised or unintended use, access or disclosure of your Personal Data.

8. Accessing Your Personal Data

If you would like to view the Personal Data we have on you or inquire about the ways in which your Personal Data has been or may have been used or disclosed by us within the past year, please contact our Data Protection Officer. In some cases whereby retrieval of the format in which your Personal Data records are stored are highly time consuming, we may also ask you to pay a reasonable fee to cover the cost of data retrieval and access. Please also note that under the Personal Data Protection Act 2012 of Singapore ("PDPA"), we are not required to provide you with certain categories of information listed under the Personal Data Protection Act 2012 of Singapore ("PDPA").

9. Updating Your Personal Data

You may update your Personal Data anytime by accessing your customer account via the Site. If you do not have an account with us, you can update your Personal Data by writing to our Data Protection Officer.

We take steps to share your updates with third parties with whom we have shared your Personal Data as is necessary to continue providing you with our services or to perform on any contract we have with you.

10. Correction of Personal Data

You may request us to correct an error or omission in relation to personal data about you that is in our possession or under our control by writing to our Data Protection Officer and including in your request your name and identification particulars and such other information that we require to identify you and the relevant Personal Data to be corrected.

11. Withdrawal of Consent

Should you wish to withdraw your consent to our continued use and disclosure of your Personal Data for any of the purposes stated herein, you may do so by writing to our Data Protection Officer, stating the following information:

- a) your name and identification number; and
- b) details of your withdrawal request.

Please note that if you so withdraw your consent, depending on the nature of your consent withdrawal, we may not be in a position to continue to provide our services to you or to perform on any contract we have with you. Our legal rights and remedies are expressly reserved in such event.

12. Complaints

If you have any complaint(s) arising from our collection, use and/or disclosure of your Personal Data, you may submit your complaint(s) in writing to our Data Protection Officer.

Upon receipt of your complaint, we shall respond to acknowledge your complaint within 3 working days. Our management will investigate your complaint thereafter and strive to resolve your complaint within 21 days. If your complaint is complex and cannot be satisfactorily resolved during this period, we will inform you accordingly and advise on the further steps we will take in our further handling of this matter.

13. Collection of Browsing Data

We or our authorized service providers may use cookies, web beacons, and other similar technologies for storing information to help provide you with a better, faster, safer and personalized experience when you use the Site. When you visit the Site, our servers will automatically record information that your browser sends whenever you visit a website. This data may include:

- a) your computer's IP address;
- b) browser type;
- c) webpage you were visiting before you came to our Site; and
- d) the pages within the Site which you visit; and
- e) the time spent on those pages, items and information searched for on the Site, access times and dates, and other statistics.

This information is collected for analysis and evaluation to help us improve our website and the services and products we provide.

Cookies are small text files (typically made up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message. They allow us to recognize a particular device or browser and help us to personalize the content to match your preferred interests more quickly, and to make our Services and Site more convenient and useful to you.

Web beacons are small graphic images that may be included on the Site. They allow us to count users who have viewed these pages so that we can better understand your preference and interests.

14. Governing Law

This Policy is governed by the laws of Singapore. You agree to submit to the exclusive jurisdiction of the Courts of Singapore in any dispute relating to this Policy.