

<b>Document ID</b>	<b>PP0013</b>
<b>Document Title</b>	<b>Personal Data Protection Policy</b>
<b>Prepared By</b>	<b>Finance Manager</b>
<b>Approved By</b>	<b>Aaron Yeoh _Chief Executive Officer</b>
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### **Personal Data Protection**

Cycling Without Age Singapore Ltd recognises its obligations under the Personal Data Protection Act 2012 (“PDPA”) and this Privacy Statement is to help you understand how CWAS collect, use, disclose and care for the personal data you have provided to CWAS, as well as to assist you in making an informed decision before providing us with any of your personal data.

CWAS recognises the importance of the personal data you have entrusted to us and are committed to properly manage and protect your personal data.

Personal Data in this Privacy Statement includes any information which identifies you such as your name, any type of unique identifier, telephone numbers, address, email address, image, photograph and any other information relating to you, which you have provided to us.

### **Purposes for Which We Process Your Personal Data**

The purposes (“purposes”) for which CWAS processes Personal Data include the following as may be applicable to you:

1. to process, administer, facilitate, maintain and manage your relationship with CWAS as a member, volunteer, programme participant, beneficiary, customer, donor and/or employee;
2. to provide you with and administer the services you have requested and maintain our relationship with you.

3. to provide you with information and materials on CWAS's activities, products, programmes and services and those of third parties with whom CWA may collaborate;
4. for communications pertaining to needs, donations and sale of products and services;
5. to conduct research, surveys and for statistical analysis with the aim of reviewing, developing and improving our products, programmes and services;
6. to process your application to CWAS for services, employment and other opportunities; and
7. to help plan and develop strategic direction for the future delivery and support of our services and programmes.

### **Collection of Personal Data**

Generally, we collect Personal Data in the following ways:

1. when you submit any forms, including but not limited to application, registration, assessment and survey forms, whether in paper or electronic mode;
2. when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services, make a donation
3. when you interact with our staff, including frontline officers, partner organisations, for example, via telephone calls, letters, fax, face-to-face meetings and email;
4. when you are contacted by, and respond to, our staff, partner organisations and other service providers;
5. when you submit an employment application or when you provide documents or information including your resume and CVs in connection with any purpose;
6. when we receive your Personal Data from collaborating entities, business entities, public agencies, your employer, your training institutions, referral agencies and individuals and other third parties;
7. when you use our electronic services, or interact with us via our websites or use services on our websites;
8. when you register for our events or promotions
9. when you submit your Personal Data to us for any other reasons.

### **Your Consent**

We generally do not collect your Personal Data unless 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 after you or your authorised representative have been notified of the purposes for which the data is collected, and you or your authorised representative have given consent to the collection and use of your Personal Data for those purposes. We may collect

or use Personal Data without consent where it is permitted or required by the PDPA or other laws.

Please note the following:

- If you provide Personal Data relating to a third party (e.g. information of your dependent, spouse, children and/or parents) to us, you represent and warrant that the consent of that third party has been obtained for the collection, use and disclosure of the Personal Data for the purposes listed above.

### Accuracy of Data

You should ensure that all Personal Data (whether that of your own or of a third party) submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you (or such third party) with products and services you (or such third party) have requested.

You should [update us](#) in a timely manner of all changes to the information provided to us and submit the completed form [here](#). We will make reasonable efforts to ensure your Personal Data is accurate and complete and up to date.

### To Whom We May Disclose Your Personal Data

CWAS will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to any applicable law, we may disclose Personal Data for any of the purposes specified above to:

1. our trusted partners, third party service providers, collaborating entities, or providers of professional services who work with us to or on our behalf provide and deliver services to support CWA's programmes, services, and operations and stipulate their compliance with data protection laws;
2. any person to whom disclosure is allowed or required by law, regulation or any other applicable instrument;
3. any court, tribunal, regulator (including national and/or international regulator), enforcement agency, exchange body, tax or other authority where we are required to do so by applicable law and/or regulation; any authority or regulator; any directive, order or request of any authority or regulator; or any agreement with a regulator or an authority;
4. relevant government authorities, ministries, statutory boards and agencies; and
5. any other party to whom you authorise us to disclose your Personal Data to.

## Security

The security of your Personal Data is important to us. CWAS has put in place the necessary technical and organisational security measures to safeguard your Personal Data. Some of the ways we protect Personal Data include restricting access only to authorised persons who need it to perform their day to day functions and maintaining technology products to prevent unauthorised computer access or damage to electronically stored information, such as requiring identifiers, passwords, firewalls and anti-virus software.

## Retention

We may retain your Personal Data for so long as it is necessary for us to do so, having regard to the uses described in this Privacy Statement or as required or permitted by applicable laws.

## Contacting Us and Opt-Out Information

If you:

1. have questions or comments about our Privacy Statement.
2. wish to make corrections to any personal identifiable information you have provided;
3. wish to request a copy of the Personal Data processed in relation to you;
4. want to opt out from receiving future updates, newsletters, information on training from SPD and/or third parties which we are associated with,

please [contact](#) the Data Protection Officer, CWAS.

CWAS is allowed by law to charge you a fee for a copy of your Personal Data. Please make all requests in writing and provide us with evidence of your identity. For opt out, please send a clearly worded write-up.

## CWAS Internal Policy

All volunteers and donors data should only reside in the cloud system that we subscribe to i.e. Rosterfy , DMS lite and Giving.sg.

Should data that is needed to be download for administration or analysis purpose, prior permission must be requested from PDPA officer in writing with the following:

Purpose

Who will have access to the data

Where is the data held

When will the data be deleted

### **Updates to This Privacy Statement**

CWAS may amend this Privacy Statement at any time to ensure that it is consistent with any developments to the way CWAS uses Personal Data or any changes to the laws and regulations applicable to CWAS. We will make available the updated Privacy Statement on our website. All communications, transactions and dealings with CWAS shall be subject to the latest version of this Privacy Statement in force at the time.