



# PRIVACY POLICY

Companyofgood.sg

## WHAT THIS PRIVACY POLICY MEANS

This Privacy Policy provides more information on these consents that we are collecting from you, via NVPC directly or via Company of Good and/or the Site, as a corporate representative and/or an individual participant to our activities, and how we will treat your personal data. This Privacy Policy is written to protect your Personal Data in compliance with the PDPA (defined below). The privacy of your personal data is important to us and we are committed to safeguarding it. When you receive an invitation, notification or other forms of correspondence from us, in which a request is made to collect your personal data, you may notice a section on Personal Data Consent. This Privacy Policy provides more information on these consents that we are collecting from you as a corporate representative and/or an individual participant to our activities, and how we will treat your personal data. This Privacy Policy supplements but does not supersede nor replace any other consents which you may have previously provided to us. This Privacy Policy may be updated to reflect future developments and/or any changes in legal or regulatory requirements. When you agree to the Personal Data Consent, subject to your rights at law, you are agreeing to be bound by the specific terms of the Personal Data Consent and the prevailing terms of this Privacy Policy. All defined terms in this Privacy Policy shall have the meaning ascribed to it in the Company of Good Terms of Use at [https://companyofgood.sg/media/CompanyOfGoodTermAndConditionsFinal\\_20160630.pdf](https://companyofgood.sg/media/CompanyOfGoodTermAndConditionsFinal_20160630.pdf).

## THE PERSONAL DATA PROTECTION ACT

The Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore (“**PDPA**”) governs the collection, use and disclosure of personal data by organisations. It contains various obligations relating to the protection of personal data and the Do-Not-Call Registry.

## USEFUL LINKS

Overview of the PDPA

<http://www.pdpc.gov.sg/personal-data-protection-act/overview>

Overview of the PDPA’s Data Protection Rules for Individuals

<https://www.pdpc.gov.sg/individuals/overview>

About Do Not Call (DNC) Registry for Individuals

<https://www.pdpc.gov.sg/individuals/do-not-call-registry-you>

## CONTACT US



If you have any questions or complaints relating to the use or disclosure of your Personal Data or about this Privacy Policy, please contact our Data Protection Office via email at [dpo@nvpc.org.sg](mailto:dpo@nvpc.org.sg).

## 1. Your Personal Data

In this Privacy Policy, “**Personal Data**” refers to any data or information, whether true or not, about you from which you can be identified, whether from that data or information alone, or from that data or information and any other information to which NVPC has or is likely to have access to. Examples of such Personal Data may include:

- a) Your name, NRIC, passport or other identification number, personal telephone number(s), personal mailing address, personal email address, personal bank account, credit card information, employment history, education background, income levels;
- b) Photos, films, portraits and/or video recordings of you;
- c) Information about your use of NVPC’s websites (including the Site), including cookies, IP addresses, etc.; or
- d) Any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interaction with you.

## 2. Collection of Personal Data

2.1 NVPC may collect your Personal Data in one or more of the following ways when you:

- a) Visit our premises as CCTV recordings is on for 24 hours;
- b) Visit our websites (including the Site);
- c) Register on our websites (including the Site);
- d) Attend our events, conferences, forums, workshops, talks;
- e) Register for our services;
- f) Register with us as volunteers;
- g) Donate to NVPC;
- h) Interact with any of our employees, interns, volunteers, board and committee members;
- i) Request that we contact you, be included in an email or other mailing list;
- j) Respond to our communications;
- k) Participate in research and/or surveys conducted by us or our partners/vendors;
- l) Apply for employment or internship with NVPC;
- m) Use third party services that give us your Personal Data; or
- n) Submit your Personal Data to us for any other reasons;

2.2 When you browse our websites (including the Site), you generally do so anonymously, but please refer to Section 10 below on the use of cookies.



### 3. Purposes for the Collection, Use and Disclosure of Your Personal Data

3.1 NVPC may collect, use and/or disclose your Personal Data for the purposes for which you have consented, and where applicable, for the purposes listed below:

#### 3.1.1 Marketing and Advocacy

NVPC may contact you to inform you about NVPC and/or NVPC related organisations, products and services, or other information which may be of interest to you. We may also invite you to participate in NVPC events and activities.

#### 3.1.2 Administration and Servicing

In order to administer and service your needs effectively, we will collect, use and disclose your personal data, for any of the following purpose(s):

- a) Administration of your data, which may include but is not limited to:
  - i. carrying out your instructions or responding to any enquiries by you;
  - ii. assessing and processing your requests made to NVPC; or
  - iii. administering your interaction with other third-parties made through NVPC, including donations you make to other charities and offering your volunteer time to other organisations.
- b) Administration of your profile, which may include but is not limited to:
  - i. maintenance of your personal data captured in the profile; or
  - ii. carrying out your instructions or responding to any enquiries by you;
- c) processing and administering payment, billing, accounts, benefits/entitlements, credit and reference checks, debt-recovery matters, including but not limited to your employment, internship or volunteer assignment with NVPC;
- d) Compiling statistics for NVPC and/or industry exercises and studies, to design and improve our products and services for you;
- e) Compliance with monitoring, audit reviews and internal policies and procedures;
- f) Providing general information on product enhancements and services, which are relevant to your needs or policies;
- g) Investigating fraud, misconduct, any unlawful action or omission, and whether or not there is any suspicion of the aforementioned;
- h) Archiving, backing-up or destroying personal data;
- i) Informing you of changes and updates to our services, policies, terms and conditions and other administrative information;
- j) Corresponding with you, which may disclose certain personal data about you on envelopes and/or packages;
- k) Complying with applicable rules, laws or regulations, regulatory policies, industry codes of practice or guidelines, judgments, orders, directions or requests issued by any court, legal or regulatory bodies, including but not limited to rules and regulations relating to anti-money laundering and countering the financing of terrorism and the carrying out of audit checks, surveillance and investigations; or



- l) Any other purposes set out in the Terms of Use and any guidelines, notices, operating rules, policies and instructions governing the your use and access of the Site and/or Services.

3.2 All Personal Data submitted to us should be complete, accurate, true and correct. Failure to do so may result in our inability to provide you with services you have requested and/or to process or administer the Personal Data.

3.3 Where Personal Data submitted by you concerns another individual other than yourself, you represent and warrant to us that all the necessary prior consents (in accordance with all applicable data protection legislation, including without limitation the PDPA) have been obtained from the relevant individuals to allow us and/or our related organisations, agents and/or third party vendors to collect, use, disclose and process their Personal Data in the manner described in this Privacy Policy, and that you have retained proof of these consents, such proof to be provided to us upon our request.

3.4 If you have provided us with your Singapore telephone number(s) and have consented to contact by telephone, we may contact you using the number(s), unless your number is listed on the DNC Registers for voice calls, messages and fax messages.

3.5 You shall consult your parent or guardian before providing us with your Personal Data if you are under the age of eighteen [18].

#### 4. Disclosure of Personal Data

The disclosure of your personal data may be from NVPC to:

- a) Our employees, volunteers, interns, board and committee members;
- b) NVPC-related organisations;
- c) You in the form of personal data you have previously supplied us;
- d) Banks, CPF or its agent banks, credit card companies, other financial institutions for the processing of any monies receivable or payable;
- e) Vendors engaged by us to perform processes required for the administration of your data or to send marketing material or messages to you;
- f) Vendors engaged by us to store and maintain our data and documents (including storage for business recovery purposes);
- g) Any regulatory, government and statutory body to comply with applicable, laws or regulation or upon their valid request;
- h) Our professional advisers such as auditors and lawyers; and
- i) Any other party to whom you authorize us to disclose your Personal Data to, including but not limited to your consent specific to the NVPC activity.

Neither NVPC nor any of its officials shall be liable for any loss or damage suffered by you or any user as a result of any disclosure of any personal data which you have consented to NVPC and/or any of its officials disclosing.

#### 5. Transfer of Personal Data outside Singapore

Your Personal Data may be transferred, stored and/or processed in a country or territory outside Singapore and you consent to any such transfer, storage and/or processing of your Personal Data



outside Singapore, where applicable. We will ensure that any party to whom we transfer your Personal Data outside Singapore provides such Personal Data a standard of protection at least comparable to the protection under the PDPA.

## 6. Withdrawal or Change of Consent and DPO Contact

6.1 If you wish to withdraw or change your consent to any use or disclosure of your Personal Data as set out in this Privacy Policy or otherwise contact us regarding privacy or personal data matters, you may contact us at +65 65509595 or email our Data Protection Office at [dpo@nvpc.org.sg](mailto:dpo@nvpc.org.sg).

6.2 If you withdraw your consent to use or disclosure of your Personal Data, we may not be able to provide certain services to you or service or execute agreements you may have with us. NVPC's legal rights and remedies are expressly reserved in such event.

## 7. Access and Correction of your Personal Data

7.1 You may request access to or make corrections to your Personal Data records, by submitting your request to our Data Protection Office at [dpo@nvpc.org.sg](mailto:dpo@nvpc.org.sg).

7.2 If you so request, provided that the request is of a reasonable nature, we will make available, within a reasonable time between 30 and 90 working days, an account of how your Personal Data was generally used or disclosed.

7.3 As you are responsible for providing correct and accurate Personal Data to NVPC, we strongly discourage frivolous, excessive or unreasonable requests for access and correction to Personal Data, which will result in higher administration cost for NVPC. NVPC reserves the right to charge a reasonable administration fee for processing your request.

## 8. Protection, Policies and Procedures

8.1 To prevent unauthorised access, maintain data accuracy and ensure the correct use of information, we have put in place appropriate physical, electronic and managerial policies and procedures to safeguard, secure and/or dispose the Personal Data we collect.

8.2 Notwithstanding the above, you acknowledge that no data transmission over the internet is completely secure and you are transmitting Personal Data over the internet at your own risk.

## 9. Retention of your Personal Data

We will retain your Personal Data for as long as your use our services and it is necessary required or relevant for business or legal purposes.

## 10. Use of Cookies

On our websites (including the Site), we may use "cookies" to track information about user frequency, profiles and preferred sites. This information will assist us in improving our websites. You may disable cookies by changing the settings on your browser. However, you may not be able to access certain part(s) of our websites or services.

## 11. Third-Party Websites



Our websites (including the Site) may contain links to other websites operated by third parties for your convenience and information. You access these websites at your own risk. To the fullest extent permitted under laws, we cannot be responsible for a third-party's acts, omissions, data policies or their use of cookies nor the content or security of any third-party websites, even if linked to our websites. Any such liability is expressly disclaimed and excluded.

## 12 Amendments to this Policy

NVPC reserves the right to revise or amend this Privacy Policy at any time in its sole discretion and you are deemed to be aware of and bound by any changes to the foregoing upon their publication on the Site. You can determine when this policy were last revised by referring to this paragraph. You agree that the amended version of policy shall apply to you if you access or use the Site and/or the Services after such amendments have been made, and you shall be deemed to have consented to such amendments. If you do not accept such amendments, you must stop accessing and/or using the Site and the Services.