

ITE ALUMNI ASSOCIATION PERSONAL DATA PROTECTION POLICY

This Data Protection Policy outlines how the ITE Alumni Association, a registered society with the Registry of Societies in Singapore (hereinafter “**ITEAA**”) collects, processes and uses personal data in accordance with the Singapore Personal Data Protection Act 2012 (“**PDPA**”). Personal Data (as defined hereinafter) will generally only be collected and used for ITEAA’s administrative and business purposes and only to the extent necessary to achieve those purposes.

By continuing your relationship with ITEAA, you signify that you have read, understood and agree to ITEAA’s collection, use and disclosure of your personal data as described in this Policy.

1. DEFINITIONS AND INTERPRETATION

The following terms shall have the following meanings:-

Individuals	mean the members of ITEAA; and/or the staff of ITEAA (whether voluntary or otherwise) as the case may be;
Organisation	means any individual, company, association or body of persons, corporate or unincorporated, whether or not formed or recognised under the law of Singapore; or resident, or having an office or a place of business in Singapore, as defined under section 2 of the PDPA;
Personal Data	means the data whether true or not, about an individual who can either be identified

from that data; or from that data and other information to which ITEAA has or is likely to have access, as defined under section 2 of the PDPA, including the information you provided to the Institute of Technical Education (ITE) as a student and any subsequent updates with ITEAA and/or ITE.

2. PURPOSE OF THE COLLECTION, USE, DISCLOSURE OF THE PERSONAL DATA

- 2.1 ITEAA is a non-profit organisation established and registered with the Registrar of Societies.
- 2.2 ITEAA is committed to protecting the Personal Data of all Individuals and strives to inform of and obtain consent for the specific purpose of collection, use and/or disclosure through the best manner possible accordingly.
- 2.3 ITEAA will make reasonable arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar activities to protect Personal Data in ITEAA's possession or under ITEAA's control.
- 2.4 ITEAA generally uses the Personal Data of its members for the purpose of administering and/or managing the relationship its members and in accomplishing the objectives of ITEAA, as follows:-
 - a) To promote closer ties, professional interests and networking among members of the Society;

- b) To promote and organize educational, social, cultural, sporting, recreational and civic activities for members of ITEAA;
- c) To promote closer links between members of ITEAA and ITE; and
- d) To promote the importance and recognition of technical skills.

2.5 From time to time, ITEAA may need to use and/or disclose Personal Data for its activities and functions which are held for the benefit of the relevant Individuals, or to serve the relevant Individuals in a most efficient and effective way. Where appropriate, ITEAA shall take reasonable steps to inform and obtain consent from the respective Individuals, and safeguard the integrity of the Personal Data. For the avoidance of doubt, we will not share your personal data with non-relevant organisations, except where such organisations have been authorised to carry out specific services on behalf of ITEAA. ITEAA will require these data protection standards to be observed by external parties who have relationships with ITEAA and/or to whom ITEAA discloses such Personal Data. While reasonable efforts will be undertaken by ITEAA in this regard, ITEAA does not and cannot assume any responsibility for any actions or omissions of third parties nonetheless.

2.6 The abovementioned purposes and any other specific purposes which may arise in due course shall be communicated to the Individuals from whom the data is being collected, processed, disclosed and used, before such collection, processing, disclosure or use.

2.7 ITEAA will make reasonable arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar activities to protect Personal Data in ITEAA's possession or under ITEAA's control.

3. CONSENT OBLIGATION

- 3.1 ITEAA shall obtain the consent of Individuals before collecting, processing, disclosing or using the Personal Data of the respective Individuals.
- 3.2 Individuals may choose to abstain from giving such consent or withdraw their consent at any time. Individuals may withdraw their consent by notifying ITEAA at administrator@itealumni.org.sg. In the event where consent has been withdrawn or the provision of the same is abstained, ITEAA shall not be responsible and/or liable for any loss, damage or harm resulting from, directly or indirectly, its inability to retrieve, use and/or disclose such Personal Data.
- 3.3 For the avoidance of doubt, where consent is not necessary in the situations provided for in the Second, Third and Fourth Schedule of the PDPA, including but not limited to the following instance:-
- the collection, disclosure and/or use is necessary for any purpose that is clearly in the interest of the respective Individuals, if consent for its collection, disclosure and/or use cannot be obtained in a timely way or the respective Individuals would not reasonably be expected to withhold consent; or
 - the collection, disclosure and/or use is necessary to respond to an emergency that threatens the life, health or safety of the respective Individuals or other Individuals;
- 3.4 ITEAA shall have the discretion to decide what appropriate action to take and need not consult the relevant Individuals accordingly.

4. PROTECTION OF PERSONAL DATA IN ANY COMPLAINTS

- 4.1 Any complaint on breach of this Policy shall be made in writing to the DPO stating the nature of the concern clearly. Any and all complaints shall be reviewed and if any further information for investigation is sought, the DPO shall contact the sender of such complaint(s) via email accordingly. A written response from ITEAA shall be provided within thirty (30) working days. Anonymous complaint(s) will not be accepted or entertained.
- 4.2 All information and Personal Data involved in any such complaints which follows the Complaints Procedure shall be kept confidential and shall not be used and/or disclosed to other persons without the consent of the involved party, unless as permitted by the PDPA and/or required by law.
- 4.3 The Data Protection Officer (as referred to in **Clause 11** of this Policy) that ITEAA has appointed to handle the complaints (if any) shall be responsible for keeping confidential all information and Personal Data received and/or disclosed in the process of communicating with the complainants and/or dealing with the matter. Such information and Personal Data shall not be used and/or disclosed to other persons without the consent of the involved party, unless as permitted by the PDPA and/or required by law.

5. ACCESS AND CORRECTION OF DATA

- 5.1 ITEAA shall upon request, provide the respective Individuals access to their Personal Data, which is under ITEAA's control.
- 5.2 ITEAA shall also upon request, provide the respective Individuals with information regarding the ways such Personal Data was used or disclosed during the past year.

5.3 ITEAA shall upon request, correct any error or omission in the respective Individuals' Personal Data that is under ITEAA's control.

5.4 All such requests may be communicated to the DPO via administrator@itealumni.org.sg. The request may be subjected to an administrative fee. Individuals are advised to enquire on whether such fee applies in their specific case upon the submission of such request.

6. ACCURACY OF DATA

6.1 ITEAA shall take reasonable measures to ensure that the Personal Data in its possession is accurate and complete. Nevertheless, Individuals are ultimately responsible for the submission of correct Personal Data and to inform ITEAA of any changes to such Personal Data as ITEAA shall not be obliged to carry out checks to determine the accuracy of the Personal Data provided.

7. DATA RETENTION PERIODS

7.1 ITEAA shall not retain the Personal Data in its possession and/or database if the Personal Data is no longer required to meet the purposes for which they were collected and/or no longer serves a legal and/or business purpose.

7.2 For the avoidance of doubt, ITEAA shall be entitled to retain and/or use such Personal Data as long as it serves an evaluative purpose.

8. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

8.1 Potential Transfers

Personal Data may be transferred to law enforcement, governmental agencies, or authorised third parties, in response to a verified request relating to a criminal

investigation or alleged illegal activity or any other activity that may expose ITEAA to legal liability.

8.2 Specific Third Party Transfers

ITEAA transfers Personal Data to a variety of third parties in order for such third parties to provide relevant and necessary service to ITEAA.

ITEAA shall enter into separate contracts with such third party service providers which shall expressly state the third party service providers' obligation to use the Personal Data in question solely for the intended purpose of providing the required service, and to undertake appropriate measures to safeguard the Personal Data in their respective possession.

8.3 Restrictions of Data Transfer Outside of Singapore

Personal Data transferred out of Singapore shall be protected with a standard of protection that is comparable to the protection under the PDPA.

9. SECURING OF PERSONAL DATA

ITEAA has implemented and maintains reasonable technical, physical, and administrative security measures for the security of personal data including regarding loss, misuse, unauthorised access, disclosure, or alteration. Members may enquire more on these measures by writing in to the DPO (as provided for in the following paragraphs), if so desired.

10. DATA PROTECTION OFFICER (“DPO”)

- 10.1 ITEAA shall appoint at least one (1) DPO, whose business contact details shall be made available to the public.
- 10.2 All Individuals whose Personal Data are in ITEAA’s possession, are entitled to contact the DPO with enquiries regarding how ITEAA processes personal data, or to access and modify personal data to the extent that they cannot do so on their own.

11. OPTING OUT OF COMMUNICATIONS

- 11.1 Individuals will continue to receive communications on ITEAA news and information unless it has been communicated to ITEAA of such intention to opt out accordingly. Individuals are to email such intention to ITEAA via administrator@itealumni.org.sg and the relevant application form for opting out of communications shall be provided accordingly, for Individuals to complete and return the same to ITEAA at the earliest opportunity.
- 11.2 Upon receipt of the completed application form as referred to above, ITEAA shall accede to such request. Nevertheless, Individuals’ contact details will still be held in ITEAA’s database to facilitate disclosure of such Personal Data as required by law in connection with judicial or administrative proceedings, or in order to fulfil a statutory obligation.

12. QUESTIONS, COMMENTS AND SUGGESTIONS

- 12.1 If you have any questions, comments or suggestions regarding this Policy, we would be glad to hear from you. Please contact our ITEAA DPO at:-

ITEAA Data Protection Officer

ITE Alumni Association

2 Ang Mo Kio Drive

Singapore 567720

Email: administrator@itealumni.org.sg

12.2 We will try to respond to your questions or request promptly. However, depending on the nature of the question or request, we may need up to thirty (30) days to provide you an estimate of when we will be able to respond to you.

13. UPDATES TO THIS POLICY

13.1 ITEAA reserves the right to update this policy from time to time. Individuals are advised to refer to the ITEAA website at <http://www.itealumni.org.sg/> for updates.

13.2 Consent to prior versions of this policy is deemed consent to a newer version, too, if not objected within ten (10) days of such update.

Updated as of May 2016