



## PERSONAL DATA PROTECTION POLICY

### Background

#### ***1. Data Protection Policy***

This document spells out the data protection policy of Limitless (Ltd.). The key features of this policy are published here, on line via the Agency's webpage. The business contact information of the Agency's data protection officer is also provided on this webpage should members of the public require more information on our data protection policies and practices. Information regarding how to withdraw consent, access, update or correct personal data are available on this webpage.

#### ***2. Data Protection Officer/s***

The roles of the Data Protection Officer/s:

- Developing good policies for handling personal data in electronic and/or manual form, that suit the Agency's needs and comply with the PDPA;
- Communicating the internal personal data protection policies and processes to customers, members and employees;
- Handling queries or complaints about personal data from customers, members and employees;
- Alerting the Agency's Management to any risks that may arise with personal data; and
- Liaising with the Personal Data Protection Commission, if necessary.

The data protection officers of the Agency are:

1. Mr Asher Low (Executive Director)

They can be contacted at [hello@limitless.sg](mailto:hello@limitless.sg)

### 3. Agency's Personal Data Inventory

This section deals with the personal data in the care of the Agency.

| # | Data Collected  | Purpose / Use   | Collection Point  | Disclosure  | Consent  | Data Access / Authorised Personnel   |
|---|---|---|---|---|--|--|
| 1 | Client or NOK Particulars<br>- Name<br>- NRIC / FIN<br>- Contact Details<br>- Address | Required to engage and provide services to clients, for purpose of contact, effective follow up, and ensuring safety during risks, as well as contact tracing | 1. Upon referral / self-write-in<br><br>2. More information may be collected as we provide services to the client | For referral to hospital staff, government bodies, or other SSAs (with consent)<br><br>For breach due to safety risk, to NOK, Family members, law enforcement | Consent attained upon<br>1. Sign up<br>2. Filling of "Client Details Form"   | Limitless directors, clinical and administrative staff, selected befriending, clinical and administrative volunteers |
| 2 | Client/user Online Details<br>- Discord username<br>- IP Address                      | Required to engage and provide services to users of SAFEHOUSE, for purpose of contact, effective follow up, and ensuring safety                               | 1. Upon signup / joining the server<br><br>2. More information may be collected as we provide                     | For breach due to safety risk to Discord, law enforcement<br><br>For referral to Limitless clinical staff (social workers, counsellors,                       | Consent attained upon<br>1. Joining SAFEHOUSE server and agreement of server | Limitless directors, clinical and administrative staff, selected befrienders, moderators, clinical and               |

|   |  |  |                        |  |  |  |
|---|--|--|------------------------|--|--|--|
|   |  | during risks, as well as contact tracing   | services to the client | psychologists) for clinical support                  | policy and rules   | administrative volunteers  |
| 3 | Collection of Volunteers Particulars<br>- Name<br>- Contact Details<br>- Address                   | Required for purpose of contacting and following up with volunteers for provision of volunteering services, as well as contact tracing | 1. Upon signup         | To authorities/ government bodies whenever necessary | Notified upon signup   | Limitless directors, staff, selected key volunteers                  |
| 4 | Collection of Donors Particulars<br>- Name<br>- NRIC / FIN / UEN<br>- Contact Details<br>- Address | For follow up, reengagement, mailing lists, and provision of tax deductible returns to IRAS  | 1. Upon donation       | To IRAS for tax deductible returns                   | Consent attained through donation form or notified upon completed donation | Limitless directors, staff, administrative or fundraising volunteers |

|   |                             |  |   |  |   |  |
|---|-----------------------------|--|---|--|---|--|
| 5 | Client's case notes         | Required for purpose of provision of services to clients, social-economic-psychological assessment, effective service delivery across agency's departments, clinical supervision of caseworkers, or referral | Information may be collected as we provide services to the client | For referral to hospital staff, government bodies, or other SSAs (with consent)<br><br>For breach due to safety risk, to law enforcement | Consent attained upon<br>1. Sign up<br>2. Filling of "Client Details Form"                    | Limitless directors, clinical and administrative staff, selected befriending, clinical and administrative volunteers             |
| 6 | SAFEHOUSE User's case notes | Required for purpose of provision of services to clients, assessment, effective service delivery across agency's departments, clinical supervision of caseworkers, or internal referral                      | Information may be collected as we provide services to the client | For internal referral to clinical staff<br><br>For breach due to safety risk to law enforcement  | Consent attained upon<br>1. Joining SAFEHOUSE server and agreement of server policy and rules | Limitless directors, clinical and administrative staff, selected befrienders, moderators, clinical and administrative volunteers |

#### **4. Data Protection Processes**

##### **a. Personal Data Collected for the Provision of Services and from Staff**

- i. Personal particulars of clients and emergency contact persons are collected at the point of application and admission for the purpose of provision of services. Clients will be notified of the collection of this information, and the use or disclosure of their personal data. Approval or consent is assumed to be given upon submission of data or agreement to receiving services from Limitless (Ltd.)
- ii. The Agency collects personal particulars of staff and volunteers for the purpose of administration and meeting the requirements of various Government authorities and submissions. Staff are to treat all official documents and information which they prepare or receive in the course of duty, as confidential. The staff must not, either during or after his service, copy, extract or translate them for unofficial use or allow others to do so. If a staff receives information that is wrongly forwarded to him, he must promptly inform the issuing party of the error and return the documents or destroy the information promptly, whichever is applicable. This above is specified in the Terms and Conditions of employment with the Agency.

Only authorized personnel of the Agency, as listed in Section 3, are allowed to access these personal data. Where in doubt, seek the advice of the Data Protection Officer.

##### **b. Personal Data Collected from Donors, and Volunteers**

This section deals with personal data of Donors and Volunteers where consent from the individual is required. The Agency will only collect, use or disclose personal data for purposes for which an individual has given his or her consent. Individuals are allowed to withdraw consent with reasonable notice. In this case the Agency will inform them of the likely consequences of withdrawal. Upon withdrawal of consent to the collection, use or disclosure for any purpose, the Agency must cease such collection, use or disclosure of the personal data of the individual

##### **i. Notification**

- Donors

Donors who wish to obtain tax benefits are required to provide their tax reference number (e.g. NRIC/FIN/UEN) to enable the Agency to provide the Inland Revenue Authority of Singapore (IRAS) details of their donations so that the tax benefit can be automatically reflected in their tax bill.

The Agency would also request for donor particulars such as address, email, telephone number and other details to allow us to maintain contact with our Donors.

In our donation response options via print or online or other media, the Agency will clearly advise donors about personal data to be collected and the purpose and ask for consent - donor will be asked to opt out if they do not wish to have their personal data collected by the Agency. Once consent is obtained, donor's personal data will be updated unto the Agency's donor's database. Whenever possible or indicated, the Agency will follow the donor's preferred mode of communication which will be recorded in the donor's database.

- Volunteers

The Agency collects personal data of volunteers to allow it to assess, select, recruit and mobilize suitable volunteers. The contact details of volunteers allow the Agency to communicate with volunteers regarding the needs of the Agency as well as update them about developments at the Agency. The Agency will clearly advise volunteers about personal data to be collected and the purpose and ask for consent in the Volunteer Application Form.

- Members of the Agency

The Agency keeps a membership list consisting of the personal data of all the members of the Agency. The contact details of members allow the Agency to communicate with members regarding the needs of the Agency as well as update them about developments at the Agency. The Agency will clearly advise members about personal data to be collected and the purpose and ask for consent in the Application Form for Membership.

- Visitors

Visitors are requested to provide their name, contact number and NRIC (NRIC is only required when a situation requiring contact tracing is required) at the reception when visiting the Agency. The reception staff (NOT the visitor) will record the personal data in the visitor registers. Visitors are not allowed to peruse the visitor registers. The registers are to be kept in locked drawer when not in use.

#### Withdrawal of Consent

Individuals are allowed to withdraw consent at any time by writing to the Agency's Data Protection Officer. The Agency will acknowledge the request and inform them of the likely consequences of withdrawal. Upon withdrawal of consent to the collection, use or disclosure for any purpose, the Agency must cease such collection, use or disclosure of the personal data.

#### Access & Correction

- Individuals may write to the Agency, via email or write to the Data Protection Officer at any time to request for the content of personal data collected by the Agency or request for update or correction to their personal data.
- Upon receiving the request, the Data Protection Officer shall file the request and perform the update or correction accordingly. After this is completed, the person concerned will be informed.
- Any other staff of the Agency who receives request or enquiry regarding personal data protection are required to forward the request to the Data Protection Officer.
- If the request for access or correction is for personal information other than personal particulars, for example medical report or CCVT footage, it will be reviewed by the Data Protection Officer and appropriate action will be taken to act on the request and a response provided to the requestor after consultation with the Management of the Agency.

#### **Personal Data Update Process**

All requests for withdrawal of consent, update and correction of personal data are to be channelled to the Data Protection Officer (DPO) who will then instruct the appropriate member of staff to update the record. The member of staff will inform the DPO once the record is updated.

## Request to Access Personal Data

All requests by individuals to access personal data must be made in writing. Such requests will be channelled to the DPO. The DPO will make necessary clarification on the purpose of the request and seek advice from the Management Committee before replying to the requester and taking action.

### **5. Care of Personal Data Collected by the Agency**

- Personal data collected and kept by the Agency are documented in Section 3.
- The data are kept in databases such as Brevo, Mailchimp, Tesseract, Google Drive, Octopus8, Discord, or in electronic forms in computers. The Agency does not keep any hard copies of files, and will transfer any hard-copied data to its database within 14 days. Any hard copies will be disposed upon appropriately (shredding) after transfer.
- Personal Data or case notes / healthcare data in electronic forms if stored on computers, must be stored in computers with passwords. Only authorized personnel are allowed to access the data.
- Staff who are required to transmit personal data to third parties in the course of work are to consult and obtain consent from the Data Protection Officer before doing so. Files containing personal data transmitted via electronics means are to be encrypted with password protection.
- Any client data that is no longer being used shall be purged from databases after 5 years. This does not include data obtained for clients requiring casework, counselling, or psychotherapy services as such specific client data may still be required in the event that it is requested by a government agency or if the client experiences a relapse and returns into service. This data will be purged 5 years after the client is no longer eligible for usage of our services (5 years after they turn 25, or from the date of case closure, whichever is later).
- Third party data intermediaries that the Agency engages have security systems in place to safeguard the database the Agency host with them and have policy in compliance with the PDPA.

### **6. Do Not Call Registry & Your Business**



## **a. Background**

Starting from 2 January 2014, the Do Not Call (DNC) provisions under the Personal Data Protection Act 2012 (PDPA) generally prohibit organizations from sending certain marketing messages (in the form of voice calls, text or fax messages) to Singapore telephone numbers, including mobile, fixed-line, residential and business numbers, registered with the DNC Registry.

Such marketing messages generally have one or more of the following purposes:

- Offer to supply, advertise or promote goods or services;
- Advertise/promote suppliers or prospective suppliers of goods or services; or
- Supply/advertise/promote land, interests in land or business/investment opportunities.

Whether an organization is directly sending such marketing messages, causing the message to be sent or authorizing another organization to do so, it has to ensure that such messages are not sent to Singapore telephone numbers registered with the DNC Registry.

The DNC Registry, however, does not cover messages sent for other purposes, such as service calls or reminder messages sent by organizations to render services bought by the individual. Messages for pure market survey or research and those that promote charitable or religious causes are also not covered under the DNC provisions. Telemarketing calls or messages of a commercial nature that target businesses are also excluded from the DNC Registry rules.

**b. If the Agency intends to send marketing messages to Singapore telephone numbers, the following procedures must be adhered to:**

- Check with the DNC Registry, unless the Agency has the recipients' clear and unambiguous consent in written or other accessible form for sending the marketing message to the Singapore telephone number.
- If the Agency is sending a text or fax message, clear and accurate information identifying the Agency as well as contact details must be included within the message. This allows the recipient to contact us for clarifications, if necessary.

- If the Agency is making a sales voice call, the calling identity, or phone number from which the message is sent out from, must not be concealed.