

## **Singapore Hokkien Huay Kuan (SHHK) Privacy Policy (Web Version)**

At SHHK, we are committed to protecting and safeguarding the personal data of individuals who visit our Website and / or make use of the online services.

This Personal Data Protection Policy describes the types of personal data we collect from visitors to our site and users of our online services. The Policy also sets forth how we use this data, provides other details about our personal data practices, and explains how to contact us if you have any questions or concerns.

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### **1. Types of Data We Collect**

SHHK only gathers personal data such as full names, telephone numbers, NRIC numbers, mailing addresses and email addresses when voluntarily submitted by you. For example, personal data may be collected when you register to be a member of the SHHK, register for SHHK's events online and/or provide feedback on its services. SHHK may collect such data through various forms and in various places on SHHK Online Services, including membership application forms, event registration forms, survey/feedback forms or when you submit data, communicate or otherwise interact with SHHK through the Online Services. You may choose not to provide the requested data but in that event the Site may not function correctly or certain functions may not be available.

If you would like us to delete data we have collected, please contact us at the e-mail or postal address listed below. Please note that we may be required by law to retain certain data.

### **2. Use of Personal Data**

When you use relevant online services, SHHK may process your personal data for the following purposes:

- a) To provide you with information or services that you have requested or agreed to receive, which include sending you electronic direct mailers on our future events;
- b) To process your registration with the Online Services, which include verifying your data is active and valid;
- c) To contact you with regard to your use of the Online Services and, in our discretion, to notify you of changes made to our Privacy Policy;
- d) To perform internal analysis purposes, and
- e) For any other purposes of which you have consented, such as those that may be set out in this Policy and other purposes as permitted or required by any applicable law.

If you no longer wish to make any further communications with SHHK, please contact us via our contact information set out below.

### **3. Disclosure of Personal Data**

The Personal Data provided to us will be kept confidential however; we may disclose your Personal Data to the following parties:

- a) Within the SHHK Family that includes SHHK's subsidiaries, our business partners and our affiliates that provide related services in connection with our services;

- b) Our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our services;
- c) Our third party service providers, third party management companies, sub-contractors or other parties as maybe deemed necessary by us to facilitate your dealings with us;
- d) Our appointed service providers in fulfilling our services or providing technical services to our Site; and
- e) Any persons, government agencies, statutory authorities and/or industry regulators, whom we are compelled or required to do so pursuant to any law

Third parties are legally tasked with processing your Personal Data in line with the principles specified by SHHK and may not use it for any other purposes. Third parties are also held responsible for securing your Personal Data at an appropriate level of security in relation to applicable data protection laws and widely accepted industry standards.

The SHHK does not sell, transfer or disclose personal data to third parties outside the SHHK Family. However, with your permission, we will, on occasion send marketing data on behalf of our business partners or associates about products or services they provide that may be of interest to you. You may be asked if you wish to receive marketing materials from SHHK's partners or associates. Even if you select to receive such materials, SHHK will not share your personal data with such partners or associates but rather will send an e-mail to you on behalf of the partners or associates.

SHHK reserves its right to use or disclose any data as needed to satisfy any law, regulation or legal request, to protect the integrity of the Online Service, to fulfill your requests, or to cooperate in any law enforcement investigation or an investigation on a matter of public safety.

#### **4. Transfer of Personal Data**

It may be necessary, if so required for any of the Purposes to transfer your personal data outside of Singapore or to disclose your personal data to our related subsidiaries, business partners, affiliates, associates, service providers and / or relevant authorities, who may be located within or outside Singapore. Save for the foregoing, your personal data will not be knowingly transferred to any place outside Singapore or be knowingly disclosed to any third party.

#### **5. Access**

You are in control of any personal data you provide us through our Online Services. If at any time, you would like to correct, update or withdraw the personal data we have about you or if you would like to change your preferred mode of communications with us or with our business partners, you can let us know by contacting us at the e-mail or postal address listed below.

#### **6. Cookies**

"Cookies" are pieces of information that a website transfers to an individual's hard drive for record keeping purposes. Cookies allow the website to remember important information that will make your use of the site more convenient. Like most websites, SHHK uses cookies for a variety of purposes in order to improve your online experience. For example, we may track the total number of visitors to our Site on an anonymous aggregate basis. We also associate personal information with a cookie file to remember you when you return to the Site and to keep track of the items in your registration form if you register to our events online.

You may use the options in your web browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. Click on the "Help" section of your browser to learn how to change your cookie preferences. If you disable all cookies, you may not be able to take advantage of all the features of the relevant Online Services.

#### **7. Links to other Sites**

We may offer links to sites that are not operated by SHHK and/or its affiliates. If you visit one of these linked sites, you should review their privacy and other policies. We are not responsible for the policies and practices of other companies, and any information you submit to those companies is subject to their privacy policies.

## **8. Changes to our Privacy Policy**

This Privacy Policy is effective as of July 1, 2014. From time to time, it may be necessary for SHHK to change this Personal Data Protection Policy. If we change our policy, we will post the revised version here, so we suggest that you check here periodically for the most up-to-date version of our Privacy Policy. Rest assured, however, that any changes will not be retroactively applied and will not alter how we handle previously collected information.

## **8. How to Contact Us**

SHHK respects your privacy and assures you that your personal data will be kept securely according to the Personal Data Protection Act. Should you wish to update or cancel your details at any time, please feel free to contact our office via e-mail at [admin@shhk.com.sg](mailto:admin@shhk.com.sg) or visit our office located at:

137 Telok Ayer Street #08-01/03  
Singapore 068602

## **9. Consent**

We trust that you will consent to the processing of your Personal Data. By providing your Personal Data to us, you declare that you have read, understood and accepted the statements and terms herein.

## **10. Integrity of Personal Data**

You are responsible for ensuring that the Personal Data you provide to SHHK is accurate, complete and not misleading and that such Personal Data is kept up to date. We may request your assistance to procure the consent of third parties whose Personal Data is provided by you to us and you agree to use your best endeavours to doing so.

## **11. Governing Law**

This Privacy Policy and the use of this website shall be governed in all respects by the laws of Singapore.

# Singapore Hokkien Huay Kuan (SHHK) Personal Data Protection Policy

At SHHK, we are committed to protecting and safeguarding the personal data we collected from you.

This Personal Data Protection Policy describes the types of personal data we collect from our operations. The Policy also sets forth how we use this data, provides other details about our personal data practices, and explains how to contact us if you have any questions or concerns.

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## **A. Our Obligations:**

### **1. Consent Obligation**

SHHK only collects, uses or discloses personal data of which you have given your consent.

SHHK allows you to withdraw consent, with reasonable notice, and shall inform you of the likely consequences of withdrawal. Upon withdrawal of consent to the collection, use or disclosure for any purpose, SHHK shall cease such collection, use or disclosure of your personal data.

### **2. Purpose Limitation Obligation**

SHHK may collect, use or disclose your personal data for the purposes that you would consider appropriate in the circumstances and for which you have given consent.

SHHK may not, as a condition of providing a service, require you to consent to the collection, use or disclosure of your personal data beyond what is reasonable to provide that service.

### **3. Notification Obligation**

SHHK shall notify you of the purposes for which SHHK is intending to collect, use or disclose your personal data on or before such collection, use or disclosure of personal data.

### **4. Access and Correction Obligation**

Upon request, your personal data and information about the ways in which your personal data has been or may have been used or disclosed within a year before the request should be provided. However, SHHK is prohibited from providing you access if the provision of the personal data or other information could reasonably be expected to:

- cause immediate or grave harm to your safety or physical or mental health;
- threaten the safety or physical or mental health of another individual;
- reveal personal data about another individual;
- reveal the identity of another individual who has provided the personal data, and
- the individual has not consented to the disclosure of your identity; or
- be contrary to national interest.

SHHK shall correct any error or omission in your personal data upon your request. Unless SHHK is satisfied on reasonable grounds that the correction should not be made, SHHK should correct the personal data as soon as practicable and send the corrected data to other organisations to which the

personal data was disclosed within a year before the correction is made, or with your consent, only to selected organisations.

**5. Accuracy Obligation**

SHHK shall make reasonable effort to ensure that personal data collected by or on behalf of SHHK is accurate and complete if it is likely to be used to make a decision that affects you, or if it is likely to be disclosed to another organisation.

**6. Protection Obligation**

SHHK shall make reasonable security arrangements to protect the personal data that SHHK possesses or controls to prevent unauthorised access, collection, use, disclosure or similar risks.

**7. Retention Limitation Obligation**

SHHK shall cease retention of personal data or remove the means by which the personal data can be associated with particular individuals when it is no longer necessary for any business or legal purposes.

**8. Transfer Limitation Obligation**

SHHK shall transfer personal data to another country only according to the requirements prescribed under the regulations, to ensure that the standard of protection provided to the personal data so transferred will be comparable to the protection under the PDPA, unless exempted by the Personal Data Protection Commission.

**9. Openness Obligation**

SHHK shall make information about SHHK's data protection policies, practices and complaints process available on request.

**B. Collection of Personal Data**

The types of Personal Data we collect essentially depend on the purpose of collection. Thus depending on the purpose of collection, the Personal Data collected may be in the form of:

- a. Name
- b. Date of Birth
- c. Gender
- d. NRIC / Passport / Birth Certificate
- e. Contact Information and Address
- f. Nationality / Race
- g. Photograph
- h. Education
- i. Occupation / Designation
- j. Income
- k. Involvement in other Civic Institutions
- l. Feedback / Performance Review
- m. Employment Records
- n. Family Records
- o. References
- p. Banking Particulars, Credit Card Details
- q. Information on Tax and CPF
- r. Sensitive Information such as Criminal Record, Religion, Health and etc
- s. Such other information as may be required for specific reasons.

**C. Purpose of Collection**

The Personal Data as provided/furnished by you to SHHK or collected by SHHK from you or through such other sources as maybe necessary for the fulfilment of the purposes ("**collected**") at the time it was sought or collected, will be used for such purpose and or for the following reasons (collectively "**Purposes**") [Personal Data collected maybe in the form of B (a) - (s) or part thereof]:

- a. Assessing application for membership.
- b. Assessing application for school registration.

- c. Assessing application for volunteer scheme.
- d. Assessing application for employment.
- e. Assessing application for council election.
- f. Assessing application for scholarship/award and bursary schemes.
- g. Communicating with its members.
- h. Providing services to process billing / payment transactions.
- i. Responding to an individual's inquiries.
- j. Administering participation in any programme/event/activity organised by SHHK and its subsidiaries.
- k. For marketing and promotional activities, market surveys, trend and statistical analysis.
- l. For finance activities.
- m. For credit assessments, financial and background investigation as and when deemed necessary.
- n. For the maintenance and upkeep of internal records, filing and operations.
- o. For meeting any legal or regulatory requirements relating to our provision of services and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us or our affiliates.
- p. To enter into the necessary agreement and/or contract.
- q. For handling the report for lost item, customer complaints and taking appropriate action relating thereto.
- r. For security and crime prevention purposes, risks management, safeguarding SHHK in the event of any claim, litigation, suits and etc.
- s. For any other grounds or reasons [Personal Data collected will correspond to such grounds or reasons].

Please note that it is necessary for an individual to provide us with your accurate personal data. Failure to do so may result in us being unable to process and/or use your personal data in relation to the Purposes.

#### **D. Consent and Right to Withdraw Consent**

You shall be invited to express consent to SHHK collecting, using and disclosing your personal data for the purposes of membership soliciting, research activities and future event notification and publicity as well as SHHK's news dissemination.

By so indicating your acceptance of the terms of this Policy, you shall be deemed to have expressly consented to the processing of your Personal Data by SHHK or any of our authorized staff, partners and/or contractors for the Purposes outlined in B above.

Notwithstanding anything to the contrary, you may at any time withdraw your consent to SHHK processing any Personal Data of yours or to any part or portion of the processing by sending to SHHK at the address set out below a written notice of withdrawal and within the period prescribed under the Act. SHHK shall take all necessary measures to give effect to your withdrawal of consent, to the extent that such withdrawal does not conflict with any of SHHK's other legal obligations.

#### **E. Rights of Access**

You may at any time hereafter make written inquiries, complaints and request for access to, or correction of, your Personal Data or limit the processing of your Personal Data by submitting such written request to the office of SHHK via e-mail to [admin@shhk.com.sg](mailto:admin@shhk.com.sg) or post it to the address as set out below:

##### **Postal:**

Singapore Hokkien Huay Kuan  
137 Telok Ayer Street #08-01/03  
Singapore 068602

Any Personal Data retained by us shall be destroyed and/or deleted from our records and system in accordance with our retention policy in the event such data is no longer required for the said Purposes.

#### **F. Disclosure of Personal Data**

The Personal Data provided to us shall be kept confidential, however, we may disclose your Personal Data to the following parties:

- a. Within the SHHK Family that includes SHHK's subsidiaries, our business partners and our affiliates that provide related services in connection with our services;
- b. Our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our services;
- c. Our third party service providers, third party management companies, sub-contractors or other parties as may be deemed necessary by us to facilitate your dealings with us;
- d. Our appointed service providers in fulfilling our services; and
- e. Any persons, government agencies, statutory authorities and/or industry regulators, whom we are compelled or required to do so pursuant to any law

Third parties are legally tasked with processing your Personal Data in line with principles specified by SHHK and may not use it for any other purposes. Third parties are also held responsible for securing your Personal Data at an appropriate level of security in relation to applicable data protection laws and widely accepted industry standards.

SHHK reserves its right to use or disclose any data as needed to satisfy any law, regulation or legal request, to protect the integrity of the Online Service, to fulfill your requests, or to cooperate in any law enforcement investigation or an investigation on a matter of public safety.

### **G. Security, Storage and Duration of Data Retention**

SHHK is committed to ensuring that your Personal Data is secure, and in connection therewith, suitable processes and procedures have been put in place to ensure that all Personal Data collected by us shall be stored and/or filed in such manner as to ensure that the Personal Data maintains its accuracy, integrity, remains confidential, is protected against loss, misuse, modification and unauthorised or accidental access, disclosure, alteration, destruction or manipulation.

SHHK shall store and/or retain all Personal Data only for as long as required for the fulfilment of the purposes stated in B above or pursuant to any legal obligation imposed upon SHHK in its operation of the Services or by virtue of any applicable law that may from time to time be in force.

### **H. Exceptions and Exclusion of Liability**

Notwithstanding the foregoing provisions, SHHK reserves the right to refuse to entertain any request for withdrawal of consent, access or correction in the following circumstances:

- Where there is an insufficiency of information provided by any party making a request to enable SHHK to positively locate or identify the Personal Data in question;
- Where there is reasonable doubt surrounding the identity of the person making the request or where SHHK feels that the requesting party is not in fact the owner or the subject of the Personal Data in question and is not lawfully entitled to make any requests in relation to the Personal Data;
- Where permitting access or correction would be tantamount to a violation of an order of Court;
- In requests for access or for correction (excluding instances of withdrawal of consent):
  - a) where the burden or expense of entertaining the request for access or correction is disproportionate to the risk to the privacy of the party making a request;
  - b) where compliance with the request would involve the unauthorised disclosure of Personal Data belonging to a third party;
  - c) where compliance would result in the disclosure of confidential commercial information; or
  - d) where access is regulated by another law

In the area of Personal Data protection, SHHK shall not be liable for any purported violation, breach or non-compliance with any precepts of privacy or the protection of Personal Data in the following instances:

- Where an act of nature or event outside the control of SHHK results in the damage or malfunction or destruction in any equipment or machinery used to secure, store or process Personal Data;
- Where Personal Data is readily available or able to be found in the public domain; and
- Where despite SHHK's best efforts, there is unauthorised access, modification, alteration, misuse, tampering or abuse of Personal Data caused by the malicious or fraudulent or criminal acts or conduct of a third party not being under the control or direction of SHHK.

## **I. Integrity of Personal Data**

You are responsible for ensuring that the Personal Data you provide us is accurate, complete and not misleading and that such Personal Data is kept up to date. We may request your assistance to procure the consent of third parties whose Personal Data is provided by you to us and you agree to use your best endeavours to do so.

## **J. Transferring and Sharing of Personal Data**

It may be necessary, if so required for any of the Purposes to transfer your Personal data outside of Singapore or to disclose your personal data to our related subsidiaries, business partners, affiliates, associates, service providers and/or relevant authorities, who may be located within or outside Singapore. Save for the foregoing, your personal data will not be knowingly transferred to any place outside Singapore or be knowingly disclosed to any third party.

SHHK also does not sell, transfer or disclose personal information to third parties outside the SHHK Family. The SHHK Family includes our subsidiaries, our affiliates and our service vendors. However, with your permission, we will, on occasion send marketing information on behalf of our business partners or associates about products or services they provide that may be of interest to you. You may be asked if you wish to receive marketing materials from SHHK's partners or associates. If you elect to receive such materials, SHHK will not share your personal information with such partners or associates but rather will send an e-mail on behalf of the partners or associates.

## **K. Protection of Personal Data in SHHK's Possession**

SHHK shall limit the collection and use of personal information to what is necessary to administer its services and to deliver superior service to you. To serve you better, SHHK may combine the information which you have given to us through our website or other channels.

SHHK shall protect the confidentiality of all personal information which you have shared with us. In cases where we share personal information with our subsidiaries, partners or affiliates, we will protect that personal information with a strict confidentiality as stated in our agreement. Companies hired by us to provide support services or to act as our agent must conform to our privacy standards.

SHHK corporate policies stipulate that any staff with access to confidential customer Information is not permitted to use or disclose such information except for business purposes. All staff are required to safeguard such information as specified in their confidentiality agreements with SHHK.

In all cases, your personal information is protected by a strictly confidentiality agreement. We do not allow any non-affiliated company to retain your personal information any longer than it is necessary to provide you with the service or information unless you have granted us permission to do so.

Staff of SHHK shall sign the Confidentiality Clause to undertake not to misuse or disclose personal data in their possession during their cause of work and to take every precaution to ensure all personal data under their possession are being kept confidential at all times.

## **L. Language**

This Policy is issued in English.

## **M. Changes to the Personal Data Protection Policy**

This Personal Data Protection Policy is effective as of 1 July 2014. From time to time, it may be necessary for SHHK to change this policy. If we change our policy, we will post the revised version on our corporate website, so we suggest that any interested person check for the most up-to-date version of our personal Data Protection Policy online.

## **N. Governing Law**

This Data Protection Policy shall be governed in all respects by the laws of Singapore.