

Introduction

1. Anglican Preschool Services Ltd. ("APS") recognises the importance of safeguarding personal data when dealing with information relating to its employees, parents, guardians, children of its activities and programmes, and visitors (including service providers), stakeholders and other interested parties, and therefore is committed to fully implementing and complying with the provisions of the Personal Data Protection Act (the "Act"). APS' Personal Data Protection Policy set out here explains the procedures and systems in place to comply with the Act (the "Policy"), in respect of personal data as defined under the Act.

Purposes for the Collection, Use and Disclosure of Personal Data

2. APS receives or collects the personal data of its employees, parents, guardians, children of its activities and programmes and visitors (including service providers), stakeholders and other interested parties for purposes reasonably required by it as an early childhood education provider.
3. These purposes include the following, whether within or outside Singapore:
 - a. operational planning and implementation of activities and programmes such as centre activities, parent-teacher communication, pastoral support and enrichment events;
 - b. communication of activities, programmes and other service-related information including parent communication and other publications;
 - c. maintenance of records such as parent/guardian and child information required by ECDA, participants of activities and programmes, service provider's information, visitor log, etc.;
 - d. management and administration of employment relationships with job applicants and employees such as work-related dealings, evaluation of performance, crediting salaries, administering staff benefit schemes and conducting audits on finance claims;
 - e. reporting and sharing of information within APS, in furtherance of organization objectives; and
 - f. such other purposes as may reasonably be appropriate in the circumstances of the collection of personal data.
4. Individuals have the choice of not to provide their personal data for APS collection, use, or disclosure; however, this may prevent APS from further providing the service required.
5. APS will not use the personal data for any purpose other than that for which it was collected. Should APS require any personal data in its possession to be used for a purpose other than those for which consent was originally given, fresh consent will be sought to use the data for that new purpose.
6. While processing personal data for the above purposes, APS may disclose such personal data to third parties within or outside Singapore. These third parties include:
 - a. governmental organisations or authorities to whom APS is required by law to disclose the data;
 - b. individuals who are legally entitled to the data;
 - c. third parties who require the data in order to process and operate programmes in which an individual intends to participate;

- d. third parties who provide APS with data processing, administration, health, insurance, or legal services, or other professional or management services; and
 - e. such other persons as may reasonably be appropriate in the circumstances of the collection of personal data.
7. Disclosure to third parties outside Singapore shall only be to organisations that are required or undertake to process the data with a comparable level of data protection as that required under Singapore law.
8. Any submission of personal data to APS on behalf of another individual by you, APS deems that you have notified the individual of the purpose and have received their consent before your submission.
9. Where consent is not obtained, APS collects personal data pursuant to an exception under the PDPA or as required/authorised under any other written law.

Minors below 13

10. APS shall not collect, use, or disclose personal data of persons below the age of thirteen (13) for any purpose unless written parental or guardian consent has been given for such purpose.

Withdrawal of consent

11. Should you wish to withdraw or limit your consent to APS' collection, use and disclosure of your personal data, please write in with full particulars to our Data Protection Officer ("DPO") using the contact details provided in paragraph 22 below.

Confidentiality

12. Any personal data collected by APS shall be accessible by employee(s) of APS to serve the purpose for which the data was collected. Such employee(s) shall always observe strict confidentiality.
13. In the event personal data is disclosed to third parties, such third parties will be required to sign an agreement requiring them to always observe confidentiality and to use the personal data only for the purpose for which it was disclosed to them.

Data Protection Officer (DPO)

14. APS has designated a DPO to deal with day-to-day data protection matters and complaints, encourage good data handling practices and ensure that APS complies with the Act and implements the Policy. If you have any questions, complaints, or concerns, please contact the DPO using the contact details provided in paragraph 22 below.

Accuracy

15. APS endeavours to take all reasonable steps to ensure that personal data in its possession or under its control is accurate, up-to-date, and complete. If there is any error or omission in the personal data you have provided to APS, please write in to our DPO with the necessary details

for correction of your data. If any personal data you have provided to APS becomes inaccurate, please contact our DPO to update your data.

Access and Correction

16. Should you wish to access or correct any personal data collected by APS or understand how such data has been used or disclosed, please write in to our DPO with your request. The DPO will provide you with the requested information within a reasonable time, after verification of your identity. Kindly note that APS reserves the right to charge a reasonable administrative fee for responding to any such requests.

Retention

17. APS will retain personal data for as long as it is necessary to serve the purpose for which it has been collected. Once the data in APS's possession is no longer necessary to serve the purpose for which it was collected, the data will be destroyed or anonymised in a secure manner.

Protection

18. APS endeavours to maintain all personal data in its possession or under its control securely. To this effect, APS has put in place measures to ensure the protection of data in its possession against unauthorised access, collection, use, disclosure, copying, modification, disposal, or other risks.

Transfer

19. APS shall not transfer any personal data in its possession to any parties outside Singapore except as specified in this Policy. Any outside party to which APS intends to transfer data in its possession must have protections equivalent to those provided for in the Act.

Complaints

20. If an individual feels that his data has been erroneously or improperly handled by APS, the individual may lodge a complaint in writing with the DPO. Once a complaint has been received, the DPO will acknowledge receipt of the same in writing and will contact the relevant departments to investigate the complaint.
21. The outcome of the investigation will be communicated by the DPO to the complainant in writing, notifying the individual of the outcome.

Enquiries

22. APS is committed to protecting the privacy and personal data of its employees, parents, guardians, children of its activities and programmes, and visitors including service providers),

stakeholders and other interested parties . For enquiries about APS's Policy, please write to the DPO at the following address:
Data Protection Officer
dpo@anglicanps.edu.sg

Cookie/Tracking Technology

23. This website may use cookie and tracking technology depending on the features offered. Cookie and tracking technology are useful for gathering personal data such as browser type and operating system, tracking the number of visitors to the website, and understanding how visitors use the website. Cookies can also help customise the website for visitors. Personal data cannot be collected via cookies and other tracking technology, however, if you previously provided personally identifiable information, cookies may be tied to such information. Aggregate cookie and tracking information may be shared with third parties.

Updating the Policy

24. This Policy may be updated from time to time to take account of changes in policy, technology, and/or to ensure compliance with any legislative changes.

End.