

SOSD: Data Protection Policy



1. INTRODUCTION

- 1.1 The purpose of this Data Protection Policy (“**DP Policy**”) is to inform you of how SOSD manages personal data which is subject to the Personal Data Protection Act (No. 26 of 2012) (the “**PDPA**”).
- 1.2 By interacting with SOSD, submitting information to us, or signing up for any events organized by us, you agree and consent to SOSD as well as our representatives, volunteers, employees and/or agents (collectively referred to in this DP Policy as “**SOSD**”, “**us**”, “**we**” or “**our**”) collecting, using, disclosing and sharing amongst ourselves your personal data, and disclosing such personal data to SOSD’s authorized services providers and relevant third parties in the manner set out in this DP Policy.
- 1.3 This DP Policy supplements but does not supersede or replace any other consents you have previously provided to SOSD in respect of your personal data, and your consent in this DP Policy are additional to any rights which SOSD may have at law to collect, use or disclose your personal data.
- 1.4 SOSD may from time to time update this DP Policy to ensure that this document is consistent with our future development and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this DP Policy as updated from time to time on our website: www.SOSD.org.sg. Please check back regularly for updated information on the handling of our personal data.

2. PERSONAL DATA

- 2.1 In this DP Policy, “personal data” refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which SOSD has or is likely to have access, including data in our records as may be updated from time to time.
- 2.2 Examples of such personal data that you may provide to us include (depending on the nature of your interaction with us) your name, full or partial NRIC, passport or other identification number, telephone number(s), residential address, email address and any other information relating to any individual which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

3. COLLECTION OF PERSONAL DATA

- 3.1 Generally, SOSD collects personal data in the following ways:

- (a) when you submit any (i)form, document or agreement relating to or in connection

with any proposed adoption, transfer, surrender, sponsorship or fostering of our dogs, (ii) volunteer agreement, (iii) sponsorship or donation agreement, (iv) event participation agreement, or (v) other form, document, or agreement relating to any of our events or our dogs or in respect of any interaction with us;

- (b) when you interact with our employees or volunteers, for example, via telephone calls, emails, face to face exchanges, letters and social media platforms;
 - (c) when you use our electronic services, or interact with us on our website, Facebook page or any other social media platform;
 - (d) when you request that we contact you or request that you be included in an email or other mailing list;
 - (e) when you respond to our campaigns, initiatives or to any request for additional personal data;
 - (f) when you submit an employment or internship application or when you provide documents or information in connection with any appointment as an officer, member, representative or any other position;
 - (g) when you provide any document or information in connection with any proposed fostering, sponsorship, adoption, surrender or transfer of dogs;
 - (h) when your images are captured by us via photographs or videos taken by us when you attend closed-door or private events at our premises or at other third-party venues;
 - (i) when you are contacted by, and respond to, our employees, interns or volunteers;
 - (j) when you submit the personal data of any other third party (such as a family member) to us in connection with any proposed adoption or fostering arrangement; and
 - (k) when you are a volunteer, intern or employee and you submit the personal data of your emergency contact persons.
- 3.2 When you browse our websites, you generally do so anonymously but see the section below on cookies. We do not, at our website, automatically collect personal data unless you provide such information.
- 3.3 If you provide any personal data relating to a third party (such as your spouse, children, parents, or partners), by submitting such information to SOSD, you represent to us that you have obtained the consent of the third party to (i) provide us with their personal data for the respective purposes and (ii) for their personal data to be retained, used

and disclosed in accordance with this DP Policy.

- 3.4 You represent to us that that all personal data submitted to us, including without limitation, personal data of third parties ((such as your spouse, children, parents, or partners) are complete, accurate, true and correct.

4. **PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

4.1 Generally, SOSD collects, uses and discloses personal data for the following purposes:

- (a) verifying your identity;
- (b) assessing any dog fostering or adoption applications;
- (c) responding to your queries, feedback and requests;
- (d) administration, management and operations of SOSD such as, volunteer management and co-ordination, co-ordination and dealings with third parties such as adopters, fosterers and veterinary personnel, fundraising and other event management;
- (e) complying with our legal or statutory obligations including without limitation, reporting of tax deductible donations to IRAS;
- (f) managing the safety and security of our premises, shelter and events including but not limited to CCTV surveillance and conducting security clearances;
- (g) monitoring or recording phone calls and public-facing interactions for quality assurance, training and performance evaluation and identity verification purposes;
- (h) in connection with any claims, actions or proceedings including but not limited to drafting and reviewing of documents, obtaining legal advice and facilitating dispute resolution, and/or protecting and enforcing our contractual and legal rights and privileges;
- (i) in connection with investigations relating to disputes, animal abandonment or animal abuse;
- (j) any other purposes reasonably related to the above.

4.2 In addition, SOSD collects, uses and discloses personal data for the following purposes:

- (a) In relation to an existing or prospective donor or sponsor:
 - (i) soliciting donations;

- (ii) creating and maintaining donor profiles in our system database for internal record and reference;
- (iii) managing relationships with our donors and sponsors (including but not limited to sending thank you letters and collaterals such as donation/sponsor-a-dog appeals and forms);
- (iv) processing tax deductions for eligible donations;
- (v) providing information which SOSD thinks you may find of interest and keeping you informed of our activities and events;
- (vi) generating publicity materials for our events and campaigns;
- (vii) any other purpose reasonably related to the above.

(b) In relation to an existing or prospective volunteer of SOSD:

- (i) assessing your suitability as a volunteer;
- (ii) if you are fosterer, monitoring the welfare of the foster dogs under your care;
- (iii) if you are a fosterer, making arrangements for transport, veterinary visits, training and other support services for your and/or the foster dogs under your care;
- (iv) if you are a Healing Paws or Canine Chums volunteer, seeking clearance from or providing your personal data at the request of the management of homes, hospitals and other institutions that you will be volunteering at;
- (v) creating and maintaining a consolidated electronic volunteer database;
- (vi) managing relationships with you including but not limited to sending you letters, invitations and collaterals such as annual review and donation forms;
- (iv) facilitating our various events, adoption drives and programmes that you may participate in;
- (v) providing information which SOSD thinks you may find of interest and keeping you informed of our activities and events;
- (vi) generating publicity for our events and campaigns; and/or any other purpose reasonably related to the above.

(c) In relation to an existing or prospective adopter of our dogs:

- (i) assessing your eligibility as an adopter;
- (ii) creating and maintaining a consolidated adopter database;
- (iii) managing relationships with you;
- (iv) monitoring and ensuring the welfare of our adopted dogs;
- (v) making arrangements for veterinary appointments, training and other support services for dogs you have adopted from SOSD;
- (vi) re-homing the adopted dog;
- (vii) providing information which SOSD thinks you may find of interest and keeping you informed of our activities and events;
- (viii) generating publicity materials for our events and campaigns; and/or

- (ix) any other purpose reasonably related to the above.
- (d) If you are an owner of an external service provider or vendor:
- (i) managing tenders, quotations, processing orders or managing the supply of goods and services;
 - (ii) processing and payment of vendor invoices and bills;
 - (iii) any other purpose reasonably related to the above.
- (e) If you have submitted an application to us as a candidate for employment:
- (i) conducting interviews;
 - (ii) processing your application including but not limited to pre-recruitment checks;
 - (iii) obtaining employee references and for background screening;
 - (iv) assessing your suitability for employment with SOSD; and/or
 - (v) any other purpose reasonably related to the above.
- 4.4 In relation to particular events or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your personal data. If so, we will collect, use and disclose personal data for these additional purposes as well, unless we have specifically notified you otherwise.

5. **DISCLOSURE OF PERSONAL DATA**

- 5.1 SOSD will take reasonable steps to protect personal data in its possession against unauthorized disclosure. Subject to the provisions of any applicable law, your personal data may be disclosed, for the purposes listed in paragraph 4 above (where applicable) to the following entities or parties whether they are located in Singapore or overseas:
- (a) our fundraising partners and service providers;
 - (b) our event organisers and service providers;
 - (c) our transport services providers, veterinary services providers and/or dog training services providers;
 - (d) insurance companies in relation to any insurance claim;
 - (e) companies providing services in connection with events organized by SOSD;
 - (f) agents, contractors or third-party service providers who provide operational services to SOSD such as courier services, information technology, payment, printing, invoicing, book keeping, market research or other services;

- (g) any assignee or transferee (actual or prospective) to facilitate any business asset transactions in connection with any re-organisation or corporatization of SOSD;
- (h) our professional advisers such as consultants, auditors and lawyers;
- (i) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies (including without limitation, Agri-Food and Veterinary Authority (“AVA”), National Parks Board (“NParks”), Housing & Development Board (“HDB”), Ministry of Culture, Community and Youth (“MCCY”), the Inland Revenue Authority of Singapore (“IRAS”), Singapore Police and the Registry of Societies;
- (j) any other party whom you authorise to disclose your personal data to; and
- (k) any other party to whom we are permitted, under the PDPA, to disclose your personal data.

6. **USE OF COOKIES**

A cookie is information that a web-site puts on your hard disk so that it can remember something about you at a later time. Cookies are stored as text files on your hard disk so servers can access them when you return to the websites you have visited before. Cookies cannot access, read or modify any other data on an electric device, nor does it capture any data which allows us to identify you individually. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visit. However, you may not be able to enter certain part(s) of our website.

7. **DATA SECURITY AND RETENTION POLICY**

- 7.1 SOSD will take reasonable efforts to protect personal data in our possession or under our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any personal data we may have collected from or about you, or that for example no harmful code will enter our websites (for example viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with using websites. While we strive to protect your personal data, we cannot ensure the security of the information you transmit to us via the Internet or when you use our online portals, and we urge you to take every precaution to protect your personal data when you are on the Internet.
- 7.2 SOSD’s website may contain links to other third-party websites. This DP Policy does not apply to the third-party websites. SOSD takes no responsibility for the privacy practices of such websites.

7.3 We will only retain personal data collected for as long as it is required for the fulfillment of the purposes or allowed by any applicable law to be retained.

8. **CONTACTING US – FEEDBACK, WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION**

8.1 If you:

- (a) have any questions or feedback relating to your personal data or this DP Policy;
- (b) would like to withdraw your consent to any use of your personal data as set out in this DP Policy; or
- (c) would like to obtain access and make corrections to your personal data records, you can contact our Data Protection Officer via the following channels:
- (d) Email: admin@sosd.org.sg
- (e) All requests for access and/or correction of personal data must be in writing stating the full name and such other requisite details as may be required and signed by the requestor.
- (f) SOSD is entitled to impose a reasonable charge for providing you with access to personal information.

8.2 If you withdraw your consent to any or all use of your personal data, depending on the nature of your request, SOSD may not be in a position to administer any contractual relationship in place, which in turn may also result in the termination of any agreements with SOSD, and your being in breach of your contractual obligations or undertakings. SOSD's legal rights and remedies in such event are expressly reserved.

9. **GOVERNING LAW**

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