



Home for Good, Singapore Ltd

Personal Data Protection Act External Policy

Document Information	
Policy Owner	Data Protection Officer
Owner Contact Information	enquiries@hfg.org.sg
Last Updated	27 February 2025

1 External Data Protection Policy

1.1 This External Data Protection Policy (“**Policy**”) aims to:

- a. Help you understand how Home for Good, Singapore Ltd. (“**HFG-SG**”) collects, uses, discloses and/or Processes the Personal Data you provide to us.
- b. Enable you to make informed decisions before sharing any of your Personal Data with us.

1.2 This Policy supplements, but does not supersede nor replace, any other consent(s) you may have previously provided to us. We may update this Policy periodically to ensure that it is consistent with our evolving practices, industry standards and any changes in legal or regulatory requirements.

2 Your Personal Data

2.1 In this Policy and under Section 2 of the Personal Data Protection Act 2012 (“**PDPA**”),

- a. “**Personal Data**” refers to any data, whether true or not, about you from which you can be identified, either (i) from that data; or (ii) from that data and other information to which we have or are likely to have access.
- b. “**Process**” or “**Processing**” in relation to Personal Data, means the carrying out of any operation or set of operations in relation to the Personal Data, and includes any of the following: (a) recording; (b) holding; (c) organisation, adaptation or alteration; (d) retrieval; (e) combination; (f) transmission; (g) erasure or destruction.

2.2 Examples of any such Personal Data we may collect from you include, but are not limited to:

- a. Your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address, bank account, credit card information and any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interaction with you;
- b. Information about your use of HFG-SG’s various websites and services, including cookies, IP addresses, policy and claims history information;
- c. Your employment history, education background and income levels; and/or
- d. Information about your usage of and interaction with our websites and/or services including computer and connection information including computer

and connection information, bandwidth, statistics on page views and traffic to and from our websites.

3 Collection of Personal Data

3.1 HFG-SG may collect your Personal Data in one or more of the following ways when you:

- a. Visit our premises as our CCTV system records footage 24 hours a day;
- b. Visit our websites;
- c. Donate to HFG-SG via our website (<https://hfg.org.sg/donate>);
- d. Donate to HFG-SG via PayNow [UEN: 202228829D];
- e. Donate to HFG-SG via Internet Banking;
- f. Donate to HFG-SG via crossed cheque donation to Home for Good, Singapore Ltd, Finance Department, 22 Sin Ming Lane, #06-76 Midview City, Singapore 573969;
- g. Attend our events, which may include workshops, talks, conferences, forums etc., as photos and/or video recordings may be taken for publicity purposes;
- h. Interact with any of our employees, interns, volunteers, board and committee members e.g., via meetings, emails or telephone calls;
- i. Request that we contact you, be included in an email or other mailing lists;
- j. Respond to our initiatives or programs;
- k. Participate in our research and/or surveys e.g. via online, face to face, or pen and pencil, conducted by us or our partners/vendors;
- l. Apply to volunteer with HFG-SG;
- m. Apply for employment with HFG-SG;
- n. Apply for an internship with HFG-SG;
- o. Choose to connect with third-party social networking services where your Personal Data can be obtained by HFG-SG via those services;
- p. Complete any participant feedback form with regard to our events and programs for administrative purposes;

- q. Complete the Media Release Consent Form that will allow HFG-SG to use your work and publications materials that you may provide;
 - r. Submit your Personal Data to us for any other reasons; and/or
 - s. Respond to our request for additional Personal Data.
- 3.2 When you browse our websites, you generally do so anonymously. However, please refer to Section 11 (Use of Cookies) of this Policy for more details.
- 3.3 If you are under the age of eighteen [18], you must obtain consent from your parent or guardian before providing us with your Personal Data.
- 3.4 **Accuracy:** HFG-SG will make reasonable efforts to ensure that the Personal Data we collect is accurate and complete. You must update us on any changes to your Personal Data by emailing enquiries@hfg.org.sg. We will correct or update your Personal Data as soon as reasonably practicable.
- 3.5 You warrant and represent to HFG-SG that all your Personal Data you submit to us is complete, accurate and true. HFG-SG will not be responsible for relying on inaccurate or incomplete Personal Data if you fail to inform us of any relevant changes regarding your Personal Data. Providing incomplete, inaccurate and/or false information may limit our ability to:
- a. Deliver the services you request from us; and/or
 - b. Perform the necessary administrative process.

4 Purposes for the Collection, Use and Disclosure of Your Personal Data

- 4.1 HFG-SG may collect, use and/or disclose your Personal Data for the purposes you have consented to, or for purposes for which you have provided your Personal Data to us. These purposes include, but are not limited to:
- a. Contacting you regarding your work, volunteering and/or any other future opportunities with HFG-SG;
 - b. Facilitating your participation in HFG-SG activities;
 - c. Administering and maintaining your records;
 - d. Contacting you about upcoming events;
 - e. Providing information to governmental and/or quasi-governmental bodies to comply with relevant legal and/or regulatory requirements, codes of practice and guidelines;

- f. Handling billing, accounting, auditing and maintaining proper book-keeping;
- g. Take pictures and videos or make sound recordings of, and use statements, comments and testimonials related to you;
- h. Conducting evaluation surveys;
- i. Conducting research;
- j. Improving our services to you; or
- k. Any other purposes incidental to the above.

4.2 Where permitted under the PDPA or applicable law, HFG-SG may, in accordance with the PDPA, rely on the exceptions under the First and Second Schedules of the PDPA (the “**Exceptions**”) to collect, use, disclose and/or Process without obtaining your consent. For example, HFG-SG may collect, use, disclose and/or Process your Personal Data without obtaining your consent by relying on the legitimate interests exception found in Part 3 of the First Schedule of the PDPA (the “**Legitimate Interests Exception**”). Your Personal Data may be collected, used, disclosed and/or Processed without your consent, including without limitation for the purpose of detecting and/or preventing:

- a. fraud;
- b. an illegal activity; and/or
- c. the misuse of services provided by or to be provided by HFG-SG,

on the basis that such collection, use, disclosure and/or Processing is for the legitimate interests of HFG-SG or some other organisation, and that such legitimate interests outweigh any adverse effect (if any) on you.

4.3 HFG-SG may/will need to disclose your Personal Data that is being processed in reliance on any Exception to third parties, whether located within or outside Singapore, for the purposes stated above, and such third parties may/would be processing your Personal Data for the purposes stated above.

4.4 HFG-SG will seek your fresh or updated consent(s) before disclosing your Personal Data for purposes which are not listed above, or for new purposes, unless processing of your Personal Data without your consent is permitted by the PDPA or by applicable law.

4.5 If you (non-exhaustive list),

- a. Submit Personal Data on behalf of another individual;
- b. Submit Personal Data concerning another individual other than yourself;
and/or
- c. As a representative or agent of your company or organisation, submit the Personal Data of others as part of the disclosures by the company or organisation to us,

You warrant and represent to HFG-SG that:

- (a) you have the authority to provide that Personal Data to HFG-SG;
- (b) the Personal Data provided is accurate and true;
- (c) you have informed the individual(s) about the purposes for which his/her Personal Data is collected, used, disclosed and/or Processed as well as the parties to whom such Personal Data may be disclosed or transferred by HFG-SG, as set out below;
- (d) the individual has consented to the collection, use, disclosure and/or Processing of his/her Personal Data for such purposes. You must retain proof of this consent and provide it to HFG-SG upon our request; and
- (e) you have provided such Personal Data in compliance with all the applicable data protection laws, including but not limited to the PDPA and other regulation(s).

- 4.6 If you have provided us with your Singapore telephone number(s) and/or email address(es) and have consented to receive updates from HFG-SG, we may contact you using such Singapore Telephone number(s) and/or email address(es), including via voice calls, text, fax, email or other means which you have provided to share information and updates regarding our events and/or initiatives.

5 Disclosure of Personal Data

- 5.1 HFG-SG will protect and keep your Personal Data confidential. However, where permitted by any applicable law, your Personal Data may be disclosed for the purposes listed above to the following parties:
- a. HFG-SG's employees, volunteers, interns, board and committee members;
 - b. Third-party service providers offering services to HFG-SG, such as courier services, payroll, mailing, information technology, data processing or insurance services;

- c. Any liquidator, receiver, official assignee/trustee, judicial manager or any other person appointed under or pursuant to any applicable law or court order in connection with the bankruptcy, liquidation, winding up, judicial management or any other analogous process in respect of any individual, company or business;
- d. Our professional advisers, such as our auditor(s) and lawyer(s);
- e. Any judicial, administrative or regulatory body, any government or public or government agency, or any parties thereof having jurisdiction over HFG-SG;
- f. Any other party to whom you authorise us to disclose your Personal Data to.

6 Transfer of Personal Data outside Singapore

- 6.1 Where your Personal Data is to be transferred out of Singapore, HFG-SG will comply with the PDPA to ensure that the transferred Personal Data is protected at a standard comparable to that under Singapore's PDPA. For example, where we may use cloud storage and/or communication tools (e.g., Google Drive), your Personal Data may be transferred outside of Singapore to such cloud service providers' servers (e.g., in the United States). If so, we will take appropriate steps to ascertain that the foreign recipient organisation of the Personal Data is bound by legally enforceable obligations to provide the transferred Personal Data a standard of protection that is at least comparable to that provided under the PDPA.

7 Withdrawal of Consent

- 7.1 If you wish to withdraw your consent to any use or disclosure of your Personal Data as set out in this Policy, please contact HFG-SG's Data Protection Officer ("DPO"). Refer to [Section 13 \(Contacting Us\)](#) to locate our DPO's contact information.
- 7.2 Please note that if you withdraw your consent to the collection, use and/or disclosure of your Personal Data, depending on the nature of your request, we may not be able to continue providing our services or performing our contractual obligations to you. Such withdrawal may result in the termination of any agreements or arrangements you may have with us. HFG-SG reserves its legal rights and remedies in such cases.
- 7.3 Processing a withdrawal of consent request may take up to 4 weeks to be reflected in our system.

8 Access and Correction of your Personal Data

- 8.1 You may request access to or make corrections to your Personal Data records that HFG-SG has. To do so, please submit your request to HFG-SG's DPO identifying yourself and indicating the Personal Data that your request concerns. Our DPO's contact information is contained in [Section 13 \(Contacting Us\)](#) of this Policy.
- 8.2 Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

9 Security

- 9.1 HFG-SG will take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that your Personal Data is adequately protected and secured. However, while HFG-SG complies with the PDPA and implements reasonable security measures to protect your Personal Data from unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage, and/or alteration, you acknowledge that no data transmission over the Internet can guarantee complete security. HFG-SG cannot assume responsibility for any unauthorised use of your Personal Data by third parties which are wholly attributable to factors beyond our control. Accordingly, by providing us with your Personal Data, you are transmitting your information at your own risk.

10 Retention of your Personal Data

- 10.1 HFG-SG will retain your Personal Data for as long as it is necessary to provide our services to you, and as required or relevant for business or legal purposes. We will cease to retain your Personal Data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the Personal Data was collected, and is no longer necessary for legal or business purposes.

11 Use of Cookies

- 11.1 HFG-SG may collect and/or analyse anonymised information from which individuals cannot be identified ("Aggregate Information"). This includes, but is not limited to metrics such as number of users, frequency of visits, the number of website page views/impressions and common entry and exit points into our websites.
- 11.2 HFG-SG uses "cookies" where a small data file is sent to your browser to store and track Aggregate Information about you when you enter our websites. The

cookies are used to track information such as the number of users, their frequency of use, profiles of users and their preferred sites. We will obtain your consent before collecting your Personal Data through the use of cookies.

11.3 The Aggregate Information collected is used to assist HFG-SG in analysing our websites' usage and improve the user experience on our websites.

11.4 If you wish to disable the cookies associated with these technologies, you may adjust your browser's settings. However, please note that doing so may restrict your access to certain part(s) of our websites.

12 Third-Party Sites

12.1 Our websites may contain links to other third-party operated websites for your convenience and information. You access these websites at your own risk. To the fullest extent permitted under laws, HFG-SG is not responsible for any third-party's acts, omissions, data policies, use of cookies, content or security of any third-party websites, even if linked to our websites.

12.2 HFG-SG recommends that you check and review the data protection policies of any relevant third-parties to understand how they collect, use, disclose, Process and protect your Personal Data. HFG-SG disclaims and excludes any liability from your use of such third-party websites.

13 Contacting Us

13.1 If you have any questions, feedback or complaints relating to HFG-SG's use or disclosure of your Personal Data, or if you wish to know more about HFG-SG's data protection policies and practices, or wish to withdraw your consent for the collection, use and/or disclosure of your Personal Data, please contact our HFG-SG DPO at:

Amos Ou
Programmes Manager
enquiries@hfg.org.sg

14 Updates on Privacy Policy

14.1 To ensure that your Personal Data is properly managed, protected and processed, HFG-SG will periodically review its policies, procedures and processes.

14.2 HFG-SG reserves the right to amend the terms of this Policy at its absolute discretion without any prior notice. Any amendments or updates to this Policy



will be published on our website and can be viewed at <https://hfg.org.sg>. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Approved by the Board 19 April 2025