Dyslexia Association of Singapore Group

("DAS" Group)

Data Protection Policy

Introduction

DAS Group ('we', 'us', 'our', etc.) respects the right of individuals to protect their personal data.

This data protection policy gives you information about how we collect, use and disclose personal data about you while recognising both your right to protect your personal data and our need to collect, use or disclose it for purposes that we believe are reasonable and appropriate in the circumstances of our non-profit work.

It applies to the personal data of all individuals ('you', 'your', etc.) who are our stakeholders, donors to us, our employees, job applicants, volunteers, and online users of our website. For our stakeholders, 'you', 'your', etc. also includes a parent or parents, a legally appointed guardian and another caregiver who takes responsibility for the stakeholder's welfare.

If you are not in any of these categories but we collect, use or disclose personal data about you in the course of our non-profit work, this data protection policy will apply to that personal data consistently with the way in which it applies to the above individuals.

We have developed this Privacy / Data Protection Policy to assist you in understanding how we collect, use, disclose, process and retain your personal data.

Purposes for us collecting, using or disclosing personal data

We collect personal data from or about our stakeholders and our potential stakeholders, donors to us, our employees, job applicants, volunteers, and online users of our website. We use and disclose that personal data so that we are able to provide our services for the following purposes:

- Process registration for assessments
- Process registration for enrolment in our Learning Centre
- Process applications for subsidies or financial assistance relating to services and/or our events and training grants
- Process billings and/or refunds
- Provide newsletters and updates and/or other relevant information to stakeholders who are interested in our
- events and services
- Process applications for registration to our courses, workshop, seminar, events and/or services
- Process referrals or enquiries relating to our services
- Process and administer donations received
- Organise campaigns to raise funds
- Process applications for volunteering opportunities at our events and/or services
- Process job applications
- Process salary payments and/or other reimbursements (or as described on our website) efficiently and effectively so that we can comply with our legal obligations.

Dyslexia Association of Singapore Group

("DAS" Group)

Data Protection Policy

How our collection, use and disclosure of personal data

Where possible, we collect personal data directly from you. We do this in various ways, including telephone and in person meetings and interviews, forms and questionnaires. This may also include the following:

- When you register for assessments
- When you register for a learning programme or training course/workshop
- When you request for financial assistance
- When we need to sent you a tax invoice/receipt
- When you indicate you wish to have follow-up from DAS
- When you donate
- When you attend an event
- When you call in to our hotline/customer service
- When you send in your job application form
- When processing your salary
- When you volunteer
- When you join as a member
- When you join as an alumni
- When you join RETA

If at any time you would prefer not to provide some personal data that we request, please let us know. We will then explain our purpose for collecting that personal data. If you still do not wish to provide it we will discuss with you whether we can proceed without it.

We collect, use, or disclose personal about you only if:

- you give, or are deemed to have given, your consent under the Personal Data Protection Act (PDPA) to us collecting, using or disclosing that personal data or
- collection, use or disclosure by us of that personal data without your consent is required or authorised under the PDPA or any other written law

Where we ask you to consent to us collecting, using or disclosing personal data about you, we will first inform you of our purposes for doing so. We will not use or disclose personal data about you for any other purposes without first informing you of the additional purposes and getting your consent to us doing so for the additional purpose(s).

In some circumstances, you are deemed to have consented to us the collecting, using or disclosing personal data about you for a purpose. For example, if you pose for a photograph by our photographer at one of our events or if you fill up a job application form and send it to us, you are deemed to have consented to us collecting, using or disclosing the personal data about you that is in the photograph (that is, your image) or the job application.

Dyslexia Association of Singapore Group

("DAS" Group)

Data Protection Policy

Types of Personal Data We Collect About You

The types of personal data we collect about you may include:

- Name
- NRIC No. / BC No.
- Gender
- Nationality
- Address
- Email address
- Contact Details
- School Name and Level
- Alternate Contact Details
- Family Background & Details
- Education & Professional Qualifications
- Employment Details & History
- Financial Information
- Criminal Background/Past Offences
- Medical Details/Health Information
- Photos & Video Footage
- Audio recording

Who We Disclose Your Personal Data To

We may disclose some of the personal data we have collected about you to the following parties or organisations within/outside DAS Group:

Within DAS Group:

- Dyslexia Association of Singapore
- DAS Academy Ltd
- DAS International Services Ltd
- Executive Committee
- Employees
- Volunteers
- Interns

Outside DAS:

- Ministry of Education
- Ministry of Social & Family Development (MSF)
- Agency for Integrated Care
- Sponsors/Donors
- Auditors
- Information Technology Service Providers
- Various Law Enforcement Agencies for Security, Customs and Immigration Purposes
- Other Contracted Service Providers (only if applicable)

Dyslexia Association of Singapore Group

("DAS" Group)

Data Protection Policy

We are permitted by the PDPA to collect, use or disclose personal data about you without your consent in various circumstances that include the following:

- if it is publicly available or if it is business contact information
- if it is disclosed to us by a public agency (such as the Ministry of Education or the Agency for Integrated Care) and the collection is consistent with the purpose of the disclosure by the public agency
- if it is necessary for any purpose that is clearly in your interests and consent cannot be obtained in a timely way
- if it was provided to us by another individual to enable us to provide a service for that other individual
- if there is an emergency
- if we do so for evaluative purposes (such as assessing a job or volunteering application) where the disclosure is related to law enforcement or where the collection, use or disclosure is in connection with certain legal issues

If you would like more information about the circumstances under which we may collect, use or disclose personal data without your consent, please contact our Data Protection Officer.

If you browse our website, we do not capture any data that allows us to identify you.

Withdrawing your consent

On giving us reasonable notice of at least 2 weeks, you may at any time withdraw any consent you have given, or are deemed to have been given, to us collecting, using or disclosing personal data about you for any purpose. Any notice of withdrawal of consent should be given in writing (which includes email) sent to our Data Protection Officer.

The consequences of you withdrawing consent to us collecting, using or disclosing personal data about you for any purpose may be onerous for you. Therefore:

- we may require you to provide proof of your identity and
- we will inform you in writing (which may be by email) of the likely consequences of withdrawing your consent for the specified purpose

If you still wish to withdraw, your consent we will act on your request and cease collecting, using or disclosing the personal data, unless doing so without your consent is required or authorised under the PDPA or other written law. We will also cause any and all of our data intermediaries to cease collecting, using or disclosing the personal data.

In addition, we will cease to retain our documents containing that personal data, or remove the means by which it can be associated with you, as soon as it is reasonable for us to assume that retention is no longer necessary for our legal or business purposes.

TO RECEIVE MOE GRANT OR MOE/DAS FINANCIAL ASSISTANCE SCHEME, YOUR CHILD'S AND YOUR PERSONAL DATA ARE REQUIRED. YOUR WITHDRAWAL OF CONSENT FOR COLLECTION OF PERSONAL DATA WILL POSSIBLY MEAN THAT YOUR CHILD WILL NO LONGER RECEIVE THESE BENEFITS.

Dyslexia Association of Singapore Group

("DAS" Group)

Data Protection Policy

Access to personal data and information about use

On request by you, we will as soon as reasonably possible provide you with:

- personal data about you that is in our possession or under our control and information about the ways in which we have, or may have, used or disclosed that personal data within a year
- before the date of your request

Your request to us should be made in writing (which includes email) sent to our Data Protection Officer. We may require you to provide proof of your identity.

There are some circumstances where we are not required to provide you with information and others where we are not allowed by the PDPA to do so. In some circumstances, we may be able to provide you with limited information. We may charge you a fee for providing you with access to your personal data or information about how we may have used or disclosed it. The fee will reflect our costs associated with responding to your request. You may obtain information about the fee from our Data Protection Officer.

Correction of errors in, or omissions from, personal data about you

You may request us to correct an error or omission in the personal data about you that we hold or that is under our control. Your request to us should be made via phone or in person over-the-counter (for parents, verifiable via student's name and B.C. Number) or corporately, in writing (which includes email) sent to our Data Protection Officer. We may require you to provide proof of your identity and/or documents or other evidence supporting your request.

There are some circumstances where we do not make a correction and other circumstances where we are not required to act on such a request. You may obtain information about these circumstances from our Data Protection Officer. Unless we are satisfied on reasonable grounds that a correction should not be made, we will correct the personal data as soon as practicable. We will also send the corrected personal data to every other organisation to which we have disclosed it within a year before the date we made the correction (unless that other organisation does not need the corrected personal data for any legal or business purpose). Alternatively, with your consent, we will send the corrected personal data only to specific organisations as agreed with you.

Another organisation that has disclosed your personal data to us might notify us that it has corrected it. If this happens, unless we are satisfied on reasonable grounds that we should not make the correction, we will correct your personal data that is in our possession or under our control.

Accuracy of personal data

We make reasonable efforts to ensure that personal data that we collect about you or that is collected on our behalf is accurate and complete if we are likely to use it to make a decision that affects you or we are likely to disclose it to another organisation.

Protection of personal data

We take reasonable steps to ensure the security of personal data about you that is in our possession or under our control and to protect it against risks such as loss or unauthorised access, destruction, use, modification or disclosure. Only authorised personnel are permitted to have access to personal data about you.

Dyslexia Association of Singapore Group

("DAS" Group)

Data Protection Policy

Retention of personal data

DAS retains student data for an extended period as long as the child has enrolled in our programme and services. We also retain student data for research purposes. However, apart from student data, we will cease to retain documents containing personal data about you, or we will remove the means by which it can be associated with you, as soon as it is reasonable to assume that the purpose for which we collected that personal data is no longer being served by its retention. This is because it is no longer necessary for legal or business purposes.

Complaints procedure

We strive for excellence in providing services to our stakeholders and in all our interactions with donors, and with our employees (which includes our volunteers) as well as with the community generally. This includes our compliance with the PDPA.

Please direct any queries or complaints you have about the way in which we collect, use or disclose personal data about you to our Data Protection Officer. Generally, we are unable to deal with anonymous complaints because we are unable to investigate them. If you raise a complaint anonymously, we will nevertheless note the matter raised and, if possible, try to investigate and resolve it appropriately.

Whenever you make a complaint, our Data Protection Officer will seek to obtain sufficient information from you to enable us to investigate it. Please be prepared to provide our Data Protection Officer with information as to, for example:

- the type of action, or lack of action, by us that has given rise to your concern
- whether it was an isolated incident or is ongoing and, in the case of an isolated incident, when it occurred
- a copy of any relevant correspondence you hold and
- details about what you consider should have happened or should not have happened

Immediately upon receiving a complaint, our Data Protection Officer must investigate it and within fourteen business days advise you of:

- the outcome of the complaint and the reasons for that outcome or
- write to you (which may be by email) advising you that the Data Protection Officer needs more time to investigate the complaint and stating when the Data Protection Officer expects to have resolved the complaint If a complaint is settled to your complete satisfaction, our Data Protection Officer is not required to advise you in writing of the outcome of the complaint, unless you request a written response (which may be by email).

If a complaint is not settled to your complete satisfaction, our Data Protection Officer will advise you of the outcome of the complaint and the reason(s) for that outcome in writing (which may be by email). If you are not satisfied with the outcome, you may take your complaint to the Personal Data Protection Commission.

Changes to This Data Protection Policy

We reserve the right to review, amend and/or update this data protection policy at any time and from time to time.

Data Protection Officer

We have appointed a Data Protection Officer who is contactable as follows:

Name: Mervin Guino-o Mosqueda Designation: DPO