

Holland-Bukit Panjang Town Council Personal Data Protection Policy

By using the services of *Holland-Bukit Panjang Town Council* (the “Town Council”), you signify that you have read, understood and agree to the Town Council’s collection, use and disclosure of your personal data as described in relevant portions of this Policy.

1. Information we may collect from you

1.1 The Town Council may collect the following data about you either directly from you, from your authorised representatives (i.e. persons whom you have authorised and persons who have been validly identified as being you or your authorised representative), from third parties (including public agencies such as Housing & Development Board), or from publicly available sources:

- 1.1.1 personal information (such as your full name, NRIC, telephone numbers, address);
- 1.1.2 records from correspondences, including details obtained through your calls or emails, your feedback via our website or otherwise, your participation in our quizzes, surveys or polls (e.g. polls on Neighbourhood Renewal Programme);
- 1.1.3 your photographs and/or video images taken at Town Council events or via CCTVs at Town Council offices or common areas managed and maintained by the Town Council (e.g. *lifts*);
- 1.1.4 *information derived from cookies (small text files which uniquely identify your browser) where you visit any website or use any application created by or on behalf of the Town Council; and/or*
- 1.1.5 information you provide to the Town Council in relation to the provision of any services from the Town Council to you (e.g. your application to use Town Council’s facilities, your request for bulky item removal services, your request to be alerted on estate matters via SMS).

2. Use and disclosure of personal data collected

2.1 You agree that the Town Council may use your personal data where permitted by applicable law and for the following purposes:

2.1.1 Service & Conservancy Charges

- (i) to facilitate the collection of service & conservancy charges (“**S&CC**”), the refund of any excess charges, and/or the transfer of credit balance to designated account(s);
- (ii) for the setting up and/or termination of recurring S&CC payment arrangements with financial institutions and banks (such as Interbank GIRO deduction or credit card monthly payments); and

- (iii) for the processing and collection of penalty fees, legal fees and/or disbursement fees in connection with late S&CC payments;

2.1.2 Collection of mortgage instalment & rental on behalf of Housing & Development Board: to facilitate the collection of mortgage instalment and rental on behalf of the Housing & Development Board;

2.1.3 Booking of facilities

- (i) for purposes of processing your application to use common facilities (e.g. void deck, open space, common property etc.), including evaluation of your application and the purpose of use, and contacting you in connection therewith; and
- (ii) for administration purposes upon grant of permit, including the issuance of permit, collection of payments, inspection of facilities after use, refund of deposit, and processing any cancellations;

2.1.4 Other services (e.g. bulky item removal): for purposes of administering your request for Town Council services (such as bulky item removal service), including the evaluation of your request, and contacting you in connection therewith;

2.1.5 Financial assistance and/or S&CC instalment payment plan

- (i) for purposes of processing your application for financial assistance and/or S&CC instalment payment plans, including evaluation of your suitability, contacting you in connection therewith, preparation of assessment reports, application to public agencies for financial assistance schemes, and conduct of means test; and
- (ii) for disbursement of funds and/or administration of S&CC instalment payment plan upon approval;

2.1.6 Surveys and polls (e.g. Neighbourhood Renewal Programme, residents' satisfaction surveys)

- (i) to collate and analyse your preferences on improvement works in the neighbourhood (such as support for such works, preference on type of improvement works, colour schemes etc.); and
- (ii) to collate and analyse your satisfaction levels (ratings or otherwise) on the Town Council's provision of services and performance of works;

2.1.7 Enquiries or feedback

- (i) to provide you with information as requested and/or to respond to your enquiries;
- (ii) to compile and analyse your feedback for internal use; and

(iii) to contact you to request for more information where required;

2.1.8 Quiz: to facilitate and administer quizzes, including announcement of winner(s), contact for random audits or checks, notification to collect prizes, gifts or vouchers;

2.1.9 SMS alerts: to send announcements, alerts and/or updates relating to estate matters via SMS;

2.1.10 Photographs and video images taken at Town Council events: for use in the Town Council's corporate publications, and informational and communications materials;

2.1.11 Photographs and video images taken via CCTV at Town Council offices or common areas: for safety and security purposes;

2.1.12 General

(i) for compliance with applicable laws, regulations, industry codes and guidelines and for internal audit, publicity, research and survey purposes; and

(ii) for other purposes as reasonably required to provide services to you.

2.2 In addition, you agree that the Town Council may disclose your personal data where permitted by applicable law and for the following purposes:

2.2.1 if we are under a duty to disclose or share your personal data:

(iii) where we believe that we are under a legal obligation to disclose; or

(iv) to protect the rights, property, security or safety of the Town Council, residents, or premises, or others;

2.2.2 to disclose to public agencies (such as Housing & Development Board, Community Development Councils, National Environment Agency) for funding, reporting, statistical, research, survey and follow-up purposes, as the case may be;

2.2.3 to persons who have been validly identified as being you or your authorised representative(s) pursuant, for the purpose of the relevant transaction or enquiry;

2.2.4 to your authorised proxies such as your Member of Parliament or a social welfare organisation representing you; and/or

2.2.5 to third parties with whom we have contracted to provide services to us (such as our managing agents) for any of the purposes described above. Where the Town Council discloses your personal data to third parties, the Town Council shall ensure that such data is used only to provide services to the Town Council.

3. Storage of data, information security and applicability to third parties

- 3.1** The data we collect from you may be transferred to, processed, and stored at, our offices or our service providers' offices in Singapore or overseas. The Town Council will take all steps as required by mandatory Singapore law in connection with any transfer of such data overseas.
- 3.2** The Town Council will make reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar activities to protect your personal data in the Town Council's possession or under the Town Council's control.
- 3.3** The Town Council will require these data protection standards to be observed by external parties who provide services to the Town Council and/or to whom we disclose your personal data, but we cannot and do not assume any responsibility for any actions or omissions of third parties.

4. Access to personal information

- 4.1** At your request, we would provide access to your personal data, save that in specified circumstances your access may be subject to fees to meet our costs.

5. Amendments

- 5.1** The Town Council may modify this Policy at any time by giving you notice via our website, newsletters and/or noticeboards. Use of the Town Council services after such notification signifies acceptance of the relevant modifications.

6. Questions, Application for Access/Correction and Withdrawal of consent

- 6.1** If you have any questions, comments or suggestions regarding this Policy, we would be glad to hear from you. Please contact our **Data Protection Officer** at:

Holland-Bukit Panjang Town Council

Tel: 1800-7669100

E-mail: mailbox@hbptc.org.sg

- 6.2** Please also contact our Data Protection Officer if you would like to apply for access/correction of your own personal data or if you would like us to cease use of your personal data for any purpose, and we will provide the relevant application form to you.
- 6.3** We will try to respond to your question or request promptly. We may however, depending on the nature of the question or request, need up to 30 days to provide you an estimate of when we will be able to respond to you.