

APHN Privacy Policy

At Asia Pacific Hospice Palliative Care Network (“**APHN**”), we are committed to protecting and respecting your personal data in accordance with the Personal Data Protection Act 2012 (“**PDPA**”), and our personal data protection policy.

This privacy policy sets out the basis on which Asia Pacific Hospice Palliative Care Network, referred to as (“we”, “us” or “our”) may collect, use, disclose or otherwise process personal data, including but not limited to our prospective service users, service users, donors, volunteers. This applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at aphn@aphn.org

Personal Data

1. As used in this policy, “personal data” means data, whether true or not, about an individual (whether a prospective service user, service user, donor, volunteer or otherwise) who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.
2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, contact information such as residential address, email address or telephone number, nationality, gender, date of birth, photographs and other audio-visual information and financial information such as credit card numbers, debit card numbers or bank account information.
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

Collection, use and disclosure of personal data

4. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
5. APHN’s personal data protection policy applies to all individuals whose personal data is within APHN’s possession or control. As a registered Charity in Singapore, should there be arising circumstances, collection, use, disclosure or otherwise

processing of personal data on behalf of government ministries or statutory boards will be in accordance with guidelines set out in the government's data management policy.

6. Personal data generally includes any information that can be used to identify a natural person, such as name, contact details, identification number/passport details, residential address, date of birth and financial information provided by you or your next kin.
7. We may collect and use your personal data for any or all of the following purposes:
 - 7.1. establishing or managing your relationship with us. This includes:
 - 7.1.1. Where you are a prospective service user,
 - 7.1.1.1. processing and evaluating your application for our services
 - 7.2. Where you are a service user,
 - 7.2.1. providing the services requested by you;
 - 7.2.2. monitoring, evaluating and/or auditing of services provided. This may include an assessment of the quality of the services provided and the effects of the services provided (both in the short and long term, and after you have stopped using the services); and
 - 7.2.3. research related to your personal circumstances or services you used, in particular, for our research entitled (Insert Title of Research Project). We will notify you and obtain your written consent before using your personal data for any specific research project, unless otherwise permitted under the PDPA or other legislation.
 - 7.3. Where you are a donor,
 - 7.3.1. processing your donations and your tax-deduction claims
 - 7.4. Where you are a volunteer,
 - 7.4.1. processing and evaluating your suitability to volunteer; and
 - 7.4.2. monitoring, evaluating and/or auditing of services you participated in.
 - 7.5. providing you with information on our upcoming events or activities, where you have specifically requested to receive such information;
 - 7.6. verifying your identity;

- 7.7. responding to, handling, and processing queries, requests, applications, complaints and feedback from you;
 - 7.8. complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority; and
 - 7.9. any other purposes for which you have provided the information.
8. We may disclose your personal data:
- 8.1. where such disclosure is required for, or in connection with, the provision of the services requested by you;
 - 8.2. to third party service providers, agents and other organisations we have engaged to perform any of the purposes listed in clause 7 above for us;
 - 8.3. to comply with any applicable laws, regulations, codes of practice, guidelines, rules or requests by public agencies, or to assist in law enforcement and investigations; and
 - 8.4. any other party to whom you authorised us to disclose your personal data to, or where necessary to undertake any action requested by you.
9. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

Reliance on the legitimate interests exception

10. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for the legitimate interests of Asia Pacific Hospice Palliative Care Network or another person. In relying on the legitimate interests exception of the PDPA, Asia Pacific Hospice Palliative Care Network will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.
11. In line with the legitimate interests' exception, we will collect, use or disclose your personal data for the following purposes:
- 11.1. Fraud detection and prevention; and
 - 11.2. Detection and prevention of misuse of services.

12. The purposes listed in the above clause may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter.

Your rights

13. Under the Personal Data Protection Act (2012), you have the right, subject to applicable laws:

- 13.1. To request for your Personal Data that is in our possession or under our control. APHN will provide you with such Personal Data within a reasonable time after APHN receives your request. A reasonable fee may be charged for processing the request;
- 13.2. To request for information about the ways in which your Personal Data may have been used or disclosed by APHN within a year before the date of the request. APHN will provide you with such Personal Data within a reasonable time after APHN receives your request. A reasonable fee may be charged for processing the request;
- 13.3. To request for APHN to correct an error or omission in an individual's Personal Data that is in the possession or under the control of the organisation;
- 13.4. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

Withdrawing your consent

14. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you or your authorised representative in writing. You or your authorised representative may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request via email or otherwise in writing to our Data Protection Officer at the contact details provided below. If you are unable to submit your request in writing or if you require any assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.
15. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which

may affect your rights and liabilities to us. In general, we shall seek to process your request within thirty (30) days of receiving it.

16. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in the manner described in clause 14 above.
17. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

Protection of Personal Data

18. APHN protects Personal Data against loss or theft, as well as unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks with security safeguards appropriate to the sensitivity of the Personal Data, regardless of the format in which it is held.
19. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

Accuracy of Personal Data

20. APHN keeps Personal Data as accurate, complete and up-to-date as necessary, taking into account its use and the interests of our members, volunteers and donors. When possible, we will validate the data provided using generally accepted practices and guidelines. This includes the requests to see original documentation before we may use the personal data such as with Personal Identifiers and/or proof of address.
21. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer at the contact details provided below.

Retention of your Personal Data

22. APHN may retain your data only for as long as the purposes for which such data is collected or used (as notified to you) continues, or where necessary for our legal and business purposes.
23. 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.

Transfer of Personal Data

24. Countries outside of Singapore do not always offer the same levels of protection to your Personal Data, so Singapore law has prohibited transfers of Personal Data outside of Singapore unless the transfer meets certain criteria.
25. Many of our third-party service providers are based outside of Singapore so their processing of your Personal Data will involve a transfer of data outside Singapore.
26. Whenever we transfer your Personal Data out of Singapore, we do our best to ascertain a similar degree of security of data by ensuring the recipient is bound by legally enforceable obligations that provide a standard of protection that is at least comparable to the PDPA.

Feedback and Queries

27. If you have any feedback or queries in relation to the protection of your personal data, you may also write to our Personal Data Protection Officer. APHN will look into your feedback or queries, and will provide you with a response within five (5) working days.

Data Protection Officer

28. Should you have any queries and concerns relating to your Personal Data that is in APHN's possession, please direct these to APHN's appointed Data Protection Officer. The contact details of our Personal Data Protection Officer are as follows:

APHN Secretariat
c/o Division of Palliative Medicine
National Cancer Centre Singapore
11 Hospital Crescent
Singapore 169610

Email: aphn@aphn.org
Contact No: +65 62355166

Changes to Policy

29. This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
30. APHN reserves the right to modify or change this Data Protection Policy at any time. If APHN makes changes to this Data Protection Policy, changes will be posted on APHN's website. Please obtain the latest version of this Privacy Policy from our website, www.aphn.org.

Third Party Links

31. APHN's website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Cookies

32. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Effective date : 25/06/2021
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