

## **SEMBAWANG COUNTRY CLUB DATA PROTECTION NOTICE**

We, at Sembawang Country Club (“SCC”) respect your privacy and take our responsibilities under the Personal Data Protection Act 2012 (the “PDPA”) seriously.

This Data Protection Notice is established to assist you in understanding how we collect, use and/or disclose the personal data you have provided us.

### **Personal Data**

“Personal Data”, as defined under the PDPA, refers to data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Common examples of personal data include names, NRIC, passport or other identification numbers, contact information including residential and email addresses and telephone numbers, photographs and video images.

We collect personal data from individuals including our members, visitors to SCC, employees, business partners, contractors and third-party service providers in meetings, email messages, telephone conversations and via other means that may be employed from time to time in the course of our business and operations.

We will collect your personal data in accordance with the PDPA. In general, before we collect any personal data from you, we will notify you the purposes for which your personal data may be collected, used and/or disclosure of your personal data for the intended purpose.

### **Collection and Use**

Personal data that may be provided to us include but not limited to your name, NRIC, home address, contact number(s), email addresses, credit card information, and any other information in relation to your employment or job application with us (if you are our employee or you are applying job with us). We may collect these personal data in the following manners:

- i. When you submit a form (online or hardcopy) for membership matters
- ii. When you interact with us through the telephone, letters, face-to-face meetings or emails
- iii. When you use our services and/or resources. Please refer to Appendix A for the list of services and resources provided to our members and visitors to SCC.
- iv. When you participate in activities and/or events organized by us. Please refer to Appendix B for the list of activities and events provided to our members and visitors to SCC.
- v. When you request that we contact you
- vi. When you submit your personal data for any other reasons including those that are required by laws and/or our administrative policies and procedures

We may use the personal data collected for any or all of the following purposes:

- i. verifying your identity;
- ii. evaluating your eligibility for membership application or processing applications for membership related services;
- iii. managing administrative and operations, and complying with internal policies and procedures including the reporting of lost and found items within the SCC premises;
- iv. managing your relationship with us;
- v. processing payment or credit transactions;
- vi. sending our marketing information about our goods or services including notifying you of our events, lucky draws, membership, initiatives and promotions;
- vii. facilitating your participation in events organized by us including private banquet and seminars. Please refer to Appendix B for the list of activities and events provided to our members and visitors to SCC.

- viii. responding to your individual needs, queries, feedbacks or communicating with you;
- ix. publishing event videos, photographs, articles, membership and activity updates, publicity materials and/or other features on our website, in our newsletters, on our social media platforms or other hard copy;
- x. submitting your personal data to the club for any reasons including submission of insurance claims relating to incidents within SCC premises;
- xi. responding to requests for information from government or public agencies, ministries, statutory boards or other similar authorities or non- government agencies authorised to carry out specific Government services or duties;
- xii. transmitting to any unaffiliated third parties including our third-party service providers and agents to perform functions on our behalf.

### **Marketing and Promotions**

You may receive our marketing and promotion materials via email or social media platforms only to inform about our club related services and activities.

If you do not wish to receive any marketing information from the club, you may write to the Data Protection Officer. However, we may still notify or send non-marketing messages or information to you.

### **Disclosure**

We respect your privacy and will take reasonable steps to protect your personal data against unauthorised disclosure.

However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations including but not limited to the following:

- i. when required for compliance with the law;
- ii. to respond to an emergency that threatens the life, health or safety of the member;
- iii. for any investigation or proceedings;
- iv. when certain data has to be shared with our business partners and/or any other third-party service providers. For such co-operation, Non- Disclosure Agreement is signed and only required data is to be shared;
- v. when we need to post some of your personal data on our website.

### **Access to and Correction of Personal Data**

Upon request, we will provide you with access to your personal data or correct an error or omission in your personal data that is in our possession or control in accordance with the requirements of the PDPA. All requests for access to and correction of personal data in writing or via email may be submitted to our Data Protection Officer.

### **Protection of Personal Data**

To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical security arrangement such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

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.

### **Retention of Personal Data**

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

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.

Data will not be held when it is no longer necessary for any business or legal purposes. Personal data that is no longer needed will be destroyed or disposed of in a secure manner. This applies to both paper documents and electronic data.

### **Contact us**

You may contact our Data Protection Officer if you:

- i. have any questions in relations to how your personal data is handled by us,
- ii. would like to withdraw your consent to any use or disclosure of your personal data as set out in this notice,
- iii. would like to obtain access\* and make correction to your personal data records,

\* a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

**Data Protection Officer**  
Sembawang Country Club  
[Noel.lee@Mckell.com.sg](mailto:Noel.lee@Mckell.com.sg)

## Appendix A

### Services and Resources for Members and Visitors

<b>A.1</b>	<b>Golf Booking System</b> For members to book regular flights for themselves and their guests
<b>A.2</b>	<b>Members Portal</b> For members to access Annual General Meeting documents, Membership Documents such as Application For Car Decal, Golfers Insurance Coverage forms, as well as Results of Golfing Tournaments
<b>A.3</b>	<b>Facilities booking (on site)</b> For members to book mahjong rooms, usage of bath towels in changing rooms
<b>A.4</b>	<b>Driving Range Office (on site)</b> For purchase and top-up of range card
<b>A.5</b>	<b>Events Booking</b> For members and visitors to book club events & private functions in Banquet Hall or Northern Lights
<b>A.6</b>	<b>Golf Booking</b> For members and visitors to book flights for private tournaments
<b>A.7</b>	<b>Oceanspoon Dining's E-Ordering System</b> For members to order food and make payment online

## Appendix B

### Activities and Events for Members and Visitors

<b>GOLFING</b>	
<b>B.1</b>	Golfing Monthly Medals
<b>B.2</b>	Festive Golf Events (for e.g., Fa Cai Golf, Senior Golf Day, Hari Raya Golf, National Day Golf, Deepavali Golf, Christmas Golf)
<b>B.3</b>	Sembawang Open
<b>B.4</b>	Gotong Royong
<b>B.5</b>	Overseas Golfing Trips To Reciprocal Clubs
<b>B.6</b>	Interclub tournaments
<b>MEMBERSHIP &amp; EVENTS</b>	
<b>B.7</b>	Family Carnival
<b>B.8</b>	Senior Golf Clinic
<b>B.9</b>	Junior Golf Camp
<b>B.10</b>	Virtual Webinars
<b>B.11</b>	Physical Workshops (for e.g., Aqua Aerobics, Microgreens, Chiropractic)
<b>B.12</b>	Members Night
<b>B.13</b>	Fitness classes
<b>B.14</b>	Banquet Functions
<b>B.15</b>	Private golf tournaments
<b>REGULAR LESSONS</b>	
<b>B.16</b>	SingaGolf Academy
<b>B.17</b>	Tao Li Swimming Club
<b>B.18</b>	Swimming lessons by residential coach