

SEMBAWANG COUNTRY CLUB DATA PROTECTION POLICY

Last revised on 25 February 2024

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 Policy ("policy") is established to assist you in understanding how we collect, use and/or disclose the personal data you have provided us. This policy applies to personal data in our possession and/or control including personal data in the possession of third-party organisations engaged by us to collect, use, or process personal data for our business purposes.

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.

Collection, Use and Disclosure of Personal Data

We collect personal data from individuals including our members, sales leads, 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 during our business and operations.

We collect, use, and disclose your personal data in accordance with the PDPA. In general, before we collect any personal data from you, we will seek your consent or deemed consent by notifying you the purposes for which your personal data may be collected, used and/or disclosed for the intended purpose. We will also obtain your consent before collecting any additional personal data and/or before using your personal data for a new or secondary purposes that had not been notified to you, except when the collection, use and disclosure of such personal data without consent is permitted under applicable laws.

We will not provide your personal data to third parties except when such disclosure is required by law, or where we have engaged third-party organisations such as data intermediaries or sub-contractors specifically to assist with our business activities that necessitate the processing of your personal data. We will ensure that any third parties engaged for such activities will be bound contractually to protect and handle your personal data according to the requirements of the PDPA.

Personal data that may be provided to us include but not limited to your name, NRIC, photograph, 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 including processing of your membership application and administration in SCC
- 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.
- xiii. the integration of Singpass ID Login for your SCC account

Withdrawal of Consent

You may withdraw your consent for the collection, use and disclosure of your personal data for any or all of the purposes listed above by submitting your written request via email to our Data Protection Officer (DPO) at the contact details provided in the 'Contact Us' section of this policy.

Upon receiving your request to withdraw your consent, we will notify you of the likely consequences of the withdrawal of consent and process your request within **10** business days of receiving it. Thereafter we will cease (and cause your personal data that are in the possession and/or control of third-party organisations engaged by us to cease) collecting, using or disclosing your personal data unless it is required or authorised under applicable laws.

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 DPO. 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 DPO.

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.

Accuracy of Personal Data

Best and reasonable efforts will be rendered by us in ensuring the accuracy and completeness of all personal data in our possession and/or control. Individuals may inform our DPO in writing or via email at the contact details provided in the 'Contact Us' section to update us if there are changes to their personal data.

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.

Transfer of Personal Data outside of Singapore

We do not transfer your personal data to any territory outside of Singapore. However, if we need to do so, we will first seek your consent for any such transfer to be made and we will also undertake the necessary procedures in ensuring your personal data will be accorded a standard of protection that is comparable to the protection under the PDPA.

Reportable Data Breach Notification

In the unlikely event that we suffer a data breach pertaining to unauthorised access or disclosure of personal data being stored or processed by us, we will meet the PDPA's data breach notification timelines and requirements to perform the needful, including but not limited to informing relevant authorities and affected individuals, based on the Significant Harm or Significant Scale definitions as set out by the PDPA.

Cookies Policy

We use “cookies” to collect information about your online activity on our website. A cookie is a small text file created by the website that is stored in your computer to provide a way for the website to recognise you and keep track of your preferences.

The cookie makes it convenient for you such that you do not have to retype the same information again when you revisit the website or in filling electronic forms.

Most cookies we use are “session cookies”, which will be deleted automatically from the hard disk of your computer at the end of the session.

You may choose not to accept cookies by turning off this feature in your web browser. Note that by doing so, you may not be able to use some of the features and functions in our web applications.

Effect of Policy and Modifications

This policy applies in conjunction with any other policies, notices, contractual clauses and consent clauses that may apply in relation to the collection, use and disclosure of personal data by us.

We reserve the right to amend any or all part of this policy at any time and the last revision date will be shown at the beginning of this policy.

We will notify you of any changes by posting the latest Policy on our website. Please visit our website periodically to note such changes. Changes to this Notice take effect when they are posted on our website.

Contact us

You may contact our DPO 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 policy,
- 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

dpo@sembawanggolf.org.sg

Appendix A

Services and Resources for Members and/or Visitors

A.1	Golf Booking System For members to book regular flights for themselves and their guests
A.2	Members Portal 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
A.3	Facilities booking (on site) For members to book mahjong rooms, usage of bath towels in changing rooms
A.4	Driving Range Office (on site) For purchase and top-up of range card
A.5	Events Booking For members and visitors to book club events & private functions in Banquet Hall or Northern Lights
A.6	Golf Booking For members and visitors to book flights for private tournaments

Appendix B

Activities and Events for Members and/or Visitors

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