



PERSONAL DATA PROTECTION POLICY

General

This Personal Data Protection Policy outlines the management of personal data in accordance with the Personal Data Protection Act (hereinafter known as “PDPA”).

2 This policy seeks to help understand the purpose for which the Golf Referees Association of Singapore (hereinafter known as “GRAS”) collects, uses and/or discloses personal data.

3 GRAS reviews this Policy on a regular basis so as to ensure that it is consistent with any changes in legal or regulatory requirements. Any changes made will be published at GRAS’s website at <http://www.gras.org.sg>.

Personal Data

4 In this Personal Data Protection Policy, “personal data” refers to any data or information from which a person can be identified either (a) from that data; or (b) from that data and other information to which GRAS has or is likely to have access. Examples of such personal data include full name, NRIC number or FIN (Foreign Identification Number), passport number, photograph or video image of an individual, mobile number, personal email address or any other information relating to the person that has been provided to GRAS in one form or another.

Collection of Personal Data

5 GRAS may collect personal data as follows:

- a. Application or Registration Form(s) submitted by an individual to GRAS; such as membership application forms or other forms relating to any events or activities organised or managed by GRAS;
- b. Where an individual contacts any staff or representatives of GRAS to make enquiries by email, voice calls, or the like;
- c. Where an individual attends at the GRAS Office for the purpose of making enquiries or to make requests relating to any events or activities organised or managed by GRAS;
- d. Where an individual makes a donation to GRAS;
- e. Where an individual makes a request to GRAS to contact that individual for any purpose;
- f. Where an individual submits that individual’s personal data for the purpose of employment;
- g. Where an individual submits that individual’s personal data for the purpose of volunteering his or her services to the GRAS;



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- h. Where an individual submits that individual's personal data for the purpose of donating to GRAS or a cause;
- i. Where an individual's personal data is submitted to any organisation for representing GRAS in any conference or seminar;
- j. Through an application to be a service provider to GRAS;
- k. Through the interaction with GRAS staff or representative for official purposes;
- l. When responding to a request for additional personal data;
- m. When personal data is submitted to GRAS for any other reason.

Purposes for the Collection, Use and Disclosure of Personal Data

- 6 GRAS may collect, use and/or disclose personal data as follows:
- a. For planning, organising and holding any events or activities;
 - b. For administration and management of GRAS's operations, functions or other internal matters as the case may be including record keeping;
 - c. To communicate with an individual whereby such communication may take the form of voice calls, SMS, other messages receivable on a mobile phone or computer, email, fax or post in respect of:
 - i. any of the matters described in the clause;
 - ii. the individual's membership with GRAS;
 - iii. responding to a request or query by the individual;
 - iv. responding to and/or resolving any complaints;
 - v. any matters by reason of which the individual is reasonable associated with, affiliated with or connected to GRAS; or
 - vi. any other matters in respect of which it is reasonable necessary for GRAS to communicate with the individual;
 - d. For providing services to one or more individuals, a community or the general public;
 - e. For internal or external communications and publications;
 - f. For evaluative purposes;
 - g. For training purposes;
 - h. For publicity and communication purposes;



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- i. For verification and update purposes;
- j. For conducting research for statistical profiling and other purposes to review, develop and improve the services of GRAS;
- k. For conducting financial reporting and analysis related to GRAS operations;
- l. For managing GRAS infrastructure and operations and complying with internal policies and procedures;
- m. For archival of documents and records;
- n. For managing and terminating a membership or an employment relationship;
- o. For security purposes;
- p. For any GRAS related matters;
- q. For any other purposes of which GRAS may notify individuals from time to time.

Disclosure of Personal Data

7 Personal data will be protected and kept confidential but, this is subject to the provisions of any applicable law. GRAS will not disclose personal data to third parties without first obtaining consent to do so. However GRAS may disclose personal data to third parties without first obtaining consent in situations where such disclosure is permitted by the PDPA or by law or where such disclosure to third parties is necessary or ancillary to GRAS's purposes as stated in paragraph 6 above.

Administration and Management of Personal Data

8 GRAS will take reasonable effort to ensure that personal data is accurate and complete. However, individuals must update GRAS of any changes in their personal data that had been initially provided. GRAS will not be responsible for relying on inaccurate or incomplete personal data arising from individuals not updating GRAS of any changes in their personal data.

9 GRAS will also put in place reasonable security arrangements to ensure that personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of personal data. However, GRAS cannot assume responsibility for any unauthorised use of personal data by third parties which are attributable to factors beyond GRAS's control.

10 GRAS retains personal data in accordance with legal, regulatory, business and operational obligations.



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Consent

11 GRAS shall seek consent from individuals to collect, use or disclose the individual's personal data, except in specific circumstances where collection, use or disclosure without consent is authorised or required by law.

12 Consent may be collected through written documentations (e.g. consent form, written note) or electronically (e.g. email consent, electronic forms).

13 GRAS may not be able to fulfil certain services if individuals are unwilling to provide consent to the collection, use or disclosure of certain personal data.

Withdrawal of Consent

14 Withdrawal of consent for the collection, use and/or disclosure of personal data in GRAS's possession can be made in person at the GRAS Office or by email to the Management Committee at admin@gras.org.sg.

15 From such a request for withdrawal of consent being made, GRAS will process the request within 30 days and thereafter not collect, use and/or disclose personal data in the manner stated in the request. With the withdrawal of consent to any or all use or disclosure of personal data, depending on the nature of the request, GRAS may not be in a position to continue to provide the services or administer any contractual relationship that is in place.

Access and Correction of Personal Data

16 Request can be made to have access to or make corrections to personal data records, but GRAS has the right to charge a reasonable fee for processing such a request. Such request can be submitted in person at the GRAS office, by telephone or by email at admin@gras.org.sg. Requests will be processed within 30 days. Personal data will only be released by the Management Committee upon verification of the requestor's identity card and a signed request form.

Contacting GRAS

17 For any question or complaint relating to the use or disclosure of personal data, or if more information about GRAS personal data protection policy, please contact the Management Committee by email at admin@gras.org.sg.

18 For more details on PDPA, please visit <https://www.pdpc.gov.sg/legislation-and-guidelines/overview>.