



Data Protection Policy

Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which the Singapore Swimming Club collects, uses and discloses your Personal Data pursuant to the Singapore Personal Data Protection Act (No. 26 of 2012) (“the Act”)

By interacting with us, submitting information to us, signing up for membership with us, using our facilities, attending any events hosted or organised by us, or using any of our services, you agree and consent to Singapore Swimming Club, as well as its representatives and/or agents (collectively referred to herein as "SSC", "us", "we" or "our") collecting, using and disclosing your Personal Data, and disclosing such Personal Data to our service providers and relevant third parties in the manner set forth in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to SSC in respect of your Personal Data, and your consents herein are additional to any rights which we may have at law to collect, use or disclose your Personal Data.

SSC may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Data Protection Policy as updated from time to time on our website (www.sswimclub.org.sg) Please check back regularly for updated information on the handling of your Personal Data.

This Data Protection Policy was last updated on 1st July 2014

1. Personal Data

1.1 In this Data Protection Policy, “Personal Data” refers to any data, whether true or not, about an individual 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, including data in our records as may be updated from time to time.

2. Collection of Personal Data

2.1 Generally, we collect Personal Data in the following ways:

- (a) when you submit any form, including but not limited to application, registration or other forms, when you provide other documentation or information in respect of your interactions with us, or when you use our services
- (b) when you interact with our staff, including customer service officers, for example, via telephone calls, letters, face-to-face meetings, social media platforms and emails;
- (c) when you request that we contact you or request that you be included in an email or other mailing list;
- (d) when you respond to our promotions, initiatives or to any request for additional Personal Data;
- (e) when you submit an employment application or when you provide documents or information including your resume and/or CVs in connection with any appointment as an officer, director, representative or any other position;
- (f) when your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events at our premises;
- (g) when we seek information about you and receive your Personal Data in connection with your relationship with us, including for our services or job applications, for example, from business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities; and/or

- (h) when you submit your Personal Data to us for any other reason.
- 2.2 When you browse our website, you generally do so anonymously but please see the section below on cookies. We do not automatically collect Personal Data at our website unless you provide us with such information or login with your account credentials.
- 2.3 If you provide us with any Personal Data relating to any other individuals (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you confirm that you have obtained the consent of these individuals to provide us with their Personal Data for the respective purposes.
- 2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure to do so on your part may result in our inability to provide you with the services you have requested.

3. **Purposes for the Collection, Use and Disclosure of Your Personal Data**

3.1 **Generally**, SSC collects, uses and discloses your Personal Data for the following purposes:

- (a) responding to your queries, feedback, complaints and requests;
- (b) verifying your identity;
- (c) managing the administrative and business operations of SSC and complying with our bye-laws, club rules, internal policies and procedures;
- (d) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for profiling purposes for us to review, develop and improve the quality of our services;
- (e) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (f) preventing, detecting and investigating crime and conducting investigations, managing risks and the safety and security of our premises and services (including carrying out CCTV surveillance and conducting security clearances);
- (g) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales);
- (h) protecting and enforcing our contractual and legal rights and obligations and obtaining legal advice;
- (i) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on SSC; and/or
- (j) purposes which are reasonably related to those purposes stated above.

3.2 **In addition**, SSC collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship:

- (a) If you are an existing or prospective member of SSC:
 - (i) processing your application for SSC membership and assessing your suitability as a member (including publishing your name and picture on our notice board);
 - (ii) providing our members with services and support and managing the membership (including but not limited to providing you with a user account, processing your payments and transactions and tracking debt recovery);
 - (iii) administering SSC's jackpot operations (including but not limited to managing the security of our slot machines and documenting payouts);

- (iv) publishing pictures and videos of SSC members in our magazines and on our website for publicity purposes;
 - (v) creating and maintaining our members' profiles in our database (including but not limited to publishing membership movements in our magazines);
 - (vi) organising events and courses and organising and administering meetings (including but not limited to taking attendance and recording minutes); and/or
 - (vii) purposes which are reasonably related to those purposes stated above.
 - (b) If you submit an application to us as a candidate for employment or representative position:
 - (i) conducting interviews and assessing your suitability for the position applied for processing your application (including but not limited to pre-recruitment checks involving your qualifications, obtaining employee references to conduct background screening and facilitating interviews);
 - (ii) facilities management (including but not limited to maintaining the security of our premises and recording entries and exits);
 - (iii) enrolling successful applicants; and/or
 - (iv) purposes which are reasonably related to the aforesaid.
- 3.3 Furthermore, where permitted under the Act, SSC may also collect, use and disclose your Personal Data for the following "SSC Additional Purposes":
- (a) providing or marketing additional services and benefits to you, including but not limited to special events, promotions, updates and reward programmes from SSC and administering and organising contests, lucky draws, promotional events, competitions and marketing campaigns;
 - (b) conducting market research and surveys to enable us to understand and determine preferences and demographics for us to offer you services as well as special offers and marketing programmes which may be relevant to your preferences and profile; and/or
 - (c) purposes which are reasonably related to the aforesaid.
- 3.4 If you have provided us with your Singapore telephone number(s) and have indicated to us that you consent to receiving marketing or promotional information via your Singapore telephone number(s) then from time to time, SSC may contact you using your Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our services.
- 3.5 You can withdraw your consent for receiving marketing or promotional materials/communication by contacting us using the contact details found below.
- 3.6 Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to **[30 working days]** for your withdrawal to be reflected in our systems. During this period of time you may still receive marketing or promotional materials/communication from us. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you in relation to the services that you have requested from SSC.

4. **Disclosure of Personal Data**

4.1 SSC will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:

- (a) our partners and governing bodies who provide leadership for aquatic sports such as the Singapore Swimming Association;
- (b) companies providing services relating to insurance to SSC
- (c) third party organisers of events or competitions that you sign up for;
- (d) agents, contractors or third party service providers who provide operational services to SSC, such as courier services, telecommunications, information technology, payment, printing, billing, technical services, training, market research, security or other services to SSC;
- (e) vendors or third party service providers in connection with marketing promotions and services offered by SSC;
- (f) external banks and other financial institutions;
- (g) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale);
- (h) our professional advisers such as consultants, auditors and lawyers;
- (i) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes; and/or
- (j) any other party to whom you authorise us to disclose your Personal Data to.

5. **Use of Cookies**

5.1 We may employ cookies in order for our server to recognise a return visitor as a unique user including monitoring information relating to how a visitor arrives at the website, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp.

5.2 Cookies are small text files stored in your computing or other electronic devices which allow us to remember you. The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on an electronic device.

5.3 Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

6. **Contacting Us – Feedback, Withdrawal of Consent, Access and Correction of your Personal Data**

6.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our Data Protection Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
- (c) would like to obtain access and make corrections to your Personal Data records,

you can approach us via the following channels:

- Call : 6342 3600 / 6342 3654
- Email : PDPO@sswimclub.org.sg
- Write to our Data Protection Officer at:

Data Protection Officer
Katong PO Box 50, Singapore 914302

6.2 Where your Personal Data has been provided to us by a third party (e.g. a referrer or your company), you should contact such party directly so that they can make any queries, feedback, complaints, and access and correction requests to SSC on your behalf.

6.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, SSC may not be in a position to continue to provide its services to you or administer any contractual relationship which we may have with you. This may in turn also result in the termination of any agreements which you may have with SSC, and your being in breach of your contractual obligations or undertakings. SSC's legal rights and remedies in such event are expressly reserved.

7. **Governing Law**

7.1 This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.