



Personal Data Protection Policy

Singapore Bible College Limited (SBC Limited) collects Personal Data to properly perform the teaching, learning, research, administration and other functions of the College. Personal Data collected through SBC Limited website or other channels is handled in accordance with the Personal Data Protection Act 2012.

This Personal Data Protection Policy sets out:

- a) our policies on how we manage your Personal Data;
- b) the types of Personal Data we collect, use, disclose and/or retain;
- c) how we collect, use, disclose and/or retain your Personal Data; and
- d) the purpose(s) for which we collect, use, disclose and/or retain your Personal Data.

1. Personal Data

1.1 In this Personal Data Protection Policy, “Personal Data” refers to any data and/or information about you from which you can be identified by, either (a) from that data; or (b) from that data and other information to which we may have legitimate access to, including data in our records as may be updated from time to time.

1.2 Examples of such Personal Data include but are not limited to:

- 1.2.1 your name, gender, NRIC, passport or other identification number, telephone number(s), mailing address, email address, photographs and any other information relating to you which you have provided in any forms you have submitted to us, or in other forms of interaction with you;
- 1.2.2 your employment history, education background, and financial information;
- 1.2.3 Personal Data of your family members or third parties;
- 1.2.4 information relating to payments or donations, such as your bank account number.

1.3 This Personal Data Protection Policy does not apply to business information or to Personal Data of persons who have been dead for more than ten years.

2. Collection of Personal Data

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

- 2.1.1 when you submit an application to us for student admission, job vacancy, lectureship or external membership;



- 2.1.2 when you access our website or send us a registration request (whether manual or online) to attend a course, seminar or an event organised by SBC Limited;
 - 2.1.3 when you submit an Interbank GIRO application form or send in a donation envelope or approach our staff regarding your donation to us;
 - 2.1.4 when you interact with any of our administrative staff, for example, via telephone calls, letters, face-to-face meetings and emails;
 - 2.1.5 when you use some of our services such as services provided by our Business Office;
 - 2.1.6 when you request that we contact you, be included in an email or other mailing list;
 - 2.1.7 when we receive references from partners and third parties, for example, where you have been referred by them;
 - 2.1.8 when we seek information from third parties about you in connection with an application that you have applied for; and
 - 2.1.9 when you submit Personal Data to us for any other reasons.
- 2.2 If you send us an electronic mail or communicate with us through our website or in any other way use our website and provide us Personal Data, we may retain such Personal Data. We may automatically receive general information that is contained in our sever log files such as your IP address and cookie information.
- 2.3 We may collect or analyse anonymised information from which individuals cannot be identified (“Aggregate Information”), such as number of users and their frequency of use, the number of page views (or page impressions) that occur on our websites and common entry and exit points into our websites.
- 2.4 We may make use of “cookies” to store and track Aggregate Information about you when you enter our website(s). Such cookies are used to track information such as the number of users and their frequency of use, profiles of users and their online preferences.
- 2.5 Such aggregate Information collected may be used to assist us in analysing the usage of our website(s) so as to improve our online services to you.
- 2.6 Should you wish to disable the cookies associated with these technologies you may do so by changing the setting on your browser. However, please note that this may affect the functionality of the website(s) for you.
- 2.7 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.
- 2.8 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the services you have requested.



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

- 3.1 We collect your Personal Data only by fair, honest and legal means, and limit its use, disclosure and transfer to that which is necessary for or incidental to the purposes identified. Your Personal Data will also be used, disclosed or transferred for another purposes which you may consent to, or as required or permitted by law.
- 3.2 Generally, we may collect, use, disclose and/or retain your Personal Data for the following purposes:
 - 3.2.1 to admit you as a student and administer all academic, financial or disciplinary matters related to or during your study in SBC Limited;
 - 3.2.2 to provide you with library or other external membership and services;
 - 3.2.3 to provide you with employment and related staff benefit and services;
 - 3.2.4 to engage you as an adjunct lecturer;
 - 3.2.5 to register you for a course, seminar or event conducted by SBC Limited;
 - 3.2.6 to provide you with business services as requested by you according to internal policies and procedures;
 - 3.2.7 to process your donation instructions;
 - 3.2.8 to keep you updated on SBC Limited news and initiatives, and promote new courses or special events via SBC Limited newsletter, e-mail or mail;
 - 3.2.9 to keep in contact with alumni and supporters; and
 - 3.2.10 to comply with applicable laws and regulations.
- 3.3 We will endeavour to give you notice of the purposes to which we will use, disclose or transfer your Personal Data before or at the time that we collect the Personal Data from you. We will do so by any one or more methods including but not limited to email or verbal communications, text messages, prominent notices displayed on our premises and website, notices placed on our data collection forms and by virtue of this Policy.

4. Disclosure of Personal Data

Subject to the provisions of any applicable laws, we may disclose your Personal Data to the following parties, both in and outside Singapore, for purposes mentioned above:

4.1 College Community

- 4.1.1 Board members for school administration and board-related affairs;
- 4.1.2 relevant SBC Limited departments for student administration, course or seminar registration, faculty and staff benefit management, adjunct lecturers, donor and alumni management and connection;
- 4.1.3 alumni related ministries for event publicity and organisation;



4.2 Third Parties

- 4.2.1 government agencies for student and work pass application, CPF and tax matters;
- 4.2.2 hospitals, vendors or service providers in connection with training, insurance or medical matters;
- 4.2.3 external banks, financial institutions, credit card companies and their respective service providers;
- 4.2.4 our professional advisers such as auditors and lawyers;
- 4.2.5 relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
- 4.2.6 any other person/organisations in connection with the purposes set forth above.

5 Third-Party Sites

- 5.1 Our website may contain links to other websites operated by third parties independent of the Organisation. We are not responsible for the privacy practices of such websites operated by third parties even though the links are provided in our website(s).
- 5.2 We encourage you to learn about the privacy policies of such third party website(s) by checking the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

6 Protection of Personal Data

We maintain appropriate security safeguards and practices to protect your Personal Data against unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, in accordance with applicable laws.

7 Accuracy of Personal Data

- 7.1 We take all reasonable measures to ensure that your Personal Data that is collected, used, disclosed or transferred by us is accurate, complete and up-to-date for the purposes for which it is used. We encourage you to access and review your Personal Data regularly and keep us informed when there are any updates to your Personal Data by contacting our Data Protection Officer directly.
- 7.2 We will correct and update the Personal Data you supply as soon as is practicable.



8 Transfer Limitation

We may need to store or process your Personal Data in a jurisdiction other than Singapore or transfer your Personal Data out of Singapore for any of the purposes mentioned above. We will not transfer your Personal Data to another party or to another country or territory without your consent unless the recipient of the Personal Data is bound by law or contract to maintain a level of protection that is at least comparable to the standards laid down by the PDPA or where we are permitted or required by the law or relevant authority of any jurisdiction.

9 Retention of Personal Data

- 9.1 Your Personal Data will only be kept for as long as is necessary to serve the purposes for which it was collected, or for as long as they are needed for our business and operational reasons, or as required or permitted by law.
- 9.2 Personal Data collected through SBC Limited which is no longer required by SBC Limited and which need not be retained by law will be destroyed, deleted, pseudonymised or anonymised according to SBC Limited's internal information retention policy.

10 Withdrawal of consent

You may refuse or withdraw your consent for us to collect, use or disclose your Personal Data by giving us reasonable notice so long as there are no legal or contractual restrictions preventing you from doing so. Withdrawing such consent may affect SBC Limited's ability to continue to provide its services to you, and may require you to surrender or terminate all applications with us.

11 Access and Correction of Personal Data

- 11.1 SBC Limited reserves the right to charge a reasonable fee for processing your request to access your Personal Data records.
- 11.2 If you wish to complain about our data protection policies or practices, or have questions or concerns about them, or you want to withdraw consent, access or correct your Personal Data, please contact the Data Protection Officer (DPO) as follows:

Email to: dpo@sbc.edu.sg
Write in: SBC Limited Data Protection Officer
Singapore Bible College Limited
9-15 Adam Road
Singapore 289886



11.3 We are entitled to refuse your request if it is prohibited by law, or in circumstances where we are permitted by law to refuse, including if the request is frivolous, or the release of your Personal Data could reasonably be expected to threaten or harm the safety, physical or mental health of another person or reveal the Personal Data of another person.

12 Updates to this policy

Any changes SBC Limited may make to this policy in the future will be posted on this page, and where appropriate, notified to you via email or correspondences.