



GENERAL INSURANCE ASSOCIATION OF SINGAPORE

PERSONAL DATA PROTECTION STATEMENT

General Insurance Association of Singapore
79 Robinson Road, #07-01, Singapore 068897
Tel: (65) 6221 8788 | www.gia.org.sg



The purpose of this Personal Data Protection Statement (“PDP statement”) is to inform you that **General Insurance Association of Singapore (GIA)** fully complies with the Singapore Personal Data Protection Act 2012 (“PDPA”) and other applicable laws. GIA respects your privacy and recognizes that your personal data is important to you.

GIA is also committed to safeguarding the personal data entrusted to it. This statement outlines the principles and practices adopted by GIA in protecting personal data.

If you, at any time, have any queries on this statement or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the “DPO”) at:

For enquires directed at General Insurance Association of Singapore

Via Email:

dpo@gia.org.sg

Via Post:

79 Robinson Road

#07-01

Singapore 068897

Our Data Protection Officer may get in touch with you if further information or clarifications are required.

1. DATA COLLECTION, USAGE AND DISCLOSURE

1.1 PERSONAL DATA

The type of personal data that GIA may collect from individuals will depend upon on your relationship with GIA (Staff, member's representative, visitor, supplier). Normally the personal data collected by GIA may include an individual's:

Personal data examples:

- name, telephone number(s), mailing address, email address and any other information relating to you which you have provided in any forms you may have submitted to use, or in other forms of interaction with you;
- personal identification/FIN, work pass or passport number
- title, date of birth/age, sex, marital status, education background, driving records, employment history, photo, skills and experience, nationality and occupation;
- passwords (including on our systems), credit card/ bank account information;
- medical condition and health details
- camera or video footage that identifies individuals (including CCTV footage);
- recordings of telephone calls between you and our representatives at our hotline
- insurance information;
- information to investigate crime, including fraud and money laundering

1.2 PURPOSE LIMITATION

The personal data which GIA has collected or will collect from you will be reasonably used, disclosed, processed or applied for one or more of the following purposes:

- a) Human resource administration
- b) Administering and maintaining training records
- c) Providing improved quality education and training relating to the GIA Internship Programme
- d) Event organization and management
- e) Fundraising, donations and activities for charitable causes
- f) Servicing agents and intermediaries
- g) Member services
- h) Communicating with you such as queries and requests handling
- i) Responding to and resolving any complaints
- j) Operating technology systems and platforms
- k) Event registration, attendance recording and settlement of fees
- l) Preventing, detecting and investigating crime

GIA collects, uses and discloses your personal data primarily for the purposes of providing you with the services and benefits of your account with us, including

administering any promotions and events, conducting surveys, research, analytics, regulatory and statutory searches and checks.

1.3 COLLECTION OF INFORMATION

Personal data is to be collected by fair and lawful means, without misleading or deceiving individuals as to the purposes for collection of personal data about them. The avenues by which GIA may collect personal data include, but are not limited to:

- Application form (soft/hard copy) submitted by an individual to the Association, such as membership application forms or other forms relevant to events and activities organized or managed by GIA;
- Where an individual contacts staff or representatives of GIA to make enquiries or in relation to industry matters, whether such contact is by email, voice calls, or otherwise;
- Where an individual, for the purpose of making enquiries or to make requests relating to any events, activities, courses or programs organized, conducted or managed by GIA;
- Where an individual makes a donation to GIA during the annual Swing for Charity event;
- Where an individual makes a request to GIA to contact that individual for any purpose;
- Where an individual submits that individual's personal data for the purpose of employment;
- Where an individual submits that individual's personal data for the purpose of attending to any events, activities, programs or courses.

1.4 CONSENT

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

Consent may be collected through written documentations (e.g. consent form, written note) or electronically (email consent, electronic forms). In situations that consent cannot be conveniently obtain in written form or electronically, GIA may opt to obtain verbal consent and such process shall be approved by Data Protection Officer.

GIA 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.

The Act allows for the collection, use or disclosure of personal data without consent in specified circumstances as elaborated in Schedules 2 to 4.

Collection, use or disclosure is permitted, for example,

- where it is "clearly in the interest of the individual" and consent cannot be obtained in a timely way;

- in response to an emergency;
- necessary in the national interest or for an investigation or legal proceedings;
- for the collection of a debt;
- for the provision of legal services;
- or authorized by the law.

Further exclusion is made for “evaluative purposes”, including decisions related to employment, admission to educational institutions and contractual and insurance matters.

Personal data may not be collected, but it may be used or disclosed without consent, for certain research purposes. A general exclusion allows for disclosure, (not for collection or use), to a public agency for the public interest.

1.5 DEEMED CONSENT

GIA may assume individual has consented to collection, usage and disclosure of their personal data in situations where the individual provided information for obvious purposes.

GIA may deem individual’s consent were obtained for personal data collected prior to 2nd July, 2014 for the purpose of which the personal data was collected. The consent may include for GIA’s usage and where applicable include disclosure.

GIA need not seek consent from staff (including individuals and voluntary members) for purposes related to the staff’s work in GIA. However, staff’s consent shall be obtained if such purpose is unrelated to their work. Staff shall be informed that their personal data may be disclosed to public and arrangements may be made to limit such disclosure with mutual agreement.

S15 and S15A of the PDPA provide for different forms of deemed consent namely:

(a) Deemed consent by conduct

- this applies to situations where the individual voluntarily provides his personal data to GIA

(b) Deemed consent by contractual necessity

- this applies where an individual (A) provides his personal data to GIA for the purpose of a transaction and it is reasonably necessary for GIA to disclose the personal data to another organization (B) for the necessary conclusion or performance of the transaction between GIA and A.
- S15(3) extends the disclosure by B to another downstream organization where the disclosure is reasonably necessary by contract necessity to fulfill the contract.

(c) Deemed consent by notification.

- S15A provides that an individual may be deemed to have consented to the collection, use and disclosure of personal data for a purpose that he had been notified of, and he has not taken any action to opt out of the collection, use or disclosure of his personal data.
- GIA must conduct an assessment to determine that the proposed collection, use and disclosure of personal data is not likely to have an adverse effect on the individual
- GIA must take reasonable steps to ensure that notification provided to the individual is adequate
- GIA must provide a reasonable opt-out period for the individual before it proceeds to collect, use or disclose the personal data.

1.6 CONSENT WITHDRAWAL

Any individual may withdraw their consent to the use and disclosure of their personal data at any time, unless such personal data is necessary for GIA to fulfil its legal obligations. GIA shall comply with the withdrawal request, and inform the individual if such withdrawal will affect the services and arrangements between the individual and GIA. GIA may cease such services or arrangements as a result of the withdrawal.

1.7 NOTIFICATION OBLIGATION

GIA shall collect this personal data directly from the Individuals. However, GIA may also collect individual's personal data from third parties provided the consent was obtained from the individual through the third parties or required by law.

Prior or during collecting personal data, GIA shall make known to the individual the purpose for which the personal data was collected, except when such personal data is provided by an individual for an obvious purpose. (E.g. individual provided personal data to register for an event, as such the purpose is for that event participation).

1.8 ACCURACY OBLIGATION

GIA shall make every reasonable effort to ensure that individuals' information it keeps are accurate and complete. GIA relies on individuals' self-notification of any changes to their personal data that is relevant to GIA.

1.9 DATA DISCLOSURE AND TRANSFER OF PERSONAL DATA IN AND OUTSIDE SINGAPORE

GIA may disclose and /or transfer individual's Personal Data to the following group of internal/external organizations for appropriate purposes and subjected to compliance of applicable laws:

- a) agents, contractors, data intermediaries or third party service providers who provide services, such as telecommunications, mailing, information technology, payment, payroll, insurance, training, storage and archival, to the Association;
- b) banks and financial institutions;
- c) professional services providers such as auditors;
- d) relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by relevant government;
- e) charity organizations; and
- f) any relevant person related to achieving the intended purposes.

GIA will transfer personal data to a country or territory outside Singapore when required for business purposes. Such transfer shall be done in a manner that is secure and appropriate align with PDPA requirements.

GIA, as an intermediary of our members, collects, uses and retains personal data on behalf of our members in furtherance of the common interests of members and the general insurance industry.

On the other hand, GIA engages service providers which collect, use and retain personal data of agents, policyholders and claimants of our members. If the purpose for which data is to be collected and used has been updated, GIA reminds its members and service providers to obtain fresh consent. Reasonable and proportionate security measures and safeguards have been put in place to guard against security breaches and attempted hacks to the database. Protection obligations responsibilities have been imposed on our intermediaries and stated in the service agreements.

Additionally, selected service providers are subject to an IT Technology Risk Management and PDPA audit review periodically.

2. SECURITY AND STORAGE

2.1 PROTECTION OBLIGATION

GIA shall adopt security arrangements that are reasonable and appropriate to the circumstances, while taking into consideration the nature of the personal data, the form in which the personal data is collected (physical or electronic) and the possible impact to the individual concerned if an unauthorized person were to obtain, modify or dispose of the personal data.

2.2 STORAGE OF DATA

GIA shall take reasonable and appropriate security measures to protect the storage of personal data, such as:

- Marking confidential on documents with personal records clearly and prominently;

- Storing hardcopies of documents with personal records in locked file cabinet systems;
- Storing electronic files that contains personal data in secured folders.

Archived paper records and data backup files may be stored in off-site facilities or service providers provided such facilities are secured

2.3 PROTECTION OF PERSONAL DATA

All personal data held must be secured and protected against unauthorized access and theft.

2.4 PREVENTING ACCIDENTAL DISCLOSURE OF PERSONAL DATA

GIA shall ensure that there are policies and procedures in place to prevent the sending of documents or communications to the wrong recipients.

2.5 RETENTION LIMITATION OBLIGATION

GIA shall retain individual's personal data only for as long as it is reasonable to fulfill the purposes for which the information was collected for or as required by law.

GIA shall establish a personal data retention schedule and ensures that personal data managed are processed regularly. GIA may anonymize collected personal data or destroy records containing personal data according to the retention schedule.

GIA ensures the disposal of personal data are performed appropriately with little possibility to recover the information from disposal process. Such method may include shredding paper records and permanent delete and wiping of electronic records.

3. ACCESS AND CORRECTION OF PERSONAL DATA

3.1 ACCESS TO PERSONAL DATA

Individuals whose personal data are kept by GIA shall be allowed to access to their personal data. GIA shall disclose such information, including the usage and disclosure history of the personal data that has occurred within a year of the date of request (basic principle as established by the OECD Guidelines). Individuals may make request of GIA for such disclosure and correction by writing to GIA in accordance to clause 2.7.

3.2 CORRECTION OF PERSONAL DATA

GIA is committed to ensure that all personal data kept are accurate and up-to-date. To achieve this, GIA recognizes individual's participation in informing GIA of any



changes, error or omission in their personal data is essential GIA shall provide facilities and processes to allow individuals to submit corrections to their personal data.

GIA shall notify all other organizations of such corrections, if the individual's personal data was disclosed by GIA to that organization one year prior to this correction. Such notification shall take place except if GIA deems the personal data is no longer relevant or needed by the organization for the purpose that GIA's disclosure was made earlier.

3.3 ACCESS AND CORRECTION PROCESS

The Data Protection Officer will have oversight of all personal data access or correction requests and ensures that they are processed in accordance with this policy.

Request for Personal data access or correction by individuals, including any enquires and complaints shall be submitted to GIA in writing to the Data Protection Officer at the following address and contact information:

Attention: Data Protection Officer
79 Robinson Road
#07-01
Singapore 068897
Tel : 6202 9885
dpo@gia.org.sg

All GIA staff shall forward any personal data access or correction request to the Data Protection Officer in a timely manner.

GIA may request for additional information from the requestor to aid in the investigation. The Data Protection Officer shall verify the identity of the individual before responding to the request for access or correction. GIA may respond to the requestor via telephone call, written note or electronic mail. In any case, the Data Protection Officer shall make a record of such requests and responds for future reference and verification.

3.4 OPENNESS OBLIGATION

GIA shall develop and publish data protection policy statements to inform staff, including part time staff and volunteers, declaring the manner that their personal data are collected, used and disclosed. Such statement shall be made available to staff upon request, or may be published in an appropriate manner that GIA deems fit.

GIA shall also publish a data protection policy statement for other parties (non-staff) and such statement shall be published on GIA's web site or circulated to GIA's members.

3.5 ACCESS OBLIGATION

Requests for information on ways of usage and disclosure of their data

For queries by telephone, staff must perform the following verification checks on the individual (requesting for information) before disclosure of personal information:

- Full Name as in NRIC
- NRIC/Fin Number
- Full Address
- Contact Number(s)
- Email Address

For queries through email or post, staff must follow up with a telephone call to verify the identity of the individual (requesting for information) before disclosure of personal data. Staff are to provide the requested information only on verification of identity.

3.6 CCTV, VIDEO RECORDING AND PHOTOGRAPHY

CCTV, video footage and photos may constitute personal data if an identifiable individual is captured.

- Appropriate notices are put up at the entrance of the event venue to clearly state the use and purpose of CCTV video/photography surveillance.
- Notices are put up at such locations to inform visitors and volunteers that photographs and videos taken may be used GIA for communication purpose in print or electronic media.
- For special events, it should be stated in the invitation that photographs of attendees will be taken at the function for publicity on print and electronic media. Appropriate notice should also be put up at the reception or entrance to inform the attendees on the event day.
- If photos and videos are taken out of the context of the above, GIA must obtain individual's consent before using them.

Only authorized staff of GIA are allowed to access these personal data.