



SINGAPORE
POLO
CLUB
Established in 1886

DATA PROTECTION POLICY

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This Data Protection Policy (“**Policy**”) sets out the basis upon which *Singapore Polo Club* (“**we**”, “**us**”, or “**our**”) may collect, use, disclose, or otherwise process the personal data of our customers in accordance with the Personal Data Protection Act (“**PDPA**”). This Policy applies to personal data in our possession or under our control, including personal data in the possession of organizations which we have engaged to collect, use, disclose or process personal data for our purposes.

PERSONAL DATA

1. As used in this Policy:

“**Customer**” means a member of Singapore Polo Club or an individual(s) who (a) has contacted us through any means to find out more about any services we provide, or (b) may, or has, either in his/her individual capacity or as an employee of an entity which has entered into a contract with us for the supply of any services by us; and

“**Personal data**” means data, whether true or not, about a customer 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.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, residential address, email address, telephone number(s), nationality, identification number, passport number, gender, date of birth, marital status, photograph(s), employment information, financial information, video(s), and other relevant information in order for us to provide and to share our services.
3. Other terms used in this Policy shall have the meanings given to them in the PDPA.

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorized by you to disclose your personal data to us (your “**authorized representative**”) after (i) you (or your authorized representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorized representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose that has not been notified to you (except where permitted or authorized by law).
5. We may collect and use your personal data for any or all of the following purposes:
 - (a) verifying your identity;
 - (b) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you; and
 - (c) processing payment or credit transactions.
 - (d) to send you information, promotions, newsletters, updates, and marketing materials in relation to our services, facilities, and activities offered by us or our partners,

- (e) to publicize the Club's events and activities in Singapore Polo Club magazine, social media, and website.
6. We may disclose your personal data:
- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the services requested by you; or
 - (b) to third-party service providers, agents, and other organizations we have engaged to perform any of the functions with reference to the above-mentioned purposes.

DEEMED CONSENT BY NOTIFICATION

7. We may collect or use your personal data, or disclose existing personal data for secondary purposes that differ from the primary purpose which it had originally collected for pursuant to clauses 5 and 6. If *Singapore Polo Club* intends to rely on deemed consent by notification for such secondary purposes, *Singapore Polo Club* will notify you of the proposed collection, use, or disclosure of his personal data through appropriate mode(s) of communication.
8. In particular, we may rely on deemed consent by notification to collect, use or disclose your personal data for the following purposes:
- i. Policies and Announcements
 - ii. Publication of your photograph and videos and/or your name in the Singapore Polo Club magazine, social media, and website.
9. Before relying on deemed consent by notification, *Singapore Polo Club* will assess and determine that the collection, use, and disclosure of personal data will not likely have an adverse effect on you.
10. You will be given a reasonable period to inform us if you wish to opt-out of the collection, use, and disclosure of your personal data for such purposes.
11. After the lapse of the opt-out period, you may notify us that you no longer wish to consent to the purposes for which your consent was deemed by notification by withdrawing your consent for the collection, use, or disclosure of your personal data in relation to those purposes.

RELIANCE ON THE LEGITIMATE INTERESTS EXCEPTION

12. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for the legitimate interests of *Singapore Polo Club* or another person. In relying on the legitimate interest's exception of the PDPA, *Singapore Polo Club* will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.
13. In line with the exception of the legitimate interest, we will collect, use or disclose your personal data for the following purposes:
- a. Fraud detection and prevention; and
 - b. Detection and prevention of misuse of services.

The purposes listed in the above clause may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter.

WITHDRAWING YOUR CONSENT

14. The consent that you provide for the collection, use, and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
15. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within seven (7) business days of receiving it.
16. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 27.
17. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use, and disclosure without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

18. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
19. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
20. We will respond to your request as soon as reasonably possible. In general, our response will be within seven (7) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

PROTECTION OF PERSONAL DATA

21. To safeguard your personal data from unauthorized access, collection, use, disclosure, copying, modification, disposal, or similar risks, we have introduced appropriate administrative, physical, and technical measures such as the minimized collection of personal data, and authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.).
22. 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

23. We generally rely on personal data provided by you (or your authorized representative). In order to ensure that your personal data is current, complete, and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

RETENTION OF PERSONAL DATA

24. We may retain your personal data for as long as it is necessary to fulfill the purpose for which it was collected, or as required or permitted by applicable laws.
25. 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.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

26. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

DATA PROTECTION OFFICER

27. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Contact No. : 68543999
Email Address: dpo@singaporepoloclub.org

EFFECT OF POLICY AND CHANGES TO POLICY

28. This Policy applies in conjunction with any other Policies, contractual clauses, and consent clauses that apply in relation to the collection, use, and disclosure of your personal data by us.

29. We may revise this Policy from time to time without any prior Policy. You may determine if any such revision has taken place by referring to the date on which this Policy was last updated. Your continued use of our services constitutes your acknowledgment and acceptance of such changes.

Effective date : 22/01/2022

Last updated : 15/07/2022