

Children's Wishing Well Privacy Policy

This Privacy Policy ("**Privacy Policy**") sets out the manner in which we, Children's Wishing Well ("**CWW**", "**us**", "**we**" or "**our**") may collect, use, disclose or otherwise process your Personal Data (as defined below) in accordance with the Singapore Personal Data Protection Act 2012 of Singapore ("**the Act**"). Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

This Privacy Policy only applies to Personal Data in our possession and under our control, including Personal Data in the possession of organisations which we have engaged to collect, use, disclose or process Personal Data for our purposes. If you wish to make any inquiries regarding this Privacy Policy, you should contact our Data Protection Officer in any of the ways specified in Section 9 below.

By interacting with us, submitting information to us, or signing up for any services or events offered by us, you agree and consent to CWW as well as our appointed representatives and/or agents collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to CWW's related entities' ("**CWW Entities**") authorised service providers and relevant third parties (e.g. schools, family service centres, social service offices and/or government agencies) in the manner set forth in this Privacy Policy. This Privacy Policy also applies to all users who access our website at <https://www.wishingwell.org.sg/> and to individuals who interact with us and provide Personal Data to us via any means.

This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which we may have at law to collect, use, disclose or otherwise process your Personal Data. We may from time to time update this Privacy Policy to ensure that this Privacy Policy is consistent with our future developments 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 this Privacy Policy as updated from time to time on our website at www.wishingwell.org.sg. Please check back regularly for updated information on the handling of your Personal Data.

1. Personal Data

- 1.1. In this Privacy 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.
- 1.2. Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your full name, NRIC number, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. Collection of Personal Data

- 2.1. Generally, we collect Personal Data in the following ways:
 - 2.1.1. when you submit an application form or registration form, or other forms relating to any of our services or events;

- 2.1.2. when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services or participate in our events;
 - 2.1.3. when you interact with our employees, volunteers or assigned vendor, for example, via telephone calls, letters, face-to-face meetings, social media platforms and emails;
 - 2.1.4. when you use our electronic services, or interact with us via any of our websites or use services on any of our websites;
 - 2.1.5. when you request that we contact you or request that you be included in an email or other mailing list;
 - 2.1.6. when you respond to our campaigns, initiatives or to any request for additional Personal Data;
 - 2.1.7. 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, member, representative or any other position;
 - 2.1.8.
 - 2.1.9. 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 our events;
 - 2.1.10. when you are contacted by, and respond to, our employees, volunteers or assigned vendors;
 - 2.1.11. when we receive references from partners and third parties, for example, where you have been referred by them;
 - 2.1.12. when we receive your Personal Data from persons whom you have authorised and persons who have been validly identified as acting on your behalf pursuant to our security procedures;
 - 2.1.13. when you fill up our surveys;
 - 2.1.14. when we seek information from third parties about you in connection with the services you have applied for; and/or
 - 2.1.15. when you submit your Personal Data to us for any other reason.
- 2.2. As you interact with our website, we may automatically collect your technical data, which includes your Internet Protocol (IP) address, the internet device identity or media access control address of your device, information regarding the manufacturer, model or operating system of the device that you use and/or information about the web browser that you use to access our website. We may collect such Personal Data by using website cookies. Please see Section 6 below for more information on cookies that may be used.
- 2.3. 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.

- 2.4. 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 Your Personal Data

- 3.1. Generally, CWW collects, uses and discloses your Personal Data for the following purposes:
 - 3.1.1. responding to your queries, feedback, complaints and requests;
 - 3.1.2. verifying your identity;
 - 3.1.3. managing the administrative and business operations of CWW and complying with internal policies and procedures;
 - 3.1.4. matching any Personal Data held which relates to you for any of the purposes listed herein;
 - 3.1.5. requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to review, develop and improve the quality of our services;
 - 3.1.6. preventing, detecting and investigating crime and analysing and managing risks;
 - 3.1.7. facilities management (including but not limited to maintaining the security of our premises);
 - 3.1.8. managing the safety and security of our premises, services and events (including but not limited to carrying out CCTV surveillance and conducting security clearances);
 - 3.1.9. in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
 - 3.1.10. conducting investigations relating to disputes, billing or fraud;
 - 3.1.11. 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 CWW (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
 - 3.1.12. any other purpose reasonably related to or in connection with the aforesaid.
- 3.2. In addition, CWW collects, uses and discloses your Personal Data for the following purposes:
 - 3.2.1. If you are an existing or prospective donor:

- (i) soliciting donations;
- (ii) creating and maintaining donor profiles in our system database for internal records and reference;
- (iii) managing relationships with you (including but not limited to sending of thank you letters and collaterals such as monthly newsletters, annual reports, and donation forms);
- (iv) processing tax deductions for eligible donations by you;
- (v) generating publicity materials for our services; and/or
- (vi) any other purpose reasonably related to or in connection with the aforesaid.

3.2.2. If you are an existing or prospective volunteer of CWW:

- (i) assessing your suitability as a volunteer of CWW;
- (ii) creating and maintaining a consolidated electronic volunteer database;
- (iii) managing relationships with you (including but not limited to sending of thank you letters, invitations and collaterals such as monthly newsletters, annual reports, and donation forms);
- (iv) facilitating our various support programmes and events which you participate in;
- (v) inviting you to our fund-raising and social service events;
- (vi) generating publicity materials for our services and campaigns; and/or
- (vii) any other purpose reasonably related to or in connection with the aforesaid.

3.2.3. If you are an existing or prospective beneficiary of CWW, or a parent or guardian of the same:

- (i) assessing your/ your child's eligibility as a beneficiary;
- (ii) creating and maintaining a consolidated beneficiary database
- (iii) managing relationships with you (including but not limited to communications regarding you / your child, our programmes, inviting you to our events, etc.);
- (iv) generating publicity materials for our services and campaigns; and/or
- (v) any other purpose reasonably related to or in connection with the aforesaid.

- 3.2.4. If you are an employee, officer or owner of an external service provider or vendor outsourced or prospected by CWW:
 - (i) managing project tenders and quotations, processing orders or managing the supply of goods and services;
 - (ii) processing and payment of vendor invoices and bills;
 - (iii) managing business operations; and/or
 - (iv) any other purpose reasonably related to or in connection with the aforesaid.
- 3.2.5. If you submit an application to us as a candidate for employment:
 - (i) conducting interviews;
 - (ii) processing your application (including but not limited to pre-recruitment checks involving your qualifications and facilitating interviews);
 - (iii) obtaining employee references and for background screening;
 - (iv) assessing your suitability for the position applied for; and/or
 - (v) any other purpose reasonably related to or in connection with the aforesaid.
- 3.3. Further, and where permitted under the Act, CWW may also collect, use and disclose your Personal Data for the following purposes:
 - 3.3.1. providing or offering our services to you and inviting you to our events;
 - 3.3.2. matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of services and events by CWW;
 - 3.3.3. administering and organising events and fundraising or volunteer recruitment campaigns, and personalising your experience at CWW's touchpoints;
 - 3.3.4. conducting research, analytics and surveys to enable us to understand and determine your preferences and demographics for us to offer you services and programmes which may be relevant to your preferences and profile; and/or
 - 3.3.5. any other purpose reasonably related to or in connection with the aforesaid.
- 3.4. In relation to particular services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

4. Disclosure of Personal Data

4.1. CWW 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:

- 4.1.1. CWW Entities;
- 4.1.2. our fund-raising event partners, in connection with services they perform for us or pursuant to agreements with such partners;
- 4.1.3. our social service event partners, in connection with services they perform for us or pursuant to agreements with such partners;
- 4.1.4. companies providing services relating to medical screening, insurance, consultancy or other services in connection with the services and events offered by CWW;
- 4.1.5. agents, contractors or third party service providers who provide operational services to CWW, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, security, employee recognition or other services to CWW;
- 4.1.6. 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) involving any of the CWW Entities;
- 4.1.7. external banks, credit card companies and their respective service providers;
- 4.1.8. our professional advisers such as consultants, auditors and lawyers;
- 4.1.9. relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies (including the Ministry of Social and Family Development, the National Council of Social Service, the Inland Revenue Authority of Singapore and the Registry of Societies) to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority;
- 4.1.10. third parties to comply with a legal obligation, when we believe in good faith that an applicable law requires it, at the request of government authorities conducting an investigation, to verify or enforce our contractual rights or other applicable policies, to detect and protect against fraud or any technical or security vulnerabilities, to respond to an emergency, or otherwise to protect the rights, property, safety or security of third parties and visitors to our website or the public; and
- 4.1.11. any other party whom you authorise us to disclose your Personal Data to.

5. Retention of Personal Data

5.1. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws. However, please be advised that we may retain some of your Personal Data after you cease to use our services, for instance

if the data is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

- 5.2. In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.
- 5.3. 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.

6. Use of Cookies

- 6.1. A cookie is information that a website puts on your hard disk so that it can remember something about you at a later time. Cookies are stored as text files on your hard disk so servers can access them when you return to websites you've visited before. Cookies cannot access, read or modify any other data on an electric device, nor does it capture any data which allows us to identify you individually. All web browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visit. However, if you disable or refuse cookies, please note that some parts of our website may become inaccessible or may not function properly

7. Data Security

- 7.1. CWW will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that for example no harmful code will enter our websites (for example viruses, bugs, trojan horses, spyware or adware). You should be aware, however, that no method of transmission over the internet or method of electronic storage is completely secure. While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet or when you use our online portals, and we urge you to take every precaution to protect your Personal Data when you are on the internet and using our website.
- 7.2. Our website contains links to other third party websites. For the avoidance of doubt, this Privacy Policy does not apply to the third parties' websites. CWW takes no responsibility for the privacy practices of such websites.

8. Collection of information from children

- 8.1. CWW does not knowingly collect Personal Data from children under the age of 12. Necessary information will be collected from the parents / legal guardians in accordance with the terms of our Privacy Policy above.

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

9.1. If you:

9.1.1. have any questions or feedback relating to your Personal Data or our Privacy Policy;

9.1.2. would like to withdraw your consent to any use of your Personal Data as set out in this Privacy Policy; or

9.1.3. would like to obtain access and make corrections to your Personal Data records,

you can contact our Data Protection Officers via the following channels:

Email address: info@wishingwell.org.sg or admin@wishingwell.org.sg

Contact no: 6777 0047 or 6970 8239 (between 10am to 6pm from Mondays to Fridays excluding public holidays)

9.2. Where we have received a request from you withdrawing your consent to the use and/or disclosure of your Personal Data for any or all of the purposes listed above, we will cease to use and/or disclose your personal data in accordance with your request within a reasonable period of receiving said request. 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 goods or services to you (as the case may be) 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 Section 9.1 above. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

9.3. 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.

9.4. Please note that there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Data, we will provide you with reasons for the refusal where we are required by law to give those reasons.

10. Effect of notice and changes to notice

10.1. This Privacy Policy applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your Personal Data by us.

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

Effective date: 1 Jan 2024

Last Update: 10 Jan 2024